

**TATA STEEL**



Contiflo® premium galvanised precision tubes  
Environmental Product Declaration



# CONTENTS

<b>1 General information</b>	03
<b>2 Product information</b>	04
2.1 Product Description	04
2.2 Manufacturing	04
2.3 Technical data and specifications	06
2.4 Packaging	06
2.5 Reference service life	06
2.6 Biogenic Carbon content	06
<b>3 Life Cycle Assessment (LCA) methodology</b>	07
3.1 Declared unit	07
3.2 Scope	07
3.3 Cut-off criteria	07
3.4 Background data	08
3.5 Data quality	08
3.6 Allocation	08
3.7 Additional technical information	09
3.8 Comparability	09
<b>4 Results of the LCA</b>	10
<b>5 Interpretation of results</b>	12
<b>6 References and product standards</b>	13

Contiflo®  
Environmental Product Declaration  
(in accordance with ISO 14025 and EN 15804)

This EPD is representative and valid for the specified (named) product.

Declaration number: EPD-TS-2025-031  
Date of Issue: 16<sup>th</sup> December 2025  
Valid until: 15<sup>th</sup> December 2025

Owner of the Declaration: Tata Steel Nederland Tubes B.V.  
Programme Operator: Tata Steel UK Limited, 18 Grosvenor Place, London, SW1X 7HS

The CEN standard EN 15804:2012+A2:2019 serves as the core Product Category Rules (PCR)  
supported by Tata Steel's EN 15804 verified EPD PCR documents

Independent verification of the declaration and data, according to ISO 14025

Internal

External

Author of the Life Cycle Assessment: Tata Steel Nederland  
Third party verifier: Chris Foster, Eugeos SRL

# 1 General information

Owner of EPD	Tata Steel Nederland Tubes B.V.
Product	Contiflo® premium galvanised precision tubes
Manufacturer	Tata Steel Nederland Tubes B.V.
Manufacturing sites	IJmuiden (Netherlands) and Oosterhout (Netherlands)
Product applications	Various applications such as closed heating systems, greenhouse construction, roofing, industrial packaging, automotive components, recreational equipment, gardening tools and household appliances.
Declared unit	1 tonne of steel product
Date of issue	16 <sup>th</sup> December 2025
Valid until	15 <sup>th</sup> December 2030



THIRD PARTY VERIFIED ISO 14025 & EN 15804

This Environmental Product Declaration (EPD) is for Contiflo® galvanised precision tubes manufactured by Tata Steel Nederland Tubes. The environmental indicators are average values for the product manufactured at the Oosterhout site, with feedstock supplied from IJmuiden and external sources.

The information in this Environmental Product Declaration is based on production data from 2024.

EN 15804 serves as the core PCR, supported by Tata Steel's EN 15804 verified EPD programme Product Category Rules documents, and this declaration has been independently verified according to ISO 14025 [1,2,3,4,5,6,7].

Third party verifier

Chris Foster, EuGeos SRL rue Dieudonné Lefèvre 17 - B 1020 Bruxelles - Belgium

## 2 Product information

### 2.1 Product description

Contiflo® (sometimes referred to as 'galvanised precision tubes'), are manufactured in a range of circular, square and rectangular shaped tubes. They are manufactured to different grades in a range of sizes from 10 to 76,1 mm, with wall thicknesses from 0,8 to 3,5mm. The full range of Tata Steel's Contiflo® are included in this EPD.

Contiflo® galvanized precision tubes are made for various applications, such as closed heating systems for houses and office buildings, construction of greenhouse roofs including the tubes used for sun screens, industrial packaging (IBC's), gardening tools, sporting equipment like table tennis tables, household appliances and automotive components. Manufacturing is in line with international standards and agreed customer specific requirements.

### 2.2 Manufacturing

The manufacturing sites included in the EPD are listed in Table 1 below.

**Table 1 Participating sites**

Site name	Product	Manufacturer	Country
IJmuiden	Cold rolled coil	Tata Steel	NL
IJmuiden	Direct rolled coil	Tata Steel	NL
External	Cold rolled coil	External	EU
Oosterhout	Contiflo®	Tata Steel	NL

The process of tube manufacture at Tata Steel begins with sinter and/or pellet being produced from iron ore and limestone, and together with coke from coal, reduced in a blast furnace to produce iron. Steel scrap is added to the liquid iron and oxygen is blown through the mixture to convert it into liquid steel in the basic oxygen furnace. The liquid steel is continuously cast into discrete slabs, which are either rolled directly to produce direct rolled coil or subsequently reheated and rolled in a hot strip mill, before being cold rolled to produce cold rolled coil. Direct rolled coil, DRC, and cold rolled coil, CRC, are the primary feedstocks of the Contiflo® manufacturing process. The coils are transported by truck from IJmuiden to Oosterhout manufacturing site and by truck from external companies. An overview of the process from raw materials to cold rolled coil and direct rolled coil is shown in Figure 1.

