

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

(Part 1: Regulatory Amendments & Implementation)



## Introduction

To strictly enforce CE marking (certification) for construction products, the EU's Construction Products Regulation 305/2011/EU (abbreviated as CPR) fully replaced the former Construction Products Directive 89/106/EEC (abbreviated as CPD), effective July 1, 2013. The shift from implementing CPD to CPR introduced entirely new requirements not only for manufacturers—already restricted under the old rules—but also for traders, importers, and distributors involved in product circulation. All construction products compliant with CPR must bear the CE mark to enter the EU market. CPR ensures products meet basic requirements with clear guidelines: only those with the CE mark are deemed safe and suitable, enabling unrestricted free trade across the EU. Under the CPD, there was no clear definition of product categories or types requiring mandatory CE marking. CPR explicitly defines the scope of construction products, including fasteners used directly in buildings and those for construction engineering purposes. Products within this scope must meet relevant standards and carry the CE mark to be imported into the EU.



The Official Journal of the European Union (OJ L, December 18, 2024) published the new CPR (EU) 2024/3110, replacing the EU Construction Products Regulation CPR 305/2011/EU effective from July 1, 2013. The new CPR (EU) 2024/3110 comprises 15 chapters, 96 articles, and 11 annexes. Per Article 96, CPR (EU) 2024/3110 takes effect 20 days after publication in the Official Journal. Implementation timelines vary by article content and transition progress, with full mandatory enforcement of all provisions by January 8, 2027. See *Table 1* for details.

## Regulatory Amendments:

In addressing climate change, the European Green Deal—proposed by the EU in 2019 serves as a policy framework to achieve climate neutrality (net-zero greenhouse gas emissions) by 2050 through energy transition, circular economy measures, and more. Its scope spans multiple levels: European Taxonomy for Sustainable Activities, Emissions Trading Scheme (ETS), Corporate Sustainability Reporting Directive (CSRD), Corporate Sustainability Due Diligence Directive (CSDDD), Carbon Border Adjustment Mechanism (CBAM), Ecodesign for Sustainable Products Regulation (ESPR), Products Regulation, and Environmental Product Declaration (EPD). With construction as a key focus, the Green Deal includes and emphasizes green sustainability, sustainable product design, increased use of recycled materials, repair and reuse services, and circular economy regulations. Thus, the Construction Products Regulation falls under the Products Regulation level and has been amended accordingly, while also incorporating carbon emissions requirements (see *Figure 1*). Revisions to building product regulations must also consider carbon emission-related tiered requirements.



The new CPR forms part of the European Green Deal, aligning with its goals to benefit European citizens and businesses through a sustainable green transition. It prioritizes environmental sustainability and aligns with the Green Deal, and is a critical part of the EU's 2050 climate neutrality target. **Key amendments promote a green transformation of construction products, addressing shortcomings in the old 305/2011/EU regarding green and sustainable development. They update obligations for economic operators, strengthen market surveillance, eliminate regulatory overlaps and contradictions, enhance legal certainty, and reduce administrative burdens. New provisions mandate environmental sustainability for construction products, minimize environmental impact, boost resource efficiency, and advance EU climate and circular economy goals. To meet digital-era needs, it establishes efficient information flows using electronic and machine-readable formats, ensuring transparent and accurate transmission of product performance data to drive digitalization in construction products and the industry.**

Table 1. Mandatory Implementation Timeline for CPR (EU) 2024/3110 Articles and Annexes	
Article/Annex	Mandatory Implementation Date
Articles 1 to 4 Article 5(1) to (7) Article 7(1) Article 9 Article 10 Article 12(1) - first subparagraph Article 16(3) Article 37(4) Article 63 Article 89 Article 90 Annexes I, II, III, IV, VII, IX, and X	January 7, 2025 (Official regulation effective date)
Remaining articles (except for Article 92)	January 8, 2026 (Start date for application of new regulation articles, excluding Article 92)
Article 92	January 8, 2027 (Final deadline for full replacement of original CPR)

Figure 1. Overview of the European Green Deal's Initiatives, Directives, and Regulations Interrelationships

**Regulatory Amendments:**

A comparison of chapters, articles, and annexes between the new regulation CPR (EU) 2024/3110 and the old regulation 305/2011/EU is shown in *Table 2*.

