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# Analyzing EU's New Construction Products Regulation (EU) 2024/3110

## (Part 2: Core Requirements)

### Preface

This article continues from the previous piece published in Fastener World Bimonthly Magazine: "Analysis of the EU's New Construction Products Regulation (EU) 2024/3110 (Part 1: Regulatory Amendments and Implementation)." It further examines the core requirements of the new regulation by reviewing the supplemented and added articles in the EU's new Construction Products Regulation (EU) 2024/3110.

### CE Marking for Construction Products & Assessment and Verification Systems

The prior CPR defined AVCP (Assessment and Verification of Constancy of Performance) systems based on basic safety requirements and risk considerations for construction products, determining assessment, validation, marking, and market surveillance for CE marking.

**The EU's new Construction Products Regulation (EU) 2024/3110 revises the previous AVCP system's definition, renaming it AVS (Assessment and**

**Verification Systems). The new regulation's AVS not only includes prior AVCP content but also adds AVS 3+. Per Annex IX of Regulation (EU) 2024/3110, the AVS systems for construction product are detailed in Table 1.**

Fastener products previously using CE marking under 305/2011/EU to meet performance standards—such as EN 14566, EN 14592, EN 14399, or European Technical Assessment (ETA) via European Assessment Documents (EAD)—have their applicable AVCP systems specified in individual EN or EAD standards. Until these EN or EAD standards are reviewed or revised, the AVCP systems of the current versions convert directly to the AVS of the new regulation for CE marking assessment, verification, and market surveillance requirements. **Fastener manufacturers should monitor revisions to AVS systems in future updates to individual EN or EAD standards.**

### Sustainability of Construction Products & Environmental Product Declarations

To achieve environmental goals—including climate change mitigation and transition to a circular economy—the new EU Construction Products Regulation establishes environmental obligations, laying the foundation for standardized assessment of sustainable construction product development and application. This includes life cycle calculations covering all stages from raw material extraction or natural resource production to final disposal, accounting for potential benefits and burdens beyond system boundaries. For reused or



**Table 1. AVS Assessment and Verification Systems for CE Marking of Construction Products per REGULATION (EU) 2024/3110**

AVS Assessment and Verification Systems		4	3	3+	2+	1	1+
		Complying with AVS Assessment and Verification Systems and CPR Regulation, Marked with General Principles and Usage Methods for CE Marking					
		Manufacturer Compliance	Must Obtain EU-Approved TAB or NB Assessment and Verification Document Approval				
Manufacturer Tasks	DoP	■	■	■	■	■	■
	Initial Type Testing (ITT)	△			X		
	Product Testing Plan Development					X	X
	Factory Production Control (FPC)	△	X	X	X	X	X
	ITT and FPC Sampling Tests per Regulations	△			X	X	X
	Product Technical Documentation (Performance Requirements Assessment and Verification Documents)	X	X	X	X	X	X
	Product Technical Documentation (Regulatory Compliance Assessment and Verification Documents)	X	X	X	X	X	X
EU Institution Assessment and Verification Tasks	Product Type Category Confirmation		▲	▲	▲	▲	▲
	Confirmation of Initial Type Testing (ITT)		▲			▲	▲
	Factory FPC Inspection				▲	▲	▲
	Ongoing Surveillance of Manufacturer Tasks (Factory FPC or Product Performance Requirements or Regulatory Compliance Technical Documents) and Approval			▲	▲	▲	▲
	Auditing Test Samples (Factory Production Sampling or Site Sampling)				▲	▲	▲
	FPC Certificate Issuance				▲		
	Product NB Certificate Issuance					▲	▲

Notes:

1. EU institutions include NB (Notified Body), TAB (Technical Assessment Body), Notified Testing Laboratory.
2. The symbol △ indicates that the CPR regulation does not specify an EU institution. Manufacturers may perform manufacturer tasks themselves or commission external laboratories for Initial Type Testing (ITT) or external factory inspection bodies for FPC inspections.

remanufactured products, the life cycle calculation starts from demolition of buildings and includes all subsequent stages to final disposal. EN 15804 serves as the European standard for Environmental Product Declarations (EPD), which construction products must follow for sustainability declarations. Annex II of Regulation (EU) 2024/3110 lists predetermined environmental essential characteristics for product life cycle assessments. Individual EN standards or product-specific EADs from ETA assessments must cover the three essential environmental characteristics in Annex III. Thus, manufacturers' products must comply with these characteristic requirements as specified in applicable EN standards or EADs for assessment and verification.

