



FESI contribution to the DPP service provider

***have your say* consultations**

FINAL

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QUESTIONS LINKED TO PROVIDING AND RECEIVING DIGITAL PRODUCT PASSPORT RELATED SERVICES

1. Do you do business outside of EU?
 - a. I do business [my business partners / target audience is] only in the EU
 - b. I do business [my business partners / target audience is] in the EU and outside of the EU
 - c. I do business [my business partners / target audience is] only outside of the EU
 - d. Other (please explain)
2. Are you already a responsible economic operator for a specific product category?
 - a. I am a manufacturer
 - b. I am an authorised representative
 - c. I am an importer
 - d. I am a distributor
 - e. I am a dealer
 - f. I am a fulfilment service provider
 - g. I am none of the above
 - h. Other (please explain) Please choose the option that best describes your situation.
3. What benefits and costs would you see for consumers and other stakeholder groups deriving from the use of a digital product passport?

The sporting goods industry would like to share with the Commission the following list of benefits:

- *Benefits for economic operators:*
 - *Over time, this brings an opportunity for label harmonisation and reduction across markets regarding the number of labels and packaging elements as well as compliance overhead.*
 - *DPP can become a value-generating asset, when communicating product attributes correctly and in an available manner, as the main communication point with stakeholders. It can enable resale, repair, authentication, and traceability services. Moreover, it can provide faster consumer services with self-service data, particularly for such aspects as care, warranty, and specifications.*



- *It can also facilitate verification of sustainability information and lead to operational savings downstream of the value chain.*
- *Benefits for customers:*
 - *Regarding the added value for consumers, DPP can facilitate access to value-added services and be the main point of information, if allowed under the EU law.*
 - *The DPP will also increase accessibility and transparency of information about the products, allowing consumers to compare them.*

While the industry supports mentioned above benefits, provided that the implementation is done right and over a realistic timeline, the industry is concerned about the following costs:

- *Labelling costs. The industry wishes to share its concerns regarding additional physical labelling requirements, differing between Member States and global labelling requirements. This creates the need for providing further explanatory guidance for consumers as well as operational complexity in the upcoming future, with more labelling configurations, data integrations, and governance as well as processes.*
- *Backup requirements bring additional data storage costs.*
- *Costs of equipment needed for advanced DPP carriers like, for example, RFID, as most economic operators do not have such type of readers installed in their facilities.*
- *Data sourcing challenges and associated costs. One of the challenges of economic operators is the ability to access reliable upstream data. Aggregations systems do not solve the challenge of pulling data from complex, multi-tiered global supply chain. This challenge is particularly noticeable when tracking data cross Tier 2,3, 4 and beyond.*
- *Costs associated with customers include a requirement for an increased information proliferation via a variety of media as required by EU legislations (for example: point of sales through the Empowering Consumer for the Green Transition Directive, label via the Textile Labelling Regulation, DPP via the Ecodesign for Sustainable Product Regulation). This can create an information overload, making important information challenging to locate as well as increase compliance costs, and ultimately, also increase the prices for consumers. This is particularly relevant in the sportswear sector, where products are already technical and priced higher than average. Considering that many studies show the conflict between consumers' willingness for more sustainable products but not the willingness to pay more for sustainability - or the infrastructure needed to support it - the industry calls the Commission to take this aspect into consideration, since mandatory transparency doesn't necessarily lead to greater consumer buy-in or higher value.*

In addition, the industry would like to raise two broader reflections:

- The absence of clarity around the specific data requirements for the DPP risks creating substantial compliance uncertainty. Not only does this affect long-term planning and budgeting, but it also raises concerns about how proportionate and actionable the final DPP framework will be for businesses of all sizes.
- While the DPP offers potential for long-term value creation, it is critical that its design avoids creating duplication with other EU regulatory instruments (e.g. Green Claims, Empowering Consumers Directive, Ecodesign for Sustainable Product Regulation), both in terms of format

and substance. A harmonised and streamlined regulatory framework will be essential to ensure legal certainty and economic feasibility.

4. How do you manage your IT services (e.g. financial information, product data, etc.)?
 - a. With an internal IT department only
 - b. Partly with an internal IT department and partly with an external service provider**
 - c. With an external service provider only
 - d. Other (please explain)
5. Do you host your company data in cloud services (e.g. with Microsoft, Amazon, etc.)?
 - a. Yes
 - b. No
 - c. I don't know**
6. Do you audit your IT services?
 - a. Yes
 - b. No
 - c. I don't know**
7. How likely is it that you will host your DPP data?
 - a. Very likely
 - b. Rather likely
 - c. Neutral
 - d. Not very likely**
 - e. Highly unlikely
 - f. I don't know
8. If a service provider is hosting the original DPP, what kind of measures should the service provider need to put in place to ensure that the DPP is always available for all users?

