

The Irish Manufacturer's Guide to CPR 2024 & Digital Product Passports

What's changing, what it means for you, and what to do now

DPP Delivery

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Abbreviations & Glossary

Quick reference for the abbreviations and acronyms used throughout this guide.

Abbreviation	Full Term
BIM	Building Information Modelling
CE	Conformité Européenne (European Conformity marking)
CIF	Construction Industry Federation
CPR	Construction Products Regulation
CSRD	Corporate Sustainability Reporting Directive
DoP	Declaration of Performance
DoPC	Declaration of Performance and Conformity
DPP	Digital Product Passport
EPBD	Energy Performance of Buildings Directive
EPD	Environmental Product Declaration
ESPR	Ecodesign for Sustainable Products Regulation
FPC	Factory Production Control
GPP	Green Public Procurement
GS1	Global Standards One (product identification organisation)
GTIN	Global Trade Item Number
GWP	Global Warming Potential
IGBC	Irish Green Building Council
JSON-LD	JavaScript Object Notation for Linked Data
LCA	Lifecycle Assessment
NCS	National Construction Summit
NZEB	Nearly Zero Energy Building
SCIP	Substances of Concern In articles, as such or in complex objects (Products)
SVHC	Substances of Very High Concern

What's Changing and Why It Matters

The construction industry accounts for roughly **37% of global CO₂ emissions** and consumes over 50% of the world's raw materials. The EU has decided that this is no longer acceptable. A wave of interconnected regulations is reshaping how construction products are manufactured, documented, and sold across Europe.

At the centre of this change is the **Construction Products Regulation 2024 (CPR 2024)**, formally Regulation (EU) 2024/3110. It replaces the original CPR from 2011 and introduces a fundamentally new requirement: **Digital Product Passports (DPPs) for construction products**.

Why is this happening now?

CPR 2024 does not exist in isolation. It is one piece of a larger EU strategy:

- **The Energy Performance of Buildings Directive (EPBD)** now requires whole-life carbon assessments for new buildings. Buildings need product-level environmental data - which means manufacturers must supply it.
- **The Corporate Sustainability Reporting Directive (CSRD)** forces large contractors and developers to report Scope 3 emissions. They will demand supply chain data from their manufacturers.
- **The Ecodesign for Sustainable Products Regulation (ESPR)** establishes the DPP concept across all product categories. CPR 2024 applies the same logic specifically to construction.
- **Green Public Procurement (GPP)** rules from June 2026 mean publicly funded projects over €5 million must include carbon assessments. Contractors will favour suppliers who can provide the data.

The plain-English version:

The EU is making environmental data mandatory for construction products. If you manufacture products that go into buildings, you will need to provide structured digital data about their environmental impact, performance, and end-of-life characteristics. This isn't optional - it's the law.

What does this mean for Irish manufacturers?

Ireland's construction manufacturing sector is heavily export-oriented, with significant trade into the EU single market. Even for domestic supply, Irish building regulations increasingly reference EU harmonised standards.

The practical impact is threefold:

1. **Market access:** Products without DPPs will eventually be unable to carry the CE marking for construction products, restricting access to EU markets.
2. **Tender requirements:** Contractors subject to CSRD and GPP will preference - and ultimately require - suppliers with structured environmental data.
3. **Competitive advantage:** Early movers who prepare now will be better positioned for tenders, particularly public sector projects, before their competitors catch up.

What Is a Digital Product Passport?

A Digital Product Passport (DPP) is a structured, machine-readable digital record that travels with a product through its lifecycle. Think of it as a comprehensive identity document for a construction product.

What data does a DPP contain?

A construction product DPP brings together several types of information into a single digital record:

Data Category	What It Covers
Environmental	Global Warming Potential (GWP), lifecycle impact data across EN 15804 modules (A1–A3 production, C1–C4 end-of-life, D reuse/recycling potential)
Performance & Conformity	Declaration of Performance and Conformity (DoPC), essential characteristics, test results, CE marking data
Circularity & Durability	Expected service life, recyclability percentage, disassembly instructions, recycled content share
Product Identity	GTIN (barcode number via GS1), manufacturer details, production facility, batch/lot information
Substances of Concern	SVHC (Substances of Very High Concern) declarations, SCIP database entries

How does a DPP work in practice?

