



General

The ICIS Product Category Rules (PCR) for Insulation products provide a standardized methodology for conducting Life Cycle Assessments (LCAs) and developing Environmental Product Declarations (EPDs) specific to thermal and acoustic insulation products. Aligned with ISO 14025, ISO 21930, and EN 15804, and governed by the principles of the International Climate Intelligence System (ICIS), this PCR enables consistent, comparable, and credible environmental impact assessments across the insulation industry.

This document defines the rules for calculating and reporting environmental performance metrics throughout the product life cycle—from raw material acquisition and manufacturing to installation, use, and end-of-life. It supports manufacturers, designers, and verifiers in developing transparent and verifiable EPDs that can meet procurement specifications, regulatory requirements, and green building standards.

Key components of the PCR include:

- Clearly defined functional units and system boundaries for various insulation applications.
- Standardized impact categories such as Global Warming Potential, primary energy use, and ozone depletion.
- Guidance on data quality, allocation methods, and third-party verification.
- Support for benchmarking and continuous environmental improvement within the insulation products sector.

By using this PCR, insulation manufacturers demonstrate a commitment to sustainability, enable environmentally informed decision-making, and contribute to global efforts in reducing the environmental footprint of the built environment.

Disclaimer

This document is intended for informational and methodological use as part of the ICIS PCR for Insulation product. It is not a substitute for regulatory guidance, product certification, or legal compliance. While it reflects current international best practices and standards for environmental assessment and declaration, users must consult applicable local laws, industry-specific regulations, and building code requirements.

ICIS reserves the right to revise this document in response to updates in international standards, scientific methodologies, or stakeholder feedback. ICIS shall not be held responsible for misinterpretation, misuse, or decisions made based on this material. For certified EPD development or official verification procedures, organizations should consult www.climateintell.com or contact an ICIS-accredited verifier or program operator.

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1.0 INTRODUCTION & PURPOSE

This PCR document establishes a robust framework for transparent environmental impact assessment of insulation products across the industry. By providing standardized methodologies and requirements, this PCR enables the development of comparable EPDs that accurately communicate the environmental performance of different insulation products to stakeholders throughout the supply chain.

The scope of this PCR encompasses a wide range of insulation products designed primarily for thermal, acoustic, and fire-resistant applications in both residential and commercial construction. This includes, but is not limited to, mineral wool, fiberglass, cellulose, expanded/extruded polystyrene (EPS/XPS), polyurethane foam (PUR/PIR), vacuum insulation panels (VIPs), and bio-based insulation products such as cork, wood fiber, and hemp.

By establishing uniform calculation methodologies, system boundaries, and reporting requirements, this PCR ensures consistency and comparability across environmental declarations in the insulation sector. This enables architects, specifiers, contractors, and end users to make informed decisions based on verified environmental performance data.

It's important to note that this PCR specifically excludes structural insulation panels (SIPs) and composite insulation systems that integrate multiple components beyond the insulation product itself. These products may be subject to separate PCR documents that address their unique characteristics and environmental impacts.

2.0 NORMATIVE REFERENCES

This PCR document is developed in alignment with internationally recognized standards and methodologies for environmental assessment and declarations. These normative references provide the foundational framework for ensuring consistency, transparency, and scientific validity in the development of Environmental Product Declarations for insulation products.

2.1 ISO and EN Standards

ISO 14025:2006 serves as the primary reference for environmental labels and declarations, establishing the principles and procedures for Type III environmental declarations. This international standard ensures that the information provided in EPDs is relevant, accurate, and verifiable, enabling meaningful comparisons between products fulfilling the same function.

The Life Cycle Assessment principles and framework outlined in ISO 14040 and ISO 14044 provide the methodological basis for assessing the environmental impacts of insulation products throughout their life cycle. These standards establish a systematic approach for inventory analysis, impact assessment, and interpretation of results, ensuring comprehensive evaluation of environmental aspects.

