FAQ

Digital Product Passport FAQ

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1. What is a Digital Product Passport (DPP)?

A Digital Product Passport (DPP) is a structured digital record linked to a product through a unique identifier. It contains regulatory information on the product's technical characteristics, compliance status, environmental performance, and supply chain details, in a machine-readable and interoperable format that can be accessed by authorised stakeholders throughout the product lifecycle.

2. Which EU laws create DPP obligations?

DPP obligations are introduced under the Ecodesign for Sustainable Products Regulation (ESPR) and implemented through delegated or implementing acts for specific product groups. These acts define the exact scope, required data fields, technical format, and timelines; additional sector-specific regulations (for example, the EU Batteries Regulation) may also impose DPP requirements aligned with ESPR.

3. Which authorities manage and enforce the DPP system?

The DPP framework operates through a coordinated system:

- The European Commission sets rules, manages the central DPP registry, and defines data and system requirements.
- National market surveillance authorities enforce compliance, request documentation, and investigate non-compliance.
- Customs authorities verify at the border that products have a valid DPP and a registered identifier before allowing entry into the EU.

All three have access to the DPP registry for enforcement purposes.

4. Who is responsible for creating and maintaining the DPP?

The economic operator placing the product on the EU market is legally responsible for the DPP. This includes uploading product data into the DPP registry, ensuring the DPP exists and is accurate, and maintaining and updating information over time. If the manufacturer is outside the EU, the importer (or authorised representative) assumes these responsibilities.

5. Does the DPP apply to non-EU companies and MSMEs?

Yes. The regulation applies to any entity whose products are placed on the EU market, regardless of location or company size. Non-EU manufacturers, exporters, and small businesses must comply if their products fall within scope; while implementation timelines and support measures may vary, the core compliance obligation is the same.

6. Which products must have a Digital Product Passport (DPP)?

Only product groups specified in delegated or implementing acts under the ESPR or related EU legislation are required to have a DPP. Once a product category is covered, every applicable product placed on the EU market must have a compliant DPP linked to it.

7. What are the DPP priority groups?

The DPP priority groups are the first product groups the EU has selected for mandatory Digital Product Passports because of their environmental impact and circularity potential. They include textiles and footwear, furniture and mattresses, tyres, detergents, paints and varnishes, lubricants, cosmetics, toys, fishing gear, hygiene products, and key intermediate materials such as iron and steel, aluminium, other metals, chemicals, plastics, paper and board, glass, and ceramics.

8. Is registration required for companies or products?

DPP operates at the product (or model/batch) level, not at the company level. The economic operator uploads product data into the EU registry, after which a unique registration identifier is automatically generated for that product; this identifier is used by authorities, including customs, to verify compliance.

9. Does my product need a Digital Product Passport to enter the EU?

Your product needs a DPP only if it belongs to a product group covered by EU DPP rules (delegated or implementing acts under ESPR or related legislation). In practice, your EU customer will inform you when a product you supply requires DPP-ready data; without a valid DPP for an in-scope product, it cannot be lawfully placed on the EU market.

10. From which year will the Digital Product Passport be mandatory for my products?

DPP requirements start on different dates for different product groups. Batteries and a few priority value chains are expected to be among the first, followed by other sectors (such as textiles, electronics, and construction products) according to the EU's work programme. You should check, together with your EU buyer, when the delegated act for your product category takes effect and what transition periods apply.

11. Do I need a Digital Product Passport even if I export only small volumes?

Yes. Once a product category is in scope, the requirement applies to all products in that category placed on the EU market, irrespective of export volume or company size. There is no exemption purely because you are an MSME or ship small quantities, although enforcement and support programmes may consider SME realities.

12. What happens if my shipment reaches the EU without a valid Digital Product Passport?

If a product that should have a DPP enters the EU without a valid passport or with clearly incomplete/incorrect data, authorities may:

- Refuse customs clearance or release for free circulation.
- Require corrective action or updated information.
- Order withdrawal or recall of products already on the market.
- Restrict or prohibit further market access for the non-compliant products.

