# ENVIRONMENTAL PRODUCT DECLARATION SOFTWOOD LUMBER

ROSEBURG FOREST PRODUCTS COMPANY





Founded in 1936, Roseburg is a privatelyowned, vertically integrated company that owns and sustainably manages more than 600,000 acres of timberland in the U.S. The company converts those renewable resources into high quality, durable wood products including lumber, softwood and hardwood plywood panels, I-joists, laminated veneer lumber, and composite panels such as medium density fiberboard and particleboard. Roseburg products are widely distributed throughout North America.







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#### According to ISO 14025, and ISO21930:2017

| EPD PROGRAM AND PROGRAM OPERATOR<br>NAME, ADDRESS, LOGO, AND WEBSITE       | UL ENVIRONMENT, 333 PFING  | STEN RD., NORTHBROOK, IL 606011 HTTPS://WWW.UL.COM  |  |  |  |  |
|--|--|---|--|--|--|--|
| GENERAL PROGRAM INSTRUCTIONS<br>AND VERSION NUMBER                         | UL Environment Environmer<br>INSTRUCTIONS, VERSION   | tal Product Declaration Program, GENERAL PROGRAM 2.7, MARCH 2022  |  |  |  |  |
| MANUFACTURER NAME AND ADDRESS  | Roseburg Forest Products<br>3660 Gateway Street<br>Springfield, OR 97477   |   |  |  |  |  |
| DECLARATION NUMBER   | UL Provided  |   |  |  |  |  |
| DECLARED PRODUCT &<br>FUNCTIONAL UNIT OR DECLARED UNIT                     | 1 cubic meter (m <sup>3</sup> ) of softwood lumber   |   |  |  |  |  |
| REFERENCE PCR AND VERSION NUMBER   | <ul> <li>ISO 21930:2017 – serves as the core PCR and:</li> <li>UL Part A: Product Category Rules for Building-Related Products and Services - Patific Cycle Assessment Calculation Rules and Report Requirements, v3.2.</li> <li>UL Part B: Product Category Rule Guidance for Building-Related Products and Services - Part B: Structural and Architectural Wood Products, EPD Requirements UL 10010-4</li> </ul> |   |  |  |  |  |
| MARKETS OF APPLICABILITY   | North America  |   |  |  |  |  |
| DATE OF ISSUE  | UL Provided  |   |  |  |  |  |
| PERIOD OF VALIDITY   | UL Provided  |   |  |  |  |  |
| EPD TYPE   | Product specific   |   |  |  |  |  |
| EPD SCOPE  |  |   |  |  |  |  |
| YEAR(S) OF REPORTED PRIMARY DATA   | 2022   |   |  |  |  |  |
| LCA SOFTWARE & VERSION NUMBER  | SimaPro V9   |   |  |  |  |  |
| LCI DATABASE(S) & VERSION NUMBER   | Ecoinvent 3.9.1, USLCI   |   |  |  |  |  |
| LCIA METHODOLOGY & VERSION NUMBER  | TRACI 2.1, IPCC AR5  |   |  |  |  |  |
| The UL Part A PCR review was conducted by:                                 |  | Lindita Bushi, PhD, Chair<br>Athena Sustainable Materials Institute<br>Lindita.bushi@athenasmi.org<br>Hughes Imbeault-Tetreault, Eng., M.A. Sc.<br>Groupe AGECO<br>Hugues.i-tetreault@groupeageco.ca<br>Jack Geibig<br>Ecoform<br>jgeibig@ecoform.com |  |  |  |  |
| The UL Part B PCR review was conducted by:                                 | Dr. Thomas Gloria, Chair<br>Industrial Ecology Consultants<br><u>t.gloria@industrial-ecology.com</u><br>Dr. Indro Ganguly<br>University of Washington<br>Dr. Sahoo<br>University of Georgia  |   |  |  |  |  |
| This declaration was independently verified in according INTERNAL EXTERNAL | rdance with ISO 14025: 2006.   | Jack Geibig   |  |  |  |  |
| This life cycle assessment was conducted in accord reference PCR by:       | lance with ISO 14044 and the   |   |  |  |  |  |
|  |  | Jack Geibig   |  |  |  |  |



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This life cycle assessment was independently verified in accordance with ISO 14044 and the reference PCR by:

Jack Geibig

#### LIMITATIONS

Exclusions: EPDs do not indicate that any environmental or social performance benchmarks are met, and there may be impacts that they do not encompass. LCAs do not typically address the site-specific environmental impacts of raw material extraction, nor are they meant to assess human health toxicity. EPDs can complement but cannot replace tools and certifications that are designed to address these impacts and/or set performance thresholds – e.g. Type 1 certifications, health assessments and declarations, environmental impact assessments, etc.

