LUXURY Ethical and Fair Foundation

LEAF HARDWARE CERTIFICATION - GENERAL REQUIREMENTS

V.1.1 - 05/09/2023



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30 1. GOAL OF THE PRESENT DOCUMENT

The goal of the present document is to define the requirements necessary to obtain LEAFHardware certification for fashion metal hardware products by:

- 1. calculating the potential environmental impact arising from the production of metal hardware products on a life cycle basis, and
 - 2. ensuring the product's safety via test reports assessing compliance to product's safety requirements.

The Life Cycle Assessment (LCA) methodology's fundamental principles and specific requirements for the present certification are reported in the following sections. In particular, LEAF Hardware certification requires that, for a specific product category, the environmental burden of selected impact categories (see Section 8.1.) and 8.2. shall be lower than the limit values determined by LEAF via a benchmark study. The product categories and related impact limit values are reported in the "LEAF Hardware: Product Categories and Impact Limit Values" document.

In addition, LEAF Hardware certification requires that a product is compliant to a list of
 restricted substances. This compliance shall be ensured by accredited Laboratories. Detailed
 information are available throughout this document and in Section 9.1. The restricted
 substances and relative limits are reported in the "LEAF Hardware: Restricted Substances List"
 document.

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50 2.<u>REFERENCE DOCUMENTS</u>

- 51 ISO 9000 Qaulity management systems– Fundamentals and vocabulary;
- ISO 14040 Environmental management Life cycle assessment Principles and
 Framework;
- ISO 14044 Environmental management Life cycle assessment Requirements and
 guidelines;
- ISO 14021 Environmental labels and declarations Self-declared environmental claims
 (Type II environmental labelling);
- 58 EN 15804:2012+A2:2019 Sustainability of construction works Environmental products
 59 declarations core rules for the product category of construction products;
- 60 ISO/IEC 17025 Testing and calibration laboratories;
- 61 ISO 19011 Guidelines for auditing management systems;
- ISO 17065 Conformity assessment Requirements for bodies certifying products,
 processes and services;
- 64 "General Requirements for LEAF Company Certification", in its most updated version
 65 <u>www.leafoundation.org/documenti</u>;
- 66 "LEAF Foundation: Costs and Fees", in its most updated version
 67 www.leafoundation.org/documenti;
- 68 "LEAF Hardware: Product Categories and Impact Limit Values", in its most updated
 69 version <u>www.leafoundation.org/documenti</u>;
 - "LEAF Hardware: Restricted Substances List", in its most updated version, <u>www.leafoundation.org/documenti</u>;
 - Requirements for the use of LEAF trademark, www.leafoundation.org/documenti;

74 3.TERMS AD DEFINITIONS

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For terms and definition, the present document makes reference to the abovementioneddocuments (Section 2).



For other definitions of interest, please refer to the ISO and IEC databases, which can befound at the following addresses:

79 <u>https://www.iso.org/obp/ui</u>
80 <u>https://www.electropedia.org/</u>

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82 4.<u>PRINCIPLES</u>

4.1. GENERAL INFORMATION

84 In the redaction of the present requirements, the following process phases have been85 considered:

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- Processing of base materials into metal hardware accessories;
 - Preparation of metal accessories to the following surface treatments;
 - Surface treatments;
 - Waste disposal.

90 The present requirements are to be considered valid for products such as rivets, loops, chains,
91 bells and more generally, fashion metal hardware accessories.

92 The present requirements are to be considered valid for base materials such as:

93 Zinc+Copper-based alloys, e.g., Brass; 94 • Zinc alloys, e.g., Zamak; 95 • Iron or Iron alloys, e.g., Steel; • Tin+Copper-based alloys, e.g., Bronze. 96 97 98 The present requirements are to be considered valid for surface treatments such as: 99 Plating (galvanic electrodeposition); • Physical vapour deposition (PVD); 100 101 • Varnishing; 102 • Any combination of abovementioned surface treatments. 103 104 The present requirements in their component relating to product safety have been redacted 105 in compliance with the limit values established by the regulations in force regarding product safety at the date of publication of this document. 106





108 5.<u>REQUIREMENTS FOR LEAF HARDWARE PRODUCT</u> 109 <u>CERTIFICATION</u>

110 **5.1. GENERAL REQUIREMENTS**

- 111 In order to request a LEAF Hardware certification for one or more products, the organization112 requesting certification shall:
- Possess a valid LEAF Company certification and, therefore, be registered in the Certified
 LEAF Organizations register;
- 116 2. Prepare a Product Dossier for all products to be certified, which shall contain:
- 118 2.1. A Technical Data Sheet according to Section 7;
- 2.2. An LCA study report for the product(s) subject of certification, according to the
 requirements reported in Section 8.1., and Annex A;
 - 2.3. A Safety Test Report in accordance to the document "LEAF Hardware: Restricted Substances List" (see Section 9 for guidance);
 - 2.4. Proof of payment for LEAF Hardware certification fee (see document "LEAF Foundation: Costs and Fees");
- Send the Product Dossier together with all attachments to the LEAF Technical Committee
 (TC) at the email address: info@leafoundation.com for review;
- 131 TC review may result in:
- 1) *Positive Review*: the product is registered in the "LEAF Hardware Certified Products"
 Register and contextually are provided:
 - a) a unique identification number,
 - b) a QR code for the traceability of product registration in the LEAF Hardware Certified Products Register, and
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- c) the release of the license to use the LEAF Hardware trademark in accordance with
 Section 10. of the present document and the "Requirements for the use of LEAF
 Trademark";
- 144 2) *Negative Review*: The TC may:

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- a) Request clarifications and/or in-depth analysis and/or objective evidences and subsequent review of the revised certification request.
- b) Reject the application for certification stating in writing to the organization the reasons for the negative review.
- 152 The LEAF Hardware certification has a validity of 1 year, except for circumstances reported in153 Sections 5.1.2. and 5.1.3.