Your EU customer will normally avoid shipping such goods, which means missing DPP data can directly delay or cancel orders.

13. What information must the DPP include?

The regulation defines a catalogue of possible data elements, from which product-specific rules select what is mandatory. Typical categories include:

- Unique product identifiers and classification codes.
- Manufacturer, importer, and facility details.

- Compliance documents (e.g. declarations of conformity, technical files, test reports).
- Material and chemical composition, and supply chain identifiers.
- User instructions, safety information, repairability and recyclability information.
- Environmental and lifecycle data (for example durability, energy or water use, emissions, or recycled content).

The exact fields depend on the product-specific delegated or implementing act; all mandatory data must be accurate, complete, and kept up to date.

14. What data do I, as an Indian MSME, need to provide for the Digital Product Passport?

Even if you do not create the DPP directly, you must supply structured data to your EU customer. Typical requirements are:

- Product-level details (model, batch, composition, bill of materials).
- Supplier and factory information (addresses, certifications, audit results where relevant).
- Regulatory compliance evidence (chemical restrictions, safety standards, quality tests).
- Environmental data (use of recycled materials, resource and energy use, emissions where applicable).

Your EU buyer will provide specific templates or lists aligned with the official EU rules; you should map your internal data to those fields.

15. How detailed must environmental and lifecycle data be?

The required level of detail is defined in each product-specific act. It may require data at product, model, or batch level on durability, reparability, resource efficiency, energy performance, or environmental footprints. Data must follow prescribed methodologies (such as specific LCA methods or harmonised standards) so that different products and suppliers can be compared consistently.

16. How can I collect the required data from my suppliers in India?

You can prepare for DPP requests by:

- Including data and documentation requirements in supplier contracts and purchase orders.
- Using standardised questionnaires or templates aligned to your EU customer's data model.
- Maintaining digital records of materials, processes, and certificates for each supplier and batch.
- Prioritising higher-risk materials for deeper due diligence and documentation.

Over time, this becomes part of your regular purchasing, quality, and sustainability management systems.

17. How do I protect confidential business information in the Digital Product Passport?

The DPP system uses role-based access levels. Basic product and sustainability information may be public, while sensitive data (detailed formulations, proprietary process parameters, or supplier identities) is visible only to authorised business partners or authorities. You should:

- Agree with your EU customer which fields will be public, restricted, or confidential.
- Avoid sharing unnecessary trade secrets and focus on required data.
- Ensure NDAs and contracts clearly govern how DPP-related data can be used and shared.

18. Which reporting standards do I need to use?

The DPP refers to standards and methods set out in ESPR and related EU legislation or harmonised standards (for example, specific durability tests, repairability scoring methods, or LCA-based footprint methods). As an Indian MSME, you will usually:

- Follow the formats, calculation rules, and test methods requested by your EU buyer.
- Where possible, align with recognised international standards (ISO, EN, sector LCA rules) to make your data compatible with EU requirements.

19. Who is legally responsible for having a valid Digital Product Passport, the EU importer or us as the manufacturer?

Legally, the "economic operator placing the product on the EU market" is responsible (usually the EU manufacturer or importer; for some products, an authorised representative). If you are outside the EU, your importer or EU brand customer carries the formal legal responsibility, but you are expected—often contractually obliged—to provide accurate, timely data and cooperate with them in maintaining a compliant DPP.

20. When must DPP data be updated?

The economic operator must ensure DPP data remains accurate at all times. Updates are required whenever changes affect compliance or key characteristics—for example changes in design, materials, suppliers, manufacturing locations, certifications, or environmental performance. Authorities can require that updated data be made available without undue delay.

21. How do users and authorities access the DPP?

Each product must carry a data carrier (such as a QR code or similar technology) that links to its DPP, and this link must remain functional over the product's expected lifetime. The European Commission will also provide a central web portal where stakeholders can access or query DPP data in line with their access rights.