Accuracy of Results: EPDs regularly rely on estimations of impacts; the level of accuracy in estimation of effect differs for any particular product line and reported impact.

<u>Comparability</u>: EPDs from different programs may not be comparable. Full conformance with a PCR allows EPD comparability only when all stages of a life cycle have been considered, when they comply with all referenced standards, use the same sub-category PCR, and use equivalent scenarios with respect to construction works. However, variations and deviations are possible". Example of variations: Different LCA software and background LCI datasets may lead to differences results for upstream or downstream of the life cycle stages declared. Comparison of the environmental performance of Structural and Architectural Wood Products using EPD information shall be based on the product's use and impacts at the building level, and therefore EPDs may not be used for comparability purposes when not considering the building energy phase as instructed under this PCR.



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### Foreword

This Type III environmental declaration is developed according to ISO 21930 and 14025 for softwood plywood (SWPW). This EPD reports environmental impacts based on established life cycle impact assessment methods. The reported environmental impacts are estimates, and their level of accuracy may differe for a particular product line and reported impact. LCAs do not generally address site-specific environmental issues related to resource extraction or toxic effects of products on human health. Unreported environmental impacts include (but are not limited to) factors attributable to human health, land use change and habitat destruction. Forest certification systemsand government regulations address some of these issues. The product in this EPD conforms to ASTM D9-09ae1. EPDs do not report product environmental performance against any benchmark.

### **Product System**

#### **Product Description**

Roseburg has been a dependable supplier of western softwood lumber since 1936 with experience in scale and service. They are committed to sustainable forest management practices and have a selection of products from a single source. Roseburg Western Softwood Lumber is produced at their Dillard, OR facility, one of the largest sawmills in North America with a capacity to ensure consistent volume to meet market needs. The product is available both kiln-dried and green with precision-end trimmed (PET) lengths available and is primarily produced using Douglas-fir species.

### **Application and Technical Data**

Common applications of the product are framing and general construction.

Table 1 shows the technical specifications of the product, including any testing data as appropriate.

| NORMAL DIMENSION | ACTUAL DIMENSION   |
|------------------|--|
| 1" x 4"          | <sup>3</sup> / <sub>4</sub> " x 3- <sup>1</sup> / <sub>2</sub> " |
| 1" x 6"          | <sup>3</sup> / <sub>4</sub> " x 5- <sup>1</sup> / <sub>2</sub> " |
| 2" x 4"          | 1-½" x 3-½"  |
| 2" x 6"          | 1-½" x 5-½"  |
| 3" x 4"          | 2-1⁄2" x 3-1⁄2"  |
| 3" x 6"          | 2-½" x 5-½"  |
| 4" x 4"          | 3-½" x 3-½"  |
| 4" x 6"          | 3-½" x 5-½"  |
| 6" x 6"          | 5-½" x 5-½"  |

Table 1: Technical Data – Kiln Dried Douglas-Fir





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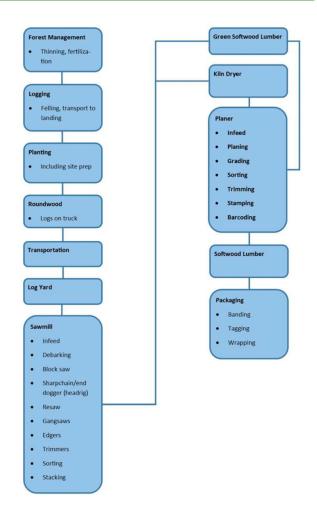
#### According to ISO 14025, and ISO 21930:2017

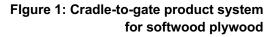
| NORMAL DIMENSION | ACTUAL DIMENSION                         |
|------------------|--|
| 6" x 8"          | 5-½" x 7-¼"                              |
| 7" x 9"          | 7 x 9 (+/- 1/8") – full sawn, not planed |

### **Production**

The upstream forest operations include forest management, logging, planting, and loading the harvested roundwood onto a truck. The roundwood is then transported from the forest road to the lumber mill, which includes the log yard and the sawmill. At the sawmill, the logs are debarked and sawed into smaller sizes, producing green wood. The lumber is then sent to a planer or kiln dried and trimmed to the correct dimensional specifications. Finally, the lumber is packaged for shipping. All of these processes require electricity, fuels, and wood inputs as biomass fuel.

