



Business plan for a general DIN PCR project¹
for
**“Product category rules for steel products
in industrial applications”**

Status:
**For the development of the DIN PCR after
acceptance on 2026-09-11**

Registrations to participate in the DIN PCR consortium and submit
comments on the business plan are requested **by August 15th, 2026** via
<https://www.din-events.de/> using the log-in code **pcr92020** ^{2, 3}

Registrations to participate in the open consultation are requested a week
before the comment period ends via <https://www.din-events.de/> using the
log-in code **oa92020** ^{4, 5}

¹ Henceforth referred to as DIN PCR in this document.

² If for technical reasons, it is not possible to register or send comments via the link, please send registration requests and any comments to Sophie.Oberlaender-Hayn@din.de.

³ We are not obligated to consider registrations to participate or comments on the business plan received after the deadline. The Consortium (committee) will decide, after it has been constituted, on the incorporation of the comments received by the deadline.

⁴ If for technical reasons, it is not possible to register via the link, please send registration requests to Sophie.Oberlaender-Hayn@din.de.

⁵ We are not obligated to consider registrations to participate in the open consultation received after the deadline.

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1 Patent rights

The recipients of this business plan are requested to indicate, together with their comments, any relevant patent rights of which they are aware and to provide supporting documentation.

2 Status/version of the business plan

- **For public comment (Version 1)**

This business plan serves to inform the public about the planned project. Interested parties have the opportunity to participate in the project and/or comment on the business plan. Interested parties can register to participate and submit comments via <https://www.din-events.de/> using the log-in code **pcr92020** ⁶.

In addition, interested parties who are not directly involved in the project can register for the open consultation (see Section 7). Interested parties can register to participate in the open consultation via <https://www.din-events.de/> using the log-in code **oa92020** ⁷.

DIN will decide on the actual implementation of the project following the publication of this business plan.

If the project goes ahead, all stakeholders who have registered to participate or who have commented on the business plan within the set deadline will be invited to the kick-off meeting.

All stakeholders who have registered for the open consultation will be informed in good time by the DIN project manager via email about the 4-week commenting period.

- **For the development of the DIN PCR after acceptance on September 11th, 2026 (Version 2)**

Amendments to the previous version 01:

- Section 2: Table of participating organizations added,
- Section 3: Consortium leader and co-leader elected during the kick-off meeting added,
- Section 4.2: Scope changed to: "This document provides product category rules (PCRs) for Environmental Product Declarations (EPDs) for the industrial application of hot-rolled flat steel from the primary production route.... Construction products in accordance with DIN EN 15804, including concrete and prestressing steel, are not included in the scope.",
- Section 5: "The DIN PCR will be drafted in German.",
- Section 8: Contact information co-leader added,
- Annex: Dates in preliminary timetable updated.

⁶ If for technical reasons, it is not possible to register via the link, please send registration requests to Sophie.Oberlaender-Hayn@din.de.

⁷ If for technical reasons, it is not possible to register via the link, please send registration requests to Sophie.Oberlaender-Hayn@din.de.

3 Initiator⁸ and other consortium members

- **Initiator:**

Person/Organization	Brief description	Interested party
Carmen Ostwald (LESS AISBL)	The Low Emission Steel Standard (LESS) is a standardized system for classifying CO ₂ emissions from steel, administered by the nonprofit organization LESS AISBL (Association Internationale Sans But Lucratif), based in Brussels.	Economy

- **Potential additional participants:**

The DIN PCR is being developed by a Consortium (temporary committee) that is open to all interested parties. Participation of other experts is sensible and desirable. It makes sense, for example, for

- Thyssen Krupp Steel Europe AG
- LESS AISBL
- GermanWatch e.V.

to take part in the development of the DIN PCR.

- **Organizations³ that have registered to participate:**

Jan Rempe	Thyssen Krupp Steel Europe AG	Economy
Carmen Ostwald	LESS AISBL	Other non-governmental organizations
Felix Gill	GermanWatch e.V.	Other non-governmental organizations
Lisa Schulz	Thyssen Krupp Steel Europe AG	Wirtschaft
Christian Weinrich	Thyssen Krupp Steel Europe AG	Wirtschaft
Dr. Sophie Oberländer-Hayn	DIN e.V.	

⁸ The masculine form of gender-related terms chosen in the German version of this document, such as “*der Initiator*” (the initiator), naturally applies to persons of all genders. In the German version, the masculine form was chosen only to make the text easier to understand.