For construction-specific considerations, ISO 21930 (Sustainability in building construction) and EN 15804 (Sustainability of construction works) provide additional guidance on the environmental assessment of building products. These standards ensure alignment with broader sustainability initiatives in the construction sector and facilitate the integration of insulation EPDs into whole-building assessments.

2.2 Industry Testing Standards (ASTM)

Technical performance characteristics of insulation products are evaluated according to ASTM, which establishes standardized test methods for determining key properties such as thermal resistance, moisture performance, and dimensional stability. This ensures that environmental declarations are based on verified technical performance under controlled conditions.

- ISO 14025:2006 establishes principles and procedures for developing Type III environmental declarations
- ISO 14040/14044 provides framework and requirements for Life Cycle Assessment methodology
- ISO 21930 & EN 15804 specific guidance for sustainability assessment in construction applications
- ASTM E1333 standardized test methods for evaluating insulation product performance

3.0 TERMS AND DEFINITIONS

To ensure clarity and consistency in the development and interpretation of Environmental Product Declarations for insulation products, this section establishes key terminology used throughout the PCR document. Understanding these terms is essential for manufacturers, verifiers, and stakeholders using the resulting EPDs.

3.1 Life Cycle Assessment

Cradle-to-gate: An assessment boundary that includes all processes from raw material extraction (cradle) through the manufacturing facility gate, encompassing modules A1-A3. This boundary is the minimum requirement for EPDs developed under this PCR.

System boundary: The set of criteria specifying which unit processes are part of the product system being assessed. System boundaries determine which processes are included in the life cycle assessment and which are excluded.

Allocation: The partitioning of input or output flows of a process or a product system between the product system under study and one or more other product systems when multiple products share processes or materials.

3.2 Insulation Performance

Functional unit: Quantified performance of a product system for use as a reference unit in an LCA study. For insulation products, this typically refers to a standardized area with specified thermal resistance.

Thermal conductivity: A measure of a material's ability to conduct heat, expressed in watts per meter-kelvin (W/m·K). Lower values indicate better insulating properties.

R-value: A measure of thermal resistance indicating the effectiveness of insulation products. Higher R-values signify greater insulating effectiveness. Expressed in m²·K/W in SI units or ft²·°F·h/BTU in imperial units.

3.3 Environmental Impact

Global Warming Potential (GWP): A measure of how much heat a greenhouse gas traps in the atmosphere relative to carbon dioxide, measured in kilograms of CO₂ equivalent (kg CO₂ eq).

Primary Energy: Energy harvested directly from natural resources such as crude oil, natural gas, sunlight, or wind, before any anthropogenic conversion or transformation.

Secondary data: Data obtained from sources other than direct measurement of the processes included in the life cycle of the product, such as databases, industry reports, or literature.

4.0 DECLARED/FUNCTIONAL UNIT

The declared/functional unit provides a reference to which the inputs and outputs of the life cycle assessment are normalized, enabling meaningful comparisons between different insulation products. This PCR establishes a dual approach to the declared unit, recognizing the importance of both thermal performance and material efficiency in the environmental assessment of insulation products.

4.1 Primary Functional Unit

The primary functional unit is defined as 1 square meter (m²) of insulation product with a thermal resistance $R = 1 \text{ m}^2\cdot\text{K}/\text{W}$. This performance-based functional unit focuses on the core function of insulation—thermal resistance—allowing fair comparison between products of different thicknesses and densities that deliver equivalent thermal performance. Manufacturers must clearly specify the thickness of material required to achieve this thermal resistance value.

4.2 Secondary Functional Unit

A secondary functional unit of 1 kilogram (kg) of insulation product is also permitted, particularly for specialized applications where weight considerations are paramount or for supply chain analysis purposes. When using this mass-based declared unit, manufacturers must additionally report the thermal resistance per kg to maintain transparency regarding the product's primary function.

4.3 Reference Conditions

All technical performance characteristics must be measured and reported under reference conditions of 23°C and 50% relative humidity, using standardized test methods as outlined in the Normative References section. Any deviation from these reference conditions must be clearly documented and justified in the EPD.

