



The Digital Product Passport within the framework of the EU Ecodesign for Sustainable Products Regulation (ESPR)

January 2026

Disclaimer: The statements in this presentation reflect our current understanding of the DPP, subject to further implementing acts, clarifications, FAQs, etc. from the EU Commission.

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- 02 | Roles and obligations for companies
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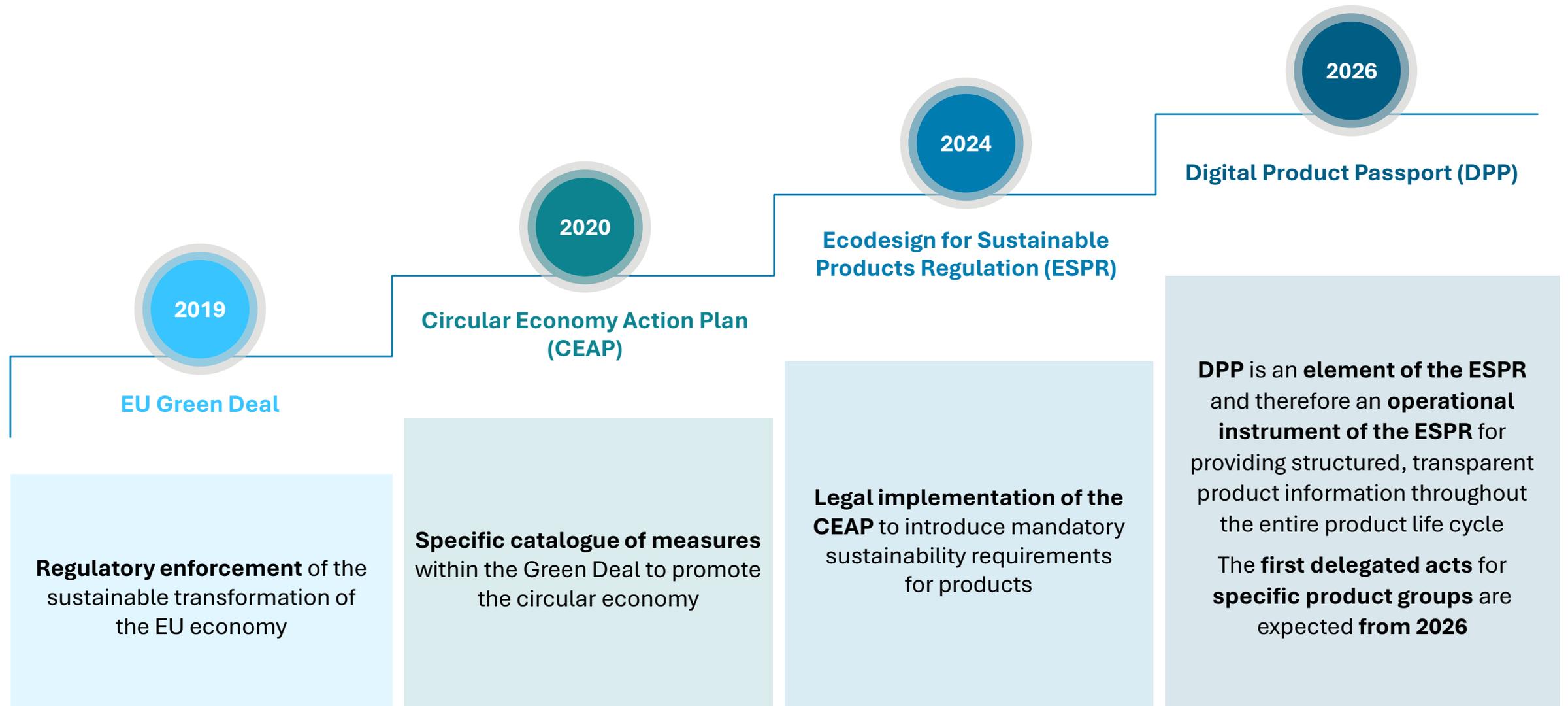


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Introduction and overview of the Digital Product Passport (DPP)



1 | Where does the Digital Product Passport (DPP) „originate“?



