Small Business Standards

CONSTRUCTION SMEs EUROPE

SME Guide:

All you need to know about the new Construction Products Regulation

JULY 2025

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ABOUT THE GUIDE

This guide is designed to help micro, small and medium-sized enterprises (SMEs) along the value chain understand the requirements of the new Construction Products Regulation approved in 2024 (referred to from now on as CPR-2024)[1] and how to ensure compliance. It is developed by the SME organisations Small Business Standards (SBS) and the European Builders Confederation (EBC). It provides simple explanations of key provisions, simplified procedures, and practical tools to help SMEs navigate the regulation. The primary aim of the guide is to provide clear, concise, and practical information tailored to the needs of SMEs, both manufacturers and users, who may have limited resources to interpret and implement complex regulatory frameworks.

If you are a small construction company in the construction sector looking to understand how the new regulation affects your business, this guide will guide you through the key steps needed for compliance. The content of the guide is based on the text of the CPR-2024 as published in the Official Journal of the European Union. It reflects the provisions and interpretations of CPR-2024 as adopted at the time of writing. Delegated acts and other supplementary legal instruments that may further clarify or amend the CPR are not included. The guide will be updated to reflect these changes as they are adopted and published.

It is essential to ensure you are using the latest version of the guide, which can be found on the SBS website. Updates will be made available there as new details emerge. By following this guide, you can stay informed about your obligations under the CPR as an SME and ensure your products meet the necessary requirements for marketing within the European Union.

The updated CPR introduces several important changes, which are covered in detail in this guide. After explaining the new obligations arising by the new CPR, this guide offers a step-by-step explanation of the various compliance tasks. These range from identifying the relevant harmonised technical specifications (hTS) and assessment and verification systems (AVS), to understanding the different roles of actors involved in the regulatory framework. The guide also includes advice on how to prepare the required technical documentation and product information, which are essential for demonstrating compliance with the CPR.

[1] Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011 (Text with EEA relevance)

European Builders Confederation (EBC) is the European sectoral social partner representing SMEs and craft trades in the construction sector.

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Small Business Standards (SBS)' goal is to represent and support SMEs in the standardisation process, both at the EU and international levels.

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LIST OF ACRONYMS

AVS: Assessment and Verification System

CE: Conformité Européenne (European Conformity)

CPR-2011: The “old” CPR: Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC Text with EEA relevance

CPR-2024: The “new” CPR: Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011

DoPC: Declaration of Performance and Conformity

DPP: Digital Product Passport

EAD: European Assessment Document

ETA: European Technical Assessment

EU: European Union

FPC: Factory Production Control

hEN: Harmonised European Standard

hTS: Harmonised technical specification

OJEU: Official Journal of the European Union

SBS: Small Business Standards

SME: Small and Medium-sized Enterprise

GLOSSARY[2]

Assessment and Verification System (AVS): Procedures used to test and confirm a construction product's performance. The different AVS range from self-checks by the manufacturer to independent assessments by third parties, depending on the product's risk level. Common AVS steps include testing, factory production controls, and certification to ensure compliance. For the detailed AVS levels, see chapter 4.2 of this guide.

Common Specifications: Legal documents providing alternative means to prove conformity with product requirements when a voluntary standard is not available.

Custom-made products: Products made specifically for a unique construction project. They are often produced using non-series processes and may be exempt from some regulatory requirements if they meet specific conditions.

Declared Use: The use intended by the manufacturer for a product, including conditions for its use, as described in technical documents, labels, instructions, safety information, or promotional materials. In case of a product covered by a harmonised technical specification, the declared use has to align with the relevant intended uses specified in the harmonised technical specification.

Delegated Acts (under the CPR): Legal acts allowing the European Commission to amend or supplement the CPR. They can define, among others, product requirements, rules for product information and safety instructions, or determine applicable assessment and verification systems. This list is not exhaustive.

European Assessment Document (EAD): A document outlining assessment methods for products not covered by harmonised technical specifications, allowing innovative or specialised products to circulate in the EU single market and benefit from the CE marking.

Factory Production Control (FPC): A system established and maintained by the manufacturer to ensure that products consistently meet declared performance and complies with the product requirements. The FPC includes internal controls and processes, from raw materials through to the final product, to guarantee compliance with the CPR.

Performance harmonised standards: Technical specifications developed by European standardisation organisations and made mandatory through implementing acts. They outline assessment methods to determine the performance of construction products. Before made mandatory by implementing acts, performance harmonised standards do not have legal effect for the manufacturers placing construction products on the single market.

Harmonised technical specification (hTS): Performance harmonised standards made mandatory for the purposes of the CPR, or implementing acts and delegated acts adopted under the CPR
➡ *see also Article 3(42) of the CPR*

[2] This is an explanatory glossary to help the reader understand these terms in the context of the CPR-2024, and does not aim to produce definitions as used in the legal text

Implementing Acts (under the CPR): Legal acts adopted by the European Commission to establish specific rules or procedures under the CPR, such as making harmonised standards mandatory, defining essential characteristics, and specifying assessment methods. This list is not exhaustive.

Intended Use: The purpose for which a construction product is designed and made available on the market, as defined by the harmonised technical specification or the European Assessment Document.

Key Parts: Components of a construction product that have been specified by a harmonised technical specification as essential for its functionality, safety or performance. For example, the glass is a key part of a window.

Non-Series process: A production method that is not repetitive, highly automated, or part of a regular assembly line. This method is typically used for custom-made or unique items rather than for mass production.

Placing on the market: The act of making a product available on the EU market for the first time in the course of a commercial activity, whether for payment or free of charge, and whether or not in the context of providing a service.

Product Type: The description of the specific performance characteristics of a construction product, including environmental characteristics, as declared by the manufacturer. To establish a product type, the manufacturer shall determine these characteristics in line with the assessment methods established in the standard, ensuring each produced item matches this set of characteristics through regular factory production control. The product type is recorded in the Declaration of Performance and Conformity (DoPC).

Voluntary Harmonised Standards: Standards cited in the OJEU which manufacturers can use to prove conformity with product requirements. These standards are not legally mandatory, but they provide the presumption of conformity and can be used to prove conformity with the mandatory product requirements that were established by delegated acts.

1. INTRODUCTION TO THE CPR

The Construction Products Regulation (CPR) 2024/3110 is a key piece of legislation in the European Union (EU) that aims to **set conditions for the marketing** of construction products by establishing **uniform rules** for expressing their **performance**. The CPR ensures that construction products carrying the CE marking can **freely circulate** within the EU internal market without additional national testing or certifications. It also ensures that the performance of construction products, linked to basic requirements for construction works and defined by European harmonised technical specifications (hTS), is consistently declared and verified across the EU.

1.1 OBJECTIVES AND RATIONALE BEHIND ITS REVISION

The 2024 revision of the CPR was driven by the need to address the identified shortcomings of the previous framework. The 2011 Regulation (EU) No 305/2011 (CPR-2011) has been criticised for its **underperforming standardisation process and incomplete regulatory coverage**. Moreover, it has been assessed to lack legal clarity and to contradict other EU legislation, while the regulatory needs of the Member states were not properly addressed. Importantly, the measures that aimed to **simplify administrative procedures for SMEs** were insufficiently implemented.

The CPR-2024 aims thus to improve the existing system by addressing these issues, and at the same time to use the opportunity to introduce elements that embrace new trends in the sector.

On top of the main objectives of the regulation, which remain the same, the revised CPR aims now to include declaration of the **environmental performance** of construction products and other elements to support sustainability in the overall built environment. For instance, it focuses on enhancing the efficient use of natural resources through practices like reuse and recycling.

In addition, **digitalisation** plays a key role in this revision, with the introduction of tools such as the DPP. This DPP will be designed to improve information sharing along the supply chain, traceability, and the transparency and efficiency of the sector. By aligning with the broader goal of integrating digital technologies into the construction sector, the DPP is expected to strengthen the market surveillance authorities to ensure product compliance is easily verified, thereby protecting users and enhancing safety.

2. WHO IS AFFECTED?

Before reviewing the changes in the new CPR, this chapter will help you understand **if you are affected by the regulation**. It will explain **which products are covered** by the regulation, which products may request for an **exemption**, and what are the implications of the newly established **harmonised zone.**

It is important to note that manufacturers are required to follow the CPR-related compliance procedures **when they market products covered by harmonised technical specifications (hTS) which have been cited under the CPR-2024**

In addition to manufacturers, the CPR affects the **entire value chain**, from importers and distributors to authorised representatives and fulfilment service providers. Each actor has specific responsibilities that together ensure that only products meeting the regulatory requirements are circulating on the single market. This chapter will explain how these different roles and responsibilities are clarified.

2.1 PRODUCTS UNDER THE CPR-2024

This section aims at explaining **what is considered a construction product**, as per the definition in the revised CPR. In addition to identifying what is a construction product and which products are covered by the regulation, it is important to keep in mind that the obligation for manufacturers to undergo the procedures described in this guide is obligatory **only for products covered by hTS which are cited under the new CPR** (see chapter 2.1.2).

In any other case, the manufacturer of a product that is under the scope of the regulation can, if they wish to, select to follow these procedures **using an EAD** (see chapter 4.1.2).

2.1.1 WHAT IS CONSIDERED A CONSTRUCTION PRODUCT

➡ *see Article 3 (1) of the new CPR*

Products are understood as construction products if they are placed in the market with the intention to be **permanently incorporated into construction works**. While this definition stands correct also for the CPR-2011, in the CPR-2024 certain aspects are clarified.

A product is considered a construction product under the CPR when:

- ✓ It is a **physical item**, either formed or formless
- ✓ It is manufactured using either traditional methods or modern technologies (e.g. 3D printing)
- ✓ It is **placed on the market for commercial purposes**, including supply to the construction site, whether sold, provided free of charge, or offered as part of a service
- ✓ It is intended to be **permanently incorporated** into construction works or parts thereof

The CPR also covers **key parts** of construction products. A key part is a part which is used as a **component or spare part for a product** and is essential for the characterisation, safety or performance of a product. It will be defined in the relevant **hTS** of a product, if any element is to be considered as a key part. For example, in the hTS of the window, glass will be specified as is its key part.

✗ If a product needs to be **integrated into another product** or combined with other products as a kit before being incorporated in the construction works, then it is **not considered** a construction product itself. For example, PVC pellets used to manufacture PVC construction products are not considered construction products on their own. However, the **manufacturer** of such parts or materials that are intended to be used in construction products - but not specified as key parts - **may request** to have them covered by the regulation.

2.1.2 WHEN THE NEW CPR APPLIES TO EACH PRODUCT

The CPR-2024 **does not become mandatory for all products immediately** upon publication. To help everyone transition smoothly, its requirements will be introduced **gradually**, giving businesses time to adapt. The CPR-2024 entered into force on 7 January 2025, meaning it becomes legally binding in all EU Member States. However, this does not mean that new obligations for products apply immediately. The CPR-2024 will start to apply from **8 January 2026**, marking the beginning of a phased implementation. From that date, the European Commission may begin **adopting hTSs under the CPR-2024**. These new hTSs will **progressively replace** existing harmonised standards.

ENTRY INTO FORCE	APPLICATION
7 January 2025	**8 January 2026**

- Each product family will fall under the CPR-2024 **only once a corresponding hTS is adopted** through an implementing act.
- A coexistence period of **at least one year** will follow before compliance with the CPR-2024 becomes mandatory for those products. However, a manufacturer can voluntarily follow the CPR-2024 already during the coexistence period.