The raw materials for the product were obtained from various parts of the US depending on the location of the facility and the product type. The materials are delivered to the manufacturing facility via truck. The distances were modeled by material and were calculated using the supplier location and the location of manufacturing. All products produced are packaged on-site utilizing wood battens and plastic strapping/banding.









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## Methodology of the Underlying LCA

#### **Declared Unit**

The declared unit is one cubic meter (1 m<sup>3</sup>) of dry sawn timber (dry planed lumber). Table 2 shows additional details related to the functional unit.

#### Table 2: Declared Unit Details

|                  | VALUE | Unit              |
|------------------|-------|-------------------|
| Declared Unit    | 1     | m <sup>3</sup>    |
| Mass             | 450   | Dry kg            |
| Density (dry)    | 450   | kg/m <sup>3</sup> |
| Moisture Content | 15    | %                 |

The general composition of softwood lumber are represented in Table 3.

### Table 3: Material Composition per Functional Unit

|             | SOFTWOOD LUMBER [%] |
|-------------|---------------------|
| Douglas Fir | 100                 |

The product is packaged in plastic strapping made of plastic, and baths and lattens made of wood. It is recommended the packaging materials are reused where possible.

No hazardous materials are contained in, or result from the production of, any of the products assessed in this study.

Information pertaining to the classification of the substances used to manufacture any of Roseburg's softwood lumber products including composition information, first aid measures, fire fighting measures, accidental release measures, handling and storage, exposure controls/PPE, physical and chemical properties, stability and reactivity, toxicological information, ecological information, disposal considerations, transport information, and regulatory information are contained in the product Safety Data Sheet which is available to download from the Roseburg website at <a href="https://www.roseburg.com">www.roseburg.com</a>.

### **System Boundaries**

As shown in Figure 2, the cradle-to-gate system boundary includes the extraction of raw materials and processing; the transportation of raw materials, secondary materials, and any fuels from the extraction site of the manufacturing site; and the manufacturing of the wood construction product, including any necessary packaging. All other life cycle stages are excluded from the analysis, denoted by MND or "module not declared."



### **Environmental** Product Declaration



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|             | PRO                    | DUCT ST   | AGE           |                                | TRUCT-<br>ROCESS<br>AGE | USE STAGE |             |        |             |               | END OF LIFE STAGE  |   |                |           | BENEFITS AND<br>LOADS<br>BEYOND THE<br>SYSTEM<br>BOUNDARY |          |  |
|-------------|------------------------|-----------|---------------|--------------------------------|-------------------------|-----------|-------------|--------|-------------|---------------|--|---|----------------|-----------|---|----------|--|
|             | A1                     | A2        | А3            | A4                             | A5                      | B1        | B2          | B3     | B4          | B5            | B6   | B7  | C1             | C2        | C3  | C4       | D  |
|             | Raw material<br>supply | Transport | Manufacturing | Transport from<br>gate to site | Assembly/Install        | Use       | Maintenance | Repair | Replacement | Refurbishment | Building Operational<br>Energy Use During<br>Product Use | Building Operational<br>Water Use During<br>Product Use | Deconstruction | Transport | Waste<br>processing                                       | Disposal | Reuse, Recovery,<br>Recycling<br>Potential |
| EPD<br>Type | х                      | х         | х             | MND                            | MND                     | MND       | MND         | MND    | MND         | MND           | MND  | MND   | MND            | MND       | MND   | MND      | MND  |

Figure 2: Life cycle stages of wood products (those included are marked with an 'x')

### **Cut-off Rules**

Material and energy inputs greater than 1% (based on total mass of the final product) were included within the scope of analysis. Material or energy inputs less than 1% were included if sufficient data was available to warrant inclusion and/or the material input was thought to have significant environmental impact. Cumulative excluded material and inputs, and environmental impacts are less than 5% based on total weight of the functional unit.

The list of excluded materials and energy inputs include:

- Some material inputs may have been excluded within the datasets used for this project. All datasets have been critically reviewed and conform to the exclusion requirement of the PCR.
- Capital material and infrastructure

Beyond this, no inputs or outputs were actively excluded.