- **Organizations³ that have accepted this business plan (consortium members):**

Person	Organization	Interested party
Dr. Carmen Ostwald	LESS AISBL	Other non-governmental organizations
Felix Gill	GermanWatch e.V.	Other non-governmental organizations
Jan Rempe	Thyssen Krupp Steel Europe AG	Economy
Lisa Schulz	Thyssen Krupp Steel Europe AG	Economy
Iulia-Clemansa Raicu-Sindilar	Thyssen Krupp Steel Europe AG	Economy
Franziska Heinz	DEKRA Assurance Services GmbH	Economy
Dr.-Ing. Lena Patterer	Bellona Deutschland	Environmental Protection
Michael Schwab	Schaeffler Technologies	Economy
Dr. Richard Knobloch	Stahlinstitut VDEh	Economy
Dr. Michael Baumann	Sphera Solutions GmbH	Environmental Protection
Julia Florin	Sphera Solutions GmbH	Environmental Protection

- **Consortium leader:**

The consortium leader is elected by the consortium during the kick-off meeting. The consortium leader is the coordinating person and main contact person of the DIN PCR consortium. Their tasks are to involve as many interested parties as possible in the PCR development process, to lead and moderate the meetings of the PCR consortium and to ensure that all members of the consortium contribute to the PCR development process. In addition, the consortium leader shall ensure, together with the consortium members, that the objectives and conditions of the business plan and the general Programme instructions are observed when developing the DIN PCR document.

The consortium leader shall have expertise in the specific product category and a high level of expertise in Life Cycle Assessment (LCA), PCR and EPD (e.g. in accordance with DIN EN ISO 14044, DIN EN ISO 14025, DIN EN ISO 14046 and DIN CEN ISO 14067).

Proposed consortium leader:

(The current information is a non-binding proposal by the initiator.)

Felix Gill/ GermanWatch e.V.	GermanWatch is an independent environmental, development, and human rights organization committed to sustainable global development.

Consortium leader elected during the kick-off meeting:

Person/Organization	Brief description
Consortium leader: Felix Gill/ GermanWatch e.V.	GermanWatch is an independent environmental, development, and human rights organization committed to sustainable global development.
Co-leader: Felix Rempe/ Thyssen Krupp Steel Europe AG	ThyssenKrupp Steel Europe AG is Germany's largest steel manufacturer and the core business of the ThyssenKrupp Group's steel division.

4 Project goals

4.1 General

As part of the project, “product category rules for steel products in industrial applications” are being developed. The development is based on the [LESS Rulebook, v1.1](#).

4.2 Planned scope

This document provides product category rules (PCRs) for Environmental Product Declarations (EPDs) for the industrial application of hot-rolled flat steel from the primary production route.

The basic product category rules (PCR):

- specify the indicators to be declared, the information to be provided and the manner in which these are collected and reported,
- describe which phases of a product's life cycle are taken into account in the EPD and which processes are to be included in the life cycle stages,
- define the rules for the development of scenarios,
- include the rules for calculating the Life Cycle Inventory and Life Cycle Impact Assessment underlying an EPD, including the definition of the data quality to be used,
- include the rules for the communication of predefined environmental and health information not covered by a life cycle assessment (LCA) for a product, process or service, where required,

- define the conditions under which products can be compared on the basis of information from the EPD.

Construction products in accordance with DIN EN 15804, including concrete and prestressing steel, are not included in the scope.

4.3 Existing PCR

Development of a new PCR despite an existing PCR

According to the initiator's review, there are two existing Standard/PCR documents for the planned DIN PCR.

1. PCR 2015.03 from EPD International „Basic iron or steel products & special steels, except construction steel products”

This PCR is explicitly intended for generic intermediate products (slabs, pig iron) without a defined end use, whereas the goal here is to develop a PCR for hot-rolled strip as a highly specialized flat steel product with clear industrial applications. The PCR does not allow for sufficient differentiation based on product-specific characteristics and is therefore not suitable.

2. ISO/FDIS 20915:2026-06 – Enquiry “Life cycle inventory calculation methodology for steel products”

This standard should generally be applied, as the methodology complies with global market standards. However, the methodology does not constitute a PCR, since - due to the wide variation in conditions worldwide - clear guidelines are sometimes lacking, leaving users with too much discretion. Therefore, developing a PCR is important and sensible despite the existence of this standard.

