



Questions & Answers during the webinar

Will the scope cover all products regardless their use, e. g. including products for industrial use? If not, how an unambiguous demarcation will be made?

Response from the Commission representative: some sectors will be surely out of scope (e.g. food, feed, military products, etc). We are still considering if to have a wider scope or a more focused one. The starting point will in any case be the sectors and priority value chains listed in the Circular Economy Action Plan (electronics & ICT, batteries & vehicles, packaging, plastics, textiles, construction & buildings, food, water & nutrients).

Is DPP planned for single product (e.g. linked to serial number of a machine) or product groups?

Response from the Commission representative: probably the decision will change depending on the product group in scope. In some cases it would not make sense to have a serialisation of the products, especially where their characteristics are always the same. In other cases, the serialisation will be required

What is with the data of already existing products - do they need a DPP as well?

Response from the Commission representative: the requirements will be applicable only to product groups for which we will develop secondary legislation (like it already happens for Ecodesign legislation). Measures will not be retro-active.

In order to make use of the DPP the access to the data (even if not stored in a database) needs to be "somehow" standardized. It is highly recommended that this interface specification is done by European Standardization Organizations, e. g. by a mandate.

Response from the Commission representative: we will only rely on non-proprietary standards. Standardisation will play an important role.

How would the DPP fit with the Environmental Product Declarations that are now introduced via the national transpositions of the Energy Performance of Buildings Directive (and thus fragmenting the Single Market)?

Response from the Commission representative: Environmental Product Declarations (EPDs) are only used for environmental information, while the passport will also include information going beyond environment. If the EPD will be based on the same calculation methods used in the DPP then it will be possible to re-use the same information. However, buildings have certain specificities that will require a tailored solution. The Commission is developing the digital logbook for buildings. The concept is similar to the digital product passport one, but it also deviates as the buildings have specific challenges related to their use and end of life phase

How does the current revision of the Ecodesign Framework Directive fit with the SPI. It has been stressed in meetings dealing with the revision of the Ecodesign methodology (MEErP) is not directly related to SPI.

Response from the Commission representative MEErP is the methodology used for the existing Ecodesign. There is an ongoing revision process, but still related to use it for the Ecodesign legislation as we know it. Considering that SPI will take some years before hitting the market (due to co-decision process plus the time to develop implementing measures), it was important to ensure business continuity, through updating the MEErP method to better factor in circularity-related issues. The methodology underpinning SPI will be developed in the coming months. It will not be included in the SPI legislation adopted by the end of the year. MEErP will be surely an important contribution to the future methodology, but we also need to factor in the differences in terms of scope, product groups, life cycle stages, that SPI will include.

How Lifecycle Assessment (LCA) modelling relates to SPI initiative?

Response from the Commission representative Ecodesign already is based on life cycle assessment. The intention is to strengthen this in SPI. The Commission has developed and widely tested in many sectors what is currently considered by many the best available practice in the LCA area, meaning the Product Environmental Footprint (PEF) method. PEF will play a role in SPI as it can help delivering on many of the SPI objectives. We are currently assessing pros and cons, including costs associated.

Question to the Commission representatives and industry speaker Louise Bünemann: under what conditions is there a business case to introduce digital product passports (e.g. retrieval of valuable End of Life assets, optimising products and services)? How can EU policies create an enabling framework for such business cases?

Response from Louise Bünemann: a thorough impact assessment analysis of the business case of the DPP needs to be done.