Until a new hTS applies to a given product family, **the current rules under the CPR-2011 continue to apply.**

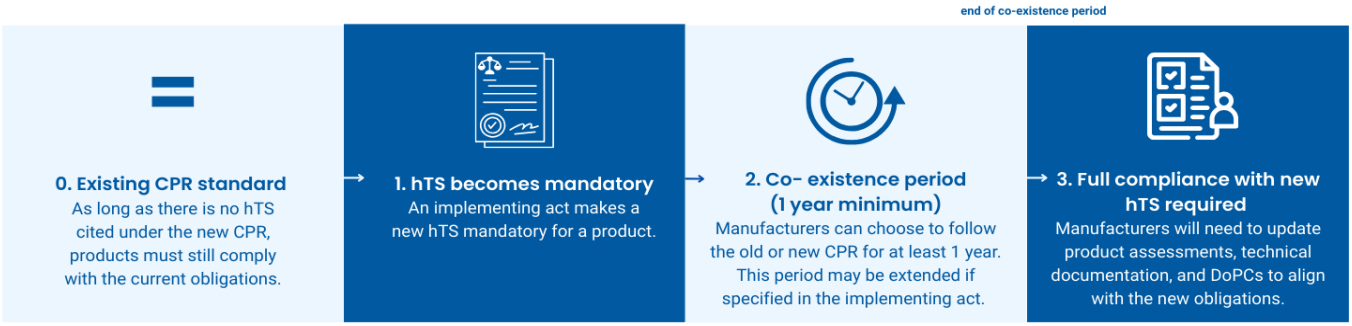

Figure 1: The transition period for products covered by hTS

Products assessed using **European Assessment Documents (EADs)** will have a different timeline:

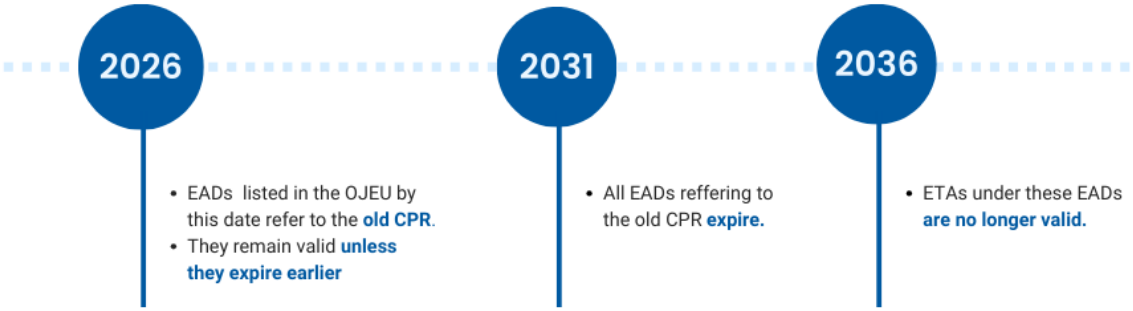

Figure 2: The transition period for products covered by EADs[3]

- EADs listed in the Official Journal by 8 January 2026 will be referring to CPR-2011, and they remain valid until 9 January 2031, unless they expire sooner.
- Products based on **European Technical Assessments (ETAs)** issued under these EADs can continue to be sold for up to 10 years from the application date, in 2036.

[3] Figure 2 is adapted from the European Union's presentation on the "New CPR Conference" licensed under CC BY 4.0.

⚠ If a hTS covers a product **previously covered by an ETA**, after the co-existence period, the ETA can no longer be used, and manufacturers must comply with the obligations according to the hTS. Upon the citation of the new hTS, manufacturers will have a **transition period of minimum one year** to adapt. After the coexistence period, the hTS becomes mandatory and the only possibility to place this product on the market. Therefore, this principle prevails over the possibility to use the respective EAD and ETA to place a product on the market.

Finally, if a product is **not covered** by any existing hTS or EAD, manufacturers may apply for a ETA through a Technical Assessment Body. This process can lead to the development of a new EAD, adapted to the specific characteristics of the product. New EADs developed under the CPR-2024 will follow the updated legal framework, which will include all new provisions such as environmental performance indicators. This option is particularly important for innovative or non-standard products seeking access to the EU internal market through CE marking, however it is not mandatory.

2.1.3 USED CONSTRUCTION PRODUCTS

Another novelty of the revised CPR is that **used products are in its scope**, if they are placed in the market after their first installation into construction works.

WHAT IS THE DIFFERENCE BETWEEN A USED AND A REMANUFACTURED PRODUCT?

➡ *see Article 3 (20) of the new CPR*

A **used product** is one that has already been installed in a construction work and is reused **without any transformative processing** beyond checking, cleaning, or repairing. It is still considered used even if it underwent minor modifications, provided these changes are not essential to its performance, as defined in the applicable hTS.

A **remanufactured product**, on the other hand, has been deinstalled and then subjected to a **transformative process that alters its performance**. This goes beyond basic cleaning or repairs and is considered essential to performance according to the hTS. Remanufactured products are treated as new products under the CPR, though only post-deinstallation impacts count in their environmental performance assessment.

For **used products**, the obligations of the economic operator placing them on the market depend on the following factors:

- **Harmonised technical specifications** (hTS): A hTS has to clearly state if it applies only to new products or also to the used products. There might be specific hTS only for used products. ➡ *Article 4 (6)*
- **Origin of the use product**: Different rules apply depending on whether the product has already been placed on the Union market or not. ➡ *Article 11 (1)*
- **If it is placed in the market**: Products directly reused in a construction project without a transfer of ownership are not considered to be placed on the market. ➡ *Recital (34)*

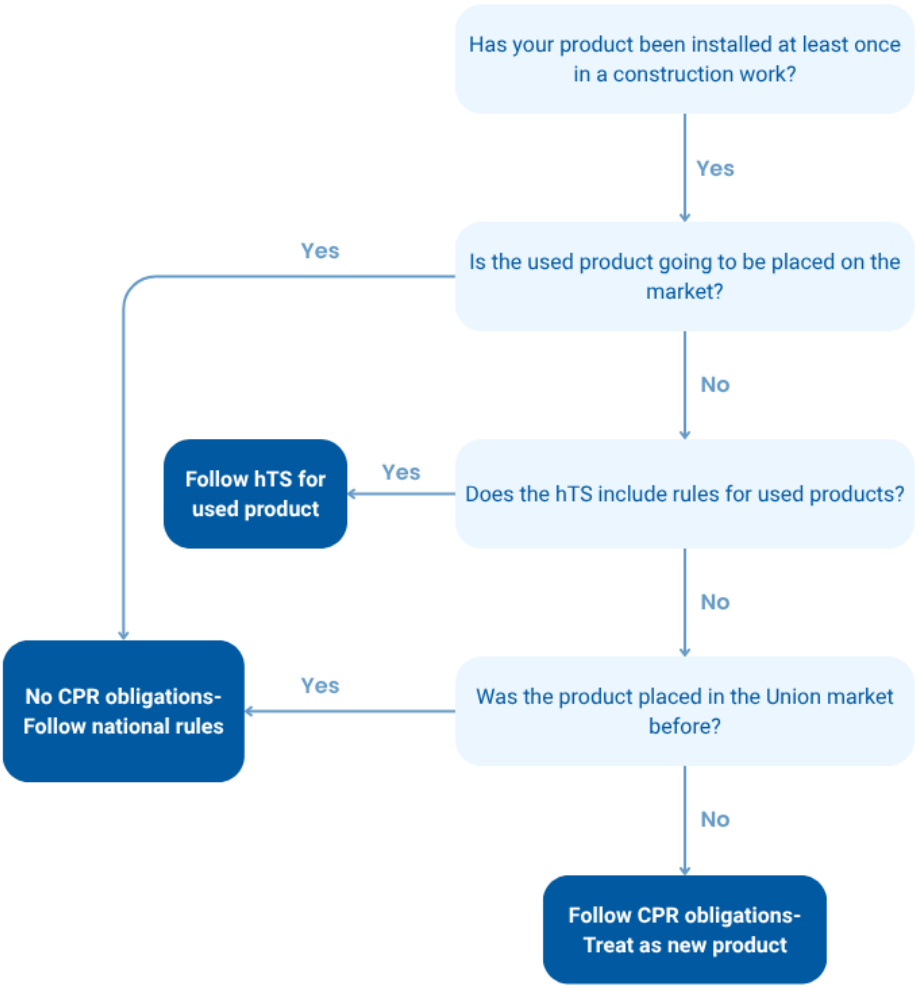

Figure 3: Decision tree on used products and the related obligations

Based on these factors, the relevant economic operator may have different obligations. These may include **assessing the product as if it was new**, following **specific rules for used products outlined in the hTS**, or, in some cases, having no CPR obligations and instead **adhering to national rules**. Also, an economic operator may choose to voluntarily comply with CPR-related obligations and CE mark their product if they wish.

In any case, a manufacturer placing a **used or remanufactured product** on the market has the right to request from suppliers - including the deinstaller - the necessary information to fulfil their obligations under the CPR. ➡ *Article 21 (3)*

2.1.4 EXEMPTIONS

➡ *see Article 14 of the new CPR*

When a product is considered a construction product and is covered by a harmonised technical specification, the regulation provides various types of **exemptions** that can reduce the compliance burden. These exemptions apply to **very specific and limited cases and** should **not be interpreted as a workaround** to avoid compliance.

It should be noted that exemptions can be used **if the manufacturer chooses so** and are not obligatory. This section will look into three SME-friendly exemptions: custom-made products; heritage cases; and outermost EU regions markets.

Table 1: Exemptions under the CPR

INDIVIDUALLY MANUFACTURED OR CUSTOM-MADE PRODUCTS
To qualify for this exemption, the product must meet all of the following conditions: ✓ It is **individually manufactured** or **custom-made** ✓ It is produced using a **non-series process** ✓ It is made in **response to a specific order** for a particular construction project ✓ It is intended for incorporation into **a single, identified construction work** ✓ The **manufacturer is responsible** for the safe installation of the product The product will still need to be **in compliance with the applicable national rules** of the member state where it is installed. An example of such a product may be a custom-made façade, specifically crafted for a unique building design, such as a museum. Given its custom nature and single-use application, it would be produced on a project-specific basis rather than mass production.

PRODUCTS MANUFACTURED EXCLUSIVELY FOR HERITAGE OR TRADITIONAL CONSTRUCTION PURPOSES

The product can qualify for an exemption if:

- ✓ It is manufactured **exclusively for heritage or traditional construction purposes**
- ✓ It is produced using a **non-series process**
- ✓ It is made using **traditional methods**
- ✓ It is intended for use in the **restoration or renovation of officially protected historic buildings** due to their cultural, architectural, or historical value

The product will still need to be **in compliance with the applicable national rules** of the member state where it is installed.

For instance, in the restoration of heritage buildings, handmade bricks or stone blocks may be required to match the exact size, texture, and appearance of the original materials. These are typically produced using traditional brick-making methods, such as hand-moulding and kiln-firing, rather than industrial processes, ensuring they align with the original materials of the building. Such products can be exempted from the obligations of the CPR.

PRODUCTS THAT ARE PLACED ON THE MARKET IN THE OUTERMOST REGIONS OF THE EU

Member states may issue exemptions for such products. If a manufacturer uses such an exemption, the product **shall not bear the CE marking** and **shall not be considered to be placed on the single market**. If they later decide to place the product in the rest of the single market, then they need to undergo all the procedures associated with the regulation and affix CE marking. ➡ *Article 2 (3)*

2.1.5 THE HARMONISED ZONE

➡ *see Article 11 of the new CPR*

A new concept introduced in the revised CPR is the so-called "harmonised zone". This zone practically encompasses products for which **hTS have been established** and specifies that they are comprehensive. The main purpose of the harmonised zone is to ensure the **free movement of construction products** within the EU internal market without national barriers, while maintaining high levels of safety, health, and environmental protection.

In this context, for products that are in the harmonised zone, **Member States shall respect it and are not allowed to impose additional rules** for products' essential characteristics or assessment methods, or product requirements other than those set out in hTS. More specifically, in the table below you will find what Member States are allowed to do and what not:

Table 2: Possibilities of Members States in regards to the harmonised zone[4]

✅ MEMBER STATES MAY:	❌ MEMBER STATES MAY NOT:
Set national requirements for construction works (e.g., design, safety, environmental performance), provided these build upon product performances declared under the CPR.	**Impose essential characteristics, product requirements or assessment methods** other than those established in hTS.
Establish national measures for health, safety, or environmental protection concerning products, but only after notifying and receiving authorisation from the European Commission.	**Require different assessments or requirements of information** for products already compliant with hTS.
Specify national requirements for the use of products, ensuring they respect the technical language of harmonised standards.	**Mandate additional markings or labels** beyond the CE marking for essential characteristics in the harmonised zone.
Establish mandatory deposit-refund systems or take back obligations for manufacturers and ban the destruction of unsold products.	**Set threshold levels, classes, or subclasses** in national measures different than those established in hTS.