154 **5.1.1.COSTS AND FEES**

- Fees associated with the registration and publication of the product's LEAF Hardware
 certification are one-time fees or recurring fees (e.g. annual) to maintain registration,
 publication, and continued use of the certification and trademark.
- 158 Up-to-date information about fees are be available at <u>www.leafoundation.org/documenti</u>.
 159 The fee structure and fees could be revised annually.
- 160 The Fees invoice shall be reported in the Product Dossier together with the invoice address161 provided in the LEAF company certification process.

162 5.1.2.CHANGES, CORRECTIONS, OR AMENDMENTS TO PUBLISHED 163 LEAF HARDWARE CERTIFICATIONS

- A LEAF Hardware product certification shall be updated and re-verified during its validity if
 changes in technology or other circumstances have led to any of the following:
 - an increase of any of the impact categories listed in Section 8.2. which causes any of those impact categories to exceed the limits reported;
 - errors in the declared information;
 - significant changes to the product's Technical Specifications or additional environmental, social or economic information.



173 If such changes have occurred, but the certification is not updated, the organization shall174 contact the TC to de-register the certification (see Section 5.1.3.)

- 175 The organization owing the product certification may also choose to make amendments or176 other changes to such LEAF Hardware certification during its period of validity.
- For changes concerning any of the reviewed data in the Product Dossier, a new review shall
 be performed by the TC. The review shall result in a review report. The updated Product
 Dossier and proof of review shall then be provided to the TC to update the certification and,
 therefore, the published version on the website.
- 181 In addition to these situations, the certification owner may make editorial changes to a
 182 published LEAF Hardware certification, such as the change of a logotype or correction of
 183 spelling errors, by providing the revised certification directly to the TC without review.
- 184 A revised LEAF Hardware shall include a revision date normally set as the date for185 submitting the updated Product Dossier document to the TC.
- Substantial changes and deviations of the product covered by a certification shall be treatedas a separate registration and not an update of an existing certification.
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5.1.3. DE-REGISTRATION OF LEAF HARDWARE CERTIFICATION

- 189 A LEAF Hardware product certification shall remain published as long as the applicable fees
 190 are paid in due time and under the condition that the certification owner applied the terms
 191 and conditions.
- 192 The certification owner may contact LEAF TC in writing for de-registration of the certification.

193 The TC may de-register certifications if fees are not paid in due time, or in case of non-194 conformance with the terms and conditions as well as if the certification contains errors that 195 are not corrected by the certification owner in due time.

- 196 A de-registered LEAF Hardware certification shall no longer be used and the assigned197 registration number shall not be re-used.
- The TC shall maintain a list of de-registered LEAF Hardware certifications, which can be madeavailable upon request, provided acceptance from the former certification owner.
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201 6.PRODUCT DOSSIER

The organization requestig LEAF Hardware certification shall prepare a Product Dossier for each product, in which at least the following information shall be reported:

- a. Name of the Organization requesting certification;
 - b. LEAF Company Certification number;
 - c. Date;

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- d. Name and description of the product;
- e. Product identification code;
- f. LEAF Hardware product category (see "LEAF Hardware: Product Categories and Impact Limit Values" document). Note that, in the case of a multi-component product, the LEAF Hardware product category to be indicated shall be that of the major component in terms of component weight with respect to the total product weight;
 - g. Name of the Technical Data Sheet file, for example "Product_TDS.pdf". See Section 7 for guidance on correct Technical Data Sheet preparation;
 - h. Name of the LCA study report, for example "Product_LCA-Report.pdf". See Section 8.1. and Annex A for correct LCA Report preparation;
- Name of the Product Safety Test Report, for example "Product_STR.pdf", with indication of the test report number, name and number of LEAF Accreditated ISO 17025 Laboratory providing the Safety Test Report. LEAF Validated Laboratory number can be found at <u>www.leafoundation.org</u>.
- j. Any additional environmental, social and economic information.

The Product Dossier shall be sent to the LEAF TC via email at <u>info@leafoundation.org</u>, together with the Technical Data Sheet, the LCA report and the Safety Test Report and any other additional environmental, social and economic information.



7.<u>TECHNICAL DATA SHEET</u>

In order to obtain a LEAF Hardware certification for a product, the organization shall prepare
 a technical data sheet, in which at least the following information shall be reported:

- a. Name of the Organization requesting certification;
- b. LEAF Company Certification number;
- c. Date;

- d. Name and description of the product;
- e. Product identification code;
- f. LEAF Hardware product category (see "LEAF Hardware: Product Categories and Impact Limit Values"). Note that, in the case of a multi-component product, the LEAF Hardware product category to be indicated shall be that of the major component in terms of component weight with respect to the total product weight;
 - g. Number and description of single components, for example a buckle and a prong;
 - h. Product weight (for single-component product) or components weights (for multicomponents products);
 - i. Product surface area (for single-component product) or components surface areas (for multi-components products);
 - j. Base materials composition and realization processes, for example a "hot-stamped brass buckle" and a "die-cast zamak prong";
 - k. Surface treatment, for example "Nickel plating";
 - I. Presence and amount of recycled materials, if any, in the base materials and/or surface treatment materials (such as substrates or additives), together with self-declarations about the nature and amount of recycled materials according to ISO 14021;
 - m. Number and description of processes for product or components making and indication of the process sites;



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n. Number and description of processes for product assembly, for eample "soldering".

Subcontract process sites indicated in the Technical Data Sheet shall find correspondance to
those indicated in the "Approved Process Sites" section in the organization's LEAF Company
certification.

The most updated version of the Technical Data Sheet template for Product Dossier
submission is available at <u>www.leafoundation.org/documenti</u> or can be requested via email
at <u>info@leafoundation.com</u>



282 8.LIFE CYCLE ASSESSMENT (LCA)

LEAF Hardware requires that the environmental performance of the product to be certified shall be obtained via a Life-Cycle Assessment (LCA) study on such product.

