An SME's Guide:

All you need to know about the New Construction Products Regulation

December 2024

Contents

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About the Guide

This guide is designed to help micro, small and medium-sized enterprises (SMEs) understand the requirements of the new Construction Products Regulation (CPR)[1] and how to ensure compliance. It is developed by Small Business Standards (SBS) and the European Builders Confederation (EBC) for SMEs across Europe. It provides simple explanations of key provisions, simplified procedures, and practical tools to navigate the regulation effectively. The primary aim of the guide is to provide clear, concise, and practical information tailored to the needs of SMEs, who may have limited resources to interpret and implement complex regulatory frameworks.

The content of the guide is based on the current text of the CPR as published in the Official Journal of the European Union. It reflects the regulation's original provisions and interpretations as of this version. Delegated acts and other supplementary legal instruments that may further clarify or amend the CPR are not yet 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 and ensure your products meet the necessary requirements for marketing within the European Union.

The updated CPR introduces several important changes to the regulatory framework, which are covered in detail in this guide. These changes include strengthened environmental sustainability requirements and the introduction of the Digital Product Passport (DPP), which aims to enhance product traceability and transparency. The guide provides SMEs with the necessary tools to meet these new obligations.

After explaining the new obligations arising by the new CPR, this guide offers a step-by-step approach to the various compliance tasks. These range from identifying the relevant harmonised technical specification s 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.

If you're 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.

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[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)

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European Builders Confederation (EBC) is the European non-profit professional organisation representing and promoting the interests SMEs and craftsmen in the construction sector, in close coordination with its national member organisations.

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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

CPR: Construction Products Regulation

SME: Small and Medium-sized Enterprises

ETA: European Technical Assessment

EAD: European Assessment Document

DoPC : Declaration of Performance and Conformity

CE: Conformité Européenne (European Conformity)

hEN: Harmonised European Standard

HTS: Harmonised technical specification

AVS: Assessment and Verification System

SBS: Small Business Standards

FPC: Factory Production Control

EU: European Union

DPP: Digital Product Passport

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Glossary[2]

Assessment and Verification System (AVS): Procedures used to test and confirm a construction product's performance. AVS levels 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 inspections, and certification to ensure ongoing compliance. For the detailed AVS levels, see chapter 4.2 of this guide.

Common Specifications: Legal documents providing alternative means to comply 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 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: 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.

Factory Production Control (FPC): A system established and maintained by the manufacturer to ensure that products consistently meet the required specifications. 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.

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

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Implementing Acts: 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 as essential for its functionality, safety or performance by a harmonised technical specification. For example, the glass is a key part of a window.

Non-Series Process: A production method that's 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 in return for payment or offered free of charge, regardless if in the context of providing a service or not.

Product Type: The description of the specific performance characteristics of a construction product, including environmental characteristics, as defined 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 developed by European Standardisation Organisations, which manufacturers can use to prove compliance with product requirements. These standards are not legally mandatory, but they provide the presumption of conformity and can be used to prove compliance with the mandatory product requirements that were established by delegated acts.

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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 having the CE marking can **freely circulate** within the EU internal market without additional national testing or certification. It also guarantees that the performance of construction products, linked to basic requirements for construction works and defined by European harmonised standards, is reliably declared and verified.

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 current framework. The existing Regulation 2011/305, established in 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 not sufficiently implemented.

The revised CPR 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 Digital Product Passport (DPP). This DPP is 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 products meet compliance, thereby protecting users and enhancing safety.

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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 compliance procedures **only if they market products covered by harmonised technical specifications (hTS)**. For products not covered by those, manufacturers **can choose** to seek compliance using a European Assessment Document (EAD).

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 are clarified.

2.1 Products under the new CPR

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 responsibility for manufacturers to undergo the procedures described in this guide is obligatory **only for products covered by hTS (see 4.1.1)**.

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

2.1.1 What is considered a construction product

Products are understood as construction products if they are placed in the market with the intention to be **permanently incorporated into construction works** (see Article 3 (1) of the new CPR). While this definition stands correct also for the current CPR, in the revised CPR certain aspects are clarified. First, both products **manufactured in traditional ways** and those created through other technologies like **3D printing** are included. Additionally, any supply of a product for distribution or use as part of a **commercial activity**—whether **sold**, **provided free of charge**, or

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supplied as part of a **service**—falls within this scope. Lastly, products **supplied to the construction site** that meet these criteria are still regarded as construction products.

The CPR also covers **key parts** of construction products. 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 **harmonised technical specification** of a product, if any element is to be considered as a key part. Examples of such products is glass that is used in a window and is essential for its thermal performance.