A comparison of annexes between the new regulation CPR (EU) 2024/3110 and the old regulation 305/2011/EU is shown in *Table 3*.



(Source: <https://www.kiwa.com/globalassets/dam/kiwa-corporate/downloads/whitepaper-the-new-european-construction-product-regulation-kiwa.pdf>)

Reviewing the structure of chapters and articles reveals the structural evolution of the new regulation. **The new regulation fundamentally encompasses the scope of the previous CPR 305/2011/EU, retaining its chapter framework with some reordering of sections—yet fully covering all prior requirements. The new regulation supplements or adds articles by incorporating requirements from various levels of the European Green Deal, revising the original CPR provisions accordingly.** Examining the annex structures and content, the new regulation introduces numerous additional annexes, providing more detailed specifications for construction product classification, basic requirements, product information, and certification assessment criteria. A detailed correlation table for these supplemented or added articles is listed in Annex XI. The new regulation defines construction products in Annex VII, classifying them into 36 product families—an increase of one from the previous 35 categories. The scope of the prior 35 construction product categories remains unchanged. Therefore, fastener products that complied with the previous CPR must also meet the requirements of the new regulation CPR (EU) 2024/3110 within its mandatory implementation timeline.



For core modifications to CPR's essential requirements through supplemented or added articles in the new regulation CPR (EU) 2024/3110 compared to the previous CPR, please refer to *Analyzing EU's New Construction Products Regulation (EU) 2024/3110 (Part 2: Core Requirements)* which will be released in an upcoming Fastener World publication.

**Table 2. Comparison of Chapters and Articles: CPR (EU) 2024/3110 vs. 305/2011/EU**

CPR (EU) 2024/3110		CPR 305/2011/EU	
Chapter	Article	Chapter	Article
CHAPTER I General Provisions	1~12	CHAPTER I General Provisions	1~3
CHAPTER II Procedure, Declarations and Markings	13~19	CHAPTER II Declaration of Performance and CE Marking	4~10
CHAPTER III Obligations and Rights of Economic Operators	20~30	CHAPTER III Obligations of Economic Operators	11~16
CHAPTER IV European Assessment Documents	31~37	CHAPTER IV Harmonized Technical Specifications	17~28
Chapter V Technical Assessment Bodies	38~41	CHAPTER V Technical Assessment Bodies	29~35
CHAPTER VI Simplified Procedures	36~38	CHAPTER VI Notifying Authorities and Notified Bodies	42~58
CHAPTER VII Notifying Authorities and Notified Bodies	39~55	CHAPTER VII Simplified Procedures	59~62
CHAPTER VIII Market Surveillance and Safeguard Procedures	63~70	CHAPTER VIII Market Surveillance and Safeguard Procedures	56~59
CHAPTER IX Information and Administrative Cooperation	71~74		
CHAPTER X Digital Product Passport	75~80		
CHAPTER XI International Cooperation	81		
CHAPTER XII Incentives and Public Procurement	82~83		
CHAPTER XIII Regulatory Status of Products	84		
CHAPTER XIV Emergency Procedures	85~88		
CHAPTER XV Final Provisions	89~96	CHAPTER IX Final Provisions	60~68

**Table 3. Comparison of Annexes: New Regulation CPR (EU) 2024/3110 vs. Old Regulation 305/2011/EU**

CPR (EU) 2024/3110		CPR 305/2011/EU	
ANNEX I	Basic Requirements for Construction Works	ANNEX I	Basic Requirements for Construction Works
ANNEX II	Predetermined Environmental Essential Characteristics		
ANNEX III	Product Requirements		
ANNEX IV	General Product Information, Instructions for Use and Safety Information		
ANNEX V	Declaration of Performance and Conformity Referred to in Article 15 (1)	ANNEX III	Declaration of Performance
ANNEX VI	Procedure for Requesting European Technical Assessments and for Adopting a European Assessment Document	ANNEX II	Procedure for Adopting a European Assessment Document
ANNEX VII	List of Product Families	ANNEX IV	Product Areas and Requirements for TABs
ANNEX VIII	Requirements for TABs		
ANNEX IX	Assessment and Verification Systems (AVS)	ANNEX V	Assessment and Verification of Constancy of Performance
ANNEX X	Essential Characteristics of a Horizontal Nature		
ANNEX XI	Correlation Tables		

### References

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