

— FACT CHECK

# Europe is building the digital operating system for products.

The Digital Product Passport (DPP) is often treated as just another item on a compliance checklist: a QR code, a dataset, a new documentation routine. That view is understandable – but far too narrow.

The DPP is not just a form. It represents a structural shift in infrastructure: away from document-based regulation and toward a digital market architecture in which products, data, and market access are systematically interconnected.

**Industry-agnostic.** • **Accessible.** • **Verifiable.**



**EXAMPLE** A jacket, a QR code, a permanently addressable dataset: material, origin, CO<sub>2</sub>, repair, second-hand market.

**AT A GLANCE**

- ▶ The DPP is the first digital infrastructure for products.
- ▶ Europe is taking a global leadership role in this space.
- ▶ Market access will increasingly be governed by data.
- ▶ Bureaucracy is being reorganized – and made more effective.
- ▶ Value creation no longer ends at the point of sale.
- ▶ The DPP turns products into communication and relationship interfaces.

SIX FACTS

# What is already anchored in EU law.

**01** FACT

**The DPP is anchored in EU law.**

The Ecodesign for Sustainable Products Regulation (ESPR, Regulation (EU) 2024/1781) establishes the framework for the Digital Product Passport – and the legal basis for delegated acts through which the European Commission defines binding requirements for individual product categories.

**02** FACT

**There will be an EU registry – and it is scheduled.**

The Commission is required to provide a digital registry for product passports by **19 July 2026**. The registry matters because it enables discoverability and verifiability – not because it centrally stores all content.

**03** FACT

**The registry validates rather than stores.**

The EU registry is primarily a directory. It validates formal aspects (existence, signatures, integrity) and points to the source of the DPP. Technically, this enables decentralized storage while ensuring verifiability for market surveillance and customs authorities.

**04** FACT

**Mandatory – but cascading.**

Requirements will not come "all at once" but cascade through delegated acts. Frequently cited early movers include certain battery categories, followed by additional high-impact product groups.

**05** FACT

**Omnibus IV: digital by default.**

The Omnibus IV package (proposal published 21 May 2025) aims to reduce paper-based requirements and establish digital evidence as the standard. As a core component, the DPP is a precursor to a broader shift: European product regulation is moving from document-based compliance to a data-driven market architecture.

**06** FACT

**Not "just about sustainability."**

In enforcement contexts (market surveillance, customs, product safety): the DPP is part of an enforcement architecture. The circular economy is a key driver – but not the only one.

SHORT TIMELINE



Note: Dates are interpreted differently across EU documents and expert analyses; rollouts typically occur in stages by product group.

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**— WHAT CAN GO WRONG**

# Three critical mistakes in DPP projects.

Many projects fail not because of the regulation, but because of its translation into practice. Three recurring patterns – and how to avoid them.



## 01

### "PDF-ization."

The most common mistake is also the simplest: digitizing documents instead of information. The result is portals full of PDFs that no one can find, version properly, or reference reliably. In a registry-based, "digital by default" environment, this becomes an operational risk: something exists formally – but is unusable in practice.

*Digital does not mean "without paper." Digital means referenceable, updatable, verifiable.*

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## 02

### Identity without governance.

The DPP requires a unique product identity – but identity without governance is just a number. The real questions are: Who can change what? Who manages versioning? Who is liable for which data field? Without a clear responsibility model, you end up with a clean data structure – and real legal ambiguity.

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## 03

### Machine-readable vs. human-readable.

DPPs are often designed purely from a technical perspective: schemas, fields, APIs. At the same time, information must be understandable to humans at the right moment – during service, recall, or second-hand use. The challenge lies in translation: machine-readable without losing meaning, and human-readable without marketing noise.

— FOUR CONCRETE EFFECTS

# What happens when products talk.

Industry-agnostic — from product recalls to post-purchase value creation.

**A** RECALL

## Recalls become precise.

Today, recalls are often broadcast-based: many are notified, few are actually affected — and those affected cannot reliably identify themselves. With product-level identity, recalls can become granular: this batch, this unit, this status.

Less PR, more safety.

**B** SECOND HAND

## Verifiable instead of trust-based.

Second-hand markets depend on trust: condition, authenticity, history. The DPP can provide the infrastructure for this — not as a marketing narrative, but as verifiable product history. This stabilizes resale values and feeds back into the primary market.

Value stability as infrastructure.

**C** SERVICE

## Service becomes proactive.

When product data is not trapped in silos but linked to the product itself, service events become predictable: maintenance windows, spare part compatibility, warranties, repair pathways. The DPP turns "customer service" into a lifecycle model.

From ticket to lifecycle logic.

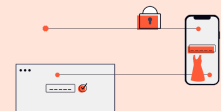
**D** VALUE CREATION

## Value creation after the purchase.

After purchase, a vacuum often emerges: consumers seek guidance wherever it is available — increasingly on platforms and AI systems. The DPP makes every sold product permanently addressable and anchors post-sale value creation within the company's own ecosystem.

The brand stays reachable.

**"Many discussions around the DPP focus on content. We focus on operations: identity, governance, verifiability, interoperability."**



## OUR POV

## We make products *infrastructure-ready*.

Our point of view is not: "We build DPPs." Our point of view is: We make products infrastructure-ready — so the DPP does not become just another documentation exercise, but a stable address for evidence, service, and trust.

That is the difference between **a passport** and **a system**.

**Narravero®** Let your products talk!

### The Narravero Checklist.

Six points you can actually work through — before the data model becomes a project.

- 01 Define the source of truth — a system, not a folder.
- 02 Define product identity — granularity: model vs. individual unit.
- 03 Clarify ownership and liability for each data field.
- 04 Establish versioning and signature strategy (integrity).
- 05 Build a human-readable interface — not just an API.
- 06 Plan integration with retail, service, and secondary markets — not just compliance.

### SOURCES (SELECTION)

- European Commission — ESPR: Ecodesign for Sustainable Products Regulation (DPP as a "digital identity card").
- European Commission — Q&A Omnibus IV ("digital by default," Common Specifications).
- Hogan Lovells / Linklaters — Omnibus IV and DPP registry by July 2026 (legal perspective).
- EUR-Lex — Regulation (EU) 2024/1781 (ESPR).
- German Federal Network Agency — DPP milestones including registry launch July 2026.

*Note: This document consolidates the current state of publicly available information and Narravero's perspective (as of May 2026).*