### **Background Data**

Background data for upstream and downstream data are representative for 2022 Ecoinvent 3.9.1, and SLCI.

### **Data Quality**

Overall data quality is considered good. Improvements can be made through the modification of datasets to





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incorporate more regional specificity, both in terms of energy and technology. However, the data were considered appropriate in relation to the goal, scope, and budget of the project.

Primary data in the form of energy consumption and water consumption were normalized based on total mass of production during the same time frame. The resulting energy and water per unit were used for product manufactured at the facilities under study. Overall, primary energy and water data quality are considered good.

Primary data also includes the bills of materials used to formulate the products that are included in the study. Overall, this data is considered excellent. Upstream data quality can be increased through the use of supplier-specific secondary datasets.

#### Period under Review

This study is intended to represent production for the year 2022.

#### **Region under Review**

Softwood lumber production occurs at Roseburg's Dillard, Oregon facility.

#### **Treatment of Biogenic Carbon**

The product system represented in this EPD includes the information modules A1, A2 and A3. According to ISO 21930 7.2.7, if a bio-based material containing biogenic carbon leaves the studied product system at the system boundary between product systems in information modules C1 to C4 (or any other information module), this export of bio-based material and associated flow of biogenic carbon is reported as an export of biogenic carbon expressed in CO2 in the LCI and characterized with +1 kg CO2e/kg CO2 of biogenic carbon in the calculation of the GWP in the respective information module C1 to C4 (or any other information module). The following results apply this methodology to the biogenic carbon present in the primary product as it leaves the manufacturer in module A3.

#### Allocation

Multi-output allocation generally follows the requirements of ISO 14044, Section 4.3.2.2. The method of multi-output allocation was determined based on the requirements and guidance of UL Part A, section 3.3 and additionally considers the following as per the PCR:

"Mass should be used as the primary basis for co-product allocation in this Part B. Allocation methods deemed more appropriate than on the basis of mass may be used but only when justified."

This allocation method applies both to wood waste as an output and as an input (i.e. wood waste used in particleboard manufacturing). Co-product allocation was done using mass. This method aligns with industry-average EPDs on the products under study.

#### Comparability

This PCR allows EPD comparability only when the same functional requirements between products are ensured and the requirements of ISO 21930:2017 §5.5 are met. It should be noted that different LCA software and background LCI datasets may lead to differences results for upstream or downstream of the life cycle stages declared. Comparison of the environmental performance using EPD information shall consider all relevant information modules over the full life







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cycle of the products within the building.

### **Additional Statements**

While this EPD does not address landscape level forest management impacts, potential impacts may be addressed through requirements put forth in regional regulatory frameworks, ASTM 7612-15 guidance, and ISO 21930 Section 7.2.11 including notes therein. These documents, combined with this EPD, may provide a more complete picture of environmental and social performance of wood products.

While this EPD does not address all forest management activities that influence forest carbon, wildlife habitat, endangered species, and soil and water quality, these potential impacts may be addressed through other mechanisms such as regulatory frameworks and/or forest certification systems which, combined with this EPD, will give a more complete picture of environmental and social performance of wood products.

EPDs can complement but cannot replace tools and certifications that are designed to address environmental impacts and/or set performance thresholds – e.g. Type 1 certifications, health assessments and declarations, etc.

National or regional life cycle averaged data for raw material extraction does not distinguish between extraction practices at specific sites and can greatly affect the resulting impacts.

EPDs can complement but cannot replace tools and certifications that are designed to address environmental impacts and/or set performance thresholds – e.g. Type 1 certifications, health assessments and declarations, etc.

Accuracy of Results: EPDs regularly rely on estimations of impacts; the level of accuracy in estimation of effect differs for any particular product line and reported impact when averaging data. The was no method used to estimate variability in this EPD because no data averaging was used.

### Life Cycle Assessments Results

The impact categories presented represent impact potentials, i.e., they are approximations of environmental impacts that could occur if the emissions would (a) actually follow the underlying impact pathway and (b) meet certain conditions in the receiving environment while doing so. In addition, the inventory only captures that fraction of the total environmental load that corresponds to the functional unit (relative approach). LCIA results are therefore relative expression only and do not predict actual imapcts, exceeding thresholds, safety margins, or risks.

The LCIA results for 1 m<sup>3</sup> of softwood lumber produced at Dillard, OR plant are presented in Table 4.

