Guideline
Declaration of Performance and conformity (DoPC)

CE Marketing and Digital Product Pass (DPP)
Basic Information and explanation

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Declaration of Performance and conformity (DoPC)

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Introduction

The European Commission provides an overview of the key elements of the new regulatory framework on its webpage "CE marking and Declaration of Performance and Conformity (DoPC)". The Commission's information covers the Declaration of Performance and Conformity, CE marking, the Assessment and Verification System (AVS), notified bodies and the Digital Product Passport, as well as related aspects of market surveillance and support.

This guideline focuses on the aspects of the Commission's overview most relevant to E.D.S.F. members rather than addressing every topic covered on the webpage. Selected Commission information is presented in italics, followed by clearly identified E.D.S.F. explanations in regular type. The Commission extracts are reproduced in their original wording; their grouping and presentation have been adapted for readability. The E.D.S.F. explanations distinguish the general CPR framework from its practical implications for manufacturers in the door sector. They provide supplementary guidance, not an official interpretation by the Commission; the applicable legislation and technical specifications remain the authoritative references.

Throughout this guideline, **CPR-2011** refers to the previous Construction Products Regulation: Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 laying down harmonised conditions for the marketing of construction products and repealing Council Directive 89/106/EEC. **CPR-2024** refers to the new Construction Products Regulation: 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.

Declaration of Performance and conformity (DoPC)

1. Declaration of Performance and conformity

Information provided by the European Commission
Once assessment and verification procedures are completed, the manufacturer is required to issue a Declaration of Performance under the CPR-2011 or a Declaration of Performance and Conformity under the CPR-2024.
For products placed on the market under the CPR-2024, this declaration must include information on predetermined environmental characteristics to facilitate the calculation of buildings' carbon footprint.
Under the CPR-2024, the DoPC will eventually be integrated into the product's digital product passport.

E.D.S.F. explanation

Manufacturers are familiar with the Declaration of Conformity from EU legislation such as the Machinery Directive and the Low Voltage Directive. By issuing such a declaration, the manufacturer confirms that the product complies with the applicable legal requirements.

The CPR-2011 introduced a different concept for construction products: the Declaration of Performance, which primarily sets out the product's performance in relation to the essential characteristics defined in the applicable harmonised technical specification.

Under the CPR-2024, these two perspectives are brought together in the Declaration of Performance and Conformity (DoPC). Once the applicable assessment and verification procedures have been completed, the manufacturer must issue a Declaration of Performance under the CPR-2011 or a DoPC under the CPR-2024.

The DoPC is not merely an information document. By drawing it up, the manufacturer assumes responsibility for the product's conformity with the declared performance and with the applicable requirements under the CPR-2024. It must therefore be supported by the relevant technical documentation and by the results of the applicable assessment and verification procedures.
The change from the Declaration of Performance to the DoPC does not take place for all construction products at the same time. During the transition period, CPR-2011 and CPR-2024 will coexist. In principle, the applicable declaration depends on whether the relevant product is still covered by a harmonised standard cited under the CPR-2011 or has already migrated to a harmonised technical specification under the CPR-2024.
As the relevant replacement harmonised product standards for doors under the CPR-2024 are not yet applicable, manufacturers must continue to apply the existing harmonised product standards (i.e. EN 14351-1 and EN 13241) and the corresponding CPR-2011 obligations until the new standards become mandatory under the CPR-2024, taking account of the applicable transitional arrangements.

The environmental information required in the DoPC will be introduced progressively. Manufacturers should distinguish between the legal obligation to declare the environmental characteristics specified under the CPR-2024 and the technical work needed to generate the underlying data, for example through a life-cycle assessment. The relevant characteristics, calculation rules, assessment methods and applicable AVS must be derived from the legal and technical basis applicable to the product family. Existing environmental product information may support this work, but it does not automatically constitute the required declaration under the CPR-2024.

For windows and pedestrian doorsets, complementary product category rules (c-PCR) are already available in EN 17213:2020+A1:2025, which complements EN 15804 for the preparation of environmental product declarations. A corresponding c-PCR standard for industrial, commercial and garage doors is currently being developed.

1.1 CE Marking

The Machinery Regulation responds to the increasing digitalisation, software control and networking of machinery and aims to ensure a more uniform application of machinery safety requirements across the EU.
The fundamental safety objective of the Machinery Regulation is no different from that of the pervious Machinery Directive: the manufacturer must ensure that an item of machinery does not pose any unacceptable risks to persons when in use (“safety in use”).

What is new, however, is that machinery has undergone fundamental changes in recent years with increasingly digitalized, networked and software-controlled elements. Safety functions are now frequently implemented via software; machinery communicates via networks, receiving updates or exchange data with other systems. This gives rise to new hazards that can no longer be fully managed by traditional safety measures alone.

