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Digital Product Passports

**New EU compliance requirements for
manufacturers**





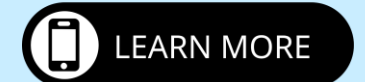
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Overcome your trade barriers

- **Learning:** Don't miss our exclusive Digital Product Passport series - **coming this February**
- **Networking:** Join our Manufacturing Special Interest Group – **DPP session on 28 January**
- **Support:** Connect with an expert via our exclusive helpline - **year-round support**

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Today's experts



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Ilona Kawka

Imports advisory practice lead at the
Chartered Institute of Export &
International Trade

Ilona is an expert in international trade compliance and the digitalisation of trade systems and documentation. She has over nine years' experience, specialising in import operations.

As the lead for the Imports Advisory Practice, she excels in managing complex import processes, conducting customs and broker invoice audits and developing policies that streamline cross-border trade while ensuring strict adherence to global regulations.



Paul Brooks

Manufacturing lead and UK nations &
regions head at the Chartered Institute
of Export & International Trade

Paul joined the Chartered Institute in May 2022 to build its profile and brand in Wales. He sits on Welsh Government's Trade Policy Advisor Group (TPAG) and is a member of the Wales Business Council.

From June 2023 Paul's brief has widened to include the other devolved nations of the UK and regions with England. Paul now leads colleagues who build the profile and brand of the Chartered Institute across the United Kingdom and within the UK manufacturing sector.

Today's experts



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Kelly Hayes

Office services manager at
Joseph Cheaney & Sons

Seasoned international trade professional with 13+ years of experience in export administration, business restructuring, and customer service. Proven track record in leading import/export operations, driving business improvements, and navigating complex trade challenges.

Currently office services manager at Joseph Cheaney & Sons, a renowned British shoemaker established in 1886, known for handcrafting premium leather shoes in Northamptonshire. Leading a diverse team in customer service, administration, and sales support, I successfully guided the business through Brexit, ensuring compliance with trade regulations and optimising import/export operations.



Christian Pulman

Head of procurement
at AESSEAL

Christian Pulman is the head of procurement at AESSEAL, where they lead strategic sourcing initiatives and oversee export controls to ensure compliance with international regulations.

With a focus on efficiency and sustainability, Christian plays a pivotal role in optimising supply chain processes while maintaining high standards of operational integrity.

AESSEAL is a specialist in the design and manufacture of mechanical seals and support systems. They operate from 161 locations in over 100 countries with its global headquarters based in Rotherham.



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Digital Product Passports

Evolving towards sustainable manufacturing




New circular economy action plan

The European Commission adopted a new circular economy action plan in March 2020

- The EU's Circular Economy Action Plan was initially adopted in 2015 with 54 actions mapped out, which were adopted or implemented by 2019
- The new plan has been adopted in March 2020 with 35 action plans and is one of the main building blocks for the European Green Deal
- 2019's European Green Deal is a package of policy initiatives supporting EU goals of reaching climate neutrality by 2050
- Today we will focus on Ecodesign for Sustainable Products Regulation (ESPR) and Digital Product Passport solution
- There are more policies worth reviewing too:
 - EU Strategy for Sustainable and Circular Textiles
 - Construction Products Regulation
 - New EU Battery Regulation
 - EU Detergents Regulation
 - EU Green Claims Directive



A circular inset image showing a hand unscrewing the cap of a clear plastic water bottle. The background of the circle is a solid light blue color. The bottle is partially filled with water.

Ecodesign for Sustainable Product Regulation (ESPR)

This regulation entered into force on 18 July 2024 and replaced Ecodesign Directive (2009/125/EC)

- ESPR is a part of the European Green Deal – a policy package to make the EU carbon neutral by 2050
- It aims to ‘improve the sustainability of products placed on the EU market by improving their circularity, energy performance, recyclability and durability’
- ESPR is a framework regulation that will allow adoption of rules affecting groups of products of similar characteristics
- First half of 2025 is dedicated by the EU Commission to the adoption of ESPR working plan
- Next step is developing specific product rules, alongside impact assessments led by stakeholder consultations under an Eco-design Forum, established through applications of volunteers

Ecodesign requirements

From the legal perspective, ESPR brings in performance and information requirements for almost all products bought and sold within the EU, for example:

- Improving product durability, reusability, upgradability and reparability
- Enhancing the possibility of product maintenance and refurbishment
- Making products more energy and resource-efficient
- Addressing the presence of substances that inhibit circularity
- Increasing recycled content
- Making products easier to remanufacture and recycle
- Setting rules on carbon and environmental footprints
- Limiting the generation of waste
- Improving the availability of information on product sustainability.



Other measures under ESPR



Digital Product Passport

ESPR introduces a Digital Product Passport (DPP) requirement for most types of goods brought into the EU market

- DPP is a digital record of a products, including the components and materials used in its manufacture or assembly
- The information about the product will vary depending on the product type and will be set out in delegated acts by the European Commission, established in consultation with stakeholders
- Regardless of origin, products entering the EU market will need to have a DPP – this will affect most of goods
- DPP will need to be made available to stakeholders
- The European Commission will prepare a public web portal where data in the DPP can be accessed



Technical requirements

The ESPR defines information on technical aspects of DPP that will apply to all groups of products

- Complementary role
- Data accessibility
- Implementation and maintenance
- SME support
- Data carrier requirements
- Standardisation for interoperability
- Centralised and decentralised systems
- Specificity



Data requirements

The specific details of the DPP for individual product groups will be outlined in delegated acts, however, the general information requirements are outlined in Article 7 and ANNEX III, stating that this information must or may include, for example:

- The unique product identifier
- The Global Trade Identification Number
- Commodity codes
- Compliance documentation
- User manuals and instructions
- Information on performance of the products
- Information about the manufacturer
- Information about the importer
- Information on how to install, use, maintain, repair, return or dispose the product



Who is affected?

The DPP will impact a wide range of stakeholders, including:

- Manufacturers and producers
- Consumers
- Supply chain stakeholders
- Retailers and resellers
- Regulatory authorities
- Policymakers



EU Battery Regulation

The European Parliament and the Council adopted the new Batteries Regulation on 12 July 2023

Chapter IX of the regulation elaborates on the digital passports:

- From 18 February 2027 each LMT battery, each industrial battery with a capacity greater than 2 kWh and each electric vehicle battery placed on the market or put into service shall have an electronic record ('battery passport')
- The battery passport shall be fully interoperable with other digital product passports required by Union law concerning eco-design, in relation to the technical, semantic and organisational aspects of end-to-end communication and data transfer



Benefits of DPP

The introduction of the regulation may be a challenge for manufacturers and supply chains, but it can also become a great benefit

How the adaptation of digital passports could benefit your company

- Create competitive edge for your products
- Enable sustainable production and support your sustainability goals
- Leverage your data to your benefit
- Improve visibility and oversight of your supply chain and operational efficiency
- Build stronger relationships with your business partners
- Bring on board new group of customers and improve the satisfaction through better engagement
- Help you fight against fraud and counterfeiting of your products



ESPR & DPP development timeline

December 2019

Adoption of the European Green Deal

02

March 2022

Proposal for ESPR including DPP was introduced

04

April 2025

Planned publication of first working plan for eco-design regulations

06

2027

DPP becomes a legal requirement for batteries under Battery Regulation

01

March 2020

The new circular economy action plan was adopted

03

December 2023

A provisional agreement on the ESPR and DPP has been agreed between the European Council and European Parliament

05

July 2026

Planned publication of DPP registry by the European Commission

07

How to prepare for DPP

Understanding the requirements of the ESDR and DPP is essential. How to start getting ready now

While the specific framework for the DPP is still being developed, it is important to:

- Understand the concept and get familiar with relevant regulations that will affect your goods – familiarise yourself with both EGD and circular economy action plan as well
- Review technology readiness – review your current infrastructure, data points, data sharing capacity, data security and related policies
- Engage with your stakeholders – collaborate with your supply chain partners and evaluate their progress and awareness of DPP
- Build internal knowledge – ensure that employees have awareness of what is coming
- Prepare implementation plan
- Consider running pilots before the regulations become requirement and get ahead of the competition





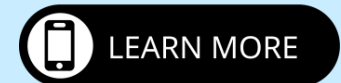
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Become a Chartered Institute business member by 11 Feb to:

- Participate in two special Lunchtime Learning sessions where we will deep dive into the DPP – **coming this February**

Learn more at:

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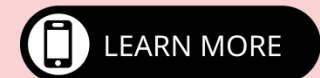
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Join our two Lunchtime Learning specials

- EU DPP: Collecting accurate data across the supply chain – **13 February**
- EU DPP: How to remain compliant with sustainability regulations throughout a product's lifecycle – **20 February**

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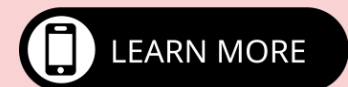
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Be part of our Manufacturing Special Interest Group

- **Next session:** An unmissable practical discussion on the EU's Digital Product Passport – connect and exchange tips and insights through peer discussion
 - **28 January**
 - **Microsoft Teams | Interactive event**

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MemberCon25

THURSDAY 13TH MARCH | LEEDS



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