



Circular Letter BC01-2026

Date: 7 January 2026

**RE: Implementation of the Construction Products Regulation 2024
(Regulation (EU) 2024/3110)**

To: The Chief Executive of each Local Authority
Director General of Limerick City and County
Director of Services for Building Control in each Local Authority
Building Control Officers in each Local Authority
National Building Control & Market Surveillance Office

Colleagues,

I wish to advise you that the Minister for Housing, Local Government and Heritage signed the following Regulations on 23 December 2025:

- *European Union (Construction Products) Regulations 2025* (S.I. No. 669 of 2025), and
- *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (Construction Products – Market Surveillance) (Amendment) Regulations 2025* (S.I. No. 670 of 2025).

These Regulations provide for the implementation and enforcement of the Construction Products Regulation 2024 (Regulation (EU) 2024/3110) and maintain the existing structures and arrangements for market surveillance of construction products within its scope in Ireland.

This circular provides an overview of the EU legislation, sets out the main provision of the Regulations, referred to above, and identifies the actions that need to be taken on foot of these, it is structured into 3 Sections:



- **SECTION 1. EU CONSTRUCTION PRODUCTS REGULATION** – this section provides an overview of Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 (CPR 2024) and arrangements for market surveillance in Ireland in accordance with the specific requirements of the CPR 2024 and the broader overarching requirements of Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019 (known as the Market Surveillance Regulation (MSR 2019)).
- **SECTION 2. MAIN PROVISIONS OF EUROPEAN UNION (CONSTRUCTION PRODUCTS) REGULATIONS 2025 (S.I. NO. 669 OF 2025)** – this section sets out the main provisions of the new Regulations i.e. *European Union (Construction Products) Regulations 2025* (S.I. No. 669 of 2025) and the consequential amendments provided for in *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (Construction Products – Market Surveillance) (Amendment) Regulations 2025* (S.I. No. 670 of 2025).

SECTION 3. ACTIONS REQUIRED – this section sets out the actions to be taken by relevant stakeholders on foot of the new Regulations - *European Union (Construction Products) Regulations 2025* (S.I. No. 669 of 2025).



SECTION 1. EU CONSTRUCTION PRODUCTS REGULATION

1.1 Introduction to Construction Products Regulation 2024 (CPR 2024)

As you are aware, further to Circular Letter BC06-2024, Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024 (CPR 2024), was published in the EU Official Journal on 18 December 2024.

In general, the CPR 2024 applies from 8 January 2026 with transitional arrangements providing for the repeal of the Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011 (CPR 2011) over the period from 2026 to 2040. See Section 1.3 below for further details on the transitional arrangements. As a European Regulation, the CPR 2024 is directly applicable in Irish law.

Building on the legal framework established by CPR 2011, CPR 2024 lays down harmonised rules for the marketing of construction products in the EU. The CPR 2024 ensures the smooth functioning of the single market and the free movement of construction products in the EU. It does so mainly through harmonised technical specifications, which provide a common technical language on how to assess and communicate the performance of construction products (e.g. reaction to fire, thermal conductivity, sound insulation properties etc.). The CPR 2024 ensures that reliable information is available to professionals, public authorities and consumers, so that they can compare the performance of construction products from different manufacturers in different EU Member States.

1.2 Main provisions of CPR 2024

CPR 2024 provides an opportunity to adapt standardisation to new technical developments and provides better information to consumers such as in respect of environmental and sustainability information.

The scope of the CPR 2024 extends to “used” products and the new definition of “construction products” extends to include 3D-printed products.

It provides for the establishment of a digital product passport system for construction products, similar to that envisaged in the Eco-Design for Sustainable Products Regulation, and for electronic declarations of performance and conformity, which can be provided via digital means.



CPR 2024 aims to address bottlenecks in the functioning of the standardisation process. It also gives the European Commission new 'fall-back' powers to develop harmonised technical specifications for assessing the performance of construction products if European standardisation bodies are too slow to act.

In addition, the Commission is empowered to supplement harmonised performance standards with specific product requirements relating to the functionality, safety and environmental impacts of a "product family" or product categories within it (for example, cladding, fire retardant products, flooring, roof coverings). In such cases, product manufacturers will be required to provide a declaration of conformity as well as the existing declaration of performance. Declared performances will be established by the relevant economic operator in accordance with the assessment and verification system set out in the harmonised technical specification.

CPR 2024 sets out the obligations on manufacturers, importers and other economic operators (including fulfilment service providers and online marketplaces) and strengthens market surveillance, enforcement and consumer protection e.g. the Commission has set up a complaint portal¹ for reporting possible breaches of the EU Regulations.