> ***Information provided by the European Commission***
> *The CE marking is affixed to a product after the declaration of performance (and conformity) is issued and technical documentation is prepared. It serves as a visual indicator that the product complies with the harmonised rules, allowing it to benefit from free circulation within the EU’s single market. A product can only bear the CE marking if it is covered by a harmonised technical specification (or a European Technical Assessment) cited in the Official Journal.*

E.D.S.F. explanation

There is only one CE marking. It is not issued separately under the CPR, the Machinery Directive, the Low Voltage Directive or other Union harmonisation legislation.
Where several EU legal acts requiring CE marking apply to the same product, the manufacturer affixes the CE marking only once and thereby declares that the product fulfils all applicable requirements covered by that marking. The manufacturer must therefore identify all relevant EU legislation and complete the respective assessment and documentation obligations before affixing the CE marking.

For construction products, the CE marking should not be understood as an approval of the product or as confirmation that it is suitable for every intended use. It indicates that the manufacturer has assessed the product in accordance with the applicable harmonised technical basis and assumes responsibility for its conformity with the declared performance and the applicable requirements. Whether the declared performance is sufficient for a specific building or intended use must be assessed against the requirements applicable at the place of use.

1.2 Assessment and Verification System (AVS)

Information provided by the European Commission
The Assessment and Verification System (AVS), which relies on similar principles to the former AVCP systems, defines the specific tasks for manufacturers and notified bodies to ensure product performance remains constant.
In particular, Commission Delegated Regulation (EU) 2026/1310 sets out the applicable AVS for product families and categories.
You may also consult an interactive version of the delegated act.

E.D.S.F. explanation

To demonstrate the performance and conformity of a construction product, the manufacturer must apply the relevant harmonised technical specification. Harmonised product standards (i.e. EN 14351-1 and EN 13241) establish the essential characteristics to be assessed and contain or refer to the relevant assessment, testing and classification methods.
They also provide the technical basis for determining the product type and for maintaining the constancy of performance in series production.

A key element is factory production control. The manufacturer must establish, document and continuously maintain procedures and production measures to ensure that products placed on the market continue to achieve the declared performance. The applicable Assessment and Verification System specifies how these manufacturer's tasks are combined with any tasks to be carried out by a notified body.

The applicable AVS is not selected by the manufacturer. It is assigned to the relevant product family or category and may differ according to the intended use, the essential characteristic concerned and the consequences of a possible product failure. The different systems therefore primarily describe the division of responsibilities between the manufacturer and the notified body; they should not be understood as different quality levels for the product. Familiar examples in the door sector include System 1 for fire-resistance and smoke-control characteristics and System 3 for products without these characteristics, subject to the applicable harmonised technical specification; System 3+ and System 3 are explained in more detail below.

1.3 System 3+

Information provided by the European Commission
This new system was introduced specifically to verify environmental essential characteristics. In this system, notified bodies validate the input values, assumptions, and software usage involved in a manufacturer's Life Cycle Assessment. It is also available for some harmonised standards under CPR-2011.

E.D.S.F. explanation

System 3+ is a new and separate system introduced for the verification of environmental essential characteristics. It should not be understood merely as a stricter version of System 3. Under System 3+, the notified body validates the input values, assumptions and correct use of the software applied by the manufacturer for the life-cycle assessment. Responsibility for preparing the environmental assessment and for the underlying product and production data remains with the manufacturer.

1.4 System 3

Information provided by the European Commission
This system now requires the notified body to confirm the product type in addition to testing. Annex IX of the regulation establishes horizontal rules and detailed descriptions for each AVS.

E.D.S.F. explanation

For doors without fire-resistance or smoke-control characteristics, manufacturers are familiar with System 3 as a division of tasks between the manufacturer and a notified laboratory. The manufacturer remains responsible for factory production control, while the notified laboratory carries out the prescribed assessment of product performance. The allocation of tasks between the manufacturer and the notified body is set out in Annex ZA of the relevant harmonised product standard.

Under the CPR-2024, the notified body must additionally confirm the product type. The precise allocation of tasks must always be checked against the applicable harmonised technical specification and the legally assigned AVS for the product and characteristic concerned.

1.5 Notified Bodies

Information provided by the European Commission
Notified bodies act as independent third parties in the assessment of construction products, significantly strengthening the reliability of the framework.