22. Who can access DPP information?

Access is role-based:

- The public can see basic, non-confidential information.
- Authorised economic operators (such as recyclers, repairers, and business partners) can view more detailed operational data where needed.
- Market surveillance and customs authorities can access all data necessary for enforcement.

23. What systems are needed to manage DPP requirements?

The DPP architecture is decentralised: companies manage their product data locally, while key identifiers and links are stored in a central EU registry. To support this, you will need:

- Systems (from structured spreadsheets to ERP/PLM/PIM tools) that store product, supplier, and environmental data in a consistent, machine-readable format.
- Processes to validate, update, and securely share this data with your EU customers.
- The ability to link physical products (labels, codes) to the correct digital records.

24. Who checks or verifies that the Digital Product Passport and data are correct?

National market surveillance authorities and customs authorities in the EU verify DPP compliance. They can:

- Check identifiers and the existence of a DPP at the border.
- Request full documentation and compare passport data with physical inspections or tests.
- Investigate suspected non-compliance and take enforcement action.

In addition, your EU customers will typically verify your data through audits, documentation reviews, and test checks to protect their own compliance position.

25. What kind of consultants, platforms, or service providers can help us create the passports?

You can get support from:

- DPP and product information platforms that manage product passports and integrate with EU registry services.
- LCA and sustainability tools that generate environmental data needed for the DPP.
- Compliance and traceability service providers that help map your supply chain and verify data.
- Sustainability, regulatory, and digital-transformation consultants who can design data templates, workflows, and training for your teams.

Often, your EU customer will already work with a preferred platform; you may simply need to onboard and supply data in their requested format.

26. What changes are needed in our factory and logistics processes to implement the passport?

Key changes are organisational and data-related:

- Establish clear ownership for DPP-relevant data (quality, compliance, sustainability).
- Ensure product and batch identification is robust and traceable through production and dispatch.
- Capture and store supplier and materials information at the right level of detail.
- Adjust labels, packing lists, or documentation so the correct identifiers travel with each shipment.

These changes can align with existing ISO/quality/sustainability systems and gradually be built into daily operations.

27. How is DPP compliance monitored?

Compliance is monitored by:

- Market surveillance checks in the EU, including document reviews, physical inspections, and sampling.
- Customs controls that verify the product's registration identifier and DPP presence at import.
- Use of the central registry to cross-check data, detect inconsistencies, and support investigations.

Products suspected of non-compliance cannot be legally placed on the EU market until issues are resolved.

28. What happens in case of non-compliance?

If a product does not meet DPP requirements (for example missing DPP, incorrect or misleading data, or failure to update), authorities may:

- Demand corrective actions or updated data.
- Restrict or prohibit sales of the product in the EU.

- Order withdrawal or recall of products already on the market.

Economic operators must inform authorities and take immediate corrective measures once they become aware of non-compliance; this can also trigger commercial penalties under contracts with EU customers.

29. What will compliance cost, and how can we turn the Digital Product Passport into a business advantage?

Costs include upgrading data systems, collecting and validating supplier information, obtaining tests or certifications, and integrating with digital platforms. You can turn this into an advantage by:

- Positioning yourself as a "DPP-ready" supplier, making it easier for EU brands to choose you.
- Using better data to improve efficiency, reduce waste, and support continuous improvement.
- Leveraging traceability and sustainability performance in your marketing and customer discussions to access higher-value markets and longer-term contracts.

30. What are the key steps to become DPP-compliant as an Indian MSME?

You can approach DPP readiness in phases:

- Identify whether your products or components are in a value chain likely to be covered (for example, batteries, textiles, electronics, construction).
- Discuss DPP expectations with key EU customers and obtain their current and anticipated data requirements.
- Map what data you already have and where the gaps are (materials, suppliers, tests, environmental data).
- Set up simple but robust digital systems and internal responsibilities to collect, validate, and update this data.
- Pilot DPP-type data collection on a few key products and refine templates and processes.

Maintain technical documentation and records for at least 10 years or as required for your product category.