Under the new regulation's sustainability requirements for construction products, supply chain-level sustainability assessments have already been established via the EU Carbon Border Adjustment Mechanism (CBAM). Environmental Product Declarations (EPD) represent product-level regulatory requirements. EN 15804 supports the following scope requirements for three EPD types:



1. Cradle-to-gate—covering the product stage from raw material selection to factory gate.
2. Cradle-to-grave—encompassing the full life cycle from raw materials through use, maintenance, and end-of-life.
3. Cradle-to-gate with options—covering the product stage, selectively including additional stages such as use, maintenance, or end-of-life processes.



The choice depends on the EPD's objectives and available data. Thus, the EPD scope of construction products is determined based on product family characteristics, industry traits, and requirements of essential environmental characteristics in EN standards or EAD documents. **Current fastener products under applicable EN standards or EADs have not yet defined EPD scopes. For fasteners, however, most align with the cradle-to-gate product stage—from raw material selection to factory gate.**

Reviewing the new regulation's sustainability mandates, compliance verification documents for sustainability must include EPD scope data and EU supply chain-level data retention under CBAM. Per EN 15804, EPD data must be recalculated and updated annually (providing data from the most recent year).

## Product DoP Requirements

Declaration of Performance (DoP) is a mandatory document for CE marking, detailing product performance and conformity. Annex III of the old regulation lacked sufficient content, now revised in the new regulation's Annex V to specify required DoP items. Manufacturers must appropriately update DoPs for CE-marked products to comply with the new regulation.

## Digital Product Passport

The EU is pursuing a "green and digital twin transition" to drive climate neutrality and sustainable economic growth. Per the European Commission, the Digital Product Passport (DPP)—a key measure in the EU Green Deal and Circular Economy Action Plan—modernizes product information across supply chains, enhances energy and resource efficiency, and strongly supports building Europe's circular economy.

A DPP is a product-specific database where data is logged, processed, and shared electronically. Key elements include unique product codes, regulatory compliance documents, user manuals, instructions, warnings or safety information (including other EU regulations applicable to the product), manufacturer details, and data on the individual or company placing the product on the EU market. Articles 75–80 of Regulation (EU) 2024/3110 establish DPP provisions for construction products. DPPs are developed under EU Regulation 2024/1781 without impairing interoperability with Building Information Modelling (BIM), while accounting for construction products' specific characteristics and requirements. They include passport functions per Article 76 and define access rights for entities (economic operators, customers, demolishers, users, and national authorities) to DPP information.

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Building on EU Regulation 2024/1781 as the foundation for DPP, product passport service providers handle details on passport information, updates, and procedures to ensure DPP availability even if the creating economic operator goes bankrupt, liquidates, ceases EU operations, or fulfills availability obligations. This includes backup systems by service providers. Where needed, more detailed or alternative rules supplement Regulation (EU) 2024/1781 for identifiers, data carriers, digital credentials, and DPP registration lifecycle management.

Economic operators must provide the DPP for at least 10 years after placing the last product of that type on the EU market, or longer if it does not impose disproportionate costs or burdens on the economic operators. DPP service providers must ensure system accessibility for a 25-year period. **The DPP must account for information needs supporting product reuse and remanufacturing, with all data kept accurate, complete, and up-to-date. A product's DPP shall include: (1) performance and conformity declarations, accessible via links to other EU databases; (2) general product information, instructions for use, and safety information; (3) technical documentation required by Article 22(3); (4) labeling required by Article 22(9); (5) unique identifier issued per Article 79(1); (6) documents for other EU laws applicable to the product; and (7) the primary data carrier effectively providing DPP data.** DPP data links to one or more data carriers for electronic access, free to all economic operators, customers, product users, and authorities with varying access rights. Designated participants in the construction DPP system may input or update information for a set period after the last product of that type is placed on the market.

## Conclusion

The EU's new Construction Products Regulation (EU) 2024/3110 emphasizes construction product sustainability and Digital Product Passports (DPP) as key revision focuses. Product sustainability is demonstrated through Environmental Product Declarations (EPD) covering life cycle scopes and product-level metrics. The DPP digitally consolidates product categories, AVS compliance, market surveillance, EU market traceability, general information, instructions, safety data, and DoP—delivered real-time via passport platforms from service providers.

Fastener operators previously using CE marking under CPR 305/2011/EU—regardless of applicable EN standards or EADs—should strengthen client communications upon new regulation implementation to understand EPD sustainability demands and support establishment of DPP for customers.

To establish digital product passports for fasteners, communicate with clients to understand their corresponding digital product passport service providers and passport platform carriers, as well as the data access rights of manufacturers and product users within the digital product passport system. Manufacturers assisting clients in establishing, updating, and maintaining accurate data in the digital product passport system will be a key issue for meeting the EU's new Construction Products Regulation requirements on digital product passports and market surveillance for product compliance. ■

## References

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