The LCA represents a methodology that allows to measure the potential environmental impacts generated by products, services, economic systems and production chains on the environment, human health and more generally on the planet along the entire life cycle, from the acquisition of raw materials to the end of life.

289 Once the system boundaries (i.e., the field of analysis) have been defined and the data 290 collected in an inventory (Life Cycle Inventory, LCI), inventory data are associated with specific 291 environmental impact categories and category indicators (see Section 8.2.), thus helping to 292 establish a cause-and-effect logic between products/services and impacts. This latter phase 293 is called the impact assessment phase (Life Cycle Impact Assessment, or LCIA) The LCIA phase 294 therefore represents the interpretation phase of the life cycle.

295 Trasparency is essential for the impact assessment, so as to guarantee the goodness and296 truthfulness of the study.

297 8.1. LCA REQUIREMENTS FOR LEAF HARDWARE 298 CERTIFICATION PROCESS

299 The LCA study may be performed by the organization itself or with the help of a consultant300 with expertise in LCA methodology.

- 301 The LCA study shall comply with:
 - the international accepted principles, framework, methodology and practices for LCA established by ISO 14040 and ISO 14044;
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 the general purpose of LEAF Hardware in the collection of data, and the methods and assumptions used as advocated and described in this Section and Annex A of the present document.

The TC may provide guidance in finding the correct product category representative for theproduct to be certified and it should be contacted in case of doubts about such topic.

310 8.1.1.LEAF HARDWARE PRODUCT CATEGORIES

Environmental impacts associated to different processes regarding the full *cradle-to-gate* cycle of fashion hardware products (for example, base materials production, metal hardware processing, surface treatments additive consumption) can be significantly different in absolute terms.

LEAF Hardware product categories have been created for the purpose of generating consistent results among products possessing similar characteristics (for example, the same base material and a comparable plating treatment), in order to increase the comparability between products within a product category.

- LEAF Hardware product categories are reported in the most updated version of the "LEAFHardware: Product Categories and Impact Limit Values" document.
- 321 Each product category reports, *i*) the functional/declared unit, and *ii*) theLCA processes to be 322 included in the LCA study.

The LCA practitioner shall comply with the reported functional/declared unit and all the mandatory LCA processes to support compatibility between products as far as possible. Any deviation from the collection of data for such mandatory processes shall be documented and motivated in the LCA report and reviewed by the TC.

327 Impact Categories Limit Values

- LEAF Hardware product categories also report the limit values for each impact category on a "per product category" basis. These limit values have been determined by the LEAF's TC collecting primary *gate-to-gate* data for processes in fashion metal hardware production in Europe and South-est Asia region the places where most of the worldwide fashion metal hardware industry is located.
- 333 Secondary *cradle-to-gate* data (for example, ores extraction and affination) have been
 334 obtained from the latest version of Ecoinvent database (Ecoinvent association, Switzerland, v.
 335 3.9.1, 2023).
- All data have been averaged on a per process basis. The resulting impact categories values,
 therefore, can be considered representing indicators for benchmark situation for a specific
 product category.
- As reported in Section 8 of the "LEAF Company Certification: General requirements"
 document, organizations requesting a LEAF Company certification shall provide company
 production data to the LEAF TC in order to update the indicators limit values and yearly
 redefine the benchmark situation. Organizations already adopting the best available practices
 (BAPs) in their production processes help to lower the benchmark indicators limit values and,



therefore, the environmental burden associated to fashion metal hardware production.
Organizations not aligned to the most recent BAPs are strongly encouraged to start a
program of progressive adoption of BAPs in order to decrese their environmental impact and
strengthen the goodness and reliability of the here-proposed benchmark situation.

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8.1.2.LCA STUDY REPORT IN THE PRODUCT DOSSIER

The results of the LCA study shall be compiled in the form of a report and inserted in the Product Dossier, together with additional documents and information as reported in Section 6. This may be performed by the organization itself (in-house) or with the help of a consultant.

352 8.1.3.REVIEW PROCESS

LCA report review consists in the review of LCA-based data, additional environmental, social
 and economic information, and its consistency with other information reported in the Product
 Dossier.

356 The review process is carried out by the LEAF TC.

357 Data for review shall be presented in the form of an LCA report i.e., a systematic and 358 comprehensive summary of the project documentation that includes the necessary data and 359 information for review. The LCA report is not made public in the certification.

- 360 The LCA report shall be written in a language that is understood by the reviewer.
- 361 The examination of the presentation of the LCA report shall specifically focus on that:
 - the background information is presented in a transparent and understandable way;
 - the presentation is credible and neutral;
 - the declaration format follows the recommended layout as reported in ISO 14040 and 14044;
 - information and guidance are given on where to find supplementary explanatory materials.

371 Independence Of Verification

All types of information and data shall be impartially reviewed. The reviewer shall not be
employed in a part- or full-time role by the practitioner or commissioner of the LCA study,
nor any subsidiaries of that organization.



The reviewer shall not have been involved in the execution of the LCA or the development ofthe LCA report, and there shall not be conflicts of interest.

The reviewer shall report any perceived pressure by the organization requesting certification or LCA practitioner to influence the outcome of the review to the LEAF Foundation board, who may assist with arbitration, if necessary.

380 **Principles For Verification**

381 The review process shall cover the following main areas:

- data collected and used for the LCA calculations and data quality;
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- the methodology adopted for LCA-based calculations;
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- the presentation of the results (i.e., impact categories) in the LCA report;
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- the presentation of additional environmental, social and economic information and any other information included in the Product Dossier.

In case of the existence of already verified background information in the LCA results (carried
 out in accordance with the ISO standards for LCA and critical review of LCA) or valid reviewed
 certifications, this information shall not be subject to further review provided that the
 information is updated and valid through the product's certification validity.

- 394 Documental Review
- 395 The review procedure consists in a documental review.

