

Passport checklist for construction products

What already applies, what the construction passport will carry and what its delegated act still has to settle - to tick off.

What this checklist covers

Nature of this checklist. Preliminary: the act is adopted, but details of its implementation are still pending. We update this list as soon as new regulatory information is published.

This checklist is part of our [reference on the digital product passport for construction products](#), which covers the timeline, the roles, the required data and the official documents for the whole industry; this page narrows it down to the passport and to the duties that already stand around it.

Regulation (EU) 2024/3110 replaced the Construction Products Regulation of 2011 and set up a construction digital product passport in its Chapter X, Articles 75 to 80. It is the only passport regime in this series with no date attached, so this checklist is built in two halves: what already binds you today, which is a great deal, and what the passport will ask for once its act exists.

What is pending is worth naming precisely, because it is most of the system. Art. 75(1) obliges the Commission to set up the construction passport system by delegated act and attaches no deadline to doing so. That act has to determine who may read which information and who may introduce or update it, the requirements for passport service providers, the arrangements for keeping passports alive after an insolvency, and whether the identifier, data carrier, digital credential and registry rules of the Ecodesign Regulation apply as they stand or in a more detailed form (Art. 75(2), Art. 79). Only once it enters into force do the two clocks of Art. 80(1) start: six months to an operational system, eighteen months to the manufacturer duty. The Commission's own timeline places the act indicatively in the second quarter of 2027, which is where the commonly quoted 2028 and 2029 dates come from. They are arithmetic on an indicative date, not law.

What is not pending is Art. 76(2), which already lists what a construction passport carries. That list is the reason this checklist is useful now: every item on it is a document or a data set you can build today. The articles in brackets are those of the regulation.

Does this apply to your product?

Tick what holds for your product. The first statement is the gate that decides whether the economic operator duties reach you at all, and it is the one most often missed. The articles in brackets point to [Regulation \(EU\) 2024/3110](#).

- ☐ The product is covered by a harmonised technical specification, or it is CE-marked on the basis of a European technical assessment: only then do the obligations of this chapter apply to you at all (Art. 20(1)).
- ☐ It is a construction product, meaning a formed or formless physical item, 3D-printed products included, or a kit, placed on the market for permanent incorporation into construction works (Art. 3(1)).
- ☐ You place it on the EU market as its manufacturer, including where you manufacture it by 3D printing, in which case the same duties attach (Art. 22(1)).
- ☐ You place it under your own name or trade mark, modify it, declare a different use, claim characteristics deviating from the manufacturer's, or place a used or remanufactured product on the market: each makes you the manufacturer in law (Art. 26(1) and (2)).
- ☐ It is individually manufactured or custom-made under the conditions of Art. 14, or made for heritage conservation: then no declaration is drawn up, and no passport is required either (Art. 14, Art. 76(4)).

What already applies today

The passport has no date, but the paperwork it will carry mostly does. Everything below comes from [Regulation \(EU\) 2024/3110](#) and is what the passport will later hold. It starts binding a product family one year after the implementing act that makes its harmonised technical specification mandatory, so check that date for your family first (Art. 95(9)). Tick off what is already in place.

- ☐ Determine the product type and have the performance assessed against the mandatory essential characteristics and those you intend to declare (Art. 22(1)).
- ☐ Draw up the declaration of performance and conformity on the model of Annex V, which merges the old performance and conformity declarations into one document (Art. 13, Art. 15(1)).
- ☐ Declare the environmental performance over the life cycle for the Annex II characteristics, calculated with the latest version of the software the Commission provides free of charge; updates become mandatory one year after publication (Art. 15(2)).
- ☐ Cover Annex II points (a) to (d) since 8 January 2026, points (e) to (m) from 9 January 2030 and points (n) to (s) from 9 January 2032 (Art. 15(3)).
- ☐ Provide the REACH information of Article 31 or, as the case may be, Article 33 together with the declaration (Art. 15(6)).