Contiflo® manufacture, shown in Figure 2, starts with the CRC and DRC followed with the uncoiling, levelling, and slitting of the coil, which is then passed through a series of shaped rolls that gradually form the flat strip into a circular section. The two strip edges, now adjacent to one another, are welded using a high frequency induction process. Both external and internal weld beads are trimmed in-line before the tube undergoes degreasing then mid-frequency induction heating, in preparation for galvanising. Once the zinc coating has been applied, the tube is cooled and further rolled into its final shape and size. 100% non-destructive testing is performed in-line on the weld seam to ensure integrity before a final passivation coating is applied to further enhance corrosion resistance. The tubes are then cut to length prior to despatch.

Process data for the manufacture of cold and direct rolled coil at IJmuiden were gathered as part of the latest data collection on behalf of worldsteel. For both IJmuiden and the tube making site in Oosterhout, the data collection was not only organised by site, but also by each process within each site. In this way it was possible to attribute resource use and emissions to each process, and using processed tonnage data, also attribute resources and emissions to specific products. The coils sourced from external companies are represented with worldsteel averages.

Figure 1 Process overview from raw materials to steel coils

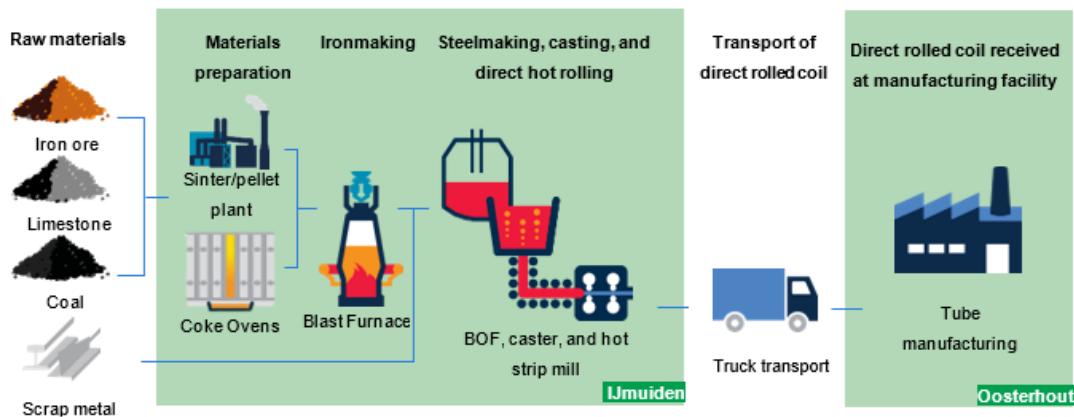
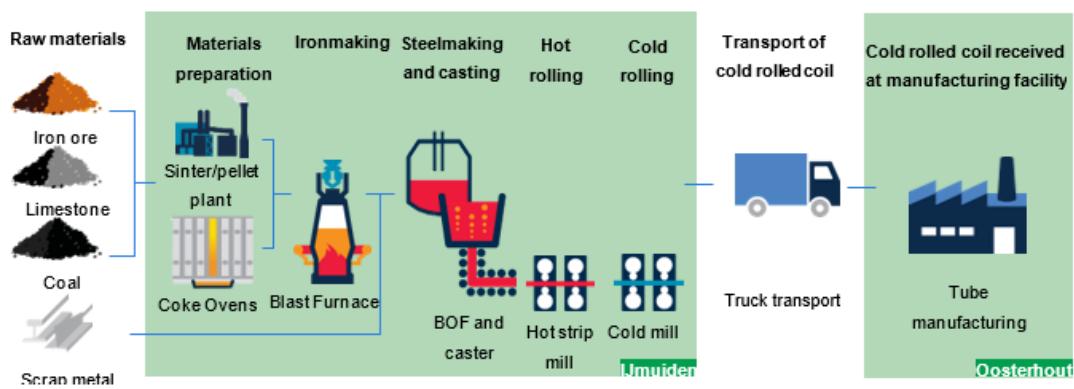
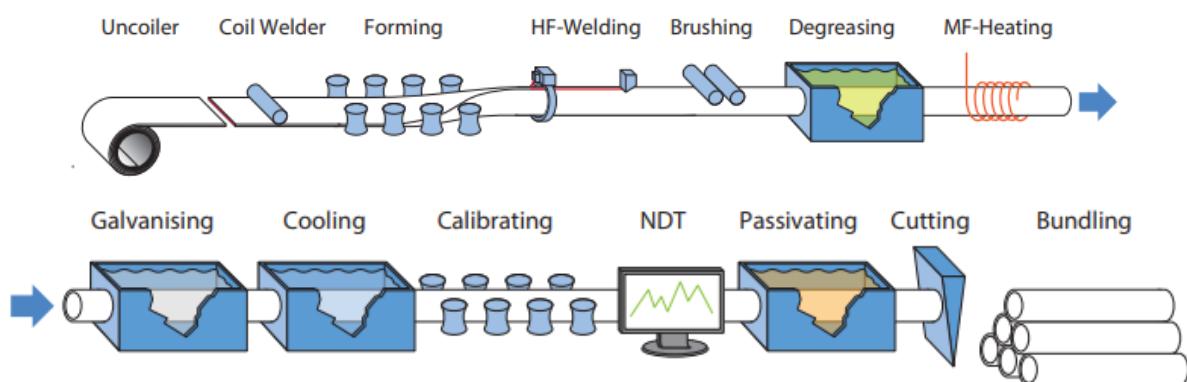