### Table 4: LCIA Results for 1 m<sup>3</sup> of softwood lumber produced by Roseburg

| IMPACT CATEGORY                       | TOTAL              | A1                   | A2       | A3       |
|---------------------------------------|--------------------|----------------------|----------|----------|
|                                       | LCIA Impact Indica | tors – TRACI 2.1 and | IPCC AR5 |          |
| IPCC AR5 GWP incl. bio [kg $CO_2$ eq] | -6.93E+02          | -7.34E+02            | 6.33E+00 | 3.50E+01 |
| IPCC AR5 GWP excl. bio [kg $CO_2$ eq] | 3.42E+01           | 2.08E+01             | 6.31E+00 | 7.07E+00 |
| GWP TRACI excl. bio [kg               | 3.38E+01           | 2.07E+01             | 6.25E+00 | 6.87E+00 |





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| IMPACT CATEGORY            | TOTAL       | A1                   | A2       | A3       |  |  |  |  |
|----------------------------|-------------|----------------------|----------|----------|--|--|--|--|
| CO2e]                      |             |                      |          |          |  |  |  |  |
| AP [kg SO <sub>2</sub> eq] | 3.24E-01    | 1.79E-01             | 3.45E-02 | 1.10E-01 |  |  |  |  |
| EP [kg N eq]               | 2.32E-02    | 1.13E-02             | 2.77E-03 | 9.14E-03 |  |  |  |  |
| ODP [kg CFC 11 eq]         | 8.60E-06    | 8.33E-10             | 1.10E-08 | 8.59E-06 |  |  |  |  |
| SFP [kg O3 eq]             | 9.47E+00    | 5.29E+00             | 9.96E-01 | 3.18E+00 |  |  |  |  |
|                            | Resour      | ce Use Parameters    |          |          |  |  |  |  |
| RPRE [MJ]                  | 1.61E+01    | 0.00E+00             | 1.81E-01 | 1.59E+01 |  |  |  |  |
| RPRM [MJ]                  | 8.57E+03    | 8.56E+03             | 0.00E+00 | 6.15E+00 |  |  |  |  |
| NRPRE [MJ]                 | 4.42E+02    | 2.73E+02             | 7.94E+01 | 8.91E+01 |  |  |  |  |
| NRPRM [MJ]                 | 5.26E+00    | 0.00E+00             | 0.00E+00 | 5.26E+00 |  |  |  |  |
| SM [kg]                    | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| RSF [MJ]                   | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| NRSF [MJ]                  | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| RE [MJ]                    | 1.57E+01    | 0.00E+00             | 0.00E+00 | 1.57E+01 |  |  |  |  |
| FW [m3]                    | 2.34E+00    | 0.00E+00             | 1.03E+00 | 1.31E+00 |  |  |  |  |
| ADPF [MJ]                  | 4.45E+02    | 2.73E+02             | 7.82E+01 | 9.31E+01 |  |  |  |  |
|                            | Waste Paran | neters and Output Fl | ows      |          |  |  |  |  |
| HWD [kg]                   | 1.20E-03    | 0.00E+00             | 9.42E-05 | 1.10E-03 |  |  |  |  |
| NHWD [kg]                  | 2.95E+00    | 2.88E-01             | 1.09E-01 | 2.55E+00 |  |  |  |  |
| HLRW [kg]                  | 1.24E-09    | 0.00E+00             | 6.19E-10 | 6.17E-10 |  |  |  |  |
| ILLRW [kg]                 | 5.99E-09    | 0.00E+00             | 2.98E-09 | 3.01E-09 |  |  |  |  |
| CRU [kg]                   | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| MR [kg]                    | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| MER [kg]                   | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| EE [kg]                    | 0.00E+00    | 0.00E+00             | 0.00E+00 | 0.00E+00 |  |  |  |  |
| Biogenic Carbon Indicators |             |                      |          |          |  |  |  |  |







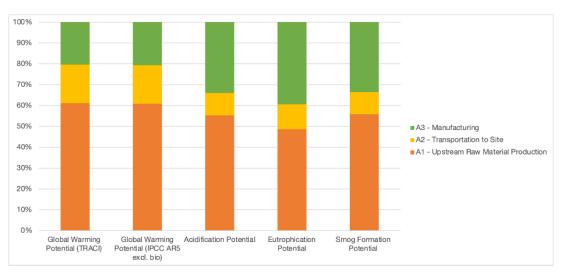
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| IMPACT CATEGORY | TOTAL     | A1        | A2       | A3        |
|-----------------|-----------|-----------|----------|-----------|
| BCRP [kg CO2]   | -1.67E+03 | -1.67E+03 | 0.00E+00 | 0.00E+00  |
| BCEP [kg CO2]   | 4.21E+01  | 0.00E+00  | 0.00E+00 | 4.21E+01  |
| BCRK [kg CO2]   | -5.40E-01 | 0.00E+00  | 0.00E+00 | -5.40E-01 |
| BCEK [kg CO2]   | 5.40E-01  | 0.00E+00  | 0.00E+00 | 5.40E-01  |
| BCEW [kg CO2]   | 7.83E+02  | 0.00E+00  | 0.00E+00 | 7.83E+02  |
| CCE [kg CO2]    | 0.00E+00  | 0.00E+00  | 0.00E+00 | 0.00E+00  |
| CCR [kg CO2]    | 0.00E+00  | 0.00E+00  | 0.00E+00 | 0.00E+00  |
| CWNR [kg CO2]   | 0.00E+00  | 0.00E+00  | 0.00E+00 | 0.00E+00  |
| BCRP [kg CO2]   | -1.67E+03 | -1.67E+03 | 0.00E+00 | 0.00E+00  |

A dominance analysis was performed to show which of the life cycle modules contributes to the majority of the impacts.



### Figure 3 : Dominance analysis for 1 cubic meter of softwood lumber produced by Roseburg

The results are primarily driven by upstream raw material production (A1) followed by manufacturing (A3) at the facility across all indicators. The raw material production is driven entirely by the upstream impacts of harvesting Douglas fir logs entering the facility. Across all key indicators, the raw logs drive 48.5% to 61.2% of impacts. The transportation to site impacts drive 10.7% to 18.5% of impacts and the manufacturing energy drive 18.0% to 33.3% across all key indicators.

Throughout this report, value choices and judgments that may have affected the LCA have been described. Additional





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decisions are summarized below:

- The inclusion of overhead energy data was determined appropriate due to the inability to sub-meter and isolate manufacturing energy from overhead energy.
- The use and selection of secondary datasets The selection of which generic dataset to use to represent an aspect of a supply chain is a significant value choice. Collaboration between the LCA practitioner, the manufacturer, and data experts was invaluable in determining best-case scenarios in the selection of data. However, no generic data can be a perfect fit. Improved supply chain-specific data would improve the accuracy of results, however budgetary and time constraints also must be considered.

Some limitations to the study have been identified as follows:

- The availability of geographically more accurate datasets would have improved the accuracy of the study.
- Only known and quantifiable environmental impacts are considered.
- Due to the assumptions and value choices listed above, these do not reflect real-life scenarios and hence they cannot assess actual and exact impacts, but only potential environmental impacts.





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### References

- 1. Life Cycle Assessment, LCA Report for Roseburg. WAP Sustainability Consulting. April 2024.
- 2. ISO 14044: 2006 Environmental Management Life cycle assessment Requirements and Guidelines.
- 3. ISO 14044: 2006/ Amd 1:2017 Environmental Management Life cycle assessment Requirements and Guidelines Amendment 1.
- ISO 14044: 2006/ Amd 2:2020 Environmental Management Life cycle assessment Requirements and Guidelines – Amendment 2.
- 5. ISO 14025: 2006 Environmental labels and declarations Type III environmental declarations Principles and Procedures.
- 6. ISO 21930: 2017 Sustainability in buildings and civil engineering works Core rules for environmental product declarations of construction products and services.
- 7. TRACI: The Tool for the Reduction and Assessment of Chemical and Other Environmental Impacts. Version 2.1 User Guide https://nepis.epa.gov/Adobe/PDF/P100HN53.pdf.
- NSF Product Category Rule for Environmental Product Declarations: PCR for Resinous Floor Coatings. December 17, 2018.
- 9. UL Environment Part A: Product Category Rules for Building-Related Products and Services Part A: Life Cycle Assessment Calculation Rules and Report Requirements, v3.2.
- 10. UL Environment Part B: Product Category Rule Guidance for Building-Related Products and Services, Part B: Structural and Architectural Wood Products, EPD Requirements UL 10010-9 v.1.0.
- 11. UL Environment Program Operator Rules v2.7 March 2022