2 | What is the DPP?

Definition of the DPP

- **A Product-specific set of data** that includes all specified information about the product, such as ingredients, repairability, and recyclability, which is accessible electronically through a data carrier (Art. 2 No. 28 ESPR).
- Please note: The ESPR regulates only **the basic functional framework of the DPP**.
- Further **specification** is provided by **implementing acts** of the European Commission (also referred to as delegated acts) and **additional legislation**.



Objectives of the DPP

- Improvement of the **traceability of all product information relevant to the law** (not all!) throughout the entire life cycle.
- Access to **reliable product information** in a harmonised manner for actors along the entire value chain (Recital 32 ESPR).



Regulatory framework

- **The ESPR is the primary legal basis** for the DPP and defines minimum requirements of a general nature; as a regulation, it does not need to be transposed into national legislation and is directly applicable.
- **Delegated acts specify the requirements (Art. 4 ESPR)** of the DPP for the respective product groups, e.g., aluminium, furniture, textiles.
- In addition, there are **other legislative acts** that also require product passports, e.g., the Batteries Regulation.



3 | Which DPPs are currently planned?

Ecodesign Regulation (ESPR)



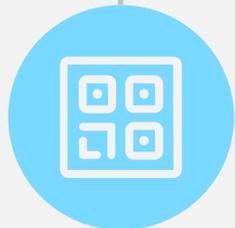
July 18, 2024

Entry into force of the ESPR (Ecodesign Regulation)
= Basis for the Digital Product Passport (DPP)



April 16, 2025

ESPR's first working plan for prioritized products (four final products & two intermediate products)



From 2027

Gradual introduction of the **DPP for prioritized product groups**, e.g., textiles and aluminium

Batteries Regulation (EBR)



August 18, 2024

Entry into force of the EBR (EU Batteries Regulation)
= Basis for the Digital Battery Passport (DBP)



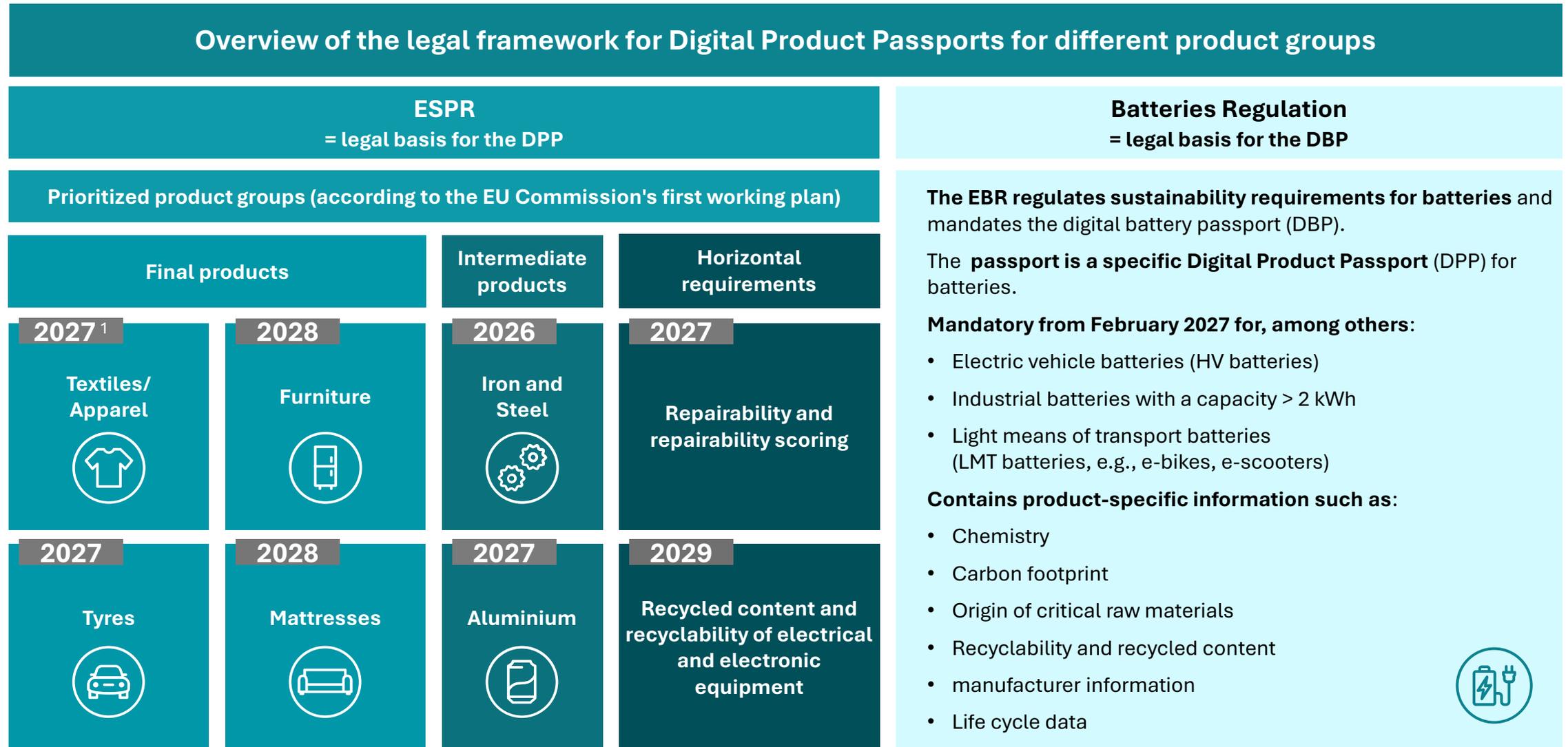
The DBP is **not part of the ESPR working plan** but is based on the EU Batteries Regulation