4.4 Service Life

The service life assumption for insulation products under this PCR is set at a minimum of 50 years, aligned with typical building envelope design standards. This timeframe reflects the expected durability of most insulation products when properly installed and maintained, though actual service life may vary based on specific application conditions.

5.0 SYSTEM BOUNDARIES

The system boundaries define which processes and life cycle stages are included in the environmental assessment of insulation products. This PCR establishes a modular approach to system boundaries, aligned with international standards for construction products, to provide flexibility while ensuring minimum requirements for comparability.

5.1 Mandatory Modules (A1—A3: Cradle-To-Gate)

A cradle-to-gate assessment (modules A1–A3) is mandatory for all EPDs developed under this PCR. This boundary ensures that environmental impacts associated with material production—typically the most significant for insulation products, are consistently captured across all declarations.

A1: Raw Material Extraction and Processing:

- Extraction of natural resources
- Processing of raw materials
- Production of semi-finished products
- Treatment of waste from raw material processing

A2: Transport to Manufacturer:

- Transportation of raw materials and semi-finished products to the production facility
- Includes fuel production and consumption

A3: Manufacturing:

- Energy consumption during production
- Waste generation and treatment
- Packaging production and processing
- Emissions into air, water, and soil

5.2 Optional Modules (A4—D: Construction Use End of Life)

Manufacturers may optionally extend the EPD to include life cycle stages beyond A3, creating a cradle-to-grave assessment. However, if a module is included, all associated processes must be assessed—partial inclusion is not permitted to preserve comparability across EPDs.

A4–A5: Construction and Installation:

- A4: Transport to construction site
- A5: Installation energy, materials, and waste processing

B1–B7: Use Phase

- Maintenance, repair, and replacement
- Operational energy and water use
- Energy savings from insulation (informative only)

C1–C4: End-of-Life

- Deconstruction or demolition
- Transport to waste processing
- Waste processing and final disposal

D: Benefits Beyond System Boundary

- Reuse, recovery, and recycling potential
- Energy recovery from waste processing

5.3 Documentation of Scenarios and Assumptions

When optional modules are included, manufacturers must clearly document all assumptions, scenarios, and calculation methods. This includes:

- Transportation distances
- Installation methods
- Maintenance frequencies
- End-of-life treatment practices

All scenario data should reflect realistic practices in the intended market to ensure the EPD's accuracy and relevance.

6.0 LIFE CYCLE INVENTORY (LCI) ANALYSIS

The Life Cycle Inventory analysis phase involves the collection and calculation of data quantifying the relevant inputs and outputs for the insulation product system throughout its life cycle. This section establishes requirements for data collection, quality, cut-off criteria, and allocation procedures to ensure consistency and reliability in inventory analysis.

6.1 Cut Off Criteria and Data Quality Requirements

To maintain practical feasibility while ensuring comprehensive assessment, cut-off criteria are established as follows: processes may be excluded if they contribute less than 1% of total energy usage, less than 1% of total mass input, and less than 5% of total environmental impact in each impact category. However, the cumulative omitted processes must not exceed 5% of total environmental impact across all categories. All hazardous and toxic materials and substances must be included regardless of their contribution percentage.

Data quality requirements:

- Temporal: Data must be less than 2 years old
- Geographical: Representative of production region
- Technological: Specific to processes and materials used
- Completeness: >95% of mass, energy, and environmental relevance
- Reliability: Verified data preferred overestimates

6.2 Primary Data Requirements

- Manufacturing processes (A3)
- Site-specific energy consumption

- Production waste quantities
- Packaging materials and processes
- Emissions measurements where available

6.3 Secondary Data Requirements

- Raw material extraction (A1)
- Transportation processes (A2)
- Background processes (electricity grid, fuel production)
- End-of-life processes (C1-C4)

6.4 Allocation Procedures and Energy Modelling

Allocation procedures for multi-output processes should follow the hierarchy established in ISO 14044: (1) subdivision or system expansion, (2) allocation based on physical relationships, and (3) allocation based on economic value. When co-products are produced, the chosen allocation method must be clearly documented and justified in the EPD. Mass allocation is generally preferred for insulation manufacturing processes where physical relationships can be established.