The documental review shall focus on the analysis of all documents that justify input data and
 information included in the LCA report, both the LCA study and documents describing
 additional environmental, social and economic information present in the Product Dossier.

- 399 The objectives of the documental review are:
 - to assess the compliance of the LCA study with ISO 14040 and 14044, and the requirements included in the present document;
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• to assess the collection of data for all mandatory processes as specified in the "LEAF Hardware: Product Categories and Impact Limit Values" document. Such data shall be



405	sufficiently consistent, reliable and understandable to enable an independent
406	evaluation of the relevance of the data;
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408	• to verify that the results from the inventory analysis and the impact assessment
409	calculations have been performed using the most updated versions of the methods
410	for the impact categories reported in Section 8.2;
411 412	• to verify procedures established for updating the information in the LCA and
413	certification;
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415	• to verify procedures established for an assessment of the conformity to all relevant
416	process and product-related environmental laws (where appropriate).
417	Data Confidentiality
418	Business data may be of confidential nature because of competitive business or aspects,
419	intellectual property rights, or similar legal restrictions. Such confidential data are not made
420	public as the LEAF Hardware certification outputs typically only provide data aggregated over
421	full or relevant portions of the life cycle. Therefore, business data identified as confidential
422	and provided during the review process shall be kept confidential. The TC shall not
423 424	disseminate or otherwise retain for use, without the permission of the organization, any information disclosed to them during the course of the review work.
474	information disclosed to them during the course of the review work.
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426 **Presentation Of Data For Verification**

In the presentation of data for review, references shall be made to the Product Dossier, as
well as other documents used. Any deviations from making use of these documents shall be
described and justified.

In the event the reviewer finds the LCA study not in conformance with the requirements
reported in Section 8.1., the reviewer may ask for additional information or further refinement
of the underlying data. This request shall be documented.

The presentation of the results from the LCA-based calculations shall be sufficiently comprehensive to facilitate the examination by the reviewer. The organization (wether by itself or with the help of a consultant) shall provide data and information to the reviewer in the form of a:

437 1. presentation of data, and

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439 2. description of the LCA-based calculations.

The presentation of data from the LCA-based calculations shall be done in a consistent way to cover the most important aspects related to the accuracy and relevance of the data. Data on unit processes/information modules shall be described in a transparent way. The same rules apply regardless of the type of data, i.e., whether the data are primary or secondary, from literature sources, from questionnaires, or from personal information.

Results from the inventory analysis should be presented separately in the form of a table. A summation of the various parameters may be included for different life cycle stages. Inventory results may be presented together with the characterisation factors used for converting the inventory data into indicators for potential environmental impacts. Results from the impact assessment should be presented in a way that illustrates the calculation procedure from raw data collected in the inventory analysis phase to the final conversion of the data into the impact categories.

Presentation of data, data quality assurance and data handling are central parts of the LCA report. Primary or equivalent data from manufacturing processes shall be documented on the site level. Unit processes/information modules and secondary data shall be reported on the level of aggregation available for use in the calculation, but more detailed data can be reported, if relevant.



Data relevant for the LEAF Hardware certification shall be documented and specified in a "per 457 LCA phases" manner, as reported in the "LEAF Hardware: Product Categories and Impact Limit 458 Values" document. 459 460 The following information about the goal and scope definition shall be included in the LCA 461 report, where relevant: 462 definition of declared or functional unit, including technical specifications; 463 description of key methodological elements, including documentation and justification 464 of procedures for allocation, averaging data, and cut-off; 465 466 467 • the technical system (type of system, geographical location, system boundary, and description of life-cycle stages including omissions of life-cycle stages and 468 469 reasons/justifications for omissions); 470 The following information about the inventory analysis shall be included in the LCA report, 471 where relevant: 472 the technical system (qualitative/quantitative description of unit processes, accounting 473 for data confidentiality, when appropriated); 474 475 • data collection (primary/secondary data, collection procedures, time period for data 476 collection, identification and handling of missing data and assessment of their, checks of data collection being performed, references, and other administrative information); 477 478 479 validation of data (internal quality assurance procedures; routines for identification, 480 follow-up, and treatment of missing data; references to external critical reviews of data 481 already validated); 482 483 inventory analysis results (presentation of all input and output inventory data, results) 484 for different life cycle stages/information modules in addition to the final aggregated 485 results); 486 487 other key assumptions made. 488 The following information about the impact assessment shall be included in the LCA report, where relevant: 489



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• assignment of the results from the inventory analysis (classification);

- results of the characterisation and impact assessment calculations;
- references to all characterisation methods and factors used.

When checking the results from the impact assessment, the reviewer shall verify that the
calculations are made in a correct way based on the inventory analysis results and prescribed
characterisation factors.

The organization developing the LCA study by itself or with the help of a consultant shall
provide the reviewer with information about the underlying data and calculations carried out
upon request.

501 An LCIA interpretation should be included in the LCA report, where relevant, in the form of a 502 sensitivity analysis, especially when using a cut-off criteria different than that reported in 503 Annex A.



8.2. IMPACT CATEGORIES

506 The impact categories and methods to be used for the present requirements are the 507 following:

- 1. **Global Warming Potential (GWP, kg CO₂ eq.):** the calculation for this impact category shall be based on the final government distribution version of the IPCC report "AR6 Climate Change 2021: The Physical Science Basis". This document contains the Global Warming Potential (GWP) climate change factors of IPCC with a timeframe of 100 years. Note that the GWP 100 factors are recommended as default by UNEP-GLAM (2017).
- 2. Abiotic Resources Depletion Potential (ADP fossil resources, MJ + ADP minerals & metals, kg Sb eq.): the calculation for this impact category shall be based on the impact factors "Abiotic resource depletion fossil fuels (ADP-fossil)" and "Abiotic resource depletion (ADP ultimate reserve)", both published on CML 2022, Guinée et. al. 2002, and van Oers et al. 2002.
- 3. Water Deprivation potential (WDP, m³ water eq. deprived): the calculation for this impact category shall be based on the AWARE (Available WAter REmaining) method, which represents the relative available water remaining per area in a region/watershed after the demand of humans and aquatic ecosystems has been met. It assesses the potential of water deprivation, to both humans and ecosystems, assuming that the less water remaining available per area, the more likely another user will be deprived. AWARE is a midpoint indicator expressed in m³ world eq. Characterization factors (CFs) of AWARE quantify the relative water scarcity of an average m³ of water withdrawn in a region, on a scale from 0.1 to 100, with a value of 1 corresponding to the world average. A value of 10, for example, indicates a region where there is 10 times less available water remaining per area than the world average.