From February 2027

Introduction of a mandatory battery passport for certain batteries

4 | For which product groups is the DPP currently intended?



¹ The dates in the first working plan indicate the expected date on which the EU Commission intends to adopt the respective delegated act. As soon as a delegated act enters into force, the implementation period for manufacturers and distributors begins – usually at least 18 months before the requirements become mandatory

5 | What are the requirements for the DPP?

The ESPR establishes the **principle** that a DPP is mandatory for specific product groups and defines the **basic requirements for the DPP**.



Content and data structure

- Details and information, e.g., on material composition, energy efficiency, environmental and carbon footprint, and repair, reuse, and recycling
- Details on the unique identification of products (model, batch, individual item)
- Documents and information on conformity
- User manuals, instructions, warnings or safety information



Technical implementation

- Data carrier (labelling (e.g., QR-Code, RFID))
- Layout & position (visible and easily accessible)



Accessibility & Responsibilities

- Access to information for customers and authorized actors
- Definition of responsibilities for creating the DPP and updating and maintaining the data



Availability

- Period of availability of the DPP

These data are further specified and supplemented by the product-specific delegated acts for each product.

6 | Which information does the DPP cover?

The DPP in the ESPR Regulation is clearly focused on **product-specific sustainability information**. It **does not cover all aspects** required, for example, for sustainability reporting (such as CSRD reporting) or for regulatory requirements (e.g., CBAM or EUDR). The DPP can be a **cornerstone** for CSRD data provision (e.g., for Scope 3 emissions or product life cycle data), but it does **not** replace the comprehensive requirements of the CSRD.



DPP covers

Product-related data such as:

- Materials and components
- Origin and place of manufacture
- Environmental and carbon footprint (at product level)
- Repairability, reusability, recyclability
- Substances of concern
- Conformity information (e. g., CE marking)
- User information (installation, maintenance & disposal)



DPP does not cover

CSRD-relevant company data, such as:

- Governance information (e.g., company policy, human rights)
- Social aspects (working conditions, related supply chain risks)
- Financial indicators and risk management

CBAM-specific requirements, such as:

- Detailed emissions data for production processes
- Information on embedded emissions

Aggregated ESG data at the company level (the DPP is product-specific, not company specific)

