Brussels, 23 June 2026

Recommendations for a Trusted and Workable EU Digital Product Passport Registry

Introduction

The Digital Product Passport (DPP) Registry under Article 13 Regulation (EU) 2024/1781 is a core enabling component of the future DPP architecture because it will underpin the practical usability of product information across the internal market. The draft act is therefore strategically important: if designed well, it can support a workable, scalable and trusted DPP ecosystem; if designed too rigidly, or without sufficient operational safeguards, it risks creating disproportionate burdens, legal uncertainty and avoidable implementation failures.

Requirements should be designed to support high-volume, automated registration processes rather than create recurring bottlenecks or manual compliance burdens. **The registry will only be credible if it can operate at scale** and if interruptions do not paralyse legitimate economic activity. The centralised operation of the registry means that outages, maintenance periods or security-related suspensions may prevent registration of products. This could have **direct implications for supply chains and customs procedures** and should be carefully addressed.

Orgalim has consistently supported the objectives of the Ecodesign for Sustainable Products Regulation (ESPR) and the potential of digital product information to strengthen circularity, improve market surveillance and facilitate more efficient information flows. At the same time, there are a number of **conditions for success**: harmonised and feasible EU rules, protection of confidential business data, interoperability based on standards, and implementation pathways that work in real-life industrial settings for companies of all sizes. In particular, Orgalim has called for a staged implementation of the DPP system, so that early benefits can be realised while more complex access-management and governance layers are introduced in a controlled and proportionate way.

Critical issues and suggested solutions

Subject	Recital	Articles	Issues and recommendations
Verification requirements for operators	(7)	4.4 and 5.4	**Three-year verification renewal bottleneck**: millions of synchronised eIDAS renewals at three-year intervals will create load spikes. At the same time, a helpdesk would be active only during working hours, not 24/7 (see also below, Article 13). The requirement creates risks for continuity, particularly where DPP processes are automated. If credentials lapse, it could interrupt data flows and compliance processes.

Subject	Recital	Articles	Issues and recommendations
Verified value chain actors	(9)	6, 20	Key terms such as "**other verified value chain actors**" should be defined more clearly, and their rights and obligations should not be left open to interpretation. **Re-registration of DPPs should only be made by the previous operator:** new versions for DPPs must only be registered by the operator that registered the original DPP. The act should also specify how **multiple authorised users** may act on behalf of a company, how continuity is ensured when personnel change, and whether company-level rather than purely natural-person-based access arrangements can be supported. See also Orgalim's recommendations on DPP service providers. The most important missing element is a clear and **operational distinction between different categories of information and corresponding access rights**. The draft should explicitly differentiate between public information, restricted information and confidential information, and it should ensure that access for authorities, customs, market surveillance bodies and other verified value chain actors is limited by role and strict need-to-know principles. This is especially important for item-level passports, where granular data may allow competitors to infer production patterns, sourcing strategies or sales developments if adequate controls are not in place. The draft should make clear that technical documentation and confidential business information are not to be uploaded to the registry or made available through the DPP. Such information should remain available to authorities only upon request under the relevant sectoral legislation.
DPP registration	(14)	8	**Verification of uniqueness of a product identifier, and a match with the operator identifier** of previous registrations, is necessary to avoid duplicate registrations. **Automatic verification must not be treated as proof of product conformity**. The automated checks performed by the registry should be limited to the existence, formal consistency and semantic conformity of the registered data. In no circumstances should they be interpreted as replacing manufacturers' obligations or physical and technical checks by competent authorities, especially for complex electrical, electronic and digital products. Suggested wording: "*The automatic verification carried out by the registry only concerns the existence, formal consistency and semantic conformity of the registered data. It does not constitute a conformity assessment of the product and does not prejudge the checks carried out by the competent authorities.*"
	(12)	8.3 and 8.4	**The registry act should remain granularity-neutral** and leave granularity requirements to product-specific delegated acts, taking account of feasibility, product characteristics and proportionality. EPSR Article 9 mandates registration at model, batch or item level, but not the combinations described in the registry draft. From the perspective of the 'need-to-know' principle, this is not necessary and requires additional effort without benefit. The draft includes **de facto obligations to maintain multiple DPP layers** where one level of granularity is already sufficient under product-specific rules. If a passport is established at item level, requiring additional registration of linked batch- and model-level identifiers as a general rule risks duplication,