The physical product carries a **QR code or data carrier** (such as a GS1 Digital Link) that links to the DPP. When scanned, it resolves to a machine-readable digital record - typically in JSON-LD format - hosted on compliant infrastructure.

This record is also registered in the **EU DPP Registry** (launching July 2026), which acts as a central index. Authorities, contractors, specifiers, and building information systems can all access the data.

How it differs from what you have today:

If you already have an EPD (Environmental Product Declaration) or a DoP (Declaration of Performance), you have some of the underlying data. But a DPP is more than either of those. It combines environmental, performance, circularity, and identification data into a single structured digital format that machines can read and process. Your existing EPD PDF cannot do that.

Key standards and frameworks

- **EN 15804+A2** - The European standard for EPDs of construction products. Defines the lifecycle modules and impact categories that feed into DPP environmental data.
- **ISO 14025** - The international standard for Type III environmental declarations (EPDs).

- **GS1 standards** - The global product identification system. Your GTIN (Global Trade Item Number) becomes the product's unique identifier in the DPP ecosystem.
- **JSON-LD / Linked Data** - The technical format for machine-readable DPP data, enabling interoperability across systems.

Timeline - Key Dates for Irish Manufacturers

CPR 2024 entered into force on 8 January 2026. However, the detailed product-specific requirements will roll out over several years through **delegated acts** - EU implementing rules that define requirements for each product family. Here are the dates that matter:

Date	What Happens	Impact
Jan 2026	CPR 2024 becomes applicable	Framework is live. General obligations begin.
Jun 2026	GPP carbon assessment mandate	Publicly funded projects >€5m must include carbon assessments. Contractors start requesting product data.
Jul 2026	EU DPP Registry launch	European Commission must establish the digital registry infrastructure.
Q4 2026	DPP Service Provider rules	Delegated act defining who can act as an official DPP service provider.
Q4 2027	Cement & binders delegated acts	First product category with mandatory DPP requirements.
2028–2029	Doors, windows, steel, insulation	Rolling mandatory compliance for additional product families.
2030	All construction products	Target for full DPP coverage across all harmonised product standards.

Your window for preparation: 2026–2029

The product-specific mandates don't arrive all at once. But the demand signal - from GPP rules, CSRD-reporting contractors, and specifiers - starts in 2026. Manufacturers who prepare early will win tenders that competitors cannot yet bid for.

Which Products Are Affected First?

The European Commission is prioritising product families based on environmental impact, market volume, and data readiness. The following eight categories are expected to be among the first to receive delegated acts with DPP requirements:

Product Family	Expected Timeline	Notes
Cement & hydraulic binders	Q4 2027	Highest environmental impact. First mover category.
Precast concrete products	2028	Large volumes, established EPD practice in some markets.
Structural steel	2028	High carbon intensity; significant recycled content variability.
Thermal insulation	2028–2029	Critical for NZEB compliance. Wide product diversity.
Doors & windows	2028–2029	Large SME sector in Ireland. Complex multi-material products.
Structural timber	2028–2029	Carbon sequestration benefits. Forest certification linkage.
Flat glass	2029	Energy-intensive manufacturing. Recyclability data required.
Cladding & facade systems	2029–2030	Composite systems with complex lifecycle data.

A note on delegated acts:

Each product family receives its own delegated act, which specifies the exact data requirements, testing standards, and transition periods. These are still being developed. The timelines above are based on the Commission's published work programme and may shift. However, the direction and obligations are confirmed - only the exact dates are subject to change.

If your products fall into any of these categories, you should be preparing now - not waiting for the delegated act to be published. The data collection and structuring work takes months, and demand from GPP-compliant contractors will arrive before the legal mandate does.

What Data Will You Need?

This is the question every manufacturer asks first. The answer depends on your product family, but the framework is consistent. Here is what a complete DPP will require:

5.1 Environmental data

The core environmental data follows **EN 15804+A2**, the European standard for construction product EPDs. The key metric is **Global Warming Potential (GWP)**, but the DPP requires a broader set of lifecycle impact data:

- **Module A1–A3:** Raw material supply, transport, and manufacturing (the “cradle to gate” footprint)
- **Module A4–A5:** Transport to site and installation
- **Module B1–B7:** Use stage (maintenance, repair, energy/water use)
- **Module C1–C4:** End-of-life (deconstruction, transport, processing, disposal)
- **Module D:** Benefits beyond the system boundary (recycling, energy recovery)

If you already hold an EPD, you have much of this data. If not, a lifecycle assessment (LCA) will be needed.