Figure 2 Process overview from coil to Contiflo® tubes



### 2.3 Technical data and specifications

The general properties of Contiflo® tubes are shown in Table 2, and the technical specifications of Contiflo® tubes are presented in Table 3. The relevant European standard for Contiflo® tubes is EN 10305-3<sup>[8]</sup>.

**Table 2 General properties of Contiflo® tubes**

Contiflo®	
<b>Density (kg/m<sup>3</sup>)</b>	7850
<b>Modulus of Elasticity (N/mm<sup>2</sup>)</b>	210000
<b>Coefficient of thermal expansion (10<sup>-6</sup> /K)</b>	12
<b>Thermal Conductivity (W/mK)</b>	48
<b>Melting Point (°C)</b>	1520
<b>Electrical Conductivity at 20°C (/ Ω m)</b>	3,9

**Table 3 Technical specifications of Contiflo® tubes**

Contiflo®	
<b>Specification</b>	EN 10305 – 3
<b>Yield strength (N/mm<sup>2</sup>)</b>	190-700
<b>Tensile strength (N/mm<sup>2</sup>)</b>	270-740
<b>Elongation</b>	5-26%
<b>Impact strength (Joules)</b>	N/A
<b>Carbon equivalent (max)</b>	0,00-0,20
<b>Certification</b>	Product certification 2.2 and 3.1 <sup>[9]</sup> Applicable to Tata Steel's Oosterhout site; ISO 9001 <sup>[10]</sup> , ISO 14001 <sup>[11]</sup> , ISO 45001 <sup>[12]</sup> , BES 6001 <sup>[13]</sup>

### 2.4 Packaging

The tubes are secured for transport using steel banding and clips, timbers and anti-slip mats. The mass of this packaging is 4,2 kg/tonne for steel banding and clips and 7,4 kg/tonne for timber. The amount of polyethylene film and card/paper packaging of 0,4 kg/tonne in total is used at the Netherlands sites.

### 2.5 Reference service life

A reference service life for Contiflo® tubes is not declared because they can be used in a variety of different forms of construction, and the final construction application is not defined. To determine the full service life of Contiflo® tubes, all factors would need to be included such as location and environment, corrosion protection, and fire protection. Corrosion and fire protection are usually applied during installation on site. Under 'normal' conditions, Contiflo® tubes would not need to be replaced over the life of the building or structure.

Tata Steel's Contiflo® tubes are supplied with full certification ensuring full traceability during and after the original service life. Contiflo® tubes can be recovered and re-used or recycled repeatedly without loss of quality.

### 2.6 Biogenic Carbon content

There are no biogenic carbon containing materials in the product. The biogenic carbon content of the packaging materials is shown in Table 3.

**Table 4 Biogenic carbon content at the factory gate**

Contiflo®	
<b>Biogenic carbon content (product) (kg C)</b>	0
<b>Biogenic carbon content (packaging) (kg C)</b>	3,71

Note: 1kg biogenic carbon is equivalent to 44/12 kg of CO<sub>2</sub>

# 3 LCA methodology

## 3.1 Declared unit

The unit being declared is 1 tonne of Contiflo® tubes.

## 3.2 Scope

This EPD can be regarded as Cradle-to-Gate with modules C and D and the specific modules considered in the LCA are:

A1-A3: Production stage (raw material supply, transport to production site, manufacturing)

C1-C4: End-of-life (demolition/deconstruction, transport, processing for recycling and disposal)