4.4 Related activities

The subject of the planned DIN PCR has so far not been the subject of a DIN standard. However, the following related committees, standards and/or regulations exist and will be taken into account and, if necessary, included in the course of the project:

Related committees at the ISO/CEN/DIN level:

- For information (not included in the scope): NA 005 NABau “DIN-Normenausschuss Bauwesen”
- NA 020 NAEBM „DIN-Normenausschuss Eisen-, Blech- und Metallwaren“
 - Mirroring (CEN/ISO):
 - CEN/TC 194 “Utensils in contact with food”
 - CEN/TC 355 “Lighters”
 - ISO/TC 186 “Cutlery and table and decorative metal hollow-ware”
- NA 021 FES „DIN-Normenausschuss Eisen und Stahl“
 - Mirroring (CEN/ISO):
 - CEN/TC 459 ECISS – “European Committee for Iron and Steel Standardization”
 - ISO/TC 17 “Steel”

- In particular: ISO/TC 17/SC 21 “Environment related to climate change in the iron and steel industry”
- ISO/TC 102 “Iron ore and direct reduced iron”
- IEC/TC 68/WG 1 “Classification, Composition, and Properties of Magnetic Materials”

Relevant Standards:

<i>DIN EN ISO 14025</i>	<i>Environmental statements and programmes for products – Environmental product declarations (ISO/DIS 14025:2025); German and English version prEN ISO 14025:2025</i>
<i>DIN EN ISO 14040</i>	<i>Environmental management – Life cycle assessment – Principles and framework (ISO 14040:2006 + Amd 1:2020); German version EN ISO 14040:2006 + A1:2020</i>
<i>DIN EN ISO 14044</i>	<i>Environmental management – Life cycle assessment – Requirements and guidelines (ISO 14044:2006 + Amd 1:2017 + Amd 2:2020)</i>
<i>DIN EN ISO 14067</i>	<i>Greenhouse gases – Carbon footprint of products – Requirements and guidelines for quantification (ISO 14067:2018); German and English version EN ISO 14067:2018</i>
<i>DIN CEN ISO/TS 14027 *</i> <i>DIN SPEC 35805</i>	<i>Environmental labels and declarations – Development of product category rules (ISO/TS 14027:2017); German and English version CEN ISO/TS 14027:2018</i>
<i>DIN EN 15804</i>	<i>Sustainability of construction works – Environmental product declarations – Core rules for the product category of construction products (includes Corrigendum:2021)</i>
<i>ISO/FDIS 20915:2026-06 - Enquiry</i>	Life cycle inventory calculation methodology for steel products

Other relevant documents:

- [LESS Rulebook, v1.1](#)
- PCR 2015.03 from EPD Int [„Basic iron or steel products & special steels, except construction steel products”](#)

4.5 Geographical scope of the DIN PCR

This PCR may be used globally.

5 Work programme

During the course of the project, a DIN PCR is to be developed in accordance with the requirements of DIN CEN ISO/TS 14027 and is intended to take into account all environmentally relevant aspects of the product life cycle. The DIN PCR shall not contradict the German body of standards.

The kick-off meeting is expected to take place on September 11th, 2026 as an online meeting. The project duration is approximately six months.

The kick-off meeting serves to constitute the consortium, to coordinate and clarify further organizational points and, if necessary, to start work on the content.

The publication of a draft for open consultation is planned.

In total, two online meetings (kick-off meeting and one further meeting) and if applicable further online workshops will be held in order to present, coordinate and, where appropriate, adopt the content developed up to that point. The content can be developed by individual consortium members or by working groups.

The consortium will schedule the meetings and/or workshops in consultation with DIN.

The DIN PCR will be developed in German (meeting language, reports, etc.). The DIN PCR will be drafted in German.

NOTE Each approved DIN PCR is published in German (de) and English (en). A DIN PCR is initially developed in one language and then translated into the other language (de/en) by the *Sprachendienst* (language service) at DIN Media and also published. Translation into additional languages is possible; the costs, which depend on the effort involved, are to be borne by the client.

6 Resource planning

Each consortium member bears its own expenses incurred in connection with the project.

This is a pilot project as part of the DIN PCR program, for which DIN bears the costs for PCR creation and recognition.

7 Rules of cooperation in the DIN PCR consortium

The project is subject to the procedural rules of the [Programme instructions of the DIN EPD programme](#). All interested parties and consortium members are obliged to familiarize themselves with these procedural rules.

The consortium will be constituted during the kick-off meeting. The kick-off meeting will only take place after the business plan has been published and the implementation of the project has been approved by DIN. The consortium shall consist of at least three consortium members from different organizations⁹. It is desirable that these represent

⁹ Organizations are legal entities and natural persons, insofar as they participate in business transactions on a commercial or freelance basis. If several legal entities belong to a group or

different interested parties (see overview in 820 Supplement 3:2016-10, 4.3, Table 2). This is to be ensured by the project initiator, among other things, by informing the representatives of the interested parties about the development of the PCR and the formation of the PCR consortium by means of this business plan. Interested parties should therefore be able to decide whether they are interested in participating in the potential PCR consortium or would like to contribute to the development of the PCR via the open consultation.

