## The Truth about EPDs

## What is an EPD?

- EPD stands for Environmental Product Declaration and it is an independently verified and registered document that details the life-cycle environmental impacts of products.
- Having an EPD for a product does not mean that it is environmentally friendly or superior to alternative products, it is simply a transparent declaration of that particular products life-cycle environmental impact.
- An EPD is based off of a LCA (Life Cycle Analysis) that is performed for the particular product(s) being analyzed. While the EPD is published and publicly available after completion the associated LCA is not required to be made publicly available.
- In order for EPDs completed by different groups to be comparable they must follow the same rules and guidelines which are called Product Category Rules (PCR).

## **PVC Industry's EPD**

- Uni-Bell says that their EPD for PVC pipe shows the "environmental benefits of utilizing PVC piping".
  - o An EPD does not state environmental benefits of using any product, it merely objectively states the environmental impacts of the product over its life-cycle.
- Uni-Bell also states their EPD identified that the C Factor of PVC, or smoothness of the interior pipe wall, provides an advantage during the pumping phase of the life-cycle.
  - o An EPD does not state advantages of a product, just the empirical environmental impacts of the product.
- Without EPDs for other piping materials to compare to, Uni-Bell cannot claim that the impacts detailed in their EPD are superior to other materials. They can only state that they have an EPD that details the life-cycle environmental impacts of PVC pipe.
- The EPD for PVC pipe uses a service life of 100 years for PVC pipe, contrary to what many in the water and waste water industry, including AWWA, identify as the expected service life of PVC pipe.
  - o The EPD looks at the life-cycle impacts of a 100 foot section of pipe over 100 years.
    If a service life of less than 100 years is used for PVC pipe then the life-cycle impacts would greatly increase due to having to manufacture and install the pipe two times (or perhaps more) in the 100 years that is analyzed.
- The PCR used for underground water and waste water piping materials does not consider potential human health impacts of the product that is analyzed.
- The PVC EPD states that "No known chemicals are released internally into the water system. No known toxicity effects occur in the use of this product."
  - o The US EPA states one of the major sources of vinyl chloride in drinking water is leaching from PVC piping. Vinyl chloride is a known human carcinogen with MCL Goal of 0.0 in drinking water.



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