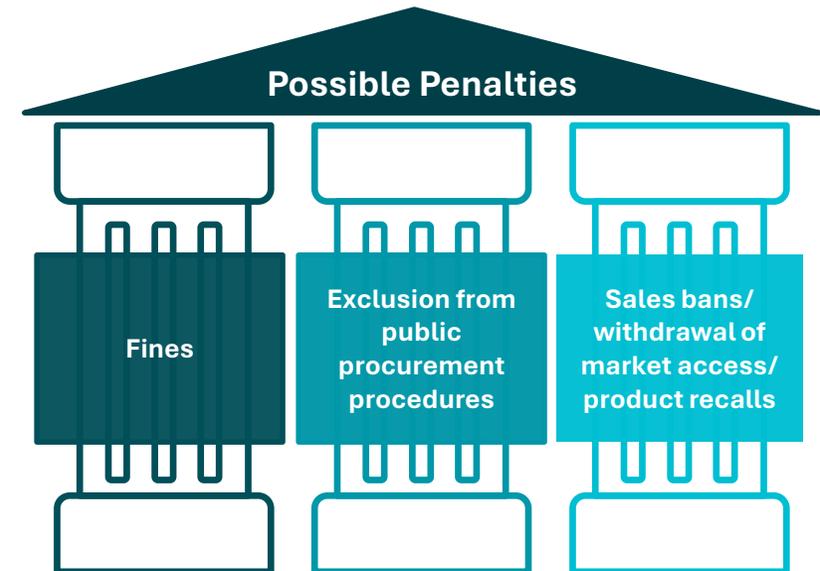
Current working assumption, further specifications to be awaited, e.g. via delegated acts etc.

7 | What penalties are imposed on companies for infringements?

The ESPR requires member states to **lay down effective, proportionate, and dissuasive rules on penalties** to ensure compliance with the requirements, including the DPP. The penalties for infringements of the ESPR regulations ultimately depend on their implementation into German law (EU member states have discretion in this area of sanctioning).

The regulation explicitly mentions the **following penalties**:

- Penalties should include at least **fin**es and a time-limited **exclusion from public procurement procedures**.
- Market surveillance authorities actively monitor and have extensive powers to ensure compliance with the ESPR. They can **prohibit the placing** on the market of non-compliant products., restrict them, or order their **withdrawal from the market**. These measures are particularly effective if the DPP is missing or defective.



However, it is to be expected that national legislators will also include other instruments such as **warnings, distribution bans, or public announcements** in their regulations, as is customary in similar regulatory frameworks. It is also expected that there will be different monitoring authorities.

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Roles and obligations for companies

