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EU Digital Product Passport: From Product Compliance to Data Compliance

In the European Union, product legislation has long been shaped around safety, technical compliance, CE marking, conformity assessment and market surveillance. For a product to be placed on the market, it is expected to comply with the relevant technical regulations, the necessary documents must be prepared and the conformity chain must be established in a traceable manner. While this framework remains valid, it is gaining a new dimension together with sustainable product policies.

The Digital Product Passport (DPP) stands out as one of the important tools of this new era. At the current stage, the main legal framework of the DPP has been established; however, consultation and