1.3 Standardisation under CPR 2024

The European Commission has established a working group known as the CPR Acquis Expert Group² which aims to collect the technical and regulatory needs from stakeholders and Member States to create detailed standardisation requests, delegated acts, product requirements and product information. This process facilitates the updating of all existing harmonised standards under CPR 2011 and extending their scope to cover new products.

In accordance with the CPR 2024, the European Commission has established a working plan for the development of harmonised technical specifications for product families, including product requirements as well as general product information, instructions for use and safety information in consultation with the CPR Acquis Expert Group.

¹ CPR Complaint Portal https://single-market-economy.ec.europa.eu/sectors/construction/construction-products-regulation-cpr_en

² CPR Acquis Expert Group <https://ec.europa.eu/transparency/expert-groups-register/screen/expert-groups/consult?lang=en&do=groupDetail.groupDetail&groupID=3776>



The first CPR Working Plan for 2026-2029 was published on 16 December 2025, it can be accessed at the following link:

<https://webgate.ec.europa.eu/circabc-ewpp/d/d/workspace/SpacesStore/1e989b50-3020-406b-9add-f847fc26de49/download>

In the context of this review of all harmonised standards, the following transitional arrangements should be noted;

- Harmonised standards, in force on 8 January 2026 under CPR 2011, remain valid under CPR 2024, until they are withdrawn or repealed. As part of the CPR Acquis process, harmonised technical specifications developed under CPR 2024 will progressively and over time replace harmonised standards (and, or, European Assessment Documents) in force under the CPR 2011, where they cover the same product family or category.
- European Assessment Documents, in force on 8 January 2026 under CPR 2011, will remain valid under CPR 2024 until 9 January 2031, unless they have expired before that date for other reasons. All other European Assessment Documents will be developed and published under CPR 2024.

Further information on CPR 2024 can be accessed at the following link:

https://single-market-economy.ec.europa.eu/sectors/construction/construction-products-regulation-cpr_en

1.4 Market Surveillance Authorities

Each Member State is responsible for regulating its own market surveillance activities in accordance with the specific requirements of the CPR 2024 and the broader overarching requirements of the MSR 2019.

The same Market Surveillance Authorities (MSAs) as were in place for construction products within the scope of the CPR 2011 are designated as Market Surveillance Authorities under the CPR 2024, the designations take effect on 8 January 2026.

As such;

- building control authorities are designated, under *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)*, as the principal MSAs for construction products that fall within the scope of the CPR 2011 and the CPR 2024, within their administrative areas, and



- Dublin City Council (via the National Building Control and Market Surveillance Office (NBCMSO)) is designated as an MSA under *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (Construction Products – Market Surveillance) (Amendment) Regulations 2025 (S.I. No. 670 of 2025)*³ for construction products that fall within the scope of the CPR 2011 and CPR 2024 on a nationwide basis.

Building control authorities should continue to liaise with NBCMSO to support compliance with the CPR 2011 and CPR 2024 and to determine appropriate action on enforcement matters, as they arise.

The Department has agreed a Memorandum of Understanding with the Department of Climate, Energy and the Environment (DCEE) / Geological Survey Ireland (GSI), to provide geological services and expertise. This includes technical support to market surveillance authorities in relation to aggregates falling within the scope of CPR 2011 and CPR 2024.

SECTION 2. MAIN PROVISIONS OF EUROPEAN UNION (CONSTRUCTION PRODUCTS) REGULATIONS 2025 (S.I. NO. 669 OF 2025)

The *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)* give full effect to the provisions of the following:

- a) Regulation (EU) No 305/2011 of the European Parliament and of the Council of 9 March 2011;
- b) Regulation (EU) 2024/3110 of the European Parliament and of the Council of 27 November 2024;
- c) in respect of construction products covered by Regulation (EU) No 305/2011 and Regulation (EU) 2024/3110, Regulation (EU) 2019/1020 of the European Parliament and of the Council of 20 June 2019.

These Regulations revoke:

- a) the European Union (Construction Products) Regulations 2013 (S.I. No. 225 of 2013);

³ The *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (Construction Products – Market Surveillance) (Amendment) Regulations 2025 (S.I. No. 670 of 2025)* amend the *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (Construction Products – Market Surveillance) Regulations 2020 (S.I. No. 682 of 2020)* to include the CPR 2024 and the *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)*.



- b) the European Union (Construction Products) (Amendment) Regulations 2023 (S.I. No. 217 of 2023).

Part 1 of the Regulations provides for the coming into operation of the Regulations on 8 January 2026.