- ***Stricter standards:*** *CPR-2024 introduces enhanced competency requirements and stricter limitations on subcontracting certain tasks.*
- ***Transition and reassessment:*** *Bodies notified under the CPR-2011 must be reassessed until 8 January 2030 to ensure they meet the new criteria.*
- ***Harmonised decisions:*** *Notified bodies must now participate in a group of notified bodies and register with a national system for harmonised decision-making to ensure consistent implementation across the EU.*

E.D.S.F. explanation

For manufacturers, the practical relevance of notified bodies depends on the AVS applicable to the product and the characteristic concerned.
Where third-party involvement is required, the manufacturer must select a body that is notified for the relevant product area, technical specification and assessment task. The manufacturer should verify the current scope of notification in the European Commission's NANDO1 database rather than relying solely on previous cooperation or general accreditation. The stricter competence, coordination and reassessment requirements under the CPR-2024 are primarily directed at notified bodies; for manufacturers, their main significance is that certificates, reports and assessments must be issued by a body whose notification remains valid for the task concerned during the transition to the new regulatory framework.

[1] European Commission, NANDO database (Single Market Compliance Space): https://webgate.ec.europa.eu/single-market-compliance-space/notified-bodies

2. Digital Product Passport

Information provided by the European Commission
The Digital Product Passport (DPP) is a key tool for the digital transition, ensuring that reliable product information is available throughout the life cycle of a building. It will be established soon.

- *Interoperability: The DPP system is designed to be machine-readable and coherent with systems established under other EU regulations, such as the Ecodesign for Sustainable Products Regulation (ESPR).*
- *Information hub: It will contain the Declaration of Performance and Conformity, general product information, and safety instructions.*
- *Mandatory use: Economic operators will be required to provide a DPP connected to a data carrier 18 months after the delegated act establishing the DPP system enters into force.*

E.D.S.F. explanation

The Digital Product Passport is intended to provide a structured digital access point for information relating to a construction product throughout its life cycle. It is not a new assessment or certification procedure. Instead, it brings together information required under the CPR-2024, including the Declaration of Performance and Conformity, product and manufacturer information, safety and use information and, where applicable, environmental information.

Two different implementation steps should be distinguished:

1. First, the European Commission must establish the technical Digital Product Passport system for construction products by means of a delegated act. The obligation to provide a DPP generally applies 18 months after that delegated act enters into force.
2. Secondly, the obligation applies only to products regulated under the CPR-2024. This requires the relevant product to be covered by an applicable harmonised technical specification or European Assessment Document under the CPR-2024 framework. Consequently, the DPP obligation will become applicable progressively as individual product families migrate from the CPR-2011 to the CPR-2024 framework.
   With particular reference to the Commission's third bullet point, "Mandatory use", it is important to note that, for products currently covered by EN 14351-1 and EN 13241, the mandatory application of the DPP under the new harmonised standards route depends on the corresponding revised standards becoming applicable under the CPR-2024, together with the DPP system requirements and the relevant transitional arrangements. Publication of a revised EN alone does not trigger the DPP obligation; manufacturers may nevertheless prepare their product data in advance.

Consequently, the DPP obligation should not be understood as becoming applicable to all construction products on one common date. The 18-month period following the delegated act establishing the DPP system and the migration of the relevant product family to the CPR-2024 framework must be considered together. Manufacturers of doors should therefore monitor both the establishment of the DPP system and the availability of the relevant harmonised technical specification or European Assessment Document under the CPR-2024. E.D.S.F. will support its members by monitoring these developments and providing timely information on relevant regulatory changes and their practical implications for the door sector.

Until these legal and technical elements are available, important details concerning the data structure, data carrier, level of identification and practical operation of the DPP remain subject to further implementation measures.

Manufacturers should nevertheless begin reviewing where the required product information is currently stored, whether it is available in a structured digital form and how information from suppliers can be linked to the finished product. Such preparatory work can be undertaken without anticipating technical solutions that have not yet been legally specified.

Manufacturers must organise the preparation, storage and availability of the required DPP information in accordance with the applicable system requirements. This may involve their own infrastructure or a DPP service provider; they should not assume that the Commission will host all product information in a single central database. A central registry and the storage of the actual passport content are distinct functions. The detailed arrangements for construction products will depend on the delegated act establishing the CPR DPP system. Using a service provider does not remove the economic operator's responsibility for the completeness, accuracy and availability of the required information. Manufacturers should therefore define responsibilities for creating, approving, updating and retaining DPP data and ensure that changes to the product or its declared performance are reflected in the associated digital information.

The DPP should not be understood as meaning that all product-related information will be publicly accessible without restriction. The future system is expected to distinguish between information intended for general access and information available only to specific actors or authorities. Manufacturers should therefore identify which data are legally required for the passport, which information may require restricted access and which commercially sensitive information is not part of the mandatory dataset. The detailed access rules will depend on the delegated act and the technical design of the DPP system.

Text / Editorial team:

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