Finally, if a product needs to be **integrated into another product** or to be combined with other products as a kit before being incorporated in the construction works, then it is **not considered** as a construction product itself (see Article 3 (1) of the new CPR). For example, additives that need to be added into a concrete mix before their incorporation into a building are not considered construction products. However, the **manufacturer** of parts or materials that are intended to be used in construction products - but not specified as key parts- **can request** to have them covered by the regulation.

2.1.2 When the new CPR applies to each product

The new CPR doesn't become mandatory for all products immediately upon publication on 18 December 2024. To help everyone transition smoothly, the requirements will be introduced **gradually**, giving businesses time to adapt. Below you will find the steps previewed for the transition:

- **Entry into force Date**: The new CPR will enter into force **on 7 January 2025**. This date makes it legally binding in all EU member states.
- **Application Date**: The regulation will start to apply **on 8 January 2026**. However, not all products will need to comply with the new rules right away.

Each product family currently covered by a harmonised standard will gradually transition to the new CPR, once a relevant **harmonised technical specification (hTS)** covering them is published under the new regulation:

- Before products will need to follow the new CPR requirements, the European Commission must make mandatory, via an implementing act, a **new hTS** for each product family or category.

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- In the **first year** after a harmonised technical specification is made mandatory, manufacturers can choose to follow either the new standard or the old one. This **co-existence period** may be extended in some cases if specified in the implementing act.
- **Once the co-existence period ends**, all products will have to meet the new harmonised technical specifications and all the requirements of the new CPR. Manufacturers will need to update product assessments, technical documentation, and Declarations of Performance and Conformity (DoPCs) to align with the new obligations.

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

- EADs listed in the Official Journal by 8 January 2026 will be referring to the old CPR, 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.
- 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.

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. The used products are only subject to CPR obligations, if the harmonised technical specification for the relevant product **namely covers the used products**. Each harmonised technical specification will have to clarify if it applies also to used products or not.

For **used products originating within the EU,** obligations are applicable only if a harmonised technical specification applies. If this is not the case, the economic operator placing the used product on the market may opt to treat it as a new product by following CPR obligations. **Products reused in the same building project** where originally installed do not need a new assessment according to the CPR, as far as there is no transfer of the ownership of the used product. National rules on its use may apply.

For **used products entering the European market from a third country**, those have to be addressed as new products, unless the harmonised technical specification explicitly provides rules for used products.

For **remanufactured products**, meaning products that have been transformed further after their deinstallation to change their performance, those must also be treated as new products. However,

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their environmental impact will be calculated only taking into account events after their deinstallation. Because remanufactured products typically use fewer new materials, they will often demonstrate a better environmental performance compared to new products.

Therefore, an operator placing on the market a used product must follow the obligations as shown in the table below:

<table>
<tr><th colspan="2">Condition</th><th colspan="2">Obligation for Operator</th></tr>
<tr><td colspan="2">Used product from outside the EU</td><td colspan="2">Follow CPR obligations for used products if hTS exists, or for new products if no hTS exists</td></tr>
<tr><td>Used product from within the EU</td><td>A harmonised technical specification for used products exists.</td><td colspan="2">CPR obligation if the product is placed on the market.</td></tr>
<tr><td colspan="2"></td><td></td><td>No obligation if reused in the same construction project (national rules apply).</td></tr>
<tr><td colspan="2"></td><td>A harmonised technical specification for used products does not exist.</td><td>No obligation under the CPR (national rules apply).</td></tr>
<tr><td colspan="2">Remanufactured product</td><td colspan="2">Follow CPR obligations in any case.</td></tr>
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2.1.4 Exemptions

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 (see Article 14 in the CPR). It should be noted that exemptions can be used **if the manufacturer chooses** so and are not obligatory. This section will delve into three SME-friendly exemptions: custom-made products; heritage cases; and outermost EU regions markets.

- One of the most significant exemptions under the CPR applies to products that **are individually manufactured or custom-made**. To qualify for this exemption, these products

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need to be produced using a **non-series process** and in **response to a specific order** for a particular construction project. If this type of product is intended for **incorporation into a single, identified construction work** and the **manufacturer is responsible** for its safe installation, the product can be exempt from the requirement to draw up a declaration of performance and conformity, affix CE-marking, and create a DPP. Please note that the product will still need to be in compliance with the applicable national rule 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.

- Similarly, **a product that is manufactured exclusively for heritage or traditional construction purposes**, **and that is produced in a non-series process** can also benefit from the above-mentioned exemptions. The product must be produced **using traditional methods** that are suitable for restoring or renovating historic buildings which are officially protected due to their cultural, architectural, or historical importance. Please note that these products must still comply with the **relevant national rules.**
  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.