Part 2 makes provision for the language to be used in documentation, and sets out the Competent National Authorities in Ireland, namely Building Control Authorities, Dublin City Council / National Building Control & Market Surveillance Office (NBCMSO), the Minister for Climate, Energy and the Environment (Geological Survey Ireland (GSI)), and the National Roads Authority (Transport Infrastructure Ireland).

Part 3 provides for the market surveillance and safeguard procedures of construction products having regard to the requirements of Chapter VIII of CPR 2024 and the MSR 2019. It designates building control authorities as market surveillance authorities and provides for the designation of others such as the Dublin City Council / NBCMSO. This part also provides for information sharing and cooperation with market surveillance authorities, appointment of, and powers of authorised officers, including warrant to enter and search, and corrective actions. It should be noted that in accordance with CPR 2024, Article 64(2), the Department is designated as the single liaison point. In this respect, the Department will act as the focal point for contacts with the Commission and single liaison points of other Member States.

Part 4 provides for offences in relation to certain requirements of the CPR 2011, CPR 2024 and MSR 2019. In general, offences include the contravention or failure to comply with;

- requirements for declarations (of performance and/or conformity) and CE marking of construction products,
- obligations of economic operators and online marketplaces, and
- findings of market surveillance authorities.

Part 5 provides for penalties, defences and prosecutions. In general, a person that commits an offence is liable—

- on summary conviction, to a class A fine or imprisonment for a term not exceeding 3 months, or to both, or
- on conviction on indictment, to a fine not exceeding €500,000 or to imprisonment for a term not exceeding 12 months, or to both.



Part 6 makes provisions for consequential amendments to the *Withdrawal of the United Kingdom from the European Union (Consequential Provisions) Act 2020 (No. 23 of 2020)*. This facilitates the continuation of Dublin City Council / NBCMSO as a market surveillance authority in accordance with the CPR 2024 on a nationwide basis.

Part 7 makes final provisions including forfeiture, service of notices, transitional provisions, and revocations. In this regard, it should be noted that any ongoing market surveillance or investigation under S.I. No. 225 of 2013 (as amended) shall continue to be dealt with and determined in accordance with those Regulations. Similarly, any notice or direction given under S.I. No. 225 of 2013 (as amended), shall remain valid and in full effect.

A copy of the *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)* is attached for your information. They should be read in conjunction with the Construction Products Regulations CPR 2011, CPR 2024, and the Market Surveillance Regulation MSR 2019.

SECTION 3. ACTIONS REQUIRED

In the interest of effective market surveillance as provided for in the *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)*, the Department requests that each building control authority and the NBCMSO take the following key actions:

- Appoint an adequate number of competent authorised officers under Regulation 8 of the *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)*⁴.
- Advise the NBCMSO (by email to support@nbco.gov.ie) of the name/contact details for each authorised officer appointed under Regulation 8 of the *European Union (Construction Products) Regulations 2025 (S.I. No. 669 of 2025)*.
- Register with the national information system in accordance with Article 71(6) (Regulation (EU) 2024/3110), at the following website:

<https://forms.gov.ie/en/695ba1db1c5cdc675809d26b-construction-products-regulati>

⁴ In the context of Regulation 36 of S.I. No. 669 of 2025, where ongoing market surveillance or investigation has been initiated prior to 8 January 2026, building control authorities should maintain the appointment of authorised officers under S.I. No. 225 of 2013 until matters are concluded.



- Ensure material on the CPR 2011 and CPR 2024 on your organisation's website is up to date, including contact details for authorised officers and contact details for NBCMSO (support@nbco.gov.ie).
- Raise awareness of the CPR 2024 with relevant economic operators within your functional area.
- Continue to ensure adequate resources are made available for market surveillance activities.
- Continue to undertake risk based, proactive and reactive market surveillance of construction products.
- Continue to liaise and co-operate with NBCMSO on the implementation of the National Market Surveillance Strategy⁵, training, enforcement actions and collection of activity data.
- Continue to work closely with NBCMSO and Revenue's Customs Service for the control of imported products from third countries.
- Continue to use the European Commission system for information exchange known as the Information and Communication System for Market Surveillance or 'ICSMS'⁶.

ENQUIRIES

Further enquires about this circular should be addressed to cpr@housing.gov.ie.

Finally, I would like to take this opportunity to thank you for your continued support and cooperation in the carrying out of the important function of market surveillance of construction products across the country.

Yours sincerely,

Sarah Neary

Principal Adviser

Building Standards Advisory Unit

⁵ The current strategy is available at: <https://nmso.nbco.localgov.ie/resources>

⁶ <https://webgate.ec.europa.eu/icsms/>



CC List

Each Chief Fire Officer
Mayor of Limerick
National Building Control & Market Surveillance Steering Group