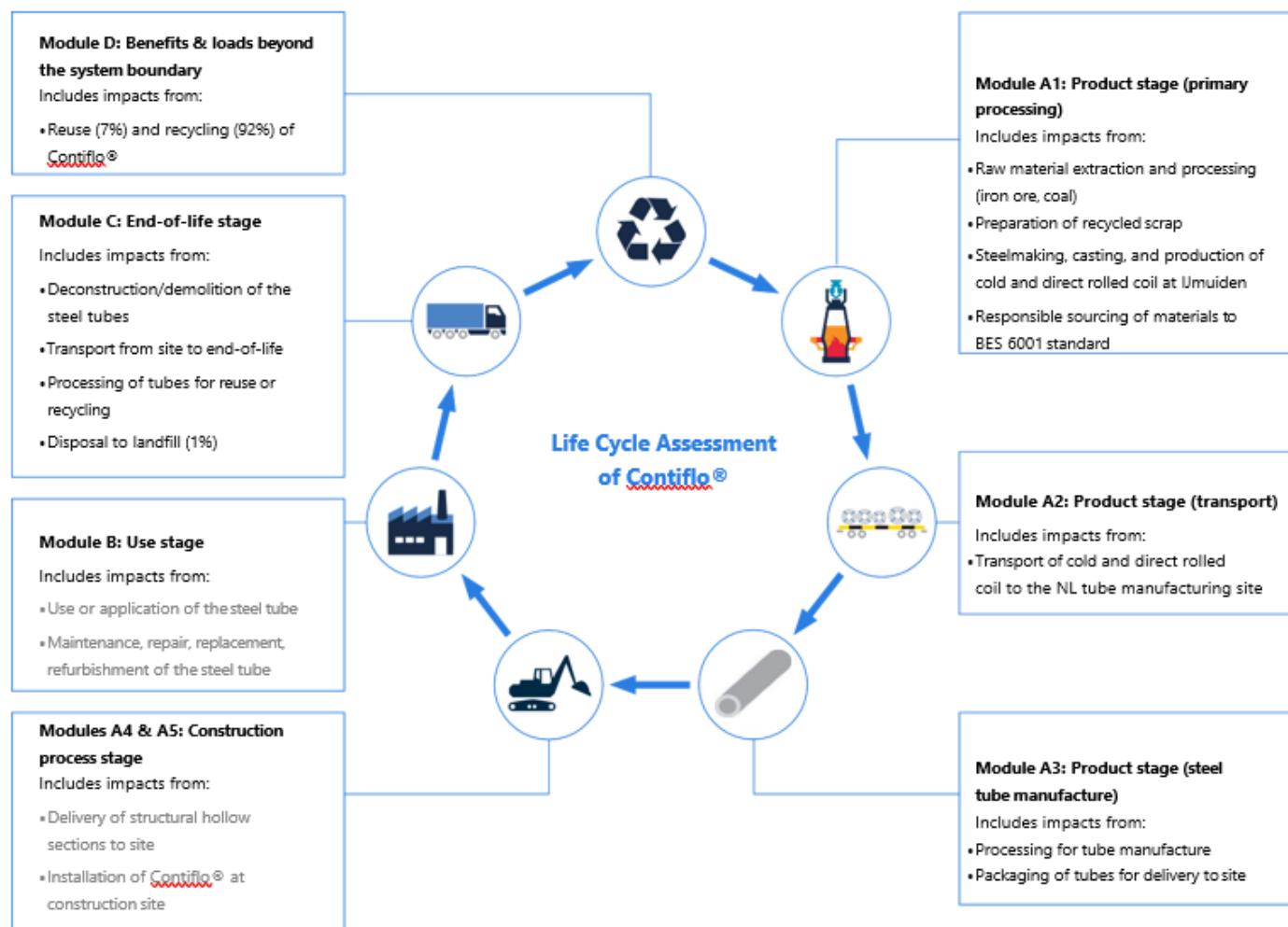
D: Reuse, recycling and recovery

The life cycle stages are explained in more detail in Figure 3, but where the text is in light grey, the impacts from this part of the life cycle are not considered.

## 3.3 Cut-off criteria

All information from the data collection process has been considered, covering all used and registered materials, and all fuel and energy consumption. On-site emissions were measured and those emissions have been considered. Data for all relevant sites were thoroughly checked and also cross-checked with one another to identify potential data gaps. No processes, materials or emissions that are known to make a significant contribution to the environmental impact of Contiflo® have been omitted. On this basis, there is no evidence to suggest that inputs or outputs contributing more than 1% to the overall mass or energy of the system, or that are environmentally significant, have been omitted. It is estimated that the sum of any excluded flows contributes less than 5% to the impact assessment categories. The manufacturing of required machinery and other infrastructure is not considered in the LCA.

Figure 3 Life Cycle Assessment of Contiflo®



### 3.4 Background data

For life cycle modelling of steel Contiflo® tubes, the LCAfE Software System for Life Cycle Engineering is used <sup>[14]</sup>. The LCAfE database contains consistent and documented datasets which can be viewed in the online LCAfE documentation <sup>[15]</sup>.

Specific data derived from Tata Steel's own production processes at IJmuiden and Oosterhout, were the first choice to use where available.

To ensure comparability of results in the LCA, the basic data of the LCAfE database were used for energy, transportation and auxiliary materials.

### 3.5 Data quality

The data from Tata Steel's own production processes are from 2021 for steelmaking and 2024 for tube manufacturing, and the technologies on which these processes were based during those periods are the ones used at the date of publication of this EPD. All relevant background datasets are taken from the LCAfE software database, and the last revision of these datasets took place less than 10 years ago. An assessment of the quality of data used in this study, has been made using the scheme provided in the UN Environment Global Guidance on LCA database development, referenced in EN 15804. The study is considered to be based on very good quality data.

### 3.6 Allocation

To align with the requirements of EN 15804, a methodology is applied to assign impacts to the production of slag and hot metal from the blast furnace (co-products from steel manufacture), that was developed by the World Steel Association and EUROFER <sup>[16]</sup>. This methodology is based on physical and chemical partitioning of the manufacturing process, and therefore avoids the need to use allocation methods, which are based on relationships such as mass or economic value. It takes account of the manner in which changes in inputs and outputs affect the production of co-products and also takes account of material flows that carry specific inherent properties. This method is deemed to provide the most representative method to account for the production of blast furnace slag as a co-product.

Economic allocation was considered, as slag is designated as a low value co-product under EN 15804. However, as neither hot metal nor slag are tradable products upon leaving the blast furnace, economic allocation would most likely be based on estimates. Similarly, BOF slag must undergo processing before being used as a clinker or cement substitute. The World Steel Association and EUROFER also highlight that companies purchasing and processing slag work on long term contracts which do not follow regular market dynamics of supply and demand.

Process gases arise from the production of the continuously cast steel slabs at IJmuiden, and are accounted for using the system expansion method. This method is also referenced in the same EUROFER document and the impacts of co-product allocation, during manufacture, are accounted for in the product stage (module A1).

End-of-life assumptions for recovered steel and steel recycling are accounted for as per the current methodology from the World Steel Association 2017 Life Cycle Assessment methodology report <sup>[17]</sup>. A net scrap approach is used to avoid double accounting, and the net impacts are reported as benefits and loads beyond the system boundary (module D)

### 3.7 Additional technical information

The main scenario assumptions used in the LCA are detailed in Table 5. The end-of-life percentages are taken from a Tata Steel/EUROFER recycling and re-use survey of UK demolition contractors carried out in 2012<sup>[18]</sup>.

For all indicators the characterisation factors from the EC-JRC are applied, identified by the name EN\_15804, and based upon the EF Reference Package 3.1<sup>[19]</sup>. In LCAfE, the corresponding impact assessment is used, denoted by 'EN 15804+A2'.

### 3.8 Comparability

Care must be taken when comparing EPDs from different sources. EPDs may not be comparable if they do not have the same functional unit or scope (for example, whether they include installation allowances in the building), or if they do not follow the same standard such as EN 15804. The use of different generic data sets for upstream or downstream processes that form part of the product system may also mean that EPDs are not comparable.

Comparisons should ideally be integrated into a whole building/infrastructure assessment, in order to capture any differences in other aspects of the building or infrastructure design that may result from specifying different products. For example, a more durable product would require less maintenance and reduce the number of replacements and associated impacts over the life of the building or infrastructure, or, a higher strength product may require less material for the same function.

**Table 5 Main scenario assumptions**

Module	Scenario assumptions
<b>A1 to A3 – Product stage</b>	Manufacturing data from Tata Steel's sites at IJmuiden and Oosterhout (Netherlands) are used
<b>A2 – Transport to the tube manufacturing site</b>	The coils from IJmuiden are transported to Oosterhout a distance of 118km by truck. In each case the truck has a 25t load capacity.
<b>C1 – Deconstruction and demolition</b>	Energy consumption estimated based upon published data for the dismantling of steel constructions in Germany <sup>[20]</sup>
<b>C2 – Transport for recycling, reuse, and disposal</b>	In the Netherlands, a distance of 150km is assumed from installation site to both recycling and reuse sites, whereas a distance of 100km is assumed from the installation site to landfill. A load capacity utilisation of 0,45 is assumed to allow for empty returns.
<b>C3 – Waste processing for reuse, recovery and/or recycling</b>	This considers the energy associated with cutting the tubes for recycling and is based upon the same data as C1
<b>C4 - Disposal</b>	At end of life, 1% of product is disposed to landfill
<b>D – Reuse, recycling, and energy recovery</b>	At end of life, 92% of product is recycled and 7% is re-used

Please note that in the LCAfE software, an empty return journey is accounted for by halving the load capacity utilisation of the outbound journey.

# 4 Results of the LCA

## Description of the system boundary

Product stage			Construction stage	Use stage							End-of-life stage				Benefits and loads beyond the system boundary	
Raw material supply	Transport	Manufacturing	Transport	Installation	Use	Maintenance	Repair	Replacement	Refurbishment	Operational energy use	Operational water use	De-construction demolition	Transport	Waste processing	Disposal	Reuse Recovery Recycling
A1	A2	A3	A4	A5	B1	B2	B3	B4	B5	B6	B7	C1	C2	C3	C4	D
X	X	X	ND	ND	ND	ND	ND	ND	ND	ND	ND	X	X	X	X	X

X = Included in LCA; ND = module not declared

## Environmental impact:

1 tonne of Contiflo®

Parameter	Unit	A1 – A3	C1	C2	C3	C4	D
<b>GWP-total</b>	kg CO <sub>2</sub> eq	2,32E+03	3,94E+01	1,57E+01	6,99E-01	7,21E+00	-1,60E+03
<b>GWP-fossil</b>	kg CO <sub>2</sub> eq	2,32E+03	3,93E+01	1,60E+01	6,97E-01	1,50E-01	-1,61E+03
<b>GWP-biogenic</b>	kg CO <sub>2</sub> eq	-6,83E+00	3,35E-02	-2,63E-01	1,29E-03	7,06E+00	9,01E+00
<b>GWP-luluc</b>	kg CO <sub>2</sub> eq	2,99E-01	1,81E-03	6,48E-04	5,09E-05	8,98E-04	-2,13E-01
<b>ODP</b>	kg CFC11 eq	3,16E-09	2,12E-11	2,95E-12	6,00E-12	4,04E-13	1,72E-09
<b>AP</b>	mol H <sup>+</sup> eq	4,82E+00	4,40E-02	6,43E-02	6,11E-04	1,06E-03	-3,88E+00
<b>EP-freshwater</b>	kg P eq	1,17E-03	1,22E-05	4,08E-06	1,51E-06	3,40E-07	-4,19E-04
<b>EP-marine</b>	kg N eq	1,28E+00	1,52E-02	3,13E-02	1,88E-04	2,74E-04	-6,58E-01
<b>EP-terrestrial</b>	mol N eq	1,39E+01	1,68E-01	3,45E-01	1,96E-03	3,01E-03	-6,07E+00
<b>POCP</b>	kg NMVOC eq	4,02E+00	5,18E-02	6,32E-02	6,54E-04	8,37E-04	-2,59E+00
<b>ADP-minerals&amp;metals</b>	kg Sb eq	2,24E-02	1,47E-06	4,95E-07	5,28E-08	9,70E-09	-9,76E-03
<b>ADP-fossil</b>	MJ net calorific value	2,30E+04	5,68E+02	2,07E+02	9,70E+00	1,97E+00	-1,60E+04
<b>WDP</b>	m <sup>3</sup> world eq deprived	5,69E+01	1,22E-01	2,16E-02	1,37E-02	1,71E-02	-1,02E+02
<b>PM</b>	Disease incidence	ND	ND	ND	ND	ND	ND
<b>IRP</b>	kBq U235 eq	ND	ND	ND	ND	ND	ND
<b>ETP-fw</b>	CTUe	ND	ND	ND	ND	ND	ND
<b>HTP-c</b>	CTUh	ND	ND	ND	ND	ND	ND
<b>HTP-nc</b>	CTUh	ND	ND	ND	ND	ND	ND
<b>SQP</b>		ND	ND	ND	ND	ND	ND

GWP-total = Global Warming Potential total

GWP-fossil = Global Warming Potential fossil fuels

GWP-biogenic = Global Warming Potential biogenic

GWP-luluc = Global Warming Potential land use and land use change

ODP = Depletion potential of stratospheric ozone layer

AP = Acidification potential, Accumulated Exceedance

EP-freshwater = Eutrophication potential, fraction of nutrients reaching freshwater end compartment

EP-marine = Eutrophication potential, fraction of nutrients reaching marine end compartment

EP-terrestrial = Eutrophication potential, Accumulated Exceedance

The following indicators should be used with care as the uncertainties on these results are high or as there is limited experience with the indicator: ADP-minerals & metals, ADP-fossil, and WDP.

POCP = Formation potential of tropospheric ozone

ADP-minerals&metals = Abiotic depletion potential for non-fossil resources

ADP-fossil = Abiotic depletion potential for fossil resources

WDP = Water (user) deprivation potential, deprivation-weighted water consumption

PM = Potential incidence of disease due to PM emissions

IRP = Potential Human exposure efficiency relative to U235

ETP-fw = Potential Comparative Toxic Unit for ecosystems

HTP-c = Potential Comparative Toxic Unit for humans

HTP-nc = Potential Comparative Toxic Unit for humans

SQP = Potential soil quality index

### Resource use:

1 tonne of Contiflo®

Parameter	Unit	A1 – A3	C1	C2	C3	C4	D
<b>PERE</b>	MJ	1,81E+03	9,31E+00	1,39E+01	2,50E+00	3,44E-01	4,41E+02
<b>PERM</b>	MJ	7,05E+01	0,00E+00	0,00E+00	0,00E+00	0,00E+00	-4,94E+00
<b>PERT</b>	MJ	1,88E+03	9,31E+00	1,39E+01	2,50E+00	3,44E-01	4,36E+02
<b>PENRE</b>	MJ	2,30E+04	5,68E+02	2,07E+02	9,70E+00	1,97E+00	-1,60E+04
<b>PENRM</b>	MJ	1,86E+01	0,00E+00	0,00E+00	0,00E+00	0,00E+00	-1,30E+00
<b>PENRT</b>	MJ	2,30E+04	5,68E+02	2,07E+02	9,70E+00	1,97E+00	-1,60E+04
<b>SM</b>	kg	9,37E+01	0,00E+00	0,00E+00	0,00E+00	0,00E+00	-6,56E+00
<b>RSF</b>	MJ	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00
<b>NRSF</b>	MJ	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00
<b>FW</b>	m <sup>3</sup>	2,91E+00	5,69E-03	1,03E-03	9,43E-04	5,23E-04	-1,47E+02