Energy modeling for manufacturing processes must account for all energy carriers (electricity, natural gas, propane, etc.) and their source. Regional electricity grid mixes should be used unless the manufacturer can demonstrate use of specific electricity sources through contractual instruments. On-site renewable energy generation should be modeled to account for both environmental benefits and potential grid interactions.

6.5 Transportation Assumptions

Transportation assumptions must be clearly documented, including vehicle types, load factors, fuel consumption, and distances. Default values may be used when specific data is unavailable, but these must be conservative estimates based on typical industry practices. For global products, weighted averages of transportation scenarios may be used, with transparent documentation of the calculation methodology.

7.0 LIFE CYCLE IMPACT ASSESSMENT (LCIA) CATEGORIES

The Life Cycle Impact Assessment translates the inventory data into potential environmental impacts across various impact categories. This PCR establishes a comprehensive set of impact categories that must be reported in all EPDs for insulation products, enabling a holistic understanding of environmental performance beyond single indicators such as carbon footprint.

7.1 Mandatory Impact Categories

These impact categories have been selected based on their relevance to insulation products, scientific validity, international acceptance, and stakeholder interests. The impact assessment methods specified are aligned with international standards and current scientific consensus on

environmental impact modeling. All impact results must be calculated using the specified characterization factors to ensure consistency and comparability between declarations.

Impact Category	Unit	Method/Source	Relevance to Insulation
Global Warming Potential (GWP)	kg CO ₂ eq.	IPCC AR5, 100-year	Blowing agents, energy use in manufacturing
Ozone Depletion Potential (ODP)	kg CFC-11 eq.	WMO, steady-state	Historical blowing agents, refrigerants
Acidification Potential (AP)	kg SO ₂ eq.	CML 2001	Combustion emissions, chemical processes
Eutrophication Potential (EP)	kg PO ₄ ³ eq.	CML 2001	Fertilizer use in bio-based materials
Photochemical Ozone Creation (POCP)	kg C ₂ H ₄ eq.	CML 2001	VOC emissions from binders, adhesives
Abiotic Depletion Potential (ADP)	kg Sb eq.	CML 2001	Mineral resource extraction
Primary Energy, non-renewable	MJ	Cumulative Energy Demand	Energy intensity of manufacturing
Primary Energy, renewable	MJ	Cumulative Energy Demand	Use of renewable energy sources
Water Usage	m ³	Inventory indicator	Process water for manufacturing

Environmental Product Declarations for insulation products must report a comprehensive set of impact indicators that reflect the most significant environmental concerns associated with insulation production and use in accordance with EN 15804. These indicators must be calculated using internationally recognized characterization methods to ensure scientific validity and comparability.

7.2 Optional Impact Indicators

In addition to these mandatory impact categories, manufacturers may report additional environmental indicators that are relevant to their specific product or production processes. These optional indicators must be clearly separated from the mandatory ones and should not be used in comparative assertions unless explicitly covered by this PCR.

7.3 Modular Reporting Requirements

For transparency, the results for each impact category must be reported separately for each module included in the EPD (A1, A2, A3, etc.) as well as in aggregated form (A1-A3, A1-D, etc.). This modular reporting allows stakeholders to understand which life cycle stages contribute most significantly to each environmental impact category.

7.4 Comparative Assertions Rules

Comparative assertions based on EPDs must only be made for products assessed using this PCR and must be limited to the same functional unit and system boundaries. When comparing products with

different service lives or technical performance characteristics, these differences must be clearly stated alongside the impact results.