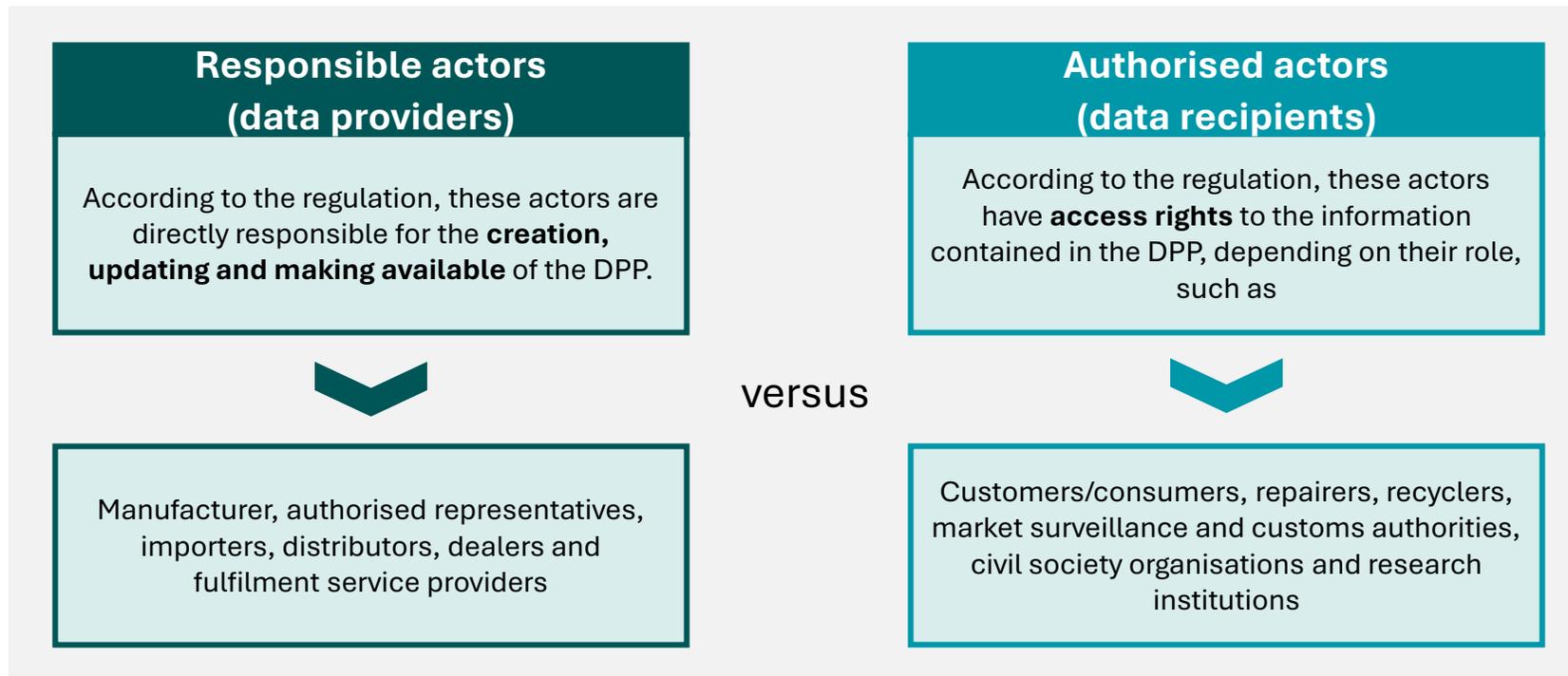


8 | Which economic operators are relevant in connection with the DPP?

With the introduction of the DPP, **new requirements** arise for companies along the entire value chain. In principle, **all economic operators** involved in the value chain of a product are affected by the requirements associated with the DPP. The specific obligations depend on the function a company performs in the supply chain.

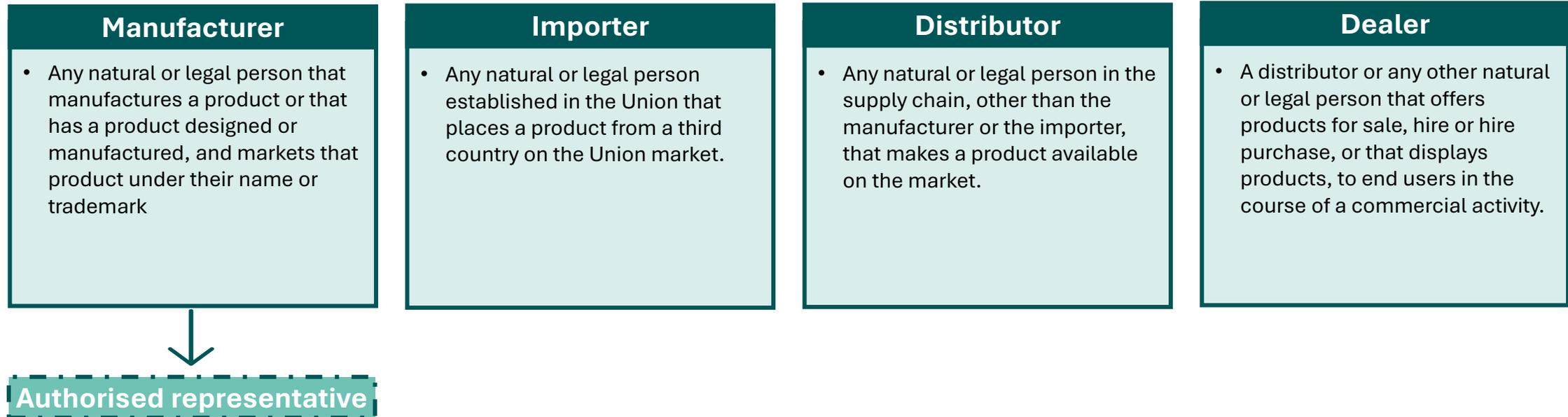
In principle (not specified in the ESPR), a distinction can initially be made between **two types of economic operators**:

- **Economic operators providing data.** These include, in particular, manufacturers, authorised representatives, importers, distributors, dealers and fulfilment service providers.
- **Economic operators receiving data,** who have access to relevant data. These include, for example, customers/consumers, repairers, recyclers, as well as market surveillance and customs authorities.



9 | What roles can companies have in the context of the DPP?

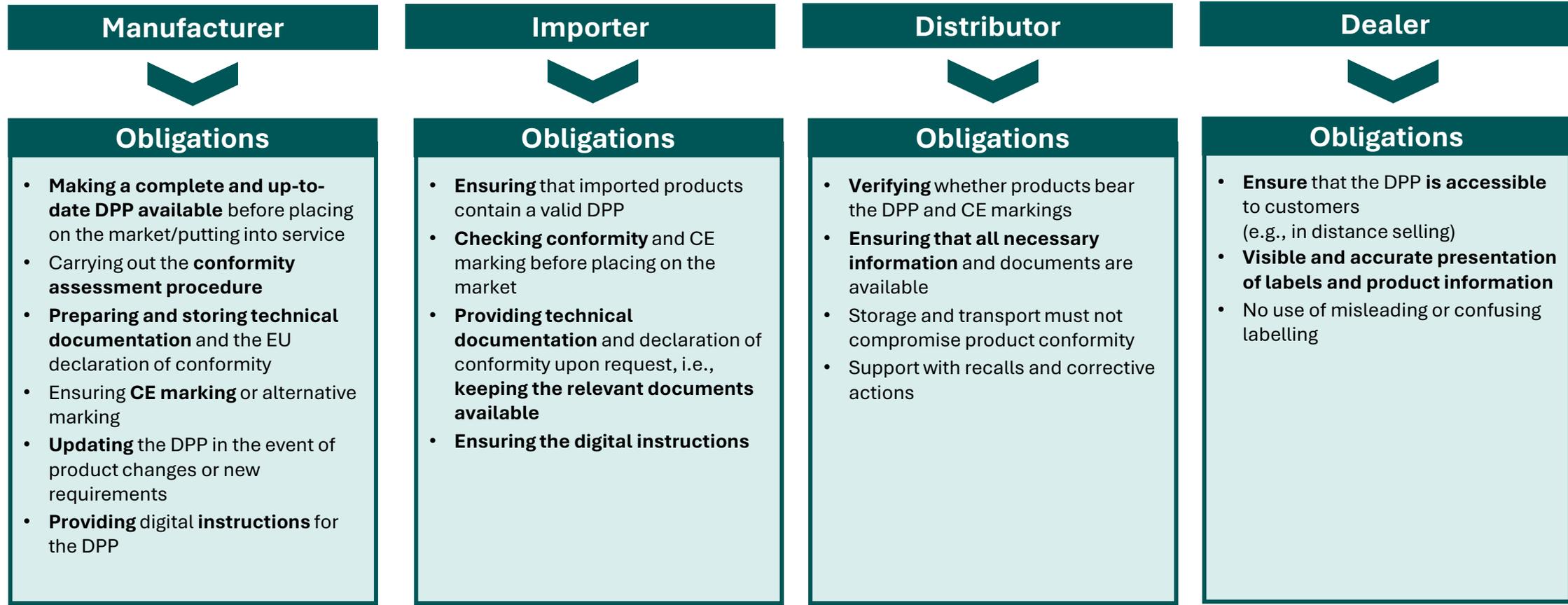
The ESPR **defines various roles in connection** with the DPP that companies may take on. The role of a company depends on its business model. A company can therefore **take on several roles at the same time**. The **most important roles for companies** are listed below, although the roles are likely to be specified in more detail in each implementing regulation:



Responsibility for creating and maintaining the DPP lies primarily with the **manufacturers of DPP-relevant final products**. They are obliged to collect, structure, and digitally provide all relevant information. In doing so, they are dependent on close cooperation with their suppliers, who must provide data on materials, components, and preliminary products. In addition, a manufacturer can appoint an **authorized representative** in writing to perform the tasks specified on behalf of the manufacturer (e.g., acting as a contact person for authorities). **Importers** and **distributors** can also be held accountable, especially if they market products under **their own name**.