In order to ensure that the DPP is always available for all types of users, a service provider hosting the original DPP should ensure the following:

- *Reliable and predictable schedules of downtimes, to allow for system upgrades as well as ensuring periods of no changes during high usage time,*
- *Ability to submit "bugs" in case a DPP is not working for a user,*
- *Allow for economic operator-owned subdomain as resolver for business continuity (DNS pointed to DPP provider while contracted),*
- *Availability: 99.99,*
- *Multi-regional Failover,*
- *DPP backup,*
- *System monitoring and incident response,*
- *Change Advisory Board (CAB) Process.*



9. In your opinion, what should be the minimum level of DPP availability (within 365 days) that the service provider should offer?

- a. Available (reachable) 99% of the time
- b. Available (reachable) 98% of the time
- c. Available (reachable) 95% of the time
- d. Available (reachable) 90% of the time

10. Please estimate what the financial impact on your business would be if your access to the DPP data were to fail e.g. at the moment of import, at the moment of sales, during a recycling process?

- a. If a single event (please explain)
- b. If a recurring event (please explain)
- c. I don't know/cannot estimate

The exact financial impact depends on timing, cause, type of data privacy, and system architecture - failure will always have some level of impact. To mitigate this, it is important to prioritise high availability, redundancy, and fallback strategies and define failure tiers and reporting standards jointly with industry to ensure consistency in impact assessment.

- Potential scenarios and impacts:
 - At import (customs/border clearance): Risk = delays in product movement, potential fees, reputational risk.
 - At point of sale: Risk = consumer trust issues, inability to validate claims (e.g., materials, origin).
 - During recycling/resale: Risk = missed compliance reporting, inability to enable circularity.

11. Would you exchange data with a DPP service provider manually (e.g. via email and/or manual operations in excel) or would you use an automated solution?

- a. Manual
- b. Automated
- c. Both manual and automated

12. According to the Ecodesign for Sustainable Products Regulation, responsible economic operators must make available a backup copy of the digital product passport through a DPP service provider that is an independent third party. Please indicate what kind of additional services you



would be interested in receiving from the DPP service provider, beyond hosting your DPP or keeping the backup copy of your DPP(s)?

- a. Creating the DPP
- b. Creating the data carrier
- c. Creating unique identifiers
- d. Registering the DPP in the Digital product passport registry
- e. Hosting (storing) the DPP
- f. Querying services in relation to DPP data
- g. Enabling updates of DPP information
- h. Offering reporting tools and services
- i. Other (please explain)

13. How would you rate the importance/relevance of the following elements/characteristics relating to the DPP?

| | 1 – not important at all | 2 – less important | 3 – somewhat importance | 4 - important | 5 – very important |
|--|--------------------------|--------------------|-------------------------|---------------|--------------------|
| User-friendliness | | | | | X |
| Data security | | | | | X |
| Cyber resilience | | | | | X |
| Access rights | | | | | X |
| Support services | | | | | X |
| A wide(r) range of services (automisation, interconnections with other relevant tools, etc.) | | | | | X |
| Certifications | | | | | X |

Additional explanation to the previous question:

Uptime: 5, Governance: 5, Continuous Integration/Continuous Delivery (CI/CD): 5

14. Do you currently apply any cybersecurity standards to your IT solutions/tools used?

- a. Yes
- b. No
- c. I don't know



15. When using the DPP, what kind of standards do you consider necessary for ensuring data security? Please name the standards and explain.

16. Do you have any specific concerns regarding DPP data that will be processed by downstream users such as repairers and recyclers?

- a. Yes
- b. No
- c. I don't know

QUESTIONS LINKED TO POSSIBLE CERTIFICATION OF DPP SERVICE PROVIDERS

1. How important would it be for you that the DPP service providers are certified service providers?
 - a. Extremely important
 - b. Rather important
 - c. Neutral**
 - d. Rather unimportant
 - e. Not important at all
 - f. I don't know
2. What do you see as the added value of using a certified service provider rather than an uncertified one, or why do you think a certificate is not important?

It ensures a level-playing field across the industry and alignment with the EU legislation.

3. How far do you agree with the following sentence: 'I am willing to bear extra costs for using a certified service provider'?
 - a. Fully agree
 - b. Somewhat agree
 - c. Neutral
 - d. Somewhat disagree**
 - e. Fully disagree
 - f. Other (please explain)



4. In your opinion, what would be the most appropriate certification process for DPP service providers?
 - a. Self-declaration
 - b. Hybrid certification process based on self-declaration and certification by an accredited third party
 - c. Certification of service providers by the European Commission
 - d. Certification by conformity assessment bodies + accreditation of these bodies by the European Commission
 - e. Certification by conformity assessment bodies + accreditation of these bodies by Member States (national accreditation bodies)
 - f. Other (please explain)

Please explain why you consider the option you selected at the previous question to be the most appropriate.

FINAL REMARKS

Please provide any further comments or additional information here: