

# Unlock value through the EU's digital product passports



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With the Ecodesign for **Sustainable Products Regulation (ESPR)** now in effect, the introduction of **Digital Product Passports (DPPs)** is moving from concept to implementation.

DPP requirements will be set through delegated acts for specific product groups over the coming years. Early candidate product groups include textiles, furniture, mattresses, tyres, iron and steel, aluminium and detergents, while batteries and construction products continue under sector-specific rules. In parallel, the Commission and standardisation bodies are working on building the enabling infrastructure for DPPs including a common DPP data architecture, a central EU registry, and rules for DPP service providers who will manage passports on behalf of manufacturers.

The question for companies is therefore no longer if DPPs are coming, but how to turn DPPs into a strategic advantage rather than just a narrow compliance obligation. This includes questioning what information DPPs for different products should contain, and how it will meaningfully influence decisions on design, repair, recycling and end-of-life to support circular economy goals.

dss+ has been working on the EU funded **CircThread project**, which has produced a series of policy briefs ([found here](#)) exploring how DPPs can solve concrete policy and business challenges.

**From our 2025 briefs, 4 key themes stand out:**

1

### **Chemical traceability through DPP:**

Today, information on substances of concern is fragmented across safety data sheets, REACH, SCIP, and internal databases. A well-designed DPP could act as a single layer connecting substance information to enable better substitution decisions, safer recycling, and alignment with future restrictions. The challenge, however, is to determine which chemical data should be publicly available and what must remain business confidential without undermining safe circularity, to avoid critical legal or competitive risks.

2

### **Enabling repair and lifetime extension:**

DPPs could help standardise access to repair instructions, repair maps, spare-part availability and price, and other repair-critical information. This opens opportunities for manufacturers to develop new service models and supports policymakers' right to repair ambitions. Yet it is essential that the information made accessible is both truly relevant and secure, to avoid exposing companies to unnecessary administrative reporting burden, IP leakage, cybersecurity pressures or increased leakage risks.

3

### **Product lifecycle information for consumers:**

DPPs should avoid overwhelming consumers with technical data and instead provide information that can best inform consumers for decisions when buying, using, repairing and disposing of products. Moreover, currently information mostly flows one way from companies to consumers, with little use-phase feedback due to inconvenience and privacy concerns. DPPs could enable consumers to optionally share anonymous data on how they use and discard products, giving companies better data to improve design, durability and repairability. However, this introduces challenges on managing new responsibilities around consumer information, integrating use-phase insights into existing systems, and data security, that could potentially erode trust or create operational burdens without delivering real value.

4

### **Connecting DPPs to science-based circular economy targets:**

Many companies are setting circularity and resource-use targets, but struggle to measure progress consistently. DPPs could provide real-world data to move from one-off lifecycle assessments to more dynamic, science-based indicators such as material recovery rates per product family or average use-phase lifetimes. The risk is that if data requirements are not designed with clear use purposes and realistic implementation considerations in mind from the start, companies may end up with high reporting burden but limited analytical value, making careful DPP design essential to ensure data usability and value.



## How businesses should prepare for DPP implementation

With implementation accelerating, early, structured action will help organisations avoid compliance risks and reduce future system integration costs.

dss+ supports companies in preparing for DPP implementation beyond just compliance, to treat DPPs as a tool for better decision making that can unlock meaningful circularity gains.

### How dss+ helps companies prepare for DPP:

#### ■ Monitor DPP developments:

dss+ helps companies track and interpret EU regulatory and technical developments, so companies understand what is coming and what it means for their systems and products. Companies should follow the approval of the EU's ESPR delegated acts defining product-specific DPP requirements to avoid compliance risks, as well as the EU's pending work on the DPP architecture (central registry, data carriers, DPP service providers). These decisions will impact how companies connect their existing systems and share data across the value chain and allow them to position themselves early on, as well as to develop a compliance roadmap.

#### ■ Map which product data you already have (and where it sits) and any major data gaps:

dss+ supports companies in mapping where their relevant data sits today (e.g. ERP, LCA tools, compliance databases, repair/service platforms, etc.) and identifying gaps that need to be addressed. Even if the final DPP content is not yet defined, building a clear overview of your company's current data on materials, components, chemicals, repairs, warranties and end-of-life helps to identify both strengths and gaps, and avoid costly duplication later when DPP requirements become concrete. This exercise can also incentivise stronger relationships with suppliers, enabling better supply-chain due diligence, and allowing companies that invest early in collecting and sharing high-quality data to turn it into a competitive advantage.

#### ■ Consider piloting DPPs:

dss+ helps companies to design and run practical pilots that test DPP-style data sharing with selected products and partners, uncovering operational, governance and data-quality challenges early. For companies likely to be heavily affected, especially those with products in the EU's priority groups for ESPR delegated acts, pilots can reveal issues around data quality, confidentiality, access rights and responsibilities across suppliers and customers. This creates a baseline to build from once EU rules and standards are finalised.

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### About dss\*

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dss\* enables companies to build organisational and human capabilities, manage risk, improve operations, achieve sustainability goals and operate more responsibly.

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