- Finally, member states may also issue additional exemptions for **products that are placed on the market in the outermost regions of the EU**. 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 EU (single market), then they need to undergo all the procedures associated with the regulation and affix CE marking.

2.1.5 The Harmonised Zone

A new concept introduced in the revised CPR is the so-called “harmonised zone” (see Article 11 of the CPR). This zone practically encompasses products for which **harmonised technical specifications** have been established and specify that harmonised standards are comprehensive. The main purpose of the harmonised zone is to ensure the **free movement of construction products** within the EU internal market while maintaining high levels of safety, health, and environmental protection.

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For products that are in the harmonised zone, **Member States shall respect it and are not allowed to impose additional rules or requirements** for products' essential characteristics or assessment methods other than those set out in harmonised technical specifications. This ensures that once a product is approved under harmonised conditions, it can be **freely marketed** across the entire EU without further testing or modifications, and the national rules for the use of the products shall respect the technical language of the harmonised standards.

However, Member States can still set their own safety and performance requirements for **construction works**, such as buildings or infrastructure projects. These national requirements apply to the design, construction, and maintenance of works, but these shall build on product-related requirements and performances declared in line with the CPR framework. However, **in some cases**, the regulation can allow Member States to deviate from the harmonised technical specification s and establish specific national measures for health, safety, or environmental protection for products, but only after notifying and receiving authorisation from the European Commission.

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 existing harmonised technical specification s, often covering unique or innovative items. While EADs enable the assessment and CE marking of the products, they do not guarantee the same ease of movement across Member States. Products with EADs may face varying national requirements, which can lead to **differences in acceptance criteria** across countries.

For example, a wooden prefabricated stair that is not covered by a harmonised technical specification can be assessed through an EAD to provide the performances requested by Country A. There, the stair is considered to meet local 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, adjust or retest the stair to satisfy the country's specific requirements.

2.2 The different actors

The new CPR will have great impact on the everyday life of the manufacturers of construction products. Additionally, other type of stakeholders in the construction sector will also have to be aware of some changes. This Chapter summarizes the provisions of Chapter III of the new CPR.

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The **manufacturers:** They produce the construction product and are the ones generally responsible for ensuring the compliance of their products with the regulation. This includes:

- providing a declaration of performance and conformity for products within the harmonised zone,
- ensuring the product's environmental performance is assessed and reported

Manufacturers are also required to keep **detailed technical documentation** (see Article 22 (3) of the CPR) that supports the product's compliance, and they must make this information readily accessible, often in electronic format.

3D printing manufacturers: Special attention is given to manufacturers of 3D-printed products. The person 3D-printing and selling the product must ensure it meets all regulatory obligations, including using appropriate 3D datasets and compliant materials.

Importers and distributors: They bring construction products into the market or distribute them within the EU and are thus also significantly affected. These actors must:

- ensure that any product they place on the market meets all the necessary requirements under the CPR,
- verify that manufacturers have prepared the correct documentation and that products carry the CE marking,
- If a product is manufactured outside the EU, importers and distributors may have to assume the responsibilities typically held by the manufacturer.

The major difference between importers and distributors lies in the obligation of importers to ensure the manufacturer has drawn up the technical documentation. Additionally, importers selling directly to end users must also fulfil the obligations that apply to distributors.

Authorised representatives: They act on behalf of manufacturers, particularly those based outside the EU, and are required to:

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- keep the declaration of performance and conformity and the technical documentation at the disposal,
- communicate with market surveillance authorities, and
- inform manufacturer and ask them to ensure that the products comply with the regulation.

This role is critical for maintaining the legal and technical compliance of products entering the EU market.

Fulfilment service providers: Increasingly important actors with the rise of e-commerce, they must:

- ensure that the handling of products during warehousing, packaging, addressing, or dispatching does not compromise the product's conformity with its declared performance or compliance with other applicable CPR requirements.
- cooperate with market surveillance authorities to prevent non-compliant products from reaching consumers.

Online marketplaces: Similarly to they previous actors, they must:

- design their platforms to allow manufacturers to display the information required by the CPR, such as product characteristics, declarations of performance, and safety information.
- ensure that the products they handle comply with the regulation and cooperate with market surveillance authorities.

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3. Overview of the main changes

The revised CPR introduces some changes that aim to improve sustainability and digitalisation. As such, the most important changes are the introduction of essential characteristics on environmental performance for construction products, as well as the obligation to create a Digital Product Passport to communicate information.