8.0 CONTENT OF THE EPD

The Environmental Product Declaration document serves as the primary communication vehicle for the environmental performance of insulation products. This section outlines the required content and structure of EPDs developed under this PCR, ensuring that declarations provide comprehensive, transparent, and accessible information to stakeholders.

Each EPD must begin with clear product identification and a detailed description of the insulation product's intended application, technical characteristics, and manufacturing process. This contextual information is essential for proper interpretation of the environmental results and for determining the appropriateness of product comparisons. Refer to ICIS General Program Instructions and EN 15804 for complete details.

8.1 General Information

- Program operator identification and logo
- Manufacturer name and contact information
- Declaration number and issue date
- Period of validity and geographical scope
- Declaration type (single product, product range, industry average)
- PCR reference and version

8.2 Product Information

- Product name and identification
- Detailed product description and application
- Technical specifications (R-value, density, dimensions)
- Material composition (% by weight, including CAS numbers for main components)
- Manufacturing process description with flow diagram
- Packaging information and disposal recommendations

8.3 Environmental Performance Declaration

- Declared/functional unit specification
- System boundaries diagram and description
- Cut-off criteria and allocation procedures applied
- Data sources and quality assessment
- LCIA results in tabular format by module
- Additional environmental information (indoor air quality, safety information)

8.4 Interpretation and Additional Information

- Interpretation of LCIA results and significant issues

- Data quality assessment and uncertainty
- Scenarios and technical information for optional modules
- Evidence of independent verification
- References and contact information for questions

The material composition must be disclosed to at least 99% by weight, with any intentionally added substances classified as hazardous according to relevant regulations identified regardless of concentration. For proprietary formulations, generic material categories may be used provided they adequately represent the environmental profile of the specific materials.

The LCIA results must be presented in a standardized tabular format that clearly indicates which modules are declared (mandatory: A1-A3; optional: A4-D). Results should be expressed with an appropriate number of significant digits reflecting the uncertainty of the data. The use of scientific notation (e.g., 1.2E-5) is recommended for very small values to improve readability.

Transportation scenarios and end-of-life assumptions must be transparently documented when including modules beyond the mandatory cradle-to-gate boundary. These scenarios should reflect realistic practices in the intended market area and be based on current technologies and systems.

9.0 VERIFICATION AND VALIDITY

Independent verification is a cornerstone of the EPD process, ensuring credibility and compliance with the PCR requirements. This section establishes the verification procedures, documentation requirements, and validity conditions for EPDs developed under this PCR for insulation products.

9.1 Third Party Verification

All EPDs must undergo third-party verification by an independent verifier who has demonstrated competence in life cycle assessment methodology, relevant product category knowledge, and understanding of the regulatory framework for environmental declarations. The verifier must be recognized by the program operator and must not have been involved in the execution of the LCA or the development of the declaration.

The verification process must confirm that the EPD and the underlying LCA study comply with all requirements specified in this PCR and the referenced standards. This includes checking the plausibility of data, calculations, and results, as well as assessing the transparency and completeness of the reported information.

Verification Requirements:

- Independent third-party verification
- Verifier must be recognized by program operator
- Verification of both LCA study and EPD content
- Statement of verification included in EPD

9.2 Validity Period and Update Conditions

The validity period for an EPD developed under this PCR is five years from the date of issue. After this period, the EPD must be reviewed and reissued. However, an EPD must be updated before its expiration date if significant changes occur in the product system that could affect the declared environmental performance. Significant changes include modifications to the manufacturing process that affect the LCI data by more than 10%, changes in raw material composition that affect any LCIA result by more than 5%, or the discovery of errors in the declared information.

Validity Period:

- 5 years from publication date
- Extension possible following review
- Update required if significant changes occur
- Grace period of 6 months for updates

Conditions Requiring Update:

- Manufacturing process changes affecting LCI by >10%
- Raw material composition changes affecting LCIA by >5%
- Error discovery in declared information
- PCR revision with substantial changes

Comparative assertions based on EPDs are only permitted when the compared products fulfill the same function, comply with the same technical requirements, and are evaluated under identical conditions regarding system boundaries, data quality, allocation methods, and LCIA methods. Any comparison must identify aspects where the products differ, and these differences must be considered when interpreting the comparison results.

9.3 Documentation of Verification and Public Disclosure

The verification documentation must include a checklist confirming compliance with each requirement in the PCR, identification of any areas where professional judgment was applied, and a signed statement of verification. This documentation must be available upon request from the program operator, though confidential information may be excluded from public disclosure.

Program operators are responsible for maintaining a registry of valid EPDs and ensuring that expired or withdrawn EPDs are clearly identified as such. They must also establish procedures for handling complaints or disputes regarding verified EPDs.

10.0 SUMMARY

This PCR document provides a comprehensive framework for the development of Environmental Product Declarations for insulation products. By following these guidelines, manufacturers can create standardized, verified declarations that accurately communicate the environmental performance of their products to stakeholders throughout the building supply chain.

10.1 Market Benefits and Applications

The implementation of this PCR contributes to market transparency, enabling informed decision-making based on credible environmental information. This supports the broader objectives of sustainable construction practices and the transition toward a low-carbon built environment. Consistent application of these rules across the insulation industry facilitates fair competition based on environmental performance and encourages continuous improvement in product sustainability.

Key benefits of developing EPDs under this PCR include:

- **Compliance with Green Building Standards:** EPDs developed under this PCR can be used to earn credits in green building certification systems such as LEED, BREEAM, and Green Star.
- **Regulatory Alignment:** This PCR aligns with evolving regulatory frameworks for environmental product disclosure and embodied carbon reporting in multiple jurisdictions.
- **Product Innovation:** The standardized assessment methodology supports benchmarking and identification of improvement opportunities in product design and manufacturing processes.
- **Market Differentiation:** Verified environmental performance data enables manufacturers to differentiate their products based on sustainability credentials.

10.2 Resources

For additional support in developing EPDs for insulation products, stakeholders are encouraged to utilize the resources available through the International Climate Intelligence System (ICIS). The ICIS platform at www.climateintell.com provides guidance documents, calculation tools, and case studies that can assist manufacturers in navigating the EPD development process.

10.3 Stakeholder Feedback and Review Timeline

The PCR development committee welcomes feedback from users of this document to inform future revisions. Comments and suggestions can be submitted through the ICIS website or directly to the PCR moderator at office@climateintell.com. This PCR will undergo a formal review after 2.5 years to incorporate emerging methodologies, updated characterization factors, and user experience insights.

For EPD verification submissions, program operators should consult the detailed submission guidelines available on the ICIS platform. These guidelines outline the required documentation, review process, and expected timelines for verification. Early engagement with program operators is recommended to ensure smooth processing of verification requests.

11.0 REFERENCES

PCR for Insulation Products provide a robust framework for assessing and communicating the environmental performance of insulation products throughout their life cycle. By establishing consistent methodologies, system boundaries, calculation rules, and reporting requirements, these

PCRs enable credible environmental claims that facilitate market transparency and fair comparisons between products with equivalent functions.

The environmental assessment of insulation products presents unique challenges due to complex production processes, diverse applications, and potential impacts across multiple environmental categories. These PCRs address these challenges through specific guidance on allocation methods for multi-output processes, content declaration requirements that balance transparency with business confidentiality and comprehensive environmental indicators that capture the most relevant impact categories for insulation products.

By following these PCRs, insulation manufacturers can develop Environmental Product Declarations that provide valuable information to customers, regulators, and other stakeholders. These EPDs support informed decision-making in procurement, product development, and policy formulation, driving continuous improvement in the environmental performance of the industry. The standardized approach also reduces the burden on manufacturers by establishing clear rules that streamline the assessment process and avoid duplicative efforts.

- **References:** For the latest PCRs and updates, visit www.climateintell.com and ISO 14025, ISO 14040/44, and the International Climate Intelligence System General Program Instructions and EN 15804.

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