

Orgalim recommendation for a staged implementation of the Digital Product Passport (DPP) system in the context of the Ecodesign for Sustainable Products Regulation (ESPR)

Executive summary

Orgalim, representing Europe's technology industries, **calls on policymakers to develop a staged implementation of the Digital Product Passport (DPP) system** to be established in the context of the Ecodesign for Sustainable Products Regulation (ESPR), **to maximise the expected early benefits while mitigating risks and implementation complexities for all stakeholders involved.**

The proposed approach seeks to **secure most of the (societal) benefits in the first phase** while allowing more time for the remaining, more complex aspects by doing the following:

- Achieve early impact by realising circular economy benefits from the very start
- Reduce risks by minimising implementation complexity and potential adverse effects for all impacted stakeholders
- Meet regulatory deadlines by ensuring the DPP system will be ready by 2027 for initial product groups under ESPR
- Support small and medium-sized enterprises (SMEs) by reducing initial bureaucratic and financial burdens on these companies

We propose a staged implementation of the DPP system, **separating the efforts into two stages:**

- **Stage 1:** Provide a minimal viable DPP system by building on the complementary responsibilities of the manufacturers and the European Commission. Manufacturers would publish their DPPs with **public information** on their own web portals or through DPP providers. Restricted information could be requested from the manufacturer in case of a reasoned request (as is already the case today) and then be delivered in DPP format. The implementation of the DPP back-up system would lead to a prolonged availability of DPPs. The Commission would set up the EU Registry, the public web portal and customs integrations. This ensures that all benefits from information requirements to customers, stakeholders, etc. can be met from the very start and that the authorities can carry out and improve their market surveillance activities.
- **Stage 2:** Implement the identity and access management requirements allowing for **differentiated access to restricted data**. This is a very complex task as there will be millions of products and actors performing different roles for different product types (manufacturer, user, distributor, refurbisher, recycler, etc.). It must be guaranteed that only actors who have the appropriate rights can access the restricted (i.e. confidential) information.

We recommend the following **priorities for the effective implementation of the DPP:**

- Describe the staged implementation for regulatory clarity
- Give clear priorities to the CEN/CENELEC Joint Technical Committee (JTC)24 "Digital Product Passport"

Introduction

Orgalim represents Europe's technology industries, the EU's largest manufacturing sector, comprised of 770,000 companies that generate an annual turnover of €2,835 billion, manufacture one-third of all European exports and provide 11.7 million direct jobs. Our industries are global leaders in the carbon-neutral energy, electrification, alternative fuels and clean manufacturing technologies needed to achieve net-zero, and we are committed to playing our part to deliver the net-zero transformation and the green transition.

Our industries welcome the Ecodesign for Sustainable Products Regulation (ESPR) as a key measure to further optimise the way resources are used throughout the economy and society as well as bringing new business opportunities – a win-win for the environment and the economy, making the most of new digital solutions. We support the potential benefits of the Digital Product Passport (DPP) established under the ESPR provided that business data is preserved, interoperability and technology neutrality without vendor lock-in is ensured and that the DPP will be based on a decentralised system with a flexible approach. We support a DPP which is interoperable, relying on existing data already provided by manufacturers and solutions from various vertical industries. See our views and recommendations on the ESPR and DPP [here](#).

The DPP system, to be developed horizontally for all product groups and legislations, represents a pivotal advance in enhancing circular economy practices and compliance within the European single market. The expected complexities of its implementation in practice demand a balanced approach that takes into account stakeholders' needs, operational feasibility and regulatory requirements.

This document outlines a proposed staged implementation approach for the DPP system in the context of the ESPR which maximises early benefits while mitigating risks and implementation complexities for all stakeholders involved.

1. Current situation

The practical implementation of the DPP system involves several challenges which are complicating its planned roll out.

Time constraints

The CEN/CENELEC Joint Technical Committee (JTC)24 "Digital Product Passport" operates on a very tight schedule, with only one year allocated for standardisation efforts.

Assuming that the necessary standards will be available in time, the proposed timeline of the European Commission leaves about 18 months for the implementation of the full DPP system, both for economic operators and the Commission.

DPP system complexity and scaling

The DPP integration across multiple stakeholders such as the Commission, third party providers and economic operators responsible for the provision of DPPs will result in managing vast amounts of sensitive data. As the DPP system will involve millions of actors (manufacturers, importers, recyclers, etc.) and a vast number of products, it must be based on a robust architecture, and will require a secure system for managing data, identities, credentials and access rights.

Open technical and regulatory questions

The DPP system's centralised and decentralised components raise concerns about "split responsibilities" between the Commission and industry stakeholders. The Commission has reserved responsibility for certain elements of the DPP system, e.g. identity and credentials management, the web portal and the integration of market surveillance and customs authorities. Other elements of the DPP system are left to the JTC24 for standardisation. This situation leads to interdependencies between the EU and JTC24, thereby increasing complexity. For example, the EU web portal may be expected to include certain features (e.g. regarding comparing DPPs) that are not necessarily foreseen by JTC24.

Given all these challenges, in our view a staged implementation approach is critical to ensure the timely success of the DPP system.

2. Objectives of the proposed staged implementation approach for the DPP system

We recommend a staged implementation of the DPP system to maximise the expected early benefits, while mitigating the risks and implementation complexities for all stakeholders involved. The proposed staged implementation ensures to secure most of the (societal) benefits in the first stage while allowing more time for the second stage and the remaining, more complex, aspects.

The proposed approach seeks to:

- **Achieve early impact** by realising circular economy benefits from the very start
- **Reduce risks** by minimising implementation complexity and potential adverse effects for all impacted stakeholders
- **Meet regulatory deadlines** by ensuring the DPP system will be ready by 2027 for initial product groups under EUPR
- **Support companies, and in particular small and medium-sized enterprises (SMEs)**, by reducing initial bureaucratic and financial burdens on these companies as well as developing information packages and guidance documents

This staged implementation strategy would ensure tangible progress while mitigating risks and implementation complexities for all stakeholders involved.

3. Orgalim proposal for a staged implementation of the DPP system

From a technical perspective, the DPP system contains a combination of centralised and decentralised parts. Functionalities could be staggered in a staged implementation to make sure that harmonised European standards for the core parts of the DPP system (Stage 1) are available in time.

From a legal perspective, some sections of the DPP system have specific deadlines. The central EU Registry needs to be set up by 19 July 2026 (Article 13 (1) EUPR). It is also required that the economic operator, when placing a product on the market, shall make a DPP back-up copy at a DPP service provider (Article 10 (4)). Other sections, such as the differentiated access to data within the DPP, could be introduced with a more flexible timeline via the respective product-related delegated acts.

Our proposal for a staged implementation of the DPP system (see also the table below) **separates the process into two stages:**

- **Stage 1:** Provide a minimal viable DPP system building on the complementary responsibilities of the manufacturers and the Commission. Manufacturers would publish their DPPs with **public information** on their own web portals or through DPP providers. Restricted information could be requested from the manufacturer in case of a reasoned request (as is already the case today) and could be delivered in DPP format. The implementation of the DPP back-up system would lead to a prolonged availability of DPPs. The Commission would set up the EU Registry, the public web portal and customs integrations. This would ensure that all benefits from information requirements to customers, stakeholders, etc. can be met from the start and that the authorities can carry out and improve their market surveillance activities.
- **Stage 2:** The implementation of identity and access management allows for **differentiated access to restricted data**. This is a very complex task as there will be millions of products and actors that could have different roles for different product types (manufacturer, user, distributor, refurbisher, recycler, etc.). It must be guaranteed that only actors with the respective rights can access the restricted (i.e. confidential) information.

We estimate the implementation timeline as follows: 1.5 years for the proposed Stage 1 after DPP standards are available and an additional 3 years for the proposed Stage 2 implementation.

Stage	Main Aspects	Expected benefits	Expected efforts	Responsible
Stage 1	<ul style="list-style-type: none"> Manufacturers publish DPPs with public information on their own web-portals Restricted information can be requested from the manufacturer following a reasoned request (as is the case today) Back-up system 	Economic operators, Consumers: <ul style="list-style-type: none"> All benefits from information requirements to customers, stakeholders, etc. Authorities Prolonged availability	<ul style="list-style-type: none"> Data carrier, unique product identifier, manufacturer identifier DPP data format, including digital signature, where necessary APIs for web access Data storage cost 	Manufacturer DPP Service Provider
	<ul style="list-style-type: none"> EU Registry Public web portal Customs authorities integration Information packages and guidance documents for companies and other stakeholders?) 	Consumers: <ul style="list-style-type: none"> Possibility to search and compare Authorities: <ul style="list-style-type: none"> Improved market surveillance 	<ul style="list-style-type: none"> APIs for DPP registration APIs for searchability Web portals 	European Commission
Stage 2	<ul style="list-style-type: none"> Differentiated access to restricted data, with identity and access management 	<ul style="list-style-type: none"> Access to restricted data, according to access rights 	<ul style="list-style-type: none"> Identity and credentials management for stakeholders Access management for different access levels 	European Commission Manufacturer (and DPP Service Provider where relevant)

4. Defining priorities for effective implementation

Orgalim calls on policymakers to provide an effective staged implementation plan by defining clear priorities on different levels:

1. Describe the staged implementation for regulatory clarity:

- Detail a staged approach for upcoming delegated and implementing acts under the ESPR.
- Ensure that differentiated access is operational post-launch. The differentiated access (as explained in the above table on page 4, or Table 1 etc.) is complex, especially regarding identity and credentials management for millions of companies, thousands of customs offices and many other stakeholders such as recyclers. This is why we recommend this aspect to be implemented only in a second stage and that differentiated access should enter into force after completing Stage 2.
- Consider the supply chain when choosing product groups. A meaningful exchange of information between different actors along the value chain will help to improve the product life cycle footprint, from design to recycling, and therefore contribute to a circular economy. The responsibility to provide data must be shared between the different actors in the value chain, so that the burden of providing this data is not only placed on the manufacturer. We welcome that data will be requested from manufacturers of intermediate products as it will help our industries to access data from these manufacturers.

2. Give clear priorities to the CEN/CENELEC Joint Technical Committee (JTC)24 “Digital Product Passport”

- Define the scope of the two stages into technical requirements and prioritise the necessary standards.

Conclusions

The proposed staged implementation of the DPP system balances immediate benefits with mid to long-term feasibility. By focusing on core priorities and structured timelines, this proposal addresses key challenges, improves clarity for those involved, facilitates stakeholder alignment and supports the EU’s broader circular economy objectives.

Thank you for considering our proposal.

Orgalim represents Europe’s technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering, electronics, ICT and metal technology branches. Together they represent the EU’s largest manufacturing sector, generating annual turnover of €2,835 billion, manufacturing one-third of all European exports and providing 11.7 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.



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