PERE = Use of renewable primary energy excluding renewable primary energy resources used as raw materials

PERM = Use of renewable primary energy resources used as raw materials

PERT = Total use of renewable primary energy resources

PENRE = Use of non-renewable primary energy excluding non-renewable primary energy resources used as raw materials

PENRM = Use of non-renewable primary energy resources used as raw materials

PENRT = Total use of non-renewable primary energy resources

SM = Input of secondary material

RSF = Use of renewable secondary fuels

NRSF = Use of non-renewable secondary fuels

FW = Use of net fresh water

### Output flows and waste categories:

1 tonne of Contiflo®

Parameter	Unit	A1 – A3	C1	C2	C3	C4	D
<b>HWD</b>	kg	5,62E-04	3,27E-08	8,39E-09	4,63E-09	4,91E-10	-1,47E-04
<b>NHWD</b>	kg	3,28E+01	1,23E-01	1,82E-02	6,52E-03	1,00E+01	1,72E+02
<b>RWD</b>	kg	2,01E-01	6,44E-04	1,52E-04	1,25E-04	2,07E-05	-1,25E-02
<b>CRU</b>	kg	0,00E+00	0,00E+00	0,00E+00	0,00E+00	7,00E+01	0,00E+00
<b>MFR</b>	kg	0,00E+00	0,00E+00	0,00E+00	0,00E+00	9,20E+02	0,00E+00
<b>MER</b>	kg	7,50E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00	-5,25E-01
<b>EEE</b>	MJ	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00
<b>EET</b>	MJ	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00	0,00E+00

HWD = Hazardous waste disposed

MFR = Materials for recycling

NHWD = Non-hazardous waste disposed

MER = Materials for energy recovery

RWD = Radioactive waste disposed

EEE = Exported electrical energy

CRU = Components for reuse

EET = Exported thermal energy

## 5 Interpretation of results

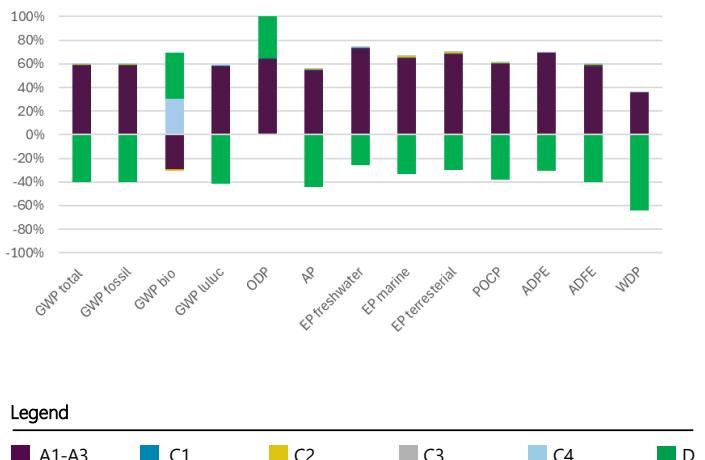
Figure 4 shows the relative contribution per life cycle stage for selected environmental impact categories for 1 tonne of Tata Steel's Contiflo® product. Each column represents 100% of the total impact score, which is why all the columns have been set with the same length. A burden is shown as positive (above the 0% axis) and a benefit is shown as negative (below the 0% axis). The main contributors across the impact categories are A1-A3 (burdens) and D (benefits beyond the system boundary). The manufacture of direct and cold rolled coil during stage A1-A3 is responsible for over 90% of each impact in all of the categories, specifically, the conversion of iron ore into liquid steel which is the most energy intensive part of the overall tube manufacturing process.

The primary site emissions come from the use of coal and coke in the blast furnace, and from the injection of oxygen into the basic oxygen furnace, as well as combustion of the process gases. These processes give rise to emissions of CO<sub>2</sub>, which contributes 98% of the Global Warming Potential (GWP), and sulphur oxides, which are responsible for 49% of the impact in the Acidification Potential (AP) category. In addition, oxides of nitrogen are emitted which contribute 49% of the A1-A3 Acidification Potential, and 100% of the Eutrophication Potentials (EP-marine and EP-terrestrial), and the combined emissions of nitrogen oxides (79%) together with sulphur oxides, carbon monoxide and methane, contribute to the Photochemical Ozone indication (POCP).