- ☐ Draw up the technical documentation naming the declared use, the elements proving performance and conformity, the assessment system of Annex IX and the environmental calculation (Art. 22(3)).
- ☐ Affix the CE marking, which may only go on a product for which the declaration has been drawn up, and put it on key parts too (Art. 17, Art. 22(2)).
- ☐ Give the product a manufacturer-specific unique identification code of the product type and, where available, a batch or serial number, visible and legible to users (Art. 22(5)).
- ☐ Label a product "Only for professional use" where expertise is needed to use it, and show that label before the sales contract binds the customer, distance selling included (Art. 22(5)).
- ☐ Accompany the product with the general product information, instructions for use and safety information of Annex IV, in the language the member state determines (Art. 22(6)).
- ☐ Keep every document and item of information of this chapter at the disposal of national authorities for ten years, and present it within ten days of a request; the duty falls away for what is available through the passport (Art. 20(4)).
- ☐ Identify on request who supplied you and whom you supplied, with contact details and tax and company registration numbers (Art. 20(3)).

What the passport will carry

Art. 76(2)(a) already lists the content, which is why the passport is less a new document than a container for documents you produce anyway. Under each item you find its place in the regulation.

- ☐ The declaration of performance and conformity, including the REACH information of Art. 15(6) and the documentation provided together with it under Annex V
Art. 76(2)(a)(i)
- ☐ The general product information, instructions for use and safety information of Annex IV
Art. 76(2)(a)(ii)
- ☐ The technical documentation, including the sections required where a simplified procedure was used
Art. 76(2)(a)(iii)
- ☐ The label, where environmental sustainability labelling has been required for your product family
Art. 76(2)(a)(iv)
- ☐ The unique identifiers issued under the identifier rules the system adopts
Art. 76(2)(a)(v)
- ☐ The documentation required under other Union law applicable to the product
Art. 76(2)(a)(vi)
- ☐ The data carriers of key parts for which a passport of their own is available
Art. 76(2)(a)(vii)

- ☐ Nothing at all, where the product is exempt from drawing up a declaration under Art. 14
Art. 76(4)

What the delegated act still has to settle

This is the part no supplier can promise you today, and the part worth reading before you sign a contract that assumes any of it. Art. 75(2) lists what the act has to determine; every point below is an open question until it is adopted.

- ☐ How the system is built on the passport of the Ecodesign Regulation without compromising interoperability with building information modelling
Art. 75(2)(a)
- ☐ Which functionalities the system needs in order to implement and manage the passports of Art. 76
Art. 75(2)(b)
- ☐ Which actors, economic operators, clients, deinstallers, users and authorities among them, may access which information, weighed against intellectual property, sensitive commercial information and the safety of construction works
Art. 75(2)(c)
- ☐ Which actors may introduce or update information, and which information they may touch
Art. 75(2)(d)
- ☐ The detailed arrangements for updating the passport of an existing product
Art. 75(2)(e)
- ☐ The procedures keeping passports available after insolvency, liquidation or cessation of activity, including a back-up system run by service providers
Art. 75(2)(f)
- ☐ The requirements for passport service providers, and a certification scheme to verify them if one is needed
Art. 75(2)(g)
- ☐ Whether the identifier, data carrier, digital credential and registry rules of the Ecodesign Regulation apply as they stand or in a more detailed or alternative form
Art. 75(2)(h), Art. 79
- ☐ The retention frame: the system accessible for twenty-five years after the last product of the type was placed on the market, and the operator making the passport available for at least ten
Art. 75(2)(i)
- ☐ How the information needed for reuse and remanufacturing stays available
Art. 75(2)(j)

How the passport will have to be built

Articles 77 and 78 already fix the properties of the passport as a system, independently of the delegated act. They are the questions to put to any provider now, because a system that cannot do these things will not become compliant later.

- ☐ Connected through one or more data carriers to a persistent unique identification code of the product type
Art. 77(1)(a)
- ☐ Reached through the data carrier that accompanies the CE marking
Art. 77(1)(b), Art. 18(2)(g)
- ☐ Corresponding to the product type and its unique identification code, and accessible free of charge to economic operators, clients, users and authorities
Art. 76(2)(d) and (e)
- ☐ Based on open standards, machine-readable, structured, searchable and transferable without vendor lock-in, with a narrow technical exemption for the attached declaration and technical documentation
Art. 77(1)(d)
- ☐ Graded by levels of access, with trade secrets and intellectual property protected
Art. 76(2)(f), Art. 78(f) and (g)
- ☐ Fully interoperable with other passports in technical, semantic and organisational terms
Art. 78(a)
- ☐ Available after insolvency, liquidation or cessation of activity in the union, through the back-up system the act will require
Art. 78(e)
- ☐ Stored and processed by operators or service providers that may not sell or reuse the data beyond the service
Art. 78(d)
- ☐ Authentic, reliable and tamper-evident, designed and operated so that fraud is avoided
Art. 78(h) and (i)
- ☐ Holding no personal data of the end user without explicit consent
Art. 77(1)(e)

