Digital Product Passport (DPP) brochure

Stay EU-ready | Make your product data work for you

The Digital Product Passport (DPP) is a key requirement under Regulation (EU) 2024/1781 on Ecodesign for Sustainable Products (ESPR). It introduces a digital "identity card" for products, linking them to structured information on materials, performance, and sustainability across their lifecycle. The EU is introducing DPPs to improve traceability and reduce environmental impact. For exporters, this means adapting early, because for many product groups, a valid DPP will become a condition for access to the EU market.

Who Needs to Act?

DPP requirements apply to any product placed on the EU market. Key stakeholders who need to prepare include EU manufacturers, non-EU manufacturers, EU importers, exporters supplying EU buyers, and component and material suppliers that provide product-level data.

What Products Are Covered?

The Digital Product Passport (DPP) will apply to products covered under the Ecodesign for Sustainable Products Regulation (ESPR). Priority product groups include iron and steel, aluminium, textiles (including clothing and footwear), furniture (including mattresses), tyres, detergents, paints, lubricants, chemicals, energy-related products (such as heaters, boilers, heat pumps, and ventilation systems), and ICT products and other electronics. Each product category will have its own implementation timeline, compliance requirements, and data fields as defined by the European Commission.

What does a DPP include?

Each product must be linked to a structured digital record containing:

- Product identifier (model, batch, or item level)
- Manufacturer and/or EU importer details
- Material composition, including recycled content and substances of concern
- Environmental and circularity performance (e.g., durability, repairability, efficiency)
- Compliance documentation (e.g., Declaration of Conformity, test references)
- End-of-life and recyclability information

All required data must be structured, machine-readable, accurate, and continuously updated throughout the product lifecycle.

Who is Responsible?

The economic operator placing the product on the EU market is responsible for the Digital Product Passport (DPP). For products manufactured in the EU, the manufacturer is responsible. For products manufactured outside the EU, the EU importer holds the legal responsibility, while the non-EU manufacturer provides the required product data. The responsible operator must create the DPP, upload it to the EU DPP Registry, maintain accurate information, and ensure it is accessible to authorised users.

Authorities and Enforcement

Compliance with the Digital Product Passport is monitored through a coordinated enforcement framework involving the European Commission, national authorities, and customs agencies. The European Commission establishes the regulatory requirements, develops the technical framework, and oversees the operation of the EU DPP system and registry. National market surveillance authorities are responsible for verifying compliance within Member States and may require corrective actions, product recalls, or impose penalties where necessary. Customs authorities verify the existence of a valid Digital Product Passport and the associated product identifiers before products are permitted to enter the EU market. Products that do not meet DPP requirements may be prevented from entering the EU or may be withdrawn from the market.

Risks of Non-Compliance

Failure to comply with Digital Product Passport requirements can have significant commercial and regulatory consequences. Companies may lose access to the EU market, face product recalls or withdrawals, incur financial penalties, experience supply chain disruptions, and risk losing existing or potential customers. Delaying DPP implementation can also increase compliance costs, create operational challenges, and reduce an organisation's ability to respond effectively to evolving regulatory requirements.

How to Get Started

Organisations should begin by identifying whether their products fall within the scope of upcoming Digital Product Passport requirements. They should then determine their role within the supply chain, whether as a manufacturer, exporter, importer, or supplier, to understand their specific compliance responsibilities. Existing product, material, sustainability, and compliance data should be reviewed to identify any gaps. Companies should engage with EU customers and business partners to understand data expectations, documentation requirements, and preferred information formats. Establishing structured data management systems, such as ERP, PLM, or dedicated DPP platforms, will help manage product information efficiently. Businesses should also prepare product identifiers, including QR codes or other approved data carriers, and implement robust governance processes to ensure that product information remains accurate and up to date throughout the product lifecycle. Rather than viewing DPP as a standalone regulatory obligation, organisations should approach it as a long-term digital transformation initiative that strengthens product data management.

Why This Matters

The Digital Product Passport (DPP) is becoming a key requirement for accessing the European market. Being DPP-ready helps businesses meet buyer expectations, reduce compliance risks, improve transparency, and strengthen sustainability reporting. Early adoption also provides a competitive advantage by supporting market access and building customer confidence.

Key Takeaway

The Digital Product Passport is more than a new regulatory requirement; it represents a fundamental shift towards data-driven and transparent trade within the European Union. Organisations that invest in organising, managing, and maintaining high-quality product data today will be better positioned to achieve compliance, strengthen stakeholder trust, improve supply chain transparency, and enhance their long-term competitiveness in international markets.