The environmental impacts for the Product Stage (A1–A3) for Contiflo® are mainly attributable to the production of the steel coil feedstock for each product manufacturing process. One outlier indicator is GWP-bio for Contiflo® -Figure 8 shows a small credit in A1-A3. This is because of the wooden pallet packaging used in the Netherlands; this is incinerated after use, at which point the biogenic carbon content is released back into the atmosphere. This release is the positive GWP bio impact from C4, also visible in Figure 8.

Module D values are largely derived using worldsteel's value of scrap methodology which is based upon many steel plants worldwide, including both BF/BOF and EAF steel production routes. At end-of-life, the recovered steel pipe is modelled with a credit given as if it were remelted in an Electric Arc Furnace and substituted by the same amount of steel produced in a Blast Furnace [17]. The specific emissions that represent the burden in A1-A3, are essentially the same as those responsible for this Module D credit. It is important that the life cycle of the steel product is considered here, because in most cases, the Module D credit provides significant benefits in terms of reducing the whole life environmental impacts.

Figure 4 LCA results for steel Contiflo®



Legend

■ A1-A3 ■ C1 ■ C2 ■ C3 ■ C4 ■ D

Figure 4 shows significant module D benefits across most impact categories, with the same outliers in the categories with reduced or negative benefit. The ADPE category also receives a credit from module D as the ADPE impact of the value of scrap is higher than that of Contiflo® manufacture. Figure 4 also shows that the WDP indicator receives a very significant credit in module D, for the same reason – the worldsteel value of scrap being an average of plants across the globe. Some of these plants will be in very water scarce regions compared to the the Netherlands, so will have a much greater WDP as a result. This means that the water 'saved' from recycling steel on a global basis is much higher than water 'used' in producing steel at IJmuiden, hence the relatively large module D credit.

Figure 4 clearly indicates the relatively small contribution to each impact from life cycle stages C1-4 for almost all impact categories. The impact from stage C4 was expected to be very small, it being the result of losing a small percentage of steel to landfill.

## 6 References and product standards

1. Tata Steel's EN 15804 verified EPD programme, General programme instructions, V2 January 2022
2. Tata Steel's EN 15804 verified EPD programme, Product Category Rules Part 1, V2 January 2022
3. Tata Steel's EN 15804 verified EPD programme, Product Category Rules Part 2 – Structural Steels, V2 January 2022
4. ISO 14044:2006, Environmental management - Life Cycle Assessment - Requirements and guidelines
5. ISO 14025:2010, Environmental labels and declarations - Type III environmental declarations - Principles and procedures
6. ISO 14040:2006, Environmental management - Life Cycle Assessment - Principles and framework
7. EN 15804:2012+A2:2019, Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products
8. EN 10305-3: Steel tubes for precision applications –Technical delivery conditions - Part 3: Welded cold sized tubes
9. EN 10204:2004, Metallic materials – Types of inspection documents
10. ISO 9001:2015, Quality management systems
11. ISO 14001:2015, Environmental management systems
12. ISO 45001:2018, Occupational health and safety management systems
13. BES 6001, Responsible sourcing of construction products
14. Sphera; LCAfE: Software-System and Database for Life Cycle Engineering. Copyright, TM. Stuttgart, Echterdingen, 1992-2022
15. Documentation of LCA for Experts. Copyright, TM. Stuttgart, Echterdingen, 1992-2024. <https://lcadatabase.sphera.com/>
16. EUROFER in cooperation with the World Steel Association, 'A methodology to determine the LCI of steel industry co-products', February 2014
17. World Steel Association: Life cycle assessment methodology report, 2017
18. Sansom M and Avery N, Reuse and recycling rates of UK steel demolition arisings, Proceedings of the Institution of Civil Engineers, Engineering Sustainability 167, June 2014, Issue ES3, (Tata Steel/EUROFER survey of members of the National Federation of Demolition Contractors (NFDC) for 'heavy structural sections and tubes')
19. EC-JRC, EN 15804 Reference Package, <https://eplca.jrc.ec.europa.eu/LCDN/EN15804.xhtml>
20. Raban Siebers, Development of sustainability key figures for the value chain stages – erection and dismantling – in steel construction, in publication, Stahlbau Verlags-und Service GmbH, Düsseldorf, 2021

[www.tatasteelnederland.com/tubes](http://www.tatasteelnederland.com/tubes)

**Trademarks of Tata Steel**

Contiflo® is a trademark of Tata Steel Nederland.

While care has been taken to ensure that the information contained in this publication is accurate, neither Tata Steel, nor its subsidiaries, accept responsibility or liability for errors or for information which is found to be misleading.

Before using products or services supplied or manufactured by Tata Steel and its subsidiaries, customers should satisfy themselves as to their suitability.

Copyright 2025

**Tata Steel Nederland Tubes B.V.**

Souvereinstraat 35  
4903 RH Oosterhout  
The Netherlands

E: Tubes@tatasteeleurope.com