WHAT HAPPENS TO PRODUCTS ASSESSED USING EADS?

Products compliant with **European Assessment Documents (EADs),** are not part of the harmonised zone. EADs are used for innovative products that are not covered by the scope of hTS. While EADs enable the assessment and CE marking of the products, they are not considered (unlike the harmonised standards) as exhaustive. The EAD-covered CE marked product can freely circulate on the single market but varying national requirements, which can lead to **differences in acceptance criteria** across countries, may apply.

For example, a wooden prefabricated stair that is not covered by a hTS can be assessed through an EAD to provide the performances requested by Country A. There, the stair is considered to meet national requirements and can be installed as-is. However, if the manufacturer decides to market their product in Country B, they may need to complement additional essential characteristics or reassess the stair with a different method to satisfy the country's specific requirements.

[4] Table 1 is consolidated from the European Union's presentation on the "New CPR Conference" licensed under CC BY 4.0.

2.2 THE DIFFERENT ACTORS

The CPR defines a range of actors involved in bringing products from manufacture to use. Each actor has specific responsibilities that are corresponding to their role in the value chain. Understanding who these actors are and what their roles involve is essential for all stakeholders in the construction ecosystem. This chapter explains the main types of market operators and users, their duties under the CPR, and how their actions connect to form a transparent and accountable supply chain.

2.2.1 MARKET OPERATORS

➡ *see Chapter III of the new CPR*

The CPR-2024 will have great impact on the everyday life of the manufacturers of construction products. Other type of stakeholders in the construction sector will also have to be aware of some changes. The main actors defined by the regulation are:

- Manufacturer
- Authorised representative
- Importer
- Distributor
- Fulfilment Service provider
- Online Marketplace

Each of these actors has clearly defined roles and responsibilities under the CPR, summarised in Table 3: Obligations of economic operators. **Their duties are interlinked** and aim to ensure that products placed on the EU market are compliant, safe, and properly documented. The CPR-2024 is built around the idea of **a connected value chain**, where each economic operator must check that the previous one has fulfilled their obligations before taking further steps.

As such, importers, distributors and authorised representatives are responsible for verifying compliance of the manufacturer. This means that they will have to make sure that:

- ✓ The product is accompanied by a **DoPC**
- ✓ The product bears the **CE marking** and the appropriate **labelling**
- ✓ A **DPP** is in place, where applicable.
- ✓ The product is accompanied by all necessary **general product information, instructions for use, and safety information** in a language understandable in the country of sale
- ✓ The product bears a manufacturer-specific **unique identification code** of the product type.

Importantly, this obligation does **not** require economic operators to repeat testing or carry out conformity assessments themselves. Instead, they must check that the documentation and markings provided by the manufacturer are complete, correct, and present.

In some cases, an economic operator that is not originally the manufacturer **needs to take the responsibilities tied to the manufacturer**. This happens when they: ➡ *Article 26*

- place a product on the market under their **own name or trademark**
- **modify a product** (intentionally or unintentionally) in a way that could affect its compliance
- market the product with a **declared use different from the one declared by the original manufacturer**
- make **claims that differ** from those in the manufacturer's declaration
- **voluntarily** decide to assume the manufacturer's role.

The same applies when placing used or remanufactured products on the market if they **are not already covered by a hTS**, or when placing used products **not previously placed on the market in the EU**.

WHAT DO MANUFACTURERS OF 3D-PRINTED PRODUCTS HAVE TO DO?

Manufacturers using 3D-printing methods to produce construction products are subject to the same obligations as other manufacturers. These include ensuring that the **materials used**, the **printing process**, and the **3D dataset** together result in a compliant construction product. These products must meet the performance requirements laid out in the applicable hTS, and the manufacturer must complete all legal requirements before the product is placed on the market.

Table 3: Obligations of economic operators[5]

ACTOR	ROLE	RESPONSIBILITIES
Manufacturer	Manufactures a construction product, or has it designed or manufactured by someone else, and then places it on the market under their own name or trademark. Manufacturers based outside the EU must appoint an authorised representative within the EU.	✓ Ensure product complies with the CPR ✓ Determine product type and affix manufacturer-specific unique identification of the product type ✓ Apply assessment and verification system ✓ Draw up DoPC, DPP, and affix CE marking ✓ Draw up, keep and provide technical documentation ✓ Ensure traceability and labelling ✓ Register complaints and take corrective action in case a product presents a risk
Authorised representative	Mandatory representative for non-EU manufacturers; may also be appointed by EU manufacturers to act on their behalf.	✓ Keep a copy of the DoPC and technical documentation available ✓ Provide information and cooperate with market surveillance authorities in case of compliance issues ✓ Verify compliance of manufacturer
Importer	Introduces a product from outside the EU market	✓ Place on the market only compliant products ✓ Ensure their name and contact details appear on the product or packaging ✓ Ensure safe storage and transport ✓ Act in case of non-compliant products and register complaints ✓ Verify compliance of manufacturer ✓ Verify that the manufacturer has drawn up technical documentation **If selling to end users:**

[5] Table 3 is adapted from the European Union's presentation on the "New CPR Conference" licensed under CC BY 4.0.

		✓ Display required product information clearly before sale (including online)
Distributor	Sells a product that is already in the EU market	✓ Display required product information clearly before sale (including online) ✓ Ensure safe storage and transport ✓ Act in case of non-compliant products ✓ Verify compliance of manufacturer ✓ Verify that the name and contact details of the importer appear on the product or packaging
Fulfilment service provider	Offer at least two of the following services - warehousing, packaging, addressing, or dispatching - without taking ownership of the product.	✓ Check product marking and availability of documents ✓ Act in case of non-compliant products ✓ Support withdrawals and recalls ✓ Ensure safe storage and transport
Online marketplace	Digital platform that facilitates the sale of construction products directly to consumers or professionals.	✓ Ensure platforms display required CPR information ✓ Establish contact and cooperate with market surveillance authorities ✓ Act in case of accidents or incidents related to products, and inform authorities ✓ Store information about offers removed ✓ Process orders requesting to provide information

2.2.2 PRODUCT USERS

While the main obligations of the CPR apply to manufacturers and suppliers, it is equally important for users of construction products, such as builders, contractors, or installers, to understand how the new system works, and what to expect over time. Since a lot of these actors are SMEs, if you are one of them, this chapter gives some tips on things to keep in mind in your communication with product manufacturers.

As a user, you are **not subject to legal obligations under the CPR**. However, you do benefit from clearer, more structured and accessible information. For example, information from the DPP will eventually support the calculation of whole life cycle carbon emissions for new buildings.

The CPR-2024 entered into force in January 2025, but it will not apply to all products immediately. New obligations, such as the DoPC and the DPP, **only apply to products that are covered by a new hTS adopted under the new CPR**. Until that happens, most products will still be placed on the market with the **current Declaration of Performance under CPR-2011**.

The changeover to the new CPR is **gradual**. There is no need to push suppliers for documents that are not yet required. Instead, ask whether the product already falls under a new hTS cited under CPR-2024. When the new documents become available, use them to support your decision making and reporting.

When a new hTS is adopted for a product family, manufacturers and suppliers will have **12 months** to start applying the new obligations. Only after this transition period should you expect to receive a DoPC. The DPP will become mandatory for products with a DoPC **18 months after** the Commission sets up the system for Construction DPP. During the first years, some products will still have a **DoP under CPR-2011**, others will already come with a **DoPC**, and later, **those with a DoPC will also need a DPP**. All of this is normal and fully compliant.

If a product is not covered by a hTS under the new CPR, the **obligation to provide the DoPC and the DPP does not apply**. This means that EADs are not obligatory. The same applies to products that are **exempted from the CPR** (see Chapter 2.1.4), such as:

- custom-made products,
- products manufactured exclusively for heritage purposes,
- products placed only on the market in the outermost regions of the EU

These are governed by national rules.

3. OVERVIEW OF THE MAIN CHANGES

The revised CPR introduces some changes that aim to improve sustainability and digitalisation. These are explained in this chapter, along with the introduction of product requirements.

3.1 PRODUCT REQUIREMENTS

➡ *see Article 7 of the CPR-2024*

Under the CPR-2024, the European Commission can set specific **product requirements** for some products, which must be met before these products can be placed on the EU market. These are established though delegated acts and can apply **only to products covered by hTS**.

Not all products need to follow these requirements, only those that are specified to do so based on the relevance for a particular product group or for certain intended uses for those products. They can focus on three main areas, specified in the Annex III: **functionality, safety**, and **sustainability**. Products covered by EADs are **not** subject to these specific product requirements.

These requirements apply to characteristics that **cannot be measured** and, therefore, a value cannot be declared but can be evaluated. For example, burglar resistance is not assessed through a measurable physical characteristic but rather through a pass/fail test. Likewise, automatic-closing doors may need to meet safety requirements to prevent injury, which can be achieved through different technical solutions rather than a single defined property.

Compliance with a product requirement may be demonstrated in different ways. If a **voluntary harmonised standard** or a **common specification** exists, manufacturers that follow these are presumed to comply. However, manufacturers may also use **alternative means** to demonstrate conformity, provided they can justify that the requirement is met.

3.2 ENVIRONMENTAL SUSTAINABILITY

The revised CPR places a strong emphasis on sustainability along the life cycle of construction products, including the deconstruction phase. Besides extending its scope to include used products (see Chapter 2.1.3), several provisions aim to ensure better performance in terms of circularity, emissions, and resource efficiency.

3.2.1 DECLARATION OF ENVIRONMENTAL CHARACTERISTICS

Manufacturers of construction products will need to declare the predetermined environmental characteristics for their products. These characteristics are assessed through environmental

calculations, such as **life cycle assessment**, not through physical testing. The predetermined environmental essential characteristics include a broad range of characteristics and correspond to indicators set out in EN 15804. ➡ *Annex II*

Unlike the traditional essential characteristics of the other Basic Requirements for Construction Works (BRCW), which allow manufacturers to tailor declarations to the country of use, the declaration of environmental performance will become **gradually mandatory across the EU,** regardless of national conditions.

The obligations to declare environmental characteristics **only** apply to products that have a hTS or are CE marked according to an ETA based on an EAD. Both the hTS and the EAD **need to be adopted under the CPR-2024**.

In some cases, Member States currently require declarations of environmental characteristics outside the CPR framework. These requirements will be gradually integrated into the CPR-2024 legal framework once the relevant hTS are adopted.

OBLIGATION TIMELINE ➡ *see Article 15 of the CPR-2024*

The obligation to declare those characteristics will occur **gradually** for each product when their harmonised technical specifications are revised to include them.

- Starting on **8 January 2026**, manufacturers of those products will need to declare the indicators that are relevant to the **Global Warming Potential** (GWP) of their products. Those are the characteristics listed in Annex II, points a) to d).
- **On 9 January 2030**, the obligation will be extended to the mandatory declaration of the **core indicators**, or the points e) to m) from the Annex II.
- Finally, **9 January 2032**, **all indicators** mentioned in the Annex II will be mandatory.

If a manufacturer wishes to **voluntarily declare** all indicators before they become obligatory, they are allowed to do so.

Figure 4: Gradual implementation of sustainability requirements[6]

[6] Figure 4 is adapted from the European Union's presentation on the "New CPR Conference" licensed under CC BY 4.0.

VERIFICATION ➡ *see Annex IX (4) of the CPR-2024*

The assessment of the environmental characteristics will be **verified** by relevant notified bodies using the AVS 3+. The AVS 3+ system will be used only in relation to environmental characteristics and focuses on assessment of the calculations and the input data, **without involving additional testing**. Under AVS 3+, manufacturers are responsible for **accurately documenting and providing information** on their products' environmental performance. The notified bodies will need to verify the **accuracy and completeness** of the necessary documentation and declarations to ensure compliance, upon which they will be issuing a validation report. It also includes the **initial inspection** to validate any company-specific data, to check if the input data are in line with the technologies used in the manufacturing plant. **This should not be considered factory production control inspection.**

Other product characteristics will be subject to different AVS depending on the applicable hTS. In practice, this means that more than one AVS will apply to a product. These may be carried out by different notified bodies, or by the same one if it falls within their area of competence.

3.2.2 SUSTAINABILITY-RELATED PRODUCT REQUIREMENTS

➡ *see Article 7 of the CPR-2024*

As explained in Chapter 3.1, the European Commission may adopt **delegated acts** establishing **product requirements** related to functionality, safety, or sustainability. These requirements are intended to address aspects that **cannot be fully assessed through the declaration of essential characteristics**, such as qualitative performance or conditions that require pass/fail validation. In the area of sustainability, product requirements may include, for example durability criteria relevant to circular economy objectives. Other product environmental requirements can be found in Annex III of the CPR-2024. For more details, check Chapter 3.1.

3.2.3 LABELLING

➡ *see Article 22 (9) of the CPR-2024*

The CPR-2024 enables the European Commission to establish specific **labelling obligations** related to environmental sustainability for certain product categories. These labelling rules apply only to products that are **typically chosen or purchased by consumers** and where their environmental performance is not significantly affected by installation methods.

The label, when introduced via a delegated act, will be performance-based and consistent with the indicators from Annex II. It will reflect lifecycle environmental performance and allow for comparability across similar products.

3.2.4 MEMBER STATES INCENTIVES

➡ *see Article 82 of the CPR-2024*

A new provision to support sustainability is that Member States are allowed to give incentives, such as subsidies, tax reductions, or public support, to encourage the use of construction products with better environmental performance. However, **these incentives can only apply to the products that meet the top two performance classes** when environmental performance is expressed as:

- a **class of performance**, or
- a class in an **environmental sustainability label** established under the CPR

This means that if a product category has defined environmental classes, such as low carbon footprint or high recyclability, only those products in the **highest two classes** can benefit from national support schemes.

3.2.5 GREEN PUBLIC PROCUREMENT

➡ *see Article 83 of the CPR-2024*

The CPR-2024 introduces new rules to better align **public procurement** with sustainability goals. If the Commission adopts a **delegated act** setting **mandatory minimum environmental sustainability requirements** for certain product categories, then public buyers must apply these requirements when awarding contracts under EU public procurement rules (Directives 2014/24/EU and 2014/25/EU).

These requirements may include:

- setting **minimum environmental performance levels** for products, or
- **using these requirements** in technical specifications, selection or award criteria, or contract performance clauses

While these minimum requirements are binding when established, **contracting authorities are free to set stricter or additional sustainability criteria**, as long as they remain consistent with the technical language of the CPR.

To support this, the Commission and Member States are required to provide **technical assistance and guidance** to help contracting entities apply these environmental provisions correctly.

3.2.6 OTHER CIRCULAR ECONOMY CONSIDERATIONS

In addition to the above-mentioned provisions, the CPR-2024 includes a number of additional measures that serve specific policy goals, many of which can directly support sustainability, circularity, and fair market functioning.

- As mentioned in Chapter 2.1.3, the CPR acknowledges and enables the placing on the market of **used and remanufactured construction products**.

- Member States may introduce **mandatory deposit-refund systems** or require **manufacturers to take back** surplus, unused, or unsold products, particularly those that are non-custom-made. This may apply to products that are new or placed on the market but not yet installed. These schemes encourage reuse and reduce waste. This provision reflects the CPR framework, but it should be noted that other EU legislation may evolve and further shape or limit the way such schemes are implemented by Member States. ➡ *Article 11 (7)*
  In such cases, Member States must **notify the Commission** and justify the measure, especially if it affects products within the harmonised zone. These schemes must also comply with EU law and not create unjustified barriers to the internal market.

- Member States may **prohibit the destruction of unsold or surplus construction products**. Before destroying such goods, economic operators must prove that reuse options have been explored, such as offering them through **national platforms** set up for this purpose. ➡ *Article 11 (8)*

- The European Commission may adopt delegated acts that can require manufacturers of specific product families or categories, to make **spare parts not commonly available on the market** accessible. This option will be used only where relevant for particular product group in question. When this obligation applies, manufacturers must ensure spare parts are offered for a **minimum of 10 years** after the last product of the respective type has been placed on the market, unless a different period is specified in the delegated act. These parts must be provided within a **reasonable delivery period**, at a **reasonable and non-discriminatory price**, and the **public must be informed** accordingly. ➡ *Article22 (3)*

- The CPR also strengthens sustainability through product documentation. Instructions for use must clearly include details on **maintenance operations**, the **parts subject to wear**, and **criteria for replacement**. Manufacturers are also required to provide **recommendations for repair, deinstallation, reuse, remanufacturing, recycling, and safe deposit** of products. For more information see Chapter 4.6. ➡ *Annex IV*

3.3 CONSTRUCTION DIGITAL PRODUCT PASSPORT

➡ *see Chapter X of the CPR-2024*

One of the aims of the CPR-2024 is also to support the construction sector to get digitalised. In line with the Ecodesign for Sustainable Products Regulation[7], it mandates the obligation of delivering a Digital Product Passport (DPP), though a specific construction DPP system, where comprehensive digital information about products will be provided. This obligation will become effective **18 months after the DPP system gets established.**

A DPP in the context of the CPR is **a digital record that contains detailed information about construction products**, including structured information allowing for the machine readability of the DPP. This information must be accurate, complete, and regularly updated. The DPP system will attribute different level of access to information depending on the respective actor, to make sure the confidentiality is respected.

Manufacturers are responsible for gathering this information in a digital format and ensure that the information in the DPP is accurate and kept up to date. They will also need to link this information to a **data carrier**. The data carrier can be for instance a QR code that is attached to the product. This carrier will allow anyone to access the DPP easily.

The DPP will need to be uploaded in a **DPP system**. This system will be specified and set up by the European Commission at a later stage, before 2030, via a delegated act. The obligation for manufacturers to make available DPP of the construction product will apply **18 months after entry into force of the delegated act**. As with the declaration of environmental sustainability essential characteristics, **only products that have a harmonised technical specification or are CE marked according to an ETA based on an EAD under the CPR-2024** will have the obligation to deliver a DPP.

When it comes to providing the declaration of performance and conformity, manufacturers will need to make it available **electronically** for each product they place on the market. This can be done via a **website** until the DPP becomes mandatory. If the website option is chosen, the declaration needs to be:

- ✓ presented in a format that **cannot be altered**
- ✓ accessible in both **human-readable and machine-readable** formats
- ✓ **continuously available** and **free of charge** to users, with clear instructions on how to access the information.

[7] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC

4 COMPLIANCE CHECKLIST

After confirming that a product falls within the scope of the CPR-2024, the next step is to ensure that all conditions for its legal marketing within the EU have been fulfilled. This chapter provides a detailed checklist of actions and documentation necessary to demonstrate compliance, enabling the product to be introduced confidently into the European market.

4.1 IDENTIFY RELEVANT hTS OR EADS

The first step to ensure compliance is to identify the applicable **harmonised technical specification** (hTS) or **European Assessment Document** (EAD) for your product. This chapter will explain what these documents are and provide resources to help you find the relevant document for your product.

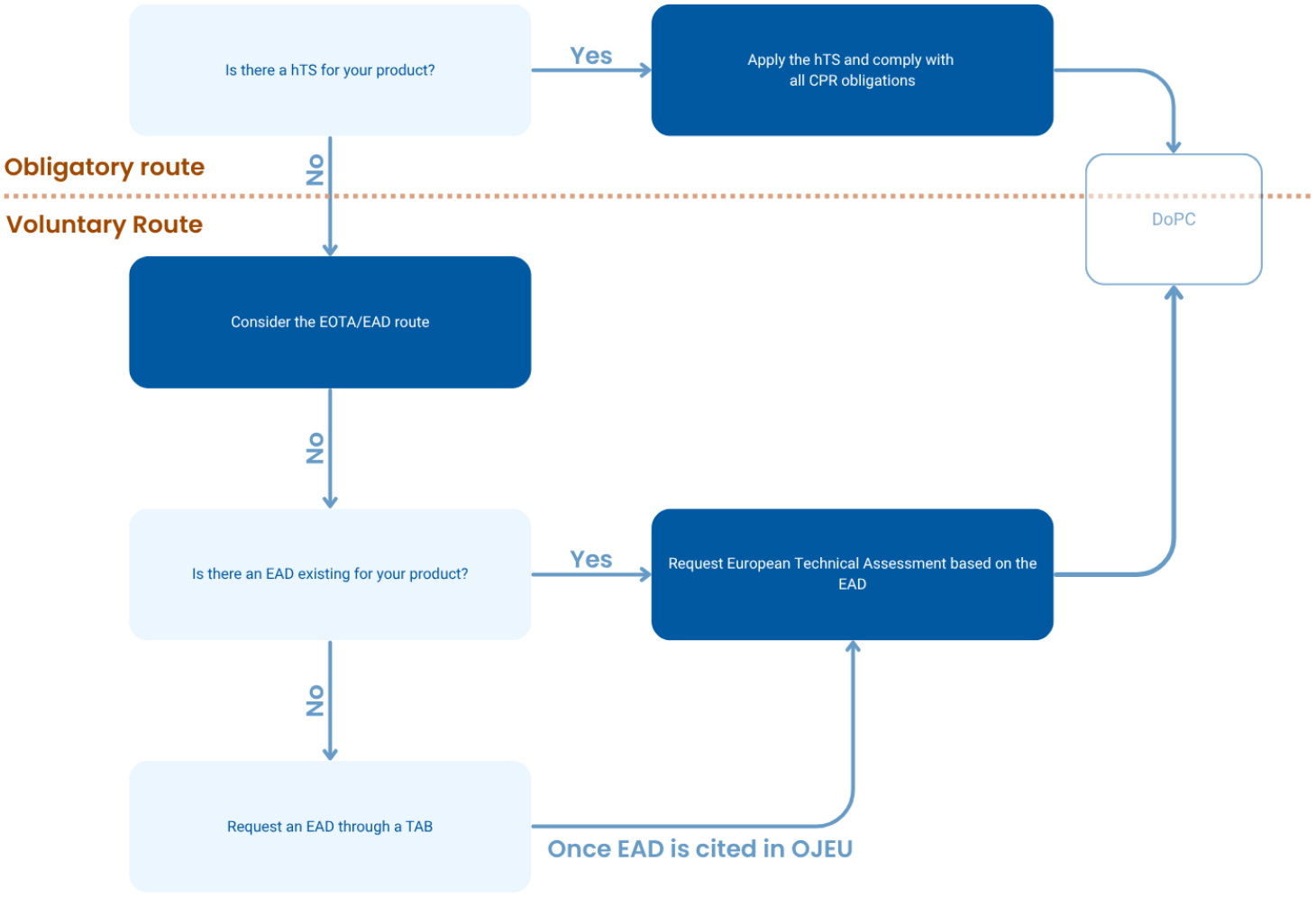

Figure 5: How to identify your compliance route

4.1.1 ABOUT THE HARMONISED TECHNICAL SPECIFICATIONS

➡ *see Article 5 and 6 of the CPR-2024*

Performance harmonised standards made mandatory under the CPR, as well as implementing acts together form the **harmonised technical specifications** (hTS) relating to the CPR. If such a document exists for your product family, then it is **mandatory** to follow it to prove compliance.

HOW DO I KNOW IF A HARMONISED STANDARD APPLIES TO MY PRODUCT?

The easiest way to find whether a harmonised standard applies to your product is by consulting the **Harmonised Standards Database**. This online resource, maintained by the European Commission, provides a comprehensive list of all harmonised standards currently in effect. By searching the database for your product type, you can identify which technical specifications apply. Equally, if you know the number of the standard but you are not sure if it is harmonised, you can search through to find out if it is on the list.

Harmonised standards are technical specifications developed by European standardisation organisations, such as CEN or CENELEC, in collaboration with the European Commission. These standards outline the performance criteria and testing methods for construction products, ensuring they meet the CPR's essential requirements. For a standard to be established as part of the regulation**,** it needs to be made mandatory through an **implementing act**, and then, **after the coexistence period**, it becomes mandatory to be applied across the EU.

If no harmonised standard applies to your product, the next step is to check for an implementing act published in the OJEU. These can be found by searching for your product family in the relevant **database**. In this case, **implementing acts** define specific rules or procedures that support the effective application of the CPR across the EU. When they are hTS, they can make **harmonised standards mandatory** or lay down essential characteristics, their assessment methods and technical details.

When the product is covered by a hTS (harmonised technical standard, or by the respective implementing act), then you should look if there is a delegated act covering your product. **Delegated acts** are another legal tool developed by the European Commission, allowing to supplement or amend certain aspects of the regulation. The ones considered hTS, can establish **product requirements** ➡ *Article 7* **,** establish rules on the provision **of general product information, instructions for use and safety information** ➡ *Article 9* **,** or determine the applicable **assessment and verification system** ➡ *Article 10***.**

4.1.1.1 HOW TO READ A STANDARD

Once you obtain your harmonised standard from your National Standardisation Body, it is important to understand how to apply it to meet the requirements of the CPR. A typical standard related to the CPR is structured into several sections, including the **scope, normative references,** and **terms and definitions**. However, for compliance purposes, you should focus primarily on **Annex ZA**.

This annex practically explains which parts of the standard are directly relevant for CPR compliance. It outlines how the standard addresses the **essential characteristics**, links the essential characteristics with the required assessment method and provides guidance on **how to declare the product's performance**. Manufacturers must declare also the predetermined environmental characteristics (the respective scope list as mentioned in 3.2.1). For some products it could be mandatory to declare other characteristics or fulfil the minimum thresholds of certain characteristics. This can be established by delegated acts. For manufacturers, it is good to know which essential characteristics of the product are required for its use in the EU Member States they intend to sell their product. While this is not an obligation for manufacturer, as the product could circulate in the single market, this will improve the acceptance of their product in national level. To clarify these national requirements, manufacturers can seek advice from National Product Contact Points (see 4.1.3).

4.1.2 ABOUT EADS AND THE EOTA ROUTE

➡ *see Chapter IV of the CPR-2024*

You may need to follow a different route and seek a **European Assessment Document** (EAD) in cases where:

- There is **no hTS** that covers your product;
- your product has different **intended use** or **material** than what is covered by the harmonised standard, or;
- the **assessment method** established in the harmonised standard is not appropriate for your product,

EADs are particularly useful for innovative or unique products. **While not mandatory**, they provide a means of assessing a product's performance that allows a manufacturer to issue a DoPC and benefit from the CE marking. The **European Organisation for Technical Assessment (EOTA)** is responsible for developing EADs.

Find existing EADs in the EOTA's website	Find the list of TABs here.

Once the EAD has been cited in the OJEU, your product can be assessed according to the EAD. Then, the TAB can issue a **European Technical Assessment (ETA)** for your product, which can serve as the basis for CE marking and allow your product to be sold within the EU.

Table 4: Comparison table of a hTS and an EAD

	HARMONISED TECHNICAL SPECIFICATIONS (HTS)	EUROPEAN ASSESSMENT DOCUMENTS (EADS)
LEGAL STATUS	**Mandatory** once cited and made mandatory via implementing act	**Optional** - enables CE marking
DEVELOPED BY	European Standardisation Bodies (CEN/CENELEC)	European Organisation for Technical Assessment (EOTA)
USED FOR	Widely used, standardised products	Innovative products not covered by hTS
PUBLISHED IN	OJEU	OJEU
ACCESS	Harmonised Standards Database	EOTA website

4.1.3 HELP PROVIDED BY NATIONAL PRODUCT CONTACT POINTS

➡ *see Article 72 of the CPR-2024*

If you need guidance on which standards apply to your product or how to comply with the CPR, each EU Member State has **National Product Contact Points**. These organisations can help businesses in understanding the regulatory requirements for selling products in their respective countries. They can provide detailed information on relevant hTS or EADs and guide you through the conformity assessment procedures.

The list of the National Contact Points can be found on the relevant

European Commission website.

4.2 IDENTIFY THE APPLICABLE ASSESSMENT AND VERIFICATION SYSTEM (AVS)

➡ *see Annex IX of the CPR-2024*

In the identified Harmonised technical specification, or the relevant European Assessment Document, you will find the **Assessment and Verification System (AVS)** that applies to your product. The AVS is **determined by the legal acts of Commission**, but to streamline the information flow, this is also **mentioned in the relevant hTS**, which includes the reference to the original legal text. This system outlines the necessary steps to demonstrate compliance with each essential characteristic of your construction product. It determines what procedures are required, the role of third-party bodies, and what responsibilities lie with you as the manufacturer.

4.2.1 DETERMINATION OF PRODUCT TYPE

Regardless of the AVS in place, **the manufacturer is always responsible for defining the product type.** This involves determining the product's **intended use**, in accordance with the options outlined in the hTS or EAD, and identifying the **declared characteristics**, including relevant classes or levels of performance. The manufacturer is responsible of deciding the level of granularity of the product type. The manufacturer must ensure **consistent performance**, as stated in the DoPC, and conformity with product requirements. To uphold these characteristics, a **Factory Production Control (FPC)** system must be maintained.

In systems involving a notified body, their role is to **verify** that the manufacturer has performed this process correctly, except in AVS 4, where the manufacturer is entirely self-responsible, without external verification.

4.2.2 ABOUT THE ROLE OF NOTIFIED BODIES

A **Notified Body** is **an organisation designated by an EU country** to assess the conformity of certain products before being placed on the market. These bodies carry out different third-party verification tasks, ranging from full audits to simply testing, depending on the AVS. You can use one or more Notified Bodies, as needed.

You will find the **official registry of Notified Bodies**, notified by Member States to perform the third party tasks, in the **dedicated website**. Only the body notified under the CPR and notified to the particular harmonised technical specification or EAD can carry out the respective AVS tasks.

4.2.3 NAVIGATING THE DIFFERENT AVS SYSTEMS

➡ *see Annex IX of the CPR-2024*

The different AVS are designed to **match the risk level and complexity** of construction products. High-risk products, such as those critical to building safety, require more strict oversight through systems like System 1+ and System 1, in which notified bodies are heavily involved in testing and continuous monitoring. For lower-risk products, like in System 4, manufacturers can self-certify compliance.

Systems in the middle, such as System 2+ and System 3, involve varying degrees of notified body participation, where the focus may shift between product testing and inspecting the **Factory Production Control (FPC)**.

4.2.4 MAIN CHANGES BETWEEN CPR-2011 AND CPR-2024

In relation to CPR-2011, there are some changes in the Assessment and Verification Systems.

First, the CPR-2024 introduces **a system dedicated to predetermined environmental essential characteristics** (System 3+). In this system, the manufacturer is responsible for gathering data and assessing the performance in relation to these characteristics. Although this task may be subcontracted, **the manufacturer retains full responsibility** for the declared performance. The notified body is then required to validate the accuracy of the calculations and methods used.

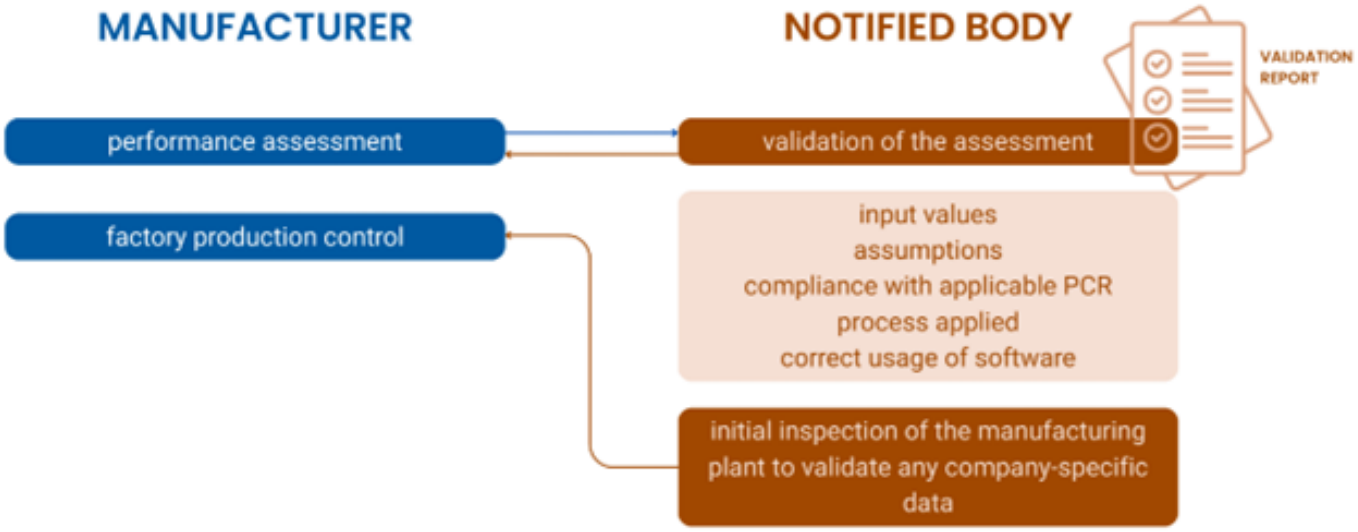

Figure 6: Assessment and Verification System 3+[8]

[8] Figures 6 and 7 are adapted from the European Union's presentation on the GNB-CPR Advisory group licensed under CC BY 4.0.

Another change is related to the **System 3**. In the CPR-2024 the AVS 3 requires the notified body to **confirm the manufacturer's determination of the product type**. This includes verifying if the test report match with the product type determined by the manufacturer. A single notified body will now be responsible for **validating that the product type corresponds to the test results** regarding all essential characteristics under this system (even if in some cases the tests are performed by multiple notified laboratories). The same body is responsible for issuing the certificate of performance and conformity for the product.

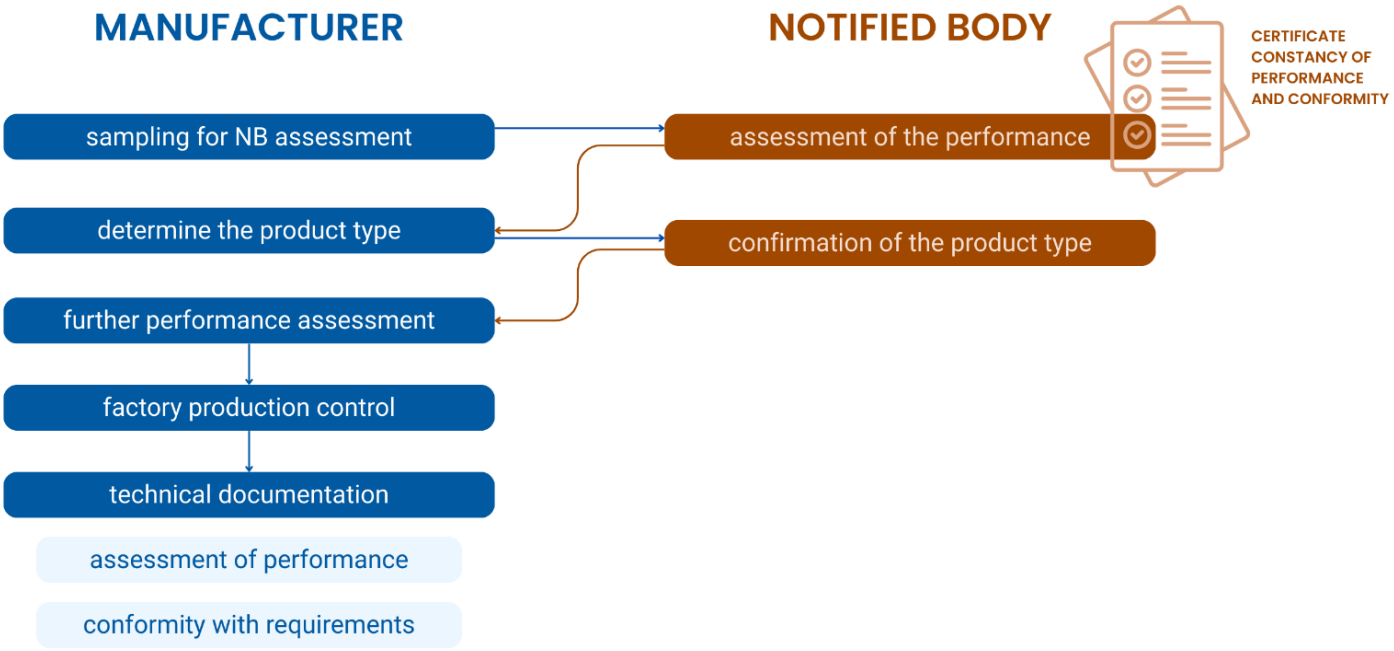

Figure 7: Assessment and Verification System 3[8]

The CPR-2024 will apply a modular approach to the Assessment and Verification Systems, meaning a notified body will only be responsible for tasks specific to the AVS system they are notified for. As a result, **manufacturers may need to engage multiple notified bodies** if no single body covers all the relevant AVS systems required for their product. This will be the case for example when a body covers the AVS 3+ and other bodies covering the other AVS for other characteristics.

You can find a summary of the tasks of the Notified bodies in the different AVS systems in the table below.

Table 5: The tasks of the Notified bodies under the different Assessment and Verification Systems

NOTIFIED BODIES TASKS	1+	1	2+	3+	3	4
Confirmation that the product type and the product category were correctly determined;	●	●	●		●	
Sampling of the items to be taken as representative of the type	●	●				
Assessment of the performance of the product on the basis of type-testing, type calculation or tabulated values or documentation describing the product;	●	●			●	
Initial inspection of the manufacturing plant and of factory production control	●	●	●			
Continuing surveillance, assessment and evaluation of factory production control including periodic inspections to the manufacturing plant	●	●	●			
Audit-testing of samples taken before placing the product on the market	●					
Verification of the drawing up of technical documentation containing proof of the correct application of the regulation with regard to the assessment of performance	●	●	●			
Verification of the drawing up of technical documentation containing proof of conformity with the applicable product requirements under this regulation	●	●	●			
Initial inspection of the manufacturing plant to validate any company-specific data	●			●		
Validation of the input values, assumptions made, compliance with applicable generic or product category specific rules, manufacturer's assessment, process applied to generate that assessment and the correct usage of software appropriate for the assessment				●		

4.3 CONSIDER THE SIMPLIFIED PROCEDURES

➡ *see Chapter VII of the CPR-2024*

As in the CPR-2011, the CPR-2024 includes a series of simplified procedures to reduce the regulatory burden, while ensuring that the product's assessment is not compromised.

4.3.1 SPECIFIC PROVISIONS REPLACING TYPE-TESTING OR TYPE-CALCULATIONS

➡ *see Article 59 of the CPR-2024*

A set of procedures **helps to avoid unnecessary testing** of construction products for which performance has already been proven by stable test results or other existing data. These procedures can be used by manufacturers that place their products covered by a hTS or an EAD on the market. In such cases, they may **replace type-testing or type-calculation** with a section in their technical documentation that demonstrates compliance through alternative methods. There are three instances where this provision can be applied, that can be found in the table below.

Table 6: Summary of simplified procedures replacing type-testing or type- calculation

SIMPLIFICATION	REQUIREMENTS	WHAT TO DECLARE	WHAT TO INCLUDE IN TECHNICAL DOCUMENTATION
DELEGATED ACTS	The product is covered by a **delegated act** that allows certain performance levels to be declared **without testing or calculation**, and meets the specific requirements set out in it.	The performance as provided in the delegated act.	The relevant delegated act and confirmation that the product meets its conditions.
PRODUCT PART OF A SYSTEM (CASCADING)	The product is a **system made of parts** already tested by the system provider. The manufacturer follows all **compatibility criteria and assembly instructions** provided by the system provider.	The performance declared for the system or components, based on provider's test results.	Provider's test results, explanation of compatibility requirements, and proof of assembly according to instructions.

USE OF TEST RESULTS FROM ANOTHER MANUFACTURER (SHARING)	The product is **identical** to one already tested by another manufacturer. The original manufacturer **authorises the use** of their test results.	The performance assessed by the original manufacturer, based on all or part of the results for the original product.	Original manufacturer's test results, written authorisation, and proof of same product type.

For all of those cases, if the product follows the Assessment and Verification systems 1, 1+, or 3, then a notified body or TAB will need to **verify compliance** with the requirements for the simplified procedures, instead of the assessment of performance of the product.

4.3.2 SPECIFIC PROVISION FOR CUSTOM-MADE, NON-SERIES PRODUCTS

➡ *see Article 61 of the CPR-2024*

Manufacturers of **custom-made, non-series products** that qualify for the exemptions mentioned in 2.1.4 opt for simplified performance assessments by including a **specific section in their technical documentation**. The documentation must demonstrate compliance with the relevant standards and provide **data equivalent to the requirements** of the hTS or EAD. Similarly to the other simplification procedures, if the product follows the AVS 1, 1+, or 3, then a notified body or TAB **will need to verify** compliance with the requirements for the simplified procedures, instead of performing the assessment of performance of the product.

This option offers **an alternative to the complete exemption** for custom-made products, offering flexibility for manufacturers that want to **enter the harmonised zone** or that need to adapt to the needs of their clients. For instance, in the context of a private contract, the contractor may ask for a CE marking and DoPC for custom-made non-series products, in order to meet national provisions easier. The manufacturer has three options for this type of products, demonstrated in the figure below.

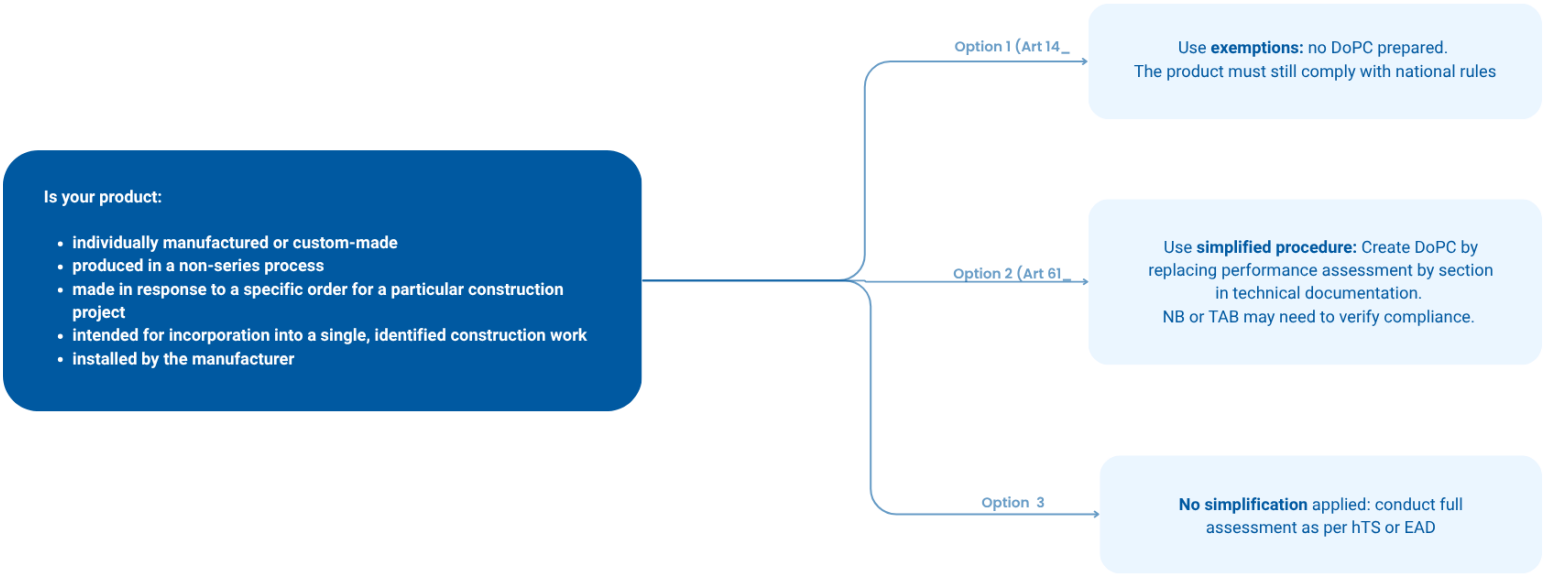

Figure 8: Options for custom-made, non-series products

4.3.3 SPECIFIC PROVISIONS FOR MICRO ENTERPRISES

➡ *see Article 60 of the CPR-2024*

There is also a specific provision **for micro enterprises that produce products with essential characteristics under the AVS 3**. In this case, manufacturers can replace type-testing or type-calculation for those essential characteristics with **equivalent data** in their technical documentation. This data must still correspond to the essential characteristics set out in hTS or EADs. This fulfilment will need to be **assessed and certified** by a notified body in place of the validation of the assessment of performance. Similarly to the case of custom-made products, this provision has a very limited application and shall not be interpreted too broadly.

4.3.4 RECOGNITION OF ASSESSMENT BETWEEN NOTIFIED BODIES

➡ *see Article 62 of the CPR-2024*

Finally, if a manufacturer has **already assessed their product** with one notified body, they can avoid repeating the process with a second notified body. The second notified body may accept the first assessment if the **product was properly verified**, and if the **manufacturer shares all relevant data**. The validity of the second certificate will be tied to validity of the first one.

This also applies to cases where **parts or materials** have already been assessed. This is particularly useful for environmental sustainability calculations under the Ecodesign for Sustainable Products Regulation, as a notified body can recognise such assessments for parts or

materials used in construction products, provided there is an agreement between the manufacturer and the provider.

4.4 CALCULATE ENVIRONMENTAL SUSTAINABILITY PERFORMANCE

The manufacturer must assess the product's environmental sustainability performance over its entire life cycle. This includes raw material acquisition, manufacturing, use, and end-of-life disposal or recycling.

The environmental impact must be calculated taking into account **the latest version of a software** provided by the European Commission. Naming it "software" may be misleading, since it is in fact not an LCA software, but a **Reference Package** that contains reference flows, impact assessment methods, characterisation factors, unit groups, and flow properties applicable according to EN 15804+A2. It may be updated in the future. In such case, manufacturers are required to **apply any updates within one year** to remain compliant. The "software" **does not perform any calculation**. Manufacturers will need to calculate the environmental performance themselves or through subcontractors using LCA software or by other means. The calculation may require **obtaining data from suppliers** or **background datasets**.

The calculation of environmental sustainability performance is based on the predetermined characteristics mentioned in the Annex II. Those characteristics are called "predetermined" because they are established in the legal text, while the environmental characteristics that must be declared by each product are established by the relevant hTS or EADs. As described in Chapter 3.2.1, the obligation to declare essential characteristics will come **gradually**.

In the European Commission's website, you can find the **EF Reference Package** (mentioned in the regulation as "software") that you must use as a support to your Life Cycle Assessment (LCA). It **does not perform any calculation**, but contains reference flows, impact assessment methods, characterisation factors, unit groups, and flow properties applicable according to EN 15804+A2.

The **reference standard** on which this package is based is EN 15804 (2012) +A2 (2019), "Sustainability of construction works - Environmental product declarations - Core rules for the product category of construction products." This standard specifies the required environmental characteristics. For accurate and consistent calculations, you should also follow complementary **Product Category Rules** (c-PCRs), which provide rules and guidelines for applying EN 15804+A2 to specific product categories.

You will need to provide specific and detailed information for the above-mentioned software, including:

- **Comprehensive data,** ie. about the product's material composition, including information on raw materials used, their sourcing, and quantities
- **Assessment and reporting of the environmental impacts** associated with energy use, water consumption, emissions, and waste generation **during the production of the product**
- **Information regarding the product's use and end-of-life processes**, such as recycling and disposal
- **Documentation of any assumptions made during the assessment,** as these can significantly impact the accuracy of the results
- Information about **the packaging used or likely to be used**

You will also need to access verified **external data**, which need to be in compliance with EN 15804+A2. External data refers to information collected from **sources outside the manufacturer's own operations**, such as the environmental impacts of raw material extraction and processing, manufacturing processes, transportation, and end-of-life activities. External data can be provided by databases and datasets and supplier's data.

The procedure to perform a Lifecycle Assessment can be challenging due to the complexity and specialised knowledge needed. While some SMEs might have the resources and expertise to conduct LCAs internally, others may benefit from **hiring specialised LCA professionals**.

To streamline assessments for product families, you may define a **worst-case scenario** for environmental sustainability. **Simplified procedures** for sharing and cascading, as outlined in 4.3.1, are also applicable to support flexibility in assessments. All input values, generic data used, and the completed assessment must be validated by a Notified Body according to System 3+ requirements, as described in Chapter 4.2.3. The final assessment results will need to be included in the DoPC.

The manufacturer may choose to declare a **worse environmental performance** than the actual assessment shows but **cannot declare better performance** than what has been verified. In all cases, the manufacturer remains **legally responsible** for the accuracy and completeness of the declared information.

4.5 COMPILE TECHNICAL DOCUMENTATION

➡ *see Article 22(3) of the CPR-2024*

Manufacturers must compile documentation that supports the product's compliance with the regulation and include any claim made in the DoPC. This documentation must include:

- Clear identification of the **product type**, its **declared use**, which falls within the intended use stated in the applicable hTS or EAD.

⚠ The declared use can be **narrower than the intended use**. The manufacturer may specify more limited conditions of use if they choose to restrict where the product is intended to be applied.

- All the relevant elements necessary to demonstrate performance and conformity
- Sufficient information to demonstrate that the product fulfils its declared **performance** and remains in **conformity with product requirements**. This may include:
    - **Product design details, including 3D datasets**
    - **Production processes**
    - **Materials used**
- Information on the applicable AVS which may vary depending on the level of performance claimed (e.g. stricter AVS may apply for products with high fire resistance).
- If **simplified procedures** are used (e.g. based on sharing data or worst-case scenarios), the supporting information that proves eligibility for those procedures
- The necessary information to validate the calculation of the performance of **environmental sustainability**

4.6 PREPARE GENERAL PRODUCT INFORMATION, INSTRUCTIONS FOR USE AND SAFETY INFORMATION

➡ *see Annex IV of the CPR-2024*

A clarification that was included in the CPR-2024 is the content of the **General product information, instructions for use and safety information**. All products accompanied by a DoPC must provide this information in the official language(s) of the Member State where the product is marketed.

Harmonised technical specifications will include guidelines to help manufacturer address the relevant on the type of information to be delivered. However, these guidelines are only recommendations and the responsibility of manufacturer to assess what is relevant lies with manufacturer.

When a product is covered by an EAD, the necessary guidelines and technical details for these documents are provided in the EAD.

4.6.1 THE GENERAL PRODUCT INFORMATION, INSTRUCTIONS FOR USE AND SAFETY INFORMATION MODEL

A simplified list according to Annex IV of the CPR is found below, with sections that are not applicable for all cases are shown in red. It is important to note that those elements are obligatory only when available. For details, please consult the legal text.

GENERAL PRODUCT INFORMATION, INSTRUCTIONS FOR USE, AND SAFETY INFORMATION
1. General Product Information **1.1. Product identification:** Unique identification code of the product type: **1.2. Product description:** (a) Declared uses: (b) Intended users: (c) Conditions of uses: (d) Estimated average and minimum service life span for declared use (durability): (e) Main materials used.

1.3. Contact details of the manufacturer:

(a) Name:

(b) Postal address:

(c) Telephone:

(d) Email address:

(e) Website:

1.4. Contact details of the manufacturer or the authorised representative dealing with:

(a) information on installation, maintenance, use, deconstruction and demolition;

(b) information on risks;

(c) information in the event of product failure.

1.5. Contact details of the product contact point for construction in the Member State:

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2. Instructions for Use and Safety Information

2.1. Safety during transport, installation, deinstallation, maintenance, deconstruction, and demolition:

(a) potential risks of the product and any reasonably foreseeable misuse thereof;

(b) instructions for the assembly, installation and connection, including drawings, diagrams and, where relevant, the means of attachment to other products and parts of construction works;

(c) instructions for operation and maintenance to be carried out safely, including the protective measures that should be taken during these operations;

(d) instructions for the training of the installers or operators;

(e) information on what to do in the event of product failure or accidents.

2.2. Compatibility and integration into systems or kits:

(a) compatibility with other materials or products;

(b) electric and electro-magnetic compatibility;

(c) software compatibility;

(d) integration in systems or kits.

2.3. Maintenance needs:

(a) Maintenance operations:

(b) Type and frequency of inspections:

(c) In case of failure:

2.4. Safety during use:

(a) Protective measures to be taken by the user, including, where appropriate, the personal protective equipment to be provided;

(b) Safe use of the product, including the protective measures that should be taken during its use;

(c) What to do in case of failure or accident during use

2.5. Training and other requirements:

2.6. Risk mitigation possibilities:

2.7. Recommendations for:

(a) Repair:
(b) De-installation:
(c) Reuse:
(d) Remanufacturing:
(e) Recycling:
(f) Safe deposit:

2.8. Climate change effects and human toxicity:

4.7 PREPARE DECLARATION OF PERFORMANCE AND CONFORMITY (DOPC)

➡ *see Article 13 of the CPR-2024*

When you collect all the relevant documents, you will need to draw **the Declaration of Performance and Conformity** (DoPC). The name of the document has changed in relation to the CPR-2011, because **now manufacturers take responsibility not only for declaring how a product performs but also for confirming its conformity with applicable requirements**.

What remains the same is that this document still serves as a formal confirmation document supporting the CE marking with all the information about the product, with CE marking only providing a summary of it.

4.7.1 THE CONTENT OF THE DOPC

➡ *see Article 15 of CPR-2024*

The DoPC is drawn up according to the **model in Annex V** of the CPR and must include:

- The product's performance in relation to the essential characteristics, based on the assessment methods in the applicable **hTS** or **EAD**.
- The **declared environmental performance**, covering the product's full life cycle, including packaging.
- A reference to any **mandatory product requirements** laid down in EU law where applicable.

- Only the **CE marking** may appear on the DoPC as proof of compliance.

Manufacturers are not required to declare all essential characteristics, but the scope of characteristics declared is their choice, depending on the needs of the market they want to address. However, some characteristics may be made **mandatory through a delegated act** or may require a **minimum performance level** to be placed on the market. The declaration of **environmental performance** becomes mandatory according to the timeline described in Chapter 3.2.1.

A change from the CPR-2011 is that **manufacturers must supply a copy of the DoPC for each product which is made available on the market by electronic means.** ➡ *Article 16.* Until the DPP system is made mandatory, this obligation can be fulfilled by **sending electronic version** of the DoPC to the customers, or by making the DoPC **available on a website**.

If the DoPC is available on a website, it must fulfil the following rules:

- It must be **free of charge**, and in a format that **cannot be altered**.
- It must be accessible in **both human-readable and machine-readable** formats.
- A **unique identification code** must link each product to its DoPC.
- A QR code, barcode on the product, or direct link can be used to provide access.

Once the DPP system becomes mandatory, the DoPC will be delivered through the DPP (see Chapter 4.9).

If the product is marketed in multiple Member States, the DoPC must be available in the **language(s) of each Member State**. If an economic operator introduces the product to additional countries, they must provide the required **translations** along with the original document.

4.7.2 THE DOPC MODEL

➡ *see Annex V of the CPR-2024*

Below you will find the model of a DoPC. The manufacturer is required to fill in only the relevant sections - sections that shown in red are obligatory in case they are available.

Name of the Manufacturer:
Declaration Code:
Version No:
Date of Version:

1. **Product Description**:
   (a) Unique identification code:
   (b) Batch or Serial number:
   (c) Product category:
   (d) Declared uses:
   (e) Nominal dimensions, or grading:
   (f) Key parts:
   (g) Variants and their descriptions:
   (h) Date and place of latest de-installation[9]

2. **Permalinks and data carriers as regards to**:
   (a) Product registration in EU database:
   (b) Information in accordance to REACH Regulation (EC) 1907/ 2006:
   (c) General information, Instructions and safety information:

3. **Manufacturer**:
   (a) Name:
   (b) Registered trade name:
   (c) Registered place of business:
   (d) Postal address:
   (e) Telephone:
   (f) Email:
   (g) Website:

4. **Authorised representative**

   (a) Name:
   (b) Registered trade name:
   (c) Registered place of business:
   (d) Postal address:
   (e) Telephone:
   (f) Email:
   (g) Website:

[9] Only relevant for used products

5. **Notified Body or Technical Assessment Body**:
   (a) Name:
   (b) Identification number:
   (c) Registered Trade name:
   (d) Registered place of business:
   (e) Postal address:
   (f) Telephone:
   (g) Email address:
   (h) Website:

6. **Reference to certificates or validation reports issued by notified bodies and TABs**:

7. **Technical Reference Documents**:
   (a) Harmonised technical specifications or European Assessment Document applied:

8. **Declared Performances and Sustainability Characteristics:**
   (a) Complete list of essential characteristics and applicable assessment and verification system
   (b) performance of the product. If no performance is declared, to insert "NULL"
   (c) Environmental Sustainability
   (d) reference to the version of the software as provided by the Commission

9. Applicable Product Requirements specified by Harmonised technical specifications:
Information on the performance of the product measured in terms of its product requirements.

11. Declarations:

(a) the performance of the product identified above is in conformity with the set of declared performances referred to in point 9;

(b) the sustainability data of the product identified above have been correctly calculated on the basis of the product category rules applicable to it;

(c) the product identified above is in conformity with the requirements listed under point 10.

Signed for and on behalf of the manufacturer by:

4.8 AFFIX CE MARKING

➡ *see Articles 17, 18 and 19 of the CPR-2024*

Once the previous procedures have been completed, the manufacturer can **affix their CE marking** to indicate that the product complies with the declared performance and conforms with the applicable product requirements. The CE marking must be applied **before the product is placed on the market.**

By affixing the CE marking, the manufacturer is **assuming full legal responsibility** for the product's compliance. If the product is **sold online** or through distance selling, the offer must clearly display the CE marking and include all required information.

The CE marking must include:

- The **two last digits of the year** when it was first affixed (for used products, the year when the product was **deinstalled** and the year **when the CE marking was applied** to the used product).
- The **name and registered address of the manufacturer**, or an identifying mark.
- The **name and address of the authorised representative** if applicable.
- The **unique identification code** of the product type.
- The **reference code** of the declaration of performance and conformity.
- The **identification number of the notified body,** if relevant.
- A **data carrier** connected to the DPP if available.

The CE marking must be the sole mark that attests to the product's performance with respect to the essential characteristics covered by the CPR. No other marking may be required by Member States to demonstrate conformity with the applicable essential characteristics. The marking must be **visible, legible, and indelibly**. Ideally, it should be **directly applied** to the product. However, if this is not possible due to the nature of the product, you can place it on a **label** attached to the product, its **packaging**, or, as a last resort, on the **accompanying documents**.

In addition to the CE marking, **other markings**, such as private labels or Eco labels, are allowed only if they: ➡ *Article 19*

- do not suggest that the product's performance was assessed **using different methods** than what is laid down in the CPR
- do not interfere with the **visibility, legibility, or meaning** of the CE marking

Additionally, any claims about the product's performance must **not mislead users or create confusion** about the product's declared performance. Such claims may only be made if they are **based on the same assessment methods** set out in the relevant harmonised technical specifications

4.8.1 THE CE MARKING MODEL

Example of a CE marking is showed below. The elements in red can be replaced by the data carrier that links to the product passport.

CE marking

CE

Manufacturer's Name and Address

Year of First CE Marking (last two digits)

Authorised Representative Name and Address

Unique identification code of Product-type

DoPC Code

Notified Body Identification Number

Data Carrier linked to DPP

4.9 CREATE A DIGITAL PRODUCT PASSPORT

➡ *see Chapter X of the CPR-2024*

Once you have collected all the above documents, you need to **create and maintain a Digital Product Passport (DPP) for each of your products that has CE Marking affixed**. This means that products that are exempted as described in 2.1.4, do not need to draw a DPP. As with all the other obligations described in this guide, **only products covered by a hTS under the CPR-2024** have the obligation to provide a DPP. This passport serves as a **digital record** of the product's performance and facilitates the compliance check while in the distribution chain and provider information for its use throughout its lifecycle. It includes all relevant documents to the product, which are the following: ➡ *Article 76*

- Declaration of Performance and Conformity.
- General product information, instructions for use and safety information
- Technical documentation
- Environmental sustainability labels established under the CPR
- Unique identifiers
- Data carriers of key parts
- Any other documentation required for the product under other EU law (e.g. Declaration of Conformity under Machinery regulation or Information on substance required by REACH)

The DPP will need to be linked to **a data carrier** like a QR code or barcode, which should be connected attached to the product or its packaging. This information is then uploaded and stored so that it becomes **accessible by electronic means for free of charge** to the customer.

4.9.1 THE CONSTRUCTION DPP SYSTEM

➡ *see Article 75 of the CPR-2024*

The European Commission will set up a **construction DPP system**. While the details of it are not defined yet, once the system is set up (see 3.3), the data included in the DPP need to be stored there. The way in which this will occur will be outlined at a later stage, at this stage the following options for the future implementation of the DPP are explored:

- directly uploading the DPP in a central database,
- connecting the system to the databases of service providers, or
- connecting it directly to manufacturers websites.

In all cases, this system will act as a platform where the DPP is hosted, and all relevant data is stored electronically. Manufacturers will be able to **introduce data** in the product passports, **introduce updates** in case of mistakes, and **create new ones** when needed. A **back-up system** by product passport service providers will also be established.

WHAT DO WE MEAN WITH DPP SERVICE PROVIDERS?

Digital Product Passport service providers are third-party companies offering platforms and tools that assist with creating, maintaining, and managing the DPP. Such actors can be helpful if the manufacturer lacks the internal resources or technical infrastructure to handle the digital aspects of the DPP.

In case you need to involve this type of service providers, and although the service provider handles the technical aspects, the manufacturer remains **responsible for the content and accuracy of the DPP**.

⚠ **When working with such providers, it is important to ensure that the service they offer qualifies to set up a Construction DPP under the CPR. At present, there are many digital passport tools available on the market that do not meet the legal requirements set by the regulation. Always check that the platform used supports compliance with the CPR's technical and legal obligations.**

The manufacturer is responsible for the **availability of the DPP** at least for the **10 years** after the last product of the respective product type has been placed on the market, while overall the DPP system shall ensure the availability of the DPP information for at least another **15 more years**. You are also responsible for keeping the information in the DPP up to date. Whenever there are changes that affect the product's performance, characteristics, or compliance status, the DPP must reflect these changes in accordance with the applicable rules. The specific procedures for updating or replacing the DPP will be further defined through delegated acts.

4.9.2 THE DPP REGISTRY

➡ *see Article 79 of the CPR-2024*

Once the product is placed on the market, you are required to upload data, including the **unique identifiers** and potentially other information related to the product passport, to the digital registry managed by the European Commission. **Unique identifiers** will need to exist for the **product type**, the **operator**, as well as the **facility**, and will need to follow standards.

WHAT ARE UNIQUE IDENTIFIERS?

Unique identifiers are specific alphanumerical codes that allow the distinct recognition of product types throughout their lifecycle. If these identifiers are not available, you must request them.

The **registry**, which is expected to be set up in 2026, securely stores data such as unique product identifiers and commodity codes for customs procedures. The same registry will be also used in the context of the Ecodesign for Sustainable Products Regulation. Uploading information to the registry **does not serve as proof of compliance with EU law**; it is only a procedural step to track products. After the data is uploaded, the registry automatically communicates a **unique registration identifier** to the manufacturer. The Commission, national authorities, and customs authorities have access to the registry to perform their duties, such as market surveillance and customs control. Finally, the Commission will set up a publicly accessible **web portal** where stakeholders can search and compare data from DPP.

4.9.3 THE DIFFERENT DPP-RELATED SYSTEMS

To support the implementation and accessibility of DPPs, the CPR foresees the development and use of **several digital systems**. These systems have distinct roles in storing, hosting, and making available the data contained in the DPP or related to product traceability and enforcement. The table below summarises these systems and their key characteristics.

Table 7: The different DPP- related systems

System	Purpose	Main Users	Key Features
Construction DPP Platform / System	Hosting environment for construction DPPs, to be established by the European Commission	Manufacturers, Commission, market authorities (different levels of access)	May consist of a centralised platform, a network of DPP service providers, or a network of manufacturers' systems including their backup environments.
DPP Registry	EU-level registry for uploading product identifiers and other related data	Manufacturers, Commission, customs, Market Surveillance Authorities	Used for traceability and enforcement; assigns unique registration ID; not a substitute for CPR compliance
Public Web Portal	EU online portal allowing public access to DPP data and comparison across products	Consumers, professionals, market actors (different levels of access)	Managed by the Commission; enhances transparency and allows DPP data to be consulted and compared by users

5 MAINTAINING COMPLIANCE

After a specific product type has been placed on the market, manufacturers remain responsible to make sure each individual product placed on the market is in compliance. Manufacturers are also responsible to remain in compliance further on. This includes obligations beyond just maintaining an updated DPP and extends to areas such as taking actions in relation to non-compliant products or availability of spare parts.

Manufacturers **must continuously monitor the requirements for their product type**. If new information arises such as updates to hTS, changes in product performance, or new safety risks, manufacturers must take necessary actions to ensure compliance for any product of the affected product type they place in the market.

5.1 ENGAGE WITH MARKET SURVEILLANCE AUTHORITIES

After a product is on the market, public authorities may conduct **market surveillance** to ensure ongoing compliance. Manufacturers must be prepared to cooperate with these national authorities by providing up-to-date documentation, including test reports and technical data. Regular checks by market surveillance bodies may require manufacturers to demonstrate continued compliance with both performance standards and product requirements.

In cases where a product is found to be non-compliant or poses safety risks after placing on the market, manufacturers have a legal obligation to take corrective actions. This could include issuing a product recall, providing repairs or replacements, or modifying the product to meet the requirements. Manufacturers are responsible for communicating any **risks** to consumers and regulatory bodies promptly, ensuring that unsafe or non-compliant products are withdrawn from the market as quickly as possible.

💡 New Tool: Complaint portal

A new tool introduced to assist market surveillance authorities, is the establishment of a **complaint portal** ➡ *Article 63*. This platform allows manufacturers, importers, distributors, and consumers to submit complaints regarding product compliance, safety issues, or misleading claims. The portal will be set up by the European Commission and serves to streamline the complaint process, enabling authorities to review and address concerns more efficiently and support a fair, compliant marketplace.

5.2 STAY INFORMED

Manufacturers are responsible for staying informed about any changes in legal acts that may affect their products. If an **implementing act is published or a hTS is revised**, the manufacturer must ensure that any product they place in the market after the day of application of the standard meets the new requirements.

If your product is covered by an EAD, it is possible that it will become covered in the scope of **a harmonised technical specification** cited in the OJEU under the CPR-2024. Upon the citation of the new standard, manufacturers will have a **transition period of minimum one year** to adapt. After the coexistence period, the harmonised technical specification will become mandatory and the only possibility to place this product on the market. Therefore, this principle prevails over the possibility to use the respective EAD and ETA to place a product on the market.

5.3 ENGAGE WITH SME REPRESENTATIVES

As it has been highlighted by this guide, the importance of standards in the daily operations of SMEs should not be underestimated. Many smaller businesses face challenges such as limited access to information, limited resources, and an incomplete understanding of the standardisation process. This can put SMEs at a disadvantage, especially when they are not involved in shaping the standards that govern their sector. **Without SME entrepreneurs and experts' engagement, there is a real risk that standards may overlook the specific needs of your business**, resulting in requirements that are either difficult to implement or unnecessary for your operations.

That is why it is crucial for SMEs **to actively participate** in the standardisation process. We strongly encourage you to connect with organizations like Small Business Standards (SBS), which specifically represent the interests of SMEs in shaping and updating standards, and the European Builders Confederation, the recognised EU sectoral social partner representing SMEs and craft trades in the construction sector. As the transition to the CPR-2024 moves forward with the publication of new standards, your voice needs to be heard to ensure those reflect the realities of running a small business.

SBS plays a key role in this by organising trainings, national seminars, and events that support you to stay informed and compliant, with EBC guaranteeing its sectoral approach for construction. SBS also appoints SME experts to participate in technical committees, ensuring that the standards being developed take into account the challenges and constraints faced by smaller enterprises. Getting involved not only ensures that the standards are more practical but also allows you to shape the future of the market in which your business operates.

Involvement in these processes is not just beneficial; it is essential for ensuring that the CPR-2024 aligns with the needs of SMEs, providing a fairer and more accessible regulatory environment for all.

6. LINKS TO OTHER EU LEGISLATION

In the beginning of the guide, we have described the objectives behind the revision of the CPR. It is important to that these objectives are pursued within the **broader framework** of EU legislation, rather than in isolation. The CPR aims to achieve these objectives collaboratively, leveraging synergies with other regulatory initiatives. In this chapter, you will find an overview of legislation aimed at fostering sustainability in construction, reducing greenhouse gas emissions, and enhancing the energy efficiency of buildings, as well as its interaction and alignment with the CPR.

- **Fit for 55 Initiative**: The CPR aligns with the Fit for 55 package, which targets a 55% reduction in greenhouse gas emissions by 2030. This initiative encompasses various measures, including emissions trading systems for sectors like road transport and buildings, and new carbon standards for vehicles. Through the CPR, construction products can contribute to lower emissions by ensuring sustainable material choices and energy efficiency. Additionally, the CPR supports the circular economy by promoting recyclability and resource efficiency. Through the DPP, the CPR encourages transparency around material reuse, facilitating circular practices in construction by enabling better tracking of product lifecycles and supporting material recycling.

- **Ecodesign for Sustainable Products Regulation (ESPR):** The ESPR emphasises the need for products to meet high environmental standards throughout their lifecycle, contributing to a circular economy. The CPR and ESPR could be used to establish environmental reporting requirements, including CO_2 emissions and resource efficiency metrics. The CPR can regulate environmental aspects at the product level allowing to achieve the ESPR objectives for construction products. Notably, the ESPR can serve to establish (via delegated act) requirements for construction products, but the CPR should be used preferentially as a legal tool covering the technical as well as the environmental concerns related to the construction products. In cases where the CPR does not fully achieve its environmental sustainability objectives, the ESPR may step in to address potential gaps. To avoid duplication and excessive administrative burden, the European Commission can adopt delegated acts specifying when obligations under other EU legislation are considered sufficient to fulfil CPR requirements. Likewise, sustainability information assessed under the ESPR may be recognised under the CPR. Finally, as mentioned in different chapters of this guide, the two regulations rely on the same provisions, such as the DPP and the DPP registry.

- **Level(s) Framework:** This framework uses environmental data at the building level for sustainability assessments, drawing on product-level data provided by the CPR. The CPR's declaration of the environmental performance included in the DoPC helps to ensure

reliable data for the Level(s) Framework, enabling consistent lifecycle impact assessments of buildings.

- **Energy Performance of Buildings Directive (EPBD)**: The EPBD sets standards for energy performance in buildings, where the CPR plays a significant role by providing standardised information for construction products. This ensures that products used in buildings meet energy efficiency and sustainability standards. The EPBD also mandates the disclosure of greenhouse gas emissions in energy certificates for larger buildings, with life-cycle carbon assessments to be introduced by 2028.

- **Energy Efficiency Directive (EED)**: Similarly, the EED and CPR work together to enhance the energy performance of buildings across the EU. Construction products that comply with the CPR contribute to meeting EED requirements, especially when Member States apply these standards in public procurement processes to drive sustainable practices in construction.

- **Public Procurement Directives**: The CPR also supports sustainability goals in public procurement. According to Article 83 of the CPR, when procurement procedures are carried out under the Public Procurement Directives and include requirements related to the environmental performance of construction products, contracting authorities must apply the mandatory minimum environmental performance requirements set out in CPR delegated acts, if such requirements exist. They may also introduce stricter requirements, as long as these remain compatible with the CPR. However, if applying the CPR minimum requirements would lead to disproportionate costs or practical incompatibilities, authorities may be exempted from using them.