By agreeing to the business plan, the interested parties declare their willingness to participate in the consortium and thereby formally become consortium members with the associated rights and obligations. Participants in the kick-off meeting who do not accept the business plan do not obtain the status of consortium member and are excluded from further decisions during the kick-off meeting and from the rest of the project. If necessary, organizations that do not accept the business plan can register to participate in the open consultation.

If an organization (e.g. an association) sends a non-full-time employee to the consortium, this employee shall be authorized by the organization, and DIN shall be provided with proof.

Each consortium member has voting rights and holds one vote. If an organization sends several experts to the consortium, the organization has only one vote, regardless of the number of participants it sends. It is not possible to transfer votes to other consortium members. Decisions are taken by a simple majority of the votes cast; abstentions are generally not counted.

During the kick-off meeting, the consortium members elect a consortium leader. This person leads the consortium in terms of content and facilitates the decision-making process (votes, resolutions). The consortium leader is supported by the DIN project manager, whereby DIN always assumes a neutral position regarding the content. In addition, the DIN project manager ensures that DIN's rules governing procedures and presentation are adhered to when developing the DIN PCR. Should the consortium leader no longer be able to fulfil their function, the DIN project manager will initiate a new election.

The kick-off meeting is organized and chaired by the DIN project manager in consultation with the initiator. The other meetings and/or workshops are organized by the DIN project manager in consultation with the consortium leader.

If consortium members are unable to attend the adoption of the DIN PCR or the draft for open consultation (if a meeting is held for this purpose), they shall be included in the vote by alternative means (e.g. in writing, electronically).

All consortium members who voted in favour of publication of the DIN PCR or the draft are listed in the foreword as authors, by name and with their associated organization. All consortium members who voted against the publication of the DIN PCR or the draft, or who abstained, shall not be named in the foreword.

An open consultation is held as part of the DIN PCR development process. Organizations that have registered for the open consultation and are not part of the DIN PCR consortium or the PCR review panel may participate in the open consultation. Registration for the open consultation is usually possible up to one week before the end of the comment period.

Each DIN PCR shall also be reviewed by an ad hoc PCR review panel. The PCR review takes place parallel to the open consultation. The ad hoc PCR review panel is appointed by the Secretariat of the DIN EPD programme and consists of at least three

corporate structure within the meaning of Section 15 of the German Stock Corporation Act or Section 271 (2) of the German Commercial Code, they are deemed to be a single organization.

persons (from different organizations) who collectively have the required expertise. The members of the ad hoc PCR review panel act independently, were not involved in the preparation of the PCR and shall not have any conflicts of interest.

During the open consultation, the consortium leader is primarily responsible for coordinating the feedback, agreements (including with the PCR review panel) and revisions to the DIN PCR, but has no overriding voting rights.

Once constituted, the consortium is generally closed. The existing consortium members decide on any subsequent expansion of the consortium. It should be noted in particular that:

- a) the expansion is conducive to shortening the project duration or avoid or avert an imminent delay in the planned project duration;
- b) the expansion does not lead to a potential extension of the project duration;
- c) the new consortium member does not address any new or additional issues outside the scope of application defined and approved in the business plan;
- d) the new consortium member brings in additional expertise to ensure that the latest scientific findings and the current state of the art are incorporated;
- e) the new consortium member actively participates in the drafting work by making concrete, rather than abstract, proposals and contributions.
- f) the new consortium member ensures increased use of DIN PCR.

In order to enable the proper reproduction and dissemination of the results of the standardization work, the consortium members grant DIN the rights of use arising from their copyrights to the results of the standardization work. The granting of copyright does not prevent the consortium members from continuing to use, exploit and further develop the knowledge, experience and findings they have contributed.

The consortium members are required to inform DIN about relevant patent rights related to this DIN PCR project.

Subsequent changes to the scope (Section 4.2) or resource planning (Section 6) require a two-thirds majority of all votes cast as well as the approval of DIN.

8 Contact persons

- **Consortium leader:**

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Annex: Schedule (provisional)

DIN PCR project	2026												2027			
	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar	Apr					
Initiation																
1. Application and review																
2. Development of the business plan																
3. Publication of the business plan																
Development phase																
4. Kick-off meeting/constitution of the consortium																
5. DIN PCR development																
6. Adoption of the DIN PCR draft																
7. Open consultation/PCR review																
8. Consultation on the comments received																
9. Adoption of the DIN PCR in the consortium																
Publication																
10. Review and approval by DIN																
11. Publication of the DIN PCR																
Milestones																

- K** Online kick-off meeting on September 11th, 2026
A Online workshops on October 9th, 2026
V Adoption of the DIN PCR (planned for January 2027)