5.2 Performance and conformity data

CPR 2024 replaces the Declaration of Performance (DoP) with a new **Declaration of Performance and Conformity (DoPC)**. This combines:

- Essential characteristics and declared performance values
- Conformity assessment results
- Reference to harmonised technical specifications
- Notified body details (where applicable)

Most of this data should already exist in your current DoP and CE marking files, but it will need to be structured for digital delivery.

5.3 Circularity and durability data

This is new for many manufacturers:

- Expected service life (in years)
- Recycled content share (pre-consumer and post-consumer)
- Recyclability at end of life (percentage by mass)
- Disassembly / deconstruction instructions
- Hazardous substance content affecting recyclability

5.4 Product identification

- **GTIN** (Global Trade Item Number) via GS1 - the unique product identifier
- Manufacturer legal name and registration
- Production facility location

- Batch or lot number (for traceability)

5.5 Substances of concern

- SVHC (Substances of Very High Concern) above 0.1% by weight
- SCIP database notification (already required under the Waste Framework Directive)

5.6 Self-assessment: Where are you today?

Data Type	Where It Comes From	Do You Have It?
Lifecycle environmental impacts (GWP, etc.)	EPD / LCA study (EN 15804)	
Performance characteristics	DoP / test reports / CE marking files	
Conformity assessment	Notified body certificates / FPC records	
Recycled content share	Manufacturing records / supplier declarations	
Service life estimate	Technical documentation / durability testing	
End-of-life recyclability	Material composition analysis	
GTIN / product identification	GS1 Ireland registration	
SVHC / substances of concern	Safety data sheets / SCIP notifications	

Tip:

Print this page and tick off which data you currently hold. The gaps are your starting point for DPP preparation.

The Irish Landscape - Who's Doing What

Ireland's DPP readiness is still in the early stages. Here is the current landscape of organisations and supports relevant to Irish manufacturers:

EPD Ireland / IGBC

EPD Ireland, managed by the Irish Green Building Council (IGBC), operates the national EPD programme. It verifies and publishes EPDs for Irish construction products. If you already hold an EPD through this programme, you have a head start on the environmental data component of your DPP. However, an EPD alone is not a DPP - additional data categories and digital formatting are required.

Construction Industry Federation (CIF)

CIF has been actively briefing members on CPR 2024 implications and the broader sustainability reporting landscape. Their guidance focuses on awareness and preparation, and they have flagged DPPs as a priority issue for Irish manufacturers and contractors.

GS1 Ireland

GS1 Ireland manages the product identification standards (GTINs, barcodes, QR codes) that underpin the DPP's data carrier requirements. If your products don't yet have GTINs, GS1 Ireland is your starting point. Registration is straightforward and affordable.

Enterprise Ireland - Grant Support

Enterprise Ireland offers grants that can offset DPP preparation costs:

Grant	Coverage	Relevance
GreenStart	Up to 80% of eligible costs	For companies starting their sustainability journey. Can fund initial LCA/EPD work.
GreenPlus	Up to 50% of eligible costs	For more advanced sustainability projects. Can fund DPP data structuring and onboarding.

Both grants can potentially cover consultant fees for DPP readiness assessments and data preparation. Check eligibility with your Enterprise Ireland Development Advisor.

Current state of readiness

The reality:

Based on industry engagement and available data, an estimated

4-5% of Irish construction product manufacturers

have begun active preparation for DPP requirements. The vast majority are aware that something is changing but have not yet taken concrete steps. This is both a challenge and an opportunity - early movers will have a significant competitive advantage.

Your Action Plan

Preparing for DPPs is not an overnight project, but it doesn't have to be overwhelming. Here is a phased approach you can start today.