3.1 Environmental sustainability

The revised CPR places a strong emphasis on sustainability. This chapter outlines the introduction of essential characteristics on environmental performance, as well as their assessment and verification.

Manufacturers of construction products will need to declare the predetermined environmental characteristics for their products. The characteristics that need to be declared for each product family will be defined in harmonised technical specifications (hTS) and European Assessment Documents (EADs). The predetermined environmental essential characteristics (established in Annex II) include a broad range of characteristics and correspond to indicators set out in EN 15804. The first characteristics that will be obligatory to assess will be the ones relevant to global warming potential. Then, other indicators such as ozone depletion, acidification potential, etc. will need to be declared gradually.

3.1.1 Obligation Timeline

The obligation to declare those characteristics will occur **gradually** for each product when their harmonised technical specifications are revised to include them. These characteristics will be based on environmental assessments rather than physical testing.

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

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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 to declare.

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

Figure 1: Gradual implementation of sustainability requirements

3.1.2 Assessment

To assess these characteristics, manufacturers must follow the methodologies and criteria provided in the harmonised technical specifications and EADs, which will be updated with regard to sustainability aspects. Manufacturers are required to **maintain thorough documentation** of the environmental performance of their products. The CPR requires the Commission to create a specific **software** to facilitate the assessment. For the moment the software only contains the characterisation factors applicable according to EN 15804+A2 but in future it may contain additional information. The software **does not perform any calculation**, manufacturers will need to calculate the environmental performance themselves or through subcontractors using LCA software or not. The calculation should use the latest version of the Commission software. The calculation may require obtaining data from suppliers or background datasets.

3.1.3 Verification

The assessment of the environmental characteristics will be then **verified** by relevant notified bodies using the AVS 3+, as specified in the Annex IX. 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

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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** on site 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.

3.2 Product Requirements

Importantly, the revised CPR can set specific **product requirements** for some products, which must be met before these products can be sold (see Article 7 of the CPR). Product requirements can be established by the Commission though delegated acts **only for products covered by harmonised technical specification**. 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. 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. Products fulfilling the criteria provided in **voluntary harmonised standards** or **common specifications** (which is an alternative if the voluntary harmonised standard was not delivered) are considered to be compliant with the relevant requirement.

3.3 Construction digital product passport

One of the aims of the new CPR is also to support the construction sector to get digitalised. In line with the Ecodesign Regulation[3], 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 (see Chapter X of the CPR).

A DPP in the context of the CPR is **a digital record that contains detailed information about construction products**. 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. The DPP will encompass:

[3] 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

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- the declaration of performance and conformity,
- general product information,
- instructions for use and safety information,
- technical documentation,
- labels (when applicable), and
- unique identifiers for products, operators, and facilities.

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 digital product passport 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 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. There, the information in the DPP will need to be kept up-to-date and maintained for a long period – the manufacturer is responsible to keep it available for 10 years, while the system will ensure that it is accessible for at least 25 years after the last product of its type has been sold. In case of insolvency or cessation of business, procedures will be in place to ensure the continuity of access to the product passport information.

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, and it must be accessible in both human-readable and machine-readable formats. The website must be continuously available and free of charge to users, with clear instructions on how to access the information.

The DPP system will be set up in the first years after the date application of this regulation. The product manufacturers will need to deliver a DPP **18 months** after the DPP system is established by the European Commission. Only products covered by harmonised technical specifications and EADs under the new CPR will have the obligation to deliver a DPP.

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4 Compliance Checklist

After confirming that a product falls within the scope of the new CPR, 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 Harmonised technical specifications 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.

4.1.1 About the Harmonised technical specifications

Performance harmonised standards made mandatory under the CPR, as well as implementing acts (Article 6(1) of the CPR) and delegated acts (Articles 7(1), 9(3), and 10(2) of the CPR) 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 conformity.

The easiest way to determine 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.

- **Harmonised standards** are technical specifications developed by European standardisation organisations, such as CEN or CENELEC, in collaboration with the European Commission. These standards become mandatory through the adoption of **implementing acts** and outline the performance criteria and testing methods for construction products, ensuring they meet the CPR's essential requirements. For a

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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 or delegated act published in the Official Journal of the European Union. These can be found by searching for your product family in the relevant **database**.