In May 2016, the method was appointed by the Life Cycle Initiative as the global consensus method for water footprinting. This method is also used in the Environmental Footprint impact assessment method developed by the European Commission.

4. **Ozone Depletion Potential (ODP, kg CFC11 eq.):** the calculation for this impact category shall be based on the impact factors published in the "Scientific Assessment of Ozone Depletion: 2014" by the World Metereological Organization



(WMO). This methods allows for the calculation of the destructive effects on the stratospheric ozone layer over a time horizon of 100 years.

5. Ecotoxicity (Acidification Potential (AP, mol H⁺ eq.) + Eutrophication Potential (EP, mol P eq.)): the calculation for the Acidification Potential shall be based on the impact indicator "Accumulated Exceedance (AE)" characterizing the change in critical load exceedance of the sensitive area in terrestrial and main freshwater ecosystems, to which acidifying substances deposit. This is originally reported in "Accumulated Exceedence, Seppälä, et al. 2006, Posch et. al. 2008"

The calculation for the Eutrophication Potential shall be based on the impact indicator "Phosphorus equivalents", as an expression of the degree to which the emitted nutrients reaches the freshwater end compartment (phosphorus considered as limiting factor in freshwater). This is originally reported in "EUTREND model, Struijs et. al. 2009b", as implemented in ReCiPe.

6. **Human Toxicity (CTUh/kg):** USEtox is a scientific consensus model endorsed by the UNEP/SETAC Life Cycle Initiative for characterizing human and ecotoxicological impacts of chemicals. It is developed by the USEtox Team, a team of international researchers from the Task Force on Toxic Impacts under the auspices of UNEP/SETAC Life Cycle Initiative. The original documentation can be found on the website: www.usetox.org. In USEtox, a distinction was made between recommended and interim characterization factors, reflecting the level of reliability of the calculations in a qualitative way. The USEtox Team advises to use the recommended USEtox characterization factors always together with the interim characterization factors.



569 9.<u>SAFETY TEST REPORT</u>

9.1. PRODUCT SAFETY REQUIREMENTS

- 571 Applicants for LEAF Hardware certification are required to perform safety tests in accordance 572 with the "LEAF Hardware: Restricted Substances List" document.
- 573 All LEAF Hardware products, including the single components of these products shall be 574 tested.
- 575 Samples for compliance verification may also be requested by the LEAF TC during the Product 576 Dossier review, either as support for the review process or in case of suspicion of 577 contamination or non-compliance.
- 578 Additional samples of goods may be sampled at any time without prior notice.
- 579 Laboratories accredited according to ISO/IEC 17025 and possessing adequate experience in 580 the testing of residual substances for fashion metal hardware are allowed to perform tests on 581 chemical residues for tests falling within the scope of both this certification and their 582 accreditation.



584 **10. <u>REQUIREMENTS FOR USE OF LEAF TRADEMARK</u>**

The use of the LEAF trademark shall comply with the requirements and provisions set out in
 the document "Regulation on the use of LEAF trademark". The approved Certification Body
 verifies compliance with the requirements for use of the trademark during surveillance audits.

588 The certified organization must keep one or more registers indicating the documents in which 589 the LEAF trademark is affixed and make these registers available for inspection by the 590 approved Certification Body during audits.



592 ANNEX A – GENERAL APPLICATION OF LCA 593 METHODOLOGY

- 594 This annex describes the general application of LCA methodology in the LEAF Hardware 595 certification.
- 596 These rules follow the international standards ISO 14040/14044.

597 An LCA study according to ISO 14040/14044 consists of several stages: definition of goal and 598 scope, inventory analysis, impact assessment and interpretation. For the application of the 599 LCA in the intended use to obtain a LEAF Hardware Certification for a given product, the 600 information reported in this Annex, in Section 8.1 of this document and in the "LEAF Hardware: 601 Product Categories and Impact Limit Values" document shall be followed in order to increase 602 the comparability between products of the same product category

- If it is necessary to meet the market demand for life cycle-based environmental information
 for certain markets, product categories or applications, a methodology may be adopted which
 deviates from the general application of the LCA methodology described in this Annex.
- An example is the methodology described in the EN 15804 standard. Such deviations must
 be described in the product and submitted to the LEAF TC review and approval process.

608 A-1 MODELLING APPROACH

- 609 The LCA modelling approach to be used is attributional LCA, which means that:
- 610 1) specific or average data (i.e. not marginal data) shall be used;
- allocation problems that cannot be avoided by subdividing the unit process into two
 or more subprocesses, shall be solved via allocation (i.e. not via system expansion
 beyond the system boundaries set in the Product Dossier). Furthermore, "substitution"
 or "credits" for avoided environmental impact shall not be used to solve allocation
 problems.
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- 618 The purpose of using this approach is to make information traceable, documented, and 619 verifiable.
- 620 A-2 DECLARED/FUNCTIONAL UNIT



The declared or functional unit is the reference unit to which the environmental performance
of the product is related. Functional unit is defined as a quantified performance of a product
and a declared unit is defined as a quantity of a product. The declared/functional unit to use
for the specific LEAF Hardware product categories are reported in the "LEAF Hardware:
Product Categories and Impact Limit Values" document.