Deadlines

The dates that matter for a construction product, taken from the application, transitional and passport articles of the regulation. Everything from the delegated act onwards is relative rather than fixed, and is marked as such.



EIGHTEEN MONTHS
AFTER THE ACT

The manufacturer duty applies

Eighteen months after the same act enters into force, manufacturers make the passport available through the construction passport system, connected to the data carrier of Art. 18(2)(g) (Art. 22(7), Art. 80(1)). This is the only clock that turns the passport into an obligation.

9 JANUARY 2030

More environmental characteristics are declared

Points (e) to (m) of Annex II join the declaration of performance and conformity, and points (n) to (s) follow on 9 January 2032 (Art. 15(3)). By then the declaration covers the full environmental profile, from climate change effects to land use related impacts.

8 JANUARY 2040

The old regulation finally goes

The provisions of Regulation (EU) No 305/2011 that survived 2026 are repealed (Art. 94). Until then two regimes sit side by side, which is why a product's paperwork can look inconsistent for years without anyone being wrong.

Sources

The documents this checklist is drawn from, and what each one is good for.

Document	What for
Regulation (EU) 2024/3110	The regulation itself: Chapter X, Articles 75 to 80, on the passport, Art. 13 to 15 and Annex V on the declaration, Art. 22 on the manufacturer, Annex II on the environmental characteristics.
Regulation (EU) No 305/2011	The previous regulation, repealed from 8 January 2026 except a listed set of provisions that run until 8 January 2040.
First CPR Working Plan for 2026–2029	The communication that sequences the standardisation work, and therefore tells you when your product family is likely to get a harmonised technical specification.

Document	What for
Regulation (EU) 2024/1781 (ESPR)	The framework the construction system has to be built upon. Its Articles 12 and 13 on identifiers and the registry apply unless the construction act sets different rules; its Article 14 on the web portal applies either way.
Implementing Regulation (EU) 2026/1778	How the central registry works. Its scope already names construction products covered by Art. 76.
DPP page of the European Commission	The official roadmap, including the indicative second quarter of 2027 for construction products, and the place a change of date shows up first.
Construction Products Regulation page of the European Commission	The Commission's own overview of the revised regulation and the acts in preparation under it.

How to prepare

Six steps in the order they pay off. None of them depends on the delegated act, which is the point of doing them now.

1. **Work the declaration, not the passport:** the declaration of performance and conformity is the passport's first item and it is already due. Getting it right, on the Annex V model and with the Annex II characteristics, is most of the preparation.
2. **Set up the environmental calculation:** Annex II points (a) to (d) are due since January 2026, and the Commission's software updates become mandatory a year after publication. Diarise the update, because a declaration calculated on a superseded version stops being current.
3. **Expose the product type code and the batch number:** Art. 22(5) wants a manufacturer-specific code of the product type plus a batch or serial number. Most production systems have never had to publish those outside the plant, and that is the real integration work.
4. **Decide the level per product family:** cement, concrete and aggregates vary between deliveries, so a passport pinned to a product type is not enough on its own. Settle now which families you will publish per batch.
5. **Pilot with a handful of product types:** [Register for free](#), start from the construction products import template and build a few real types with their declarations and environmental figures attached. Fields the act has not settled stay empty without blocking anything.

6. **Ask providers the Art. 75(2) questions:** access levels, update rights, back-up after insolvency and the twenty-five-year horizon are the four the act will decide. Our [provider checklist](#) turns them into questions you can put in writing.

As of 8 September 2026. The current version of this checklist:

<https://transpareo.com/en/industries/construction/checklist-construction-products>