- **Implementing acts** are legal acts that 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.
- **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,** establish rules on the provision **of general product information, instructions for use and safety information,** or determine the applicable **assessment and verification system.**

4.1.1.1 How to read a standard

Once you obtain your harmonised standard from your National Standardisation Body, it is important to be able 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 need to know which essential characteristics of the product are required for its use in the EU Member States they intend to sell their product. Manufacturers are not obliged to declare any essential characteristic which is not required in the markets in which the product is placed unless the standard establishes that it is mandatory (which is the case of environmental sustainability essential characteristics). To clarify these requirements, manufacturers can seek advice from National Product Contact Points (see section 4.4.3).

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4.1.2 About EADs and the EOTA route

In cases where there is no harmonised technical specification that **covers your product**, or 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, you may need to follow a different route and seek a **European Assessment Document** (EAD). EADs are particularly useful for innovative or unique products that are not covered by existing standards. **While not mandatory**, they provide a means of assessing a product's performance that allows a manufacturer to issue a declaration of performance and benefit from the CE marking.

The **European Organisation for Technical Assessment (EOTA)** is responsible for developing EADs. You can find existing EADs in the EOTA website, and if you want to develop a new one or to amend an existing EAD, then you need to contact a Technical Assessment Body (TAB). The list of TABs can be found here.

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

Once the EAD has been cited in the Official Journal of the EU, 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.

4.1.3 Help provided by National Product Contact Points

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 harmonised technical specifications or EADs and guide you through the conformity assessment procedures. These contact points can offer support and advice on how to meet the legal requirements for selling your product in different EU markets and information on rules applicable to the incorporation, assembling or installation of products.

The National Contact Points can be found on the relevant European Commission website.

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4.2 Identify the applicable Assessment and Verification System (AVS)

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, but this is also mentioned in the relevant harmonised technical specification, 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 harmonised technical specification or EAD, and identifying the **declared characteristics**, including relevant classes or levels of performance. The manufacturer must ensure **consistent performance**, as stated in the DoPC, and compliance 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 play a role in verifying compliance, ranging from full audits to simply validating test results, depending on the AVS. You can use one or more Notified Bodies, as needed.

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You will find the **official registry of Notified Bodies**, notified by Member States to perform the third party tasks, in the relevant 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

The different AVS systems are designed to **match the risk level and complexity** of construction products (see Annex IX in the CPR). 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 the old and new CPR

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

First, the new regulation 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 the predetermined environmental essential characteristics, while the notified body validates the accuracy of the calculations and methods used.

Another change is related to the System 3. In the new CPR the AVS 3 requires the notified body to **confirm the manufacturer's determination of the product type**. This includes verifying the applicability of test reports provided by laboratories. A single notified body will now be responsible for validating that the product type corresponds to the rest results regarding all essential characteristics under this system, even if the tests are performed by multiple laboratories. The same body is responsible for issuing the certificate of performance and conformity for the product.

The new CPR 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.

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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 overing 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.

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	■	■	■			

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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

As in the old CPR, the new CPR 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 on testing

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 only be used by manufacturers who place their products on the market. In such cases, manufacturers 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, described in Article 59 of the CPR.

- First, **delegated acts may outline conditions where a product can achieve a certain level of performance without the need for testing or calculation**. For some essential characteristics, no assessment is required because a generic value or declaration is accepted at European level. In these cases, the European Commission publishes a delegated act containing this information. The same delegated acts establish the specific requirements in order to apply this simplification procedure. If your product is covered by such a legal act, you can declare the performance provided by the delegated act instead of assessing the performance of your product.

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- Second, another option is available **when the product is part of a system made of components that have already been tested by the provider**. If the manufacturer assembles the system following precise instructions from the provider, including compatibility criteria, they can rely on these test results of the system or its components, as long as they verify that all compatibility requirements are met. In this case, you can declare the performance obtained from the components, and the technical documentation must include the system provider's test results, an explanation of the compatibility requirements, and proof that the system was assembled according to the instructions.

- A third option applies **when a product corresponds to a product type already manufactured and tested by another manufacturer.** If the original manufacturer authorises it, the new manufacturer can use the existing test results and declare the same performance. However, the original manufacturer remains responsible for the accuracy and reliability of the test results, and the new manufacturer must obtain proper authorisation before applying this simplification. If these conditions are correct, you can declare the performance assessed by the original manufacturer instead of assessing the performance of your product. The technical documentation must include the other manufacturer's test results, their authorisation, and proof that the product types are identical.

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

Manufacturers of **custom-made, non-series products** that qualify for the exemptions mentioned in 2.1.4 can opt for simplified performance assessments by including a **specific section in their technical documentation** (Article 61 in the CPR). This documentation must demonstrate compliance with the relevant standards and provide **data equivalent to the requirements** of the Harmonised technical specification or EAD. Similarly to the other simplification procedures, 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 performing the assessment of performance of the product.