626 If the function of the product in the use phase is known and can be clearly defined, a
627 functional unit shall be used. If the function of the product in the use phase is unknown, if the
628 product can be used for several different functions, or if the function cannot be clearly
629 defined, a declared unit may be used.

630 **A-3 TECHNICAL SPECIFICATION**

The technical specification shall include sufficient information for the TC to verify the
legitimate correspondence between the results of the LCA study and the technical
specifications declared for the product to be certified. The technical specification shall include,
at least,:

- 635 1) the composition of the base material and its recycled metal content;
- 637 2) the accessory fabrication procedure (e.g., die-casting);
- 639 3) the plating/PVD/varnish pre-deposit operations, if any (e.g., polishing);
 - 4) the plating/PVD/varnish deposit operations with amount of materials and energy consumption (e.g., plating, PVD, ecc.);
 - 5) the plating/PVD/varnish post-deposit operations, if any (e.g., laser operations).

645 See "LEAF Hardware Product Categories and Impact Limit Values" document for further 646 details.

647 **A-4 SYSTEM BOUNDARY**

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The system boundary of the product life cycle determines the processes to be included or
excluded in the LCA. In principle, all environmentally relevant processes from "cradle to grave"
should be included, so that at minimum 99% of the total energy use, mass of product content,
and environmental impact is accounted for.

For intermediate products, such as fashion hardware accessories or other products for which
 further processing and/or the end use is unknown, the system boundary may be limited to



654 "cradle to gate". If end-of-life treatment is excluded, one or more of the following criteria shall655 be fulfilled:

- the product is physically integrated with other products in subsequent life-cycle
 process (such as fashion hardware accessories in fashion products) and cannot be
 physically separated at end of life;
- 660 2) the product or material is no longer identifiable at end-of-life as a result of a physical
 661 or chemical transformation process;
- Any deviations from the above criteria for excluding end-of-lite treatment shall be justified inthe Product Dossier.

665 **A-5 LIFE-CYCLE STAGES**

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For the purpose of different data quality rules and for the presentation of results, the productlife cycle should be divided into the following life-cycle stages:

- 1) Upstream processes, mainly including the production of material inputs to the core
 processes (e.g. raw material extraction and refinement, and the production of
 intermediate components);
 - 2) *Core processes*, mainly including the processes managed by the organization requesting LEAF Hardware certification;
 - 3) *Downstream processes*, including, for example, distribution transports, retail, product use and end-of-life management of the product.

677 Which life cycle stage division to use and mandatory processes to be included in the LCA 678 study are reported in detail in the "LEAF Hardware: Product Categories and Impact Limit 679 Values" document.

680 **A-6 SPECIFICATIONS OF OTHER BOUNDARY SETTINGS**

Boundary in time shall define the time period for which the life cycle inventory data are
collected. The year that the LCA model best represents, considering the representativeness of
the inventory data shall, as far as possible, represent the year of the publication of the LEAF
Hardware certification. Boundary towards nature shall define the flow of material and energy
resources from nature into the technical system (i.e., the product system) and emissions from
the technical system to air, soil, and water. Agriculture, forestry, aquaculture and similar



687 production systems are part of the technical system, i.e. elementary flows that originate from
688 applied substances and eventually leaves to water, soil or air shall be accounted for.
689 Geographical boundary shall define the geographical coverage of the LCA. This shall reflect
690 the physical reality of the product under study, accounting for the representativeness of
691 technology, input materials and input energy.

692 Boundaries towards other technical systems shall define the flow of materials and 693 components to/from the product system under study from/to other product systems. If there 694 is an inflow of recycled material to the product system in the production/manufacturing stage, 695 the amount of recycled material shall be included, and the transport from the 696 scrapyard/collection site to the recycling plant, the recycling process, and the transportation 697 from the recycling plant to the site where the material is being used shall also be included, if 698 known.

If there is an outflow of material or component to recycling, the transportation of the material
to the scrapyard/collection site shall be included. The material or component going to
recycling is then an outflow from the product system.

702 A-7. CRITERIA FOR THE INCLUSION OF INPUTS AND OUTPUTS (CUT-OFF CRITERIA)

The default cut-off rule shall be set to 1%. In other words, the included inventory data shall together give rise to at least 99% of the results of any of the environmental impact categories (not including inventory data of processes that are explicitly outside the system boundary as described above). Also, 99% of the mass of the product content and 99% of the energy use of the product life cycle shall be accounted for. Deviations from this cut-off rule shall be described in and justified in the Technical Specifications provided during the certification process.

710 It is important to emphasise that, in general, the cut-off of inventory data should be avoided, 711 and all available inventory data shall be used. Using cut-off rules shall not give the impression 712 of "hiding" information but rather facilitating the data collection for practitioners. Exclusion 713 of inventory data based on the cut-off rule shall be documented in the LCA report. The cut-714 off of inventory data, based on the abovementioned cut-off criteria, should be an output of 715 a sensitivity analysis, alone or in combination with expert judgment based on experience of 716 similar product systems. Further, the cut-off shall be possible to verify in the verification 717 process. The LCA study developer shall provide the information the verifier considers necessary to verify the cut-off (e.g., in the form of a sensitivity analysis). 718

719 **A-8 DESCRIPTION OF DATA AND DATA QUALITY REQUIREMENTS**



720 Life cycle inventory data are classified into primary data and secondary data, where the latter can be generic data or proxy data. The data categories are defined as follows: 721 722 1) primary data (also referred to as "site-specific data"): 723 724 a. data gathered from the actual manufacturing plant where product-specific 725 processes are carried out; 726 727 b. actual data from other stages of the product's life cycle, for example, site-728 specific data on the production of materials or generation of electricity provided by contracted suppliers, and transportation data on distances, means of 729 730 transportation, load factors, fuel consumptions, etc., of contracted 731 transportation providers; 732 733 c. LCI data from databases on transportation and energy that is combined with 734 actual transportation and energy parameters as listed above. 735 736 2) Secondary data, divided into: 737 738 a. generic data: data (e.g. commercial databases and free databases) that fulfil 739 data quality characteristics for precision, completeness, and representativeness 740 as reported in ISO 14040 and 14044; 741 742 b. proxy data: data (e.g. commercial databases and free databases) that do not 743 fulfil all of the data quality requirements of "generic data". 744 Primary data shall be used for the core processes. Primary data shall be used for upstream 745 and downstream processes, when available, otherwise secondary data may be used. Secondary data should be used in cases in which they are representative for the purpose of 746 747 the certification, e.g. for bulk and raw materials on a spot market, if there is a lack of specific 748 data on the final product or if a product consists of many components. 749 For secondary data to be classified as "generic data", the following requirements apply: 750 1) datasets shall be based on attributional LCA modelling; 751 752 2) the reference year shall be as current as possible and should be representative for the 753 validity period of the certificate; 754 755 3) the 1% cut-off rule shall be met on the level of the product system;



- 4) datasets shall represent average values for a specific reference year; however, how data are generated could vary, e.g. over time, and then they should have the form of a representative annual average value for a specified reference period. Deviations shall be justified and declared in the technical specifications;
- 5) the representativeness of the data shall be assessed to be better than ±5% (in terms of the environmental impact calculated on the basis of the data) of data that is fully representative for the given temporal, technological and geographical context.

Providing databases in the technical specifications does not replace the need for data qualityassessment during the LCA study.

If data fulfilling the above requirements on generic data are not available, proxy data may be
used. The environmental impacts associated with proxy data shall not exceed 10% of the
overall environmental impact of the product system.

771A-9 GENERAL DATA REQUIREMENTS

Guarantees of Origin may be used to demonstrate that a specific electricity mix has been
used. Also, other contractual instruments may be used, as long as reliability, traceability, and
the avoidance of double counting are ensured.

The Guarantees of Origin (or similar) shall be valid for at least the upcoming year and the manufacturer shall make a commitment to possess Guarantees of Origin for the full validity period of the certificate. The LCA report associated to the Product Dossier shall contain information on how electricity has been modelled for core processes, e.g. including whether Guarantees of Origin (or similar) and/or residual electricity mixes have been used. Such report should also contain information on how electricity has been modelled for upstream and downstream processes, if relevant and if the information is available.

Guarantee certificates shall also be available for recycled product content in order to correctly
 model the environmental impact associated to production and all other phases inerent to the
 totally or partially recycled product.

785 **A-10 DATA QUALITY REQUIREMENTS PER LIFE-CYCLE STAGE**

- 786 Below are the default data quality requirement per life-cycle stage.
- 787 Upstream processes:



788 789 790	 data referring to upstream processes and activities in a supply chain over which an organization has direct management control shall be specific and collected on site;
791 792 793	 data referring to contractors that supply main parts, packaging, or main auxiliaries should be requested from the contractor as specific data, where relevant;
794 795 796 797 798	 data on transport of main parts and components along the supply chain to a distribution point (e.g. a stockroom or warehouse) where the final delivery to the manufacturer can take place, should be specific and based on the actual transportation mode, distance from the supplier, and vehicle load;
799 800 801	 in the case of lacking of primary data, secondary generic data may be used. If this is also lacking, proxy data may be used;
801 802 803 804	 for upstream processes modelled with specific data, generation of electricity used shall be accounted for in this priority:
805 806 807 808	 specific electricity mix as generated, or purchased from an electricity supplier, demonstrated by a Guarantee of Origin or similar as provided by the electricity supplier;
808 809 810	2) residual electricity mix of the electricity supplier on the market;
811 812	3) residual electricity mix on the market;
813 814	4) electricity consumption mix on the market.
815 816 817	"The market" in the above hierarchy may correspond to a national electricity market, if this can be justified. The electricity mixes used to model upstream processes shall be documented in the certificate, where relevant.
818	Core processes:
 819 820 821 822 823 	 transport from the final delivery point of raw materials, chemicals, main parts, and components (see above regarding upstream processes) to the manufacturing plant/place should be based on the actual transportation mode, distance from the supplier, and vehicle load, if available;



824 825 826 827	 goods: primary data shall be used for the assembly of the product and for the manufacture of main parts as well as for on-site generation of steam, heat, electricity, etc., where relevant;
828 829 830	 services: primary data shall be used for the consumption of materials, chemicals, steam, heat, electricity, etc., necessary for execution of the service;
831 832 833	 for electricity used in the core processes, generation of electricity used shall be accounted for in this priority:
834 835 836 837	 specific electricity mix as generated, or purchased from an electricity supplier, demonstrated by a Guarantee of Origin or similar as provided by the electricity supplier;
837 838 839	2) residual electricity mix of the electricity supplier on the market;
840 841	3) residual electricity mix on the market;
842 843	4) electricity consumption mix on the market.
844 845 846	"The market" in the above hierarchy may correspond a national electricity market, if this can be justified. The electricity mixes used to model upstream processes shall be documented in the certificate, where relevant.
847 848	• Waste treatment processes of manufacturing waste should be based on primary data, if available.
849	Downstream processes, if a cradle-to-grave approach is followed:
850 851 852	 data for the use stage are usually based on scenarios, but primary data should be used when available and relevant;
853 854 855 856	 data on the emissions from the use stage should be based on documented studies/tests. Such studies/tests shall be representative for at least the temporal validity of the certificate and shall be available if requested from the LEAF TC;
857 858 859	 the use of electricity in the region/country where the product is used shall be accounted for in this priority:



- 860 1) specific electricity mix as generated, or purchased from an electricity supplier, demonstrated by a Guarantee of Origin or similar as provided by the electricity 861 supplier; 862 863 864 2) residual electricity mix of the electricity supplier on the market; 865 3) residual electricity mix on the market; 866 867 4) electricity consumption mix on the market. 868 869 "The market" in the above hierarchy may correspond a national electricity market, if this can 870 be justified. The electricity mixes used to model upstream processes shall be documented in the certificate, where relevant. 871
- Scenarios for the end-of-life stage shall be technically and economically practicable and compliant with current regulations in the relevant geographical region based on the geographical scope of the certificate. Key assumptions regarding the end-of-life stage scenario shall be documented in the LCA report.
- 876 **A-11 DATA QUALITY DECLARATION**
- 877 LEAF Hardware certificates shall include a declaration of the quality of data used in the LCA878 calculations.

879 **A-12 ALLOCATION RULES**

Allocation can be divided into allocation of co-products, i.e. allocation of unit processes that generate several products, and allocation of waste, i.e. allocation of unit processes that generate materials that are, for example, landfilled recovered, recycled or reused, and which require further processing to cease being waste and become products. The principles for allocation of co-products and allocation of waste are described separately in the following subsections.

886 **A-13 ALLOCATION OF CO-PRODUCTS**

- 887 In case of allocation of co-products, the following hierarchy of allocation methods shall be888 followed:
- allocation shall be avoided, if possible, by dividing the process to be allocated into
 sub-processes and collecting the inventory data for each sub-process;



- 892 2) if allocation cannot be avoided, the inventory data should be partitioned between the
 893 different co-products in a way that reflects the underlying physical relationships
 894 between them, i.e. allocation should reflect the way in which the inventory data
 895 changes if the quantity of delivered co-products changes;
- 3) if a physical relationship between the inventory data and the delivery of co-products cannot be established, the inventory data should be allocated between the co-products in a way that reflects other relationships between them. For example, inventory data might be allocated between co-products in proportion to their economic values. If economic allocation is used, a sensitivity analysis exploring the influence of the choice of economic value shall be included in the LCA report.

903 **A-14 ALLOCATION OF WASTE** (Adapted from EN 15804)

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Allocation of waste shall follow the *polluter pays* principle: "processes of waste processing
shall be assigned to the product system that generates the waste until the end-of-waste state
is reached."

- 907 The end-of-waste state is reached when all the following criteria for the end-of-waste state 908 are fulfilled:
- 909 1) the recovered material, component or product is commonly used for specific purposes;
- 911 2) a market or demand, identified e.g. by a positive economic value, exists for such a
 912 recovered material, component or product;
 - the recovered material, component or product fulfils the technical requirements for the specific purposes and meets the existing legislation and standards applicable to products;
- 4) the use of the recovered material/product will not lead to overall adverseenvironmental or human health impacts.

920 The above outlined principles mean that the generator of the waste shall carry the full 921 environmental impact until the point in the product life cycle in which all the end-of-waste 922 criteria are fulfilled. Waste may have a negative economic market value, and then the end-of-923 waste stage is typically reached after (part of) the waste processing and further refinement, 924 at the point at which the waste no longer has a negative market value. This allocation method 925 is (in most cases) in line with a waste generator's juridical and financial responsibilities. For waste being recycled or reused, the environmental impact of processes until the end-ofwaste state shall be attributed to the product system generating the waste. Processes after the end-of-waste state, if any, shall be attributed to the product system using the recycled/reused material flow (recycled materials are thereafter considered secondary materials).

931 For waste incineration with energy recovery, the end-of-waste state is reached after the incineration if the waste incinerator gets paid for incinerating the material (i.e., the material 932 has a negative economic value), which means that the environmental impact of collection, 933 pre-processing and incineration of the waste shall be attributed to the product system 934 935 generating the waste. Impacts related to making use of the energy, if any, shall however be 936 attributed to the product system using the energy. If the end-of-waste state is reached before 937 the incineration/combustion of the waste, the waste shall be considered a secondary fuel and 938 further processing and incineration/combustion of the secondary fuel shall be attributed to 939 the product system using the energy. For example, this is the case if the waste incinerator 940 pays for the material (i.e., the economic value of the material is positive) and all other criteria for the end-of-waste state are fulfilled as well. 941

For waste incineration without energy recovery, the environmental impact of collection, preprocessing and incineration of the waste shall be attributed to the product system generating
the waste.

For landfilling of waste, the environmental impact of landfilling as well as capturing and combustion of landfill gas, if any, shall be attributed to the product system generating the waste. Impacts related to making use of the energy, if any, shall be attributed to the product system using the energy.

Even if benefits of reuse, recycling or recovery by default should be considered to be outside
the system boundary, quantitative information on recovered material/energy that potentially
can lead to environmental benefits may be declared.

952 **A-15 MODELLING OF END-OF-LIFE SCENARIOS**

End-of-life treatment processes of the product may depend on the destination of the product
and on the end-of-life treatment alternatives available where the product are expected to be
disposed. For these reasons, the end-of-life may be evaluated using one or several scenarios.

- 956 The following general rules shall be considered when defining end-of-life scenarios:
- 957 scenarios shall be realistic and representative for the most probable end-of-life
 958 treatment alternatives considering the geographical scope of the certificate;



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- scenarios shall not include processes or procedures that are not in current use or which have not been demonstrated to be practical;
- scenarios used shall be described in the LCA report, in a way that makes it clear that they reflect possible and realistic end-of-life treatment.

965 **A-16 MODELLING OF PRODUCT USE**

- Product use extends from the moment the end user uses the product until it leaves its place
 of use and enters the next process (e.g., an end-of-life process or a transport to end-of-life).
 For products used by end users, product use shall always be included within the system
 boundary.
- 970 Product use may be excluded for intermediate products such as fashion hardware accessories971 being part of a fashion product.
- 972 To ensure consistency between certificates for the same product category, the certifications973 guidelines shall:
 - clearly indicate if product use shall, should or may be included or excluded;
 - define which processes belonging to product use that shall be included in the system boundary and which shall be excluded (any exclusion shall be justified);
- provide default data/scenarios. The default data shall be used to fill in the data gaps
 and ensure consistency among certificates. Better data may be used but shall be
 justified in the LCA report.