Now: Q1–Q2 2026

- Audit your current product data: EPDs, DoPs, technical sheets, test reports, safety data sheets
- Identify which product families are likely to be affected first (see Section 4)
- Check your GS1 registration - do your products have GTINs?
- Read the CPR 2024 regulation text (see Resources section for the link)
- Understand your SVHC / SCIP obligations - are your notifications current?
- Explore Enterprise Ireland grant eligibility (GreenStart / GreenPlus)
- Engage your supply chain - do your raw material suppliers have environmental data?
- Consider a professional DPP readiness assessment to understand your specific gaps

Mid-term: Q3 2026 – Q2 2027

- Monitor the EU DPP Registry specifications as they are published (from July 2026)
- Watch for the DPP Service Provider delegated act (Q4 2026) - this defines the rules for service providers
- Begin structuring your product data in digital formats
- If you don't have EPDs, commission LCA studies for your priority product families
- Start collecting circularity data (recycled content, service life, recyclability)
- Build internal processes for maintaining and updating product data

Long-term: 2028–2030

- Mandatory compliance arriving for most product families - DPPs must be in place
- Ensure DPPs are registered in the EU Registry
- QR codes / data carriers on products and packaging
- Ongoing maintenance: update DPPs when formulations, suppliers, or data change

- Leverage DPP data for tender responses, sustainability reporting, and customer communications
-

The strategic point:

You don't need to have a complete DPP today. But you do need to understand what's required and start closing the gaps. The manufacturers who begin data collection and structuring in 2026 will be ready when the mandates arrive - and competitive before they do.

Resources & Further Reading

Regulatory sources

- **CPR 2024 full text** - Regulation (EU) 2024/3110, available on EUR-Lex (eur-lex.europa.eu)
- **ESPR (Ecodesign for Sustainable Products Regulation)** - Regulation (EU) 2024/1781 on EUR-Lex
- **EPBD recast** - Directive (EU) 2024/1275 on EUR-Lex
- **gov.ie** - Department of Enterprise guidance on construction product regulations

Irish organisations

- **IGBC / EPD Ireland** - igbc.ie - EPD programme and sustainability guidance
- **Construction Industry Federation** - cif.ie - Industry guidance and CPR briefings
- **GS1 Ireland** - gs1ie.org - Product identification (GTIN registration)
- **Enterprise Ireland** - enterprise-ireland.com - GreenStart and GreenPlus grants
- **Construct Innovate** - constructinnovate.ie - Research and innovation support

Events

- **National Construction Summit** - nationalconstructionsommit.ie - Annual industry event (April 2026)
- **Construct Innovate webinars** - Regular online sessions on digital construction and sustainability
- **IGBC events** - Green Building workshops and seminars

Technical guidance

- **EPD.Guide** - epd.guide - Plain-English guide to EPDs and EN 15804
- **One Click LCA** - oneclicklca.com - LCA software widely used in construction
- **NBS Source** - source.thenbs.com - Product data platform with emerging DPP features
- **ECHA SCIP database** - echa.europa.eu/scip - Substances of concern notification

Next Steps - How DPP Delivery Can Help

DPP Delivery is a specialist consultancy focused on helping Irish construction product manufacturers prepare for and comply with Digital Product Passport requirements under CPR 2024.

We combine lifecycle assessment expertise, data science capabilities, and deep knowledge of Irish construction to provide a practical, structured path from where you are today to full DPP compliance.

Our service pathway

We've designed a logical journey that meets you wherever you are in your DPP preparation:

1

DPP Readiness Assessment

A structured session reviewing your current product data landscape. You receive a gap analysis report mapping your data against DPP requirements, with a prioritised action plan. A low-commitment starting point that gives you clarity on exactly what you need to do.

2

DPP Data Audit & Structuring

We collect your EPDs, DoPs, technical data sheets, and certificates. We map your data to the CPR 2024 DPP schema, identify gaps, and work with you to fill them. The output is structured, validated product data ready for DPP creation.

3

Full DPP Onboarding

Complete done-for-you DPP creation: data ingestion, structuring, machine-readable passport generation (JSON-LD), QR code creation, and hosted URLs. Your products get compliant Digital Product Passports, ready for the EU Registry.

4

DPP Hosting & Maintenance

Ongoing hosting on compliant infrastructure, regulatory updates as delegated acts evolve, tender-ready data exports, and customer access management. Your DPPs stay current and compliant as requirements develop.

Start with an assessment. No commitment beyond that.

The Readiness Assessment is designed as a standalone engagement. It gives you a clear picture of where you stand and what you need to do - whether or not you choose to work with us further.

DPP Delivery

Specialist DPP consultancy for Irish construction product manufacturers.

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