This option offers **an alternative to the complete exemption** for custom-made products (see 2.1.4), offering flexibility for manufacturers to adapt to the needs of their clients. For instance, in the context of a private contract, the construction contractor can require CE marking and DoPC also for custom-made non-series products. In summary, when a manufacturer produces product

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that is individually manufactured or custom made, manufactured in a non-series process, in response to a specific order, and installed by the manufacturer in a single construction work, then the manufacturer has three options:

- Use the **exemptions** to avoid producing a DoPC. The product must still need to comply with the applicable national rules.
- Use the **simplification procedures** described in this section to create a DoPC by replacing the performance assessment by technical documentation.
- Conduct a **full performance assessment** as usual, following all procedures.

4.3.3 Specific provisions for micro enterprises

There is also a specific provision **for micro enterprises that produce products with essential characteristics under the Assessment and Verification System 3** (Article 60 in the CPR). 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 harmonised technical specifications or European assessment documents. This fulfilment will need to be **assessed and certified** by a notified body in place of the validation of the assessment of performance.

4.3.4 Recognition of assessment between notified bodies

Finally, if a manufacturer has **already assessed their product** with one notified body, they can avoid repeating the process with a second notified body (Article 62 in the CPR). The second notified body can 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 the first.

This also applies to cases where **parts or materials** have already been assessed. This is particularly useful for environmental sustainability calculations under the Eco-design for Sustainable Products Regulation, as a notified body can recognise such assessments for parts or materials used in construction, provided there is an agreement between the manufacturer and the parts provider.

4.4 Calculate environmental sustainability performance

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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 **using the latest version of a software** provided by the European Commission. The current version of the software contains Flows, Methods, Characterisation Factors, Unit Groups and Flow Properties to be used for calculation of environmental footprint. The software may be updated. In such case, manufacturers are required to **apply any updates within one year** to remain compliant. The software accounts for the predetermined characteristics mentioned in the Annex II. Those characteristics are called “predetermined” because the environmental characteristics that must be declared by each product are established by the relevant hTS or EADs. As described in Chapter 3.1, the obligation to declare essential characteristics will come **gradually**.

In the European Commissions website, you can find the EF Reference Package to use in order to conduct your Life Cycle Assessment (LCA). This package includes reference flows, impact assessment methods, characterisation factors, unit groups, and flow properties, all structured in the International Reference Life Cycle Data System (ILCD) format. To use the package, download and import the data into the recommended LCA software, Look@LCI. Once imported, you configure the Life Cycle Assessment (LCA) project using the methods and characterisation factors provided, input inventory data, and analyse the product’s environmental impacts.

The **reference standard** on which this package is based is EN 15804+A2, "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 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 to the above-mentioned software. You will need to input **comprehensive data,** for example about the product's material composition, including information on raw materials used, their sourcing, and quantities. Then, you must assess and report the environmental impacts associated with energy use, water consumption, emissions, and waste generation **during the production** of the product. This assessment needs to cover the use of resources like water and energy in production, and any pollutants or waste byproducts. You must also provide information regarding the product’s **use and end-of-life processes** like recycling and disposal, to enable the software to calculate the environmental impacts. You must carefully consider and document any **assumptions** made during the assessment, as they can significantly impact the accuracy of the results.

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You will also need to access **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. Finally, in addition to assessing the product itself, you must also include the **packaging** used or likely to be used.

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 Chapter 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. The final assessment results will need to be included in the Declaration of Performance and Conformity.

4.5 Compile Technical documentation

As a rule, manufacturers must compile documentation that supports the product's compliance with the regulation and include any claim made in the DoPC (Article 22(3) in the CPR). This documentation must detail the product's **declared use**, ensuring it aligns with its intended application as outlined in the applicable hTS. It should include information on all relevant elements necessary to demonstrate the product's performance and conformity, such as design details, manufacturing processes, and test results.

Technical documents must be detailed enough to demonstrate compliance with harmonised standards or a European Assessment Document. The technical file should include product drawing and specifications; test and validation reports; quality control reports and material certificates. Moreover, if the product was tested or assessed by a notified body, manufacturers must include certificates or validation reports issued by these bodies.

When the simplified procedures mentioned in chapter 4.3 are used, then the information proving that the product fulfils the requirements to apply these procedures should be included.

To back up the **sustainability claims** in the DoPC, manufacturers must keep records of the life cycle assessment (LCA) calculations. These records should demonstrate how the product's

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environmental impact was calculated, including data on energy use, emissions, recyclability, and resource consumption. It's important to reference the software used for these calculations.

All documentation should be kept on file **for at least 10 years** after the **last** product of the respective type has been placed on the market. This ensures traceability and that any future inspections or requests for documentation can be met promptly. These documents must be accessible to authorities, customers, and other relevant parties upon request.

4.6 Prepare general product information, instructions for use and safety information

A clarification that was included in the new CPR is the content of the **General product information, instructions for use and safety information** (see Annex IV). All products accompanied by a Declaration of Performance and conformity must provide this information in the official language(s) of the Member State where the product is marketed.

Harmonised technical specifications will include guidelines on the type of information to be delivered.

When a product is covered by a European Assessment Document (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 list according to Annex IV of the CPR is found below - sections that are not applicable for all cases are shown in red. Those elements are obligatory only when available.

GENERAL PRODUCT INFORMATION, INSTRUCTIONS FOR USE, AND SAFETY INFORMATION
1. General Product Information **1.1. Product identification:** Unique identification code of the product type:

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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.

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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:

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4.7 Prepare Declaration of Performance and Conformity (DoPC)

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 old CPR, because **now manufacturers take responsibility not only for declaring how a product performs but also for confirming its compliance 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

The DoPC is drawn up according to a set **model in Annex V** of the CPR and must express the product's performance in relation to its essential characteristics according to the assessment methods defined by hTS or EAD. It also includes information about the **product's declared performance of predetermined environmental essential characteristics** covering the product's life cycle (including its packaging). The **manufacturer is not obliged to declare all the essential characteristics.** Some characteristics can be made mandatory to be declared in a delegated act and or those can be subject to a threshold level for entry into market. The predetermined environmental characteristics are mandatory to be declared in line with the time frame set out in Article 15(3) of the CPR (see 3.1.1). When relevant **product requirements** have been established by law, the DoPC must confirm that these requirements have been met. Only the CE marking may be displayed on the DoPC, demonstrating that the product complies with the regulation.

A change from the current CPR is that **manufacturers must supply by electronic means a copy of the DoPC of each product which is made available on the market.** Before the digital product passport system is made mandatory, this obligation can be fulfilled by sending electronic version of the DoPC to the customers, or it can be fulfilled by making the DoPC available on the website.

- If the DoPC is available on a website, it must be provided in **an unamendable format**, accessible **free of charge**, and available both in **human and machine-readable forms**. A unique identification code links the product to the DoPC, and a data carrier such as a QR code or permalink can be used to provide this link.

When the DPP system is made mandatory the manufacturer must provide the DPP of construction product (see 4.9).

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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

Below you will find the model of a Declaration of performance and conformity, as provided in Annex V of the CPR. 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

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:

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4. **Authorised representative**

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

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.

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Signed for and on behalf of the manufacturer by:

4.8 Affix CE-Marking

Once the previous procedures have been completed, the manufacturer can **affix their CE marking** to indicate that the product complies with EU regulations, with the declared performance and fulfils product requirements (see Article 18 in the CPR). The CE marking must be applied **before the product is placed on the market.**

The CE marking should be affixed only to products for which you, as the manufacturer, have prepared a DoPC. This declaration ensures that your product meets all applicable requirements, and by affixing the CE marking, you are **assuming your responsibility** for the product's performance compliance with the product requirements.

The CE marking must be **the sole mark** that attests to the product's performance with respect to the essential characteristics covered by the Regulation. 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.

Additionally, the CE marking must include:

- The two last digits of the year when the CE marking was first affixed, or for used products, the year when the product was deinstalled and the year when the 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 product passport if available.

It is important to note that while **other markings**, including private labels, may be added, they must not mean that the product's performance was **assessed differently** from the requirements of the regulation. Additionally, any claims about the product's performance must align with the assessment methods specified in the relevant technical standards. If the product is **sold online** or

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through distance selling, the offer must clearly display the CE marking and include all required information.

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 
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 product passport