10 | What are the main obligations associated with these DPP-related roles?

The **main obligations** in connection with the DPP vary depending on a company's role and position in the supply chain. A company may also have several roles, which must be examined on a case-by-case basis. The main roles and obligations for companies are as follows²:



Data sharing: All actors along the supply chain must provide relevant information →

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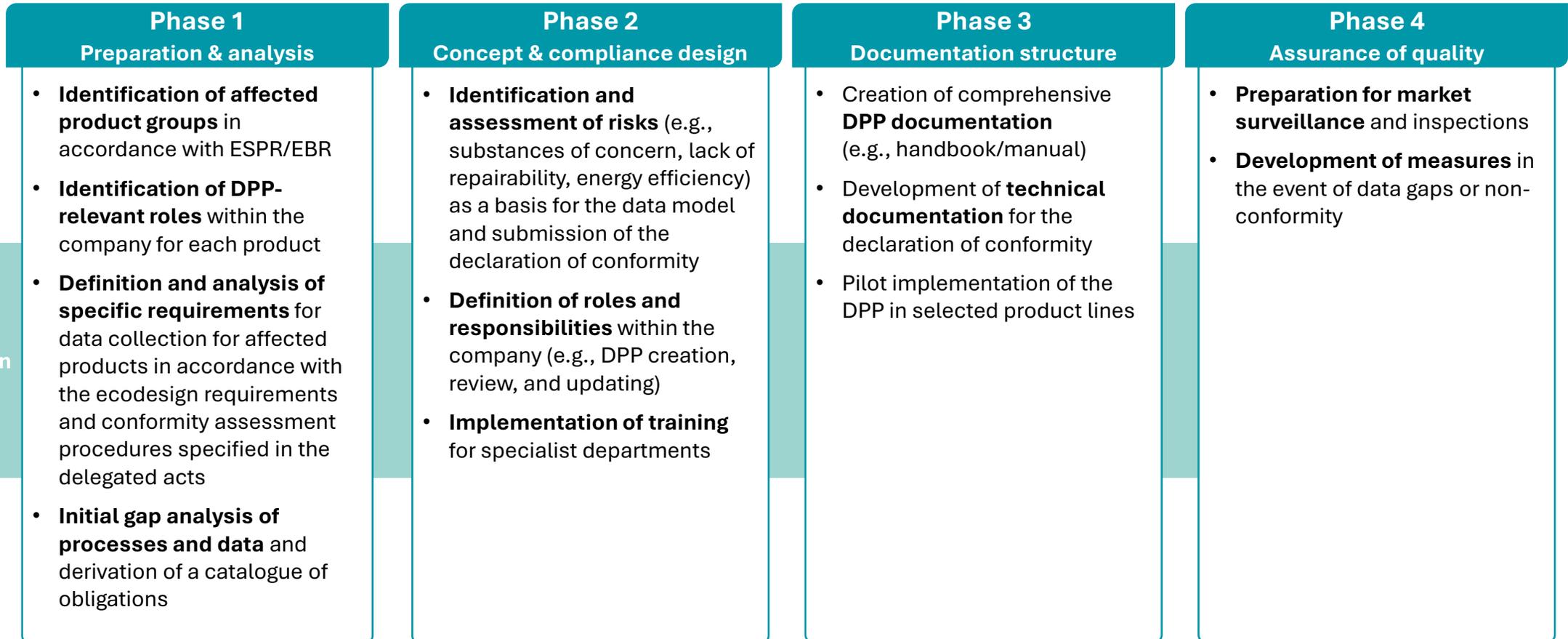
Implementation of the DPP in companies



11 | What could an implementation approach³ for the DPP look like?

The aim is to **ensure early compliance with and documentation of the regulatory requirements** of the ESPR & DPP in order to minimize compliance risks and create transparency in the supply chain. Companies should prepare for the DPP at an early stage; it would be advisable to start with a passport.

Procedure for implementation project



PMO and development of a detailed regulatory project plan

IT implementation

4 | Q&A



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