Subject	Recital	Articles	Issues and recommendations
			an increased administrative burden and broader exposure of sensitive commercial information without clear added value. The same concern applies to batch-level registration being systematically linked to model-level registration. Orgalim recommends clarifying that less granular references may be used where useful, but should not be mandatory unless specifically justified in the relevant product legislation. The act should also acknowledge specific implementation cases that may require exemptions or simplified modalities, including customised products, low-volume production, prototypes, samples, spare parts and complex business-to-business (B2B) products.
	(14)	8.6	**Five-step synchronous validation with external dependencies**: multi-step validation with live external calls (backup provider, TARIC, DPP content) together with undefined response times. If any check fails, including due to external factors, (backup provider, TARIC, semantic repository, eIDAS), the entire registration fails and no fallback option exists. We therefore recommend the implementation of asynchronous registration validation with queue registrations during provider downtime. **All-or-nothing failure?** One minor semantic problem can potentially block the whole registration process and delay access to market.
Proof of registration (90 days document)	(15)	9.4	The **registration ID should be sufficient proof** of successful submission. It does not appear necessary to generate an additional document or specify its validity date.
Registration data management	(16)	10	**The ten year retention period for registry data is misaligned with the circular economy**: Orgalim recommends auto-deletion before end-of-life for long-lifespan products. Otherwise, products with a lifetime of more than ten years lose traceability mid-life cycle. **De-activation of DPPs must be possible:** if a product is withdrawn from the market, it must be possible to mark the DPP as 'inactive'. **Processing of previous registration versions** should also be possible.
Semantic repository	(17), (18)	12	**Semantic repository as a single-point-of-failure**: repository unavailability means registry unavailability – with no fallback option. The registry and the repository should be designed as an **open framework that can incorporate and reference relevant international, European and industry-developed standards,** including work under CEN and CENELEC. If the act is too prescriptive in favour of a closed semantic repository model, it risks duplicating existing solutions, increasing implementation costs and reducing global interoperability. **Publish standard role library** with data-to-role mappings. Economic operators cannot implement Role-Based Access Control (RBAC) until roles are published in the future ESPR delegated acts. **The registry should follow a 'once only' approach**. Economic operators should not be required to enter the same information multiple times in different EU or national systems. Interoperability with existing and future systems should therefore be built in by design.

Subject	Recital	Articles	Issues and recommendations
Technical support	(19)	13	**Helpdesk bottleneck**: Single helpdesk, working hours only (9-5 Brussels time), for more than 27 million global operators working around the clock 24/7. Only six-month knowledge retention. Guidance should be available well before obligations apply and should include sectoral examples, complete API specifications, testable data models, correction procedures, access-management rules and SME-oriented use cases. A sandbox environment, pilot phases and sufficient transition periods should be in place before mandatory registration starts.
Maintenance and registry availability	(25)	15	If registration is legally required before placing products on the market, then the system must either guarantee a very high level of **operational continuity or provide a legally secure fallback option** in cases where the registry or critical dependencies are unavailable. Likewise, identity verification and renewal requirements should be adapted to avoid systemic load peaks and unnecessary disruption of automated compliance processes. **Service level contradiction**: Article 15.2 specifies "accessible at all times;" which is not implementable. At the same time, Article 15.3 allows suspension without notice. **Suspension without notice**: suspension can block all EU registrations instantly and the act does not offer any fallback option. The fallback option should include a legally recognised proof of attempted registration and a possibility for ex-post regularisation once the registry, API or other critical dependency is restored.
Personal data	(28)	18	**Personal data.** The requirement for storage of personal data seems excessive. Personal data needs to be very well protected against potential data breaches. A user registration and authentication scheme could be implemented as in The European Product Registry for Energy Labelling (EPREL).
Responsibility of the verified economic operator	(29)	19	**Economic operators would be liable but powerless**: operators are responsible for accuracy but cannot control authority access, registry deletion, or credential compromise, which third parties can modify if delegated.
Responsibilities of the European Commission	(30), (31)	21	The draft lacks sufficiently concrete business-continuity, incident-response and service-level safeguards for a system that may become critical to market access and compliance.
Responsibilities of Member States	(32)	22	**Fragmented national security**: each Member State implements its own security. The registry will be as secure as its weakest link, as there is no mandated standard.

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 over €2,972 billion, manufacturing one-third of all European exports and providing over 11,9 million direct jobs. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

Orgalim aisbl
Arts 56
Avenue des Arts 56,
1000 Brussels, Belgium

+32 2 206 68 83
secretariat@orgalim.eu
www.orgalim.eu
VAT BE 0414 341 438