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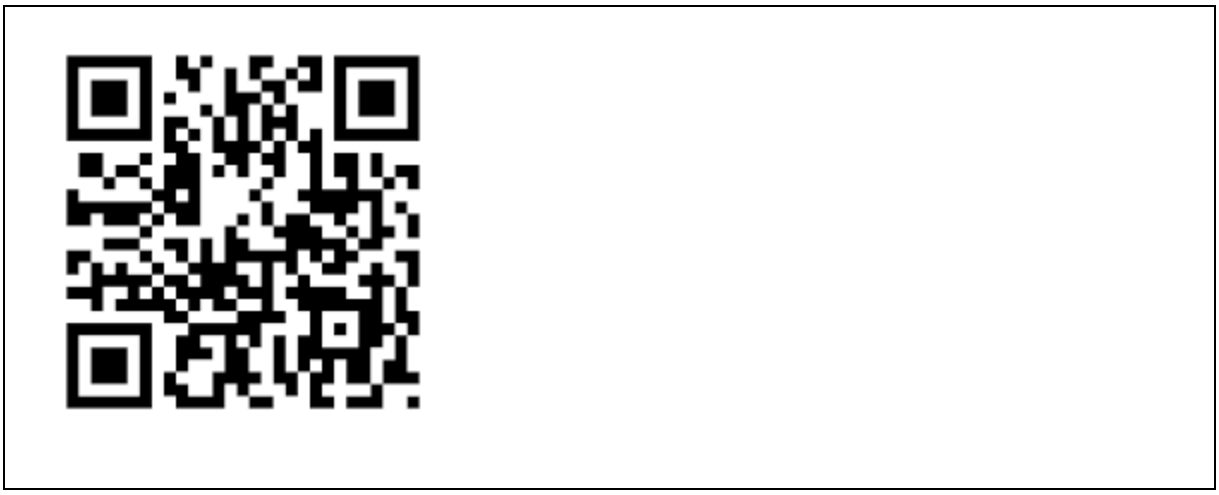

4.9 Create a Digital Product Passport

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 obligations under the CPR** (see Chapter X of the CPR). This means that products that are exempted as described in 2.1.4, do not need to draw 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:

- Declaration of Performance and Conformity.
- General product information, instructions for use and safety information
- Technical documentation
- Environmental sustainability labels established by 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)

Once all the necessary information is collected, the DPP must be formatted in a machine-readable and human-readable electronic format. The exact specification of the format will be determined in a future delegated act. The DPP must 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

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uploaded and stored so that they become **accessible by electronic means for free of charge** to the customer.

4.9.1 The DPP System

The European Commission will set up a **construction digital product passport system** (see Article 76 of the CPR). 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 defined by the Commission at a later stage, at this stage a feasibility study is being carried out, that explores following options for the future implementation of the DPP:

- 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** if needed. A back-up system by product passport service providers will also be established.

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**.

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 in the product's performance, characteristics, or compliance status, you need to draw up a new DoPC and a new DPP linked to it.

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4.9.2 The DPP Registry

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 (see Article 79 of the CPR). **Unique identifiers** will need to exist for the **product type**, the **operator**, as well as the **facility**, and will need to follow standards. Unique identifiers are specific alphanumerical codes that allow the distinct recognition of products 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 this data, such as unique product identifiers and commodity codes for customs procedures. The same registry will be also used in the context of the ESPR. 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 digital product passports.

5 Maintaining Compliance

After a construction product has been placed on the market, manufacturers remain responsible for ensuring **long-term compliance** with regulatory needs for products of the same product type that continue to be placed on the market. 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** even after they are sold. If new information arises -such as updates to European standards, 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. This could involve re-testing the product, modifying its design or manufacturing process, or updating the documentation and certifications associated with the product.

If changes in your production or FPC affect the product's characteristics, such as its structural integrity, fire resistance, or environmental impact, a new DPP and related documents must be provided. To do so, you will have to carry out all the relevant tasks regarding the characteristics that have changed.

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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.

A new tool introduced to assist market surveillance authorities, is the establishment of a **complaint portal** (see Article 63 in the CPR). 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 and implementing act is published or a harmonised standard 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. This may involve updating product designs, sourcing compliant materials, or adjusting manufacturing processes.

Moreover, if your product is covered by an **EAD cited in the OJEU in the context of the old CPR**, an ETA for products covered by the EAD can be issued for a period of **five years** after the date of application of the new CPR. After these five years, **only products with an existing ETA** based on the respective EAD can be placed on the market for another period of five years. This means that the product can be placed in the market maximum 10 years after the date of application of the new CPR.

It is possible, that some products currently covered by the EADs will newly be covered in the scope of **a harmonised technical specification** cited in the Official Journal of the European Union under the new CPR. Upon the citation of the new standard, manufacturers will have a **transition period**

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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 a 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. As the transition to the new CPR 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 new CPR 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

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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, in cases where the CPR may fall short of achieving its environmental sustainability objectives, the ESPR is positioned to step in and address potential gaps, the same applies to the CPR when ESPR does not cover other regulatory needs related to the products. Moreover, as mentioned in different chapters of this guide, the two regulations share some provisions, such as the DPP and the DPP registry. Finally, sustainability information assessed in the context of the ESPR can be recognised to prevent redundant assessment of a product under the CPR.

- **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

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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.