

The Digital Product Passport

Europe is building the digital operating system for products — readable by humans and machines alike.

AS OF: JULY 2026

WHAT IT'S ABOUT

The digital infrastructure for products

The Digital Product Passport (DPP) is sometimes treated as just another chapter in the compliance manual: a QR code, a data record, a new documentation routine. That's understandable — but it falls far too short.

The Digital Product Passport is an **infrastructure shift**: away from document-based regulation, towards a digital market architecture in which products, data and market access are systematically linked.

- The DPP is the first digital infrastructure for products
- Market access for products will be governed by data
- Value creation no longer ends at the point of sale
- Europe is taking a digital lead with it
- Bureaucracy is reorganised — and yes: streamlined
- The DPP turns products into media for communication and relationships

Seven facts about the DPP

What is legally established – and what is often misunderstood.

01 The DPP is anchored in EU law.

The Ecodesign for Sustainable Products Regulation (ESPR, Regulation (EU) 2024/1781) creates the framework for the Digital Product Passport and the legal basis for delegated acts per product group, through which the European Commission progressively sets binding, detailed requirements for individual product groups.

02 The EU register is live.

Since 19 July 2026, the central EU register for product passports has been in operation. The Commission has released the register, a test environment and usage guides, thereby meeting the deadline set out in Article 13 ESPR. The register matters because it enables discoverability and verifiability – not because it stores all content centrally. The deadline concerns the availability of the register, not an immediate obligation for all products.

03 The register points to the passport, it does not store it.

The EU register is primarily a directory: it stores the unique product identifier and, for imports, the commodity code, and points to the source of the passport. The product data itself remains decentralised, with the manufacturer or its service provider. This reduces central data control while creating verifiability for market surveillance and customs. A registration identifier only confirms a successful entry – it is not proof of conformity (Article 13(5) ESPR).

04 The DPP becomes mandatory step by step, per product group.

The obligation does not arrive for "everything at once", but cascades through delegated acts. A frequently cited first mover is certain battery categories; other high-impact groups follow.

05

Omnibus IV shifts the default: digital by default.

The Omnibus IV package (proposal, since 21 May 2025) aims to dismantle paper-based requirements in product law and to establish digital record-keeping as the norm – with exceptions where safety demands them. The DPP, as a key component, is therefore not the exception but the forerunner of a broader shift: European product law is structurally moving from document-based regulation to data-based market architecture.

06

The DPP is not "just sustainability".

In the safety and enforcement context (market surveillance, customs, product safety) it becomes clear at the latest: the DPP is part of an enforcement architecture. The circular economy is a driver – but not the only one.

07

The register establishes the shared layer of meaning for product data.

Implementing Regulation (EU) 2026/1778 governs the operation of the register. Its Article 12 creates a "semantic data repository": a binding, multilingual directory that defines what each data field of a product passport means, how fields relate to one another and how statements are linked to their supporting evidence. It is public, searchable, free of charge and accessible to external systems via an open interface. For the first time, it is thereby bindingly defined how a product passport is read unambiguously and without interpretation – across Europe and according to European rules.

TIMELINE

Short timeline

- **21 May 2025**
Omnibus IV – proposal published
- **2024 – 2026**
ESPR implementation & delegated acts (ongoing)
- **19 July 2026**
EU DPP register live (Article 13 ESPR) – operating rules in Implementing Regulation (EU) 2026/1778
- **February 2027**
Batteries as the first mandatory product group – followed by e.g. textiles, steel, electronics

Note: dates are classified differently across EU documents and expert analyses; rollouts often happen in stages per product group.

ANTI-PATTERNS

Three deadly sins in DPP projects

1 PDF-ification

The most common mistake is banal: you digitise the document, not the information. The result is portals full of PDFs that nobody finds, nobody versions, nobody references cleanly. In a registry- and "digital by default" world, that becomes an operational risk: formally something exists – in practice it is unusable.

Digital is not "without a printer". Digital is "referenceable, updatable, verifiable".

2 Identity without governance

The DPP needs a unique product identity — but identity without governance is just a number. The decisive questions are: who may change it? Who versions it? Who is liable for which field? Without a responsibility matrix you get a pretty data model — and a very real fog of liability.

3 Machine-readable vs. human-readable

DPPs are often conceived in purely technical terms: schema, fields, APIs. At the same time, information must be understandable for people at the right moment (service, recall, second hand). The art is in the translation: machine-readable without loss of meaning — human-readable without marketing fog.

MARKET IMPACT

Five concrete market effects

Industry-agnostic — what changes once products become addressable.

A

Recalls become precise

Today recalls are often a broadcast: many are informed, few are affected — and the affected cannot reliably tell. With product-level identity, recalls can become granular: this batch, this item, this status. That is less PR, more safety.

B

Second hand becomes "verifiable" instead of "take our word for it"

Second-hand markets hinge on trust: condition, authenticity, history. The DPP can supply the infrastructure for this — not as a marketing story, but as a verifiable history. This stabilises resale values and feeds back into the primary market.

C

Service becomes proactive

When product data no longer disappears into silos but attaches to the product, service events become plannable: maintenance windows, spare-part compatibility, warranty, repair paths. The DPP turns "customer service" into a lifecycle logic.

D

Value creation continues after the sale

After the sale, a vacuum often opens up: consumers seek guidance wherever it is available – increasingly from platforms and AI systems. Relationship and loyalty thereby shift outside the brand's sphere of influence. The Digital Product Passport offers, for the first time, an infrastructure that keeps every sold product permanently addressable and serviceable. In this way value creation is anchored in your own system, even after the sale.

E

The next reader is an AI agent

Increasingly it is no longer a human who searches, compares and recommends, but an AI agent acting on their behalf. It makes the pre-selection before a human even looks. Where that agent sources its product information decides the outcome. If it draws on the product passport, it reads a statement that stands under European law, is verifiable and sits with the manufacturer. If it draws on a provider whose rules and legal jurisdiction lie elsewhere, it follows that provider's rules. The semantic data repository now defines how an agent reads the passport unambiguously. In this way the DPP becomes the reliable source for AI-assisted selection – instead of a claim that an AI merely deems plausible.

OUR POV

Many talk about the DPP in terms of content. We talk about operations: identity, governance, verifiability, interoperability.

Because that is the difference between "a passport" and "a system".

Our POV is therefore not: "We build DPPs." Our POV is: **We make products infrastructure-ready.** So that the DPP does not become the next document project, but a stable address for evidence, service and trust.

CHECKLIST

The Narravero checklist

The one you can actually work through.

1 Define the source of truth — a system, not a folder

2 Define product identity — granularity: model vs. item

3 Clarify responsibilities & liability per data field

4 Set the versioning & signature strategy — integrity

5 Build a human-readable surface — not just an API

6 Design for retail / service / secondary market — not only compliance

SOURCES (SELECTION)

European Commission: ESPR — Ecodesign for Sustainable Products Regulation (DPP as "digital identity card").

EUR-Lex: Regulation (EU) 2024/1781 (ESPR).

EUR-Lex: Implementing Regulation (EU) 2026/1778 (operation of the DPP register; Article 12: semantic data repository).

European Commission: Q&A Omnibus IV ("digital by default", Common Specifications).

Bundesnetzagentur (presentation/overview): DPP milestones incl. registry launch on 19 July 2026 (completed).

Hogan Lovells / Linklaters (assessments): Omnibus IV and DPP registry by July 2026 (legal perspective).

Note: this document consolidates the state of publicly available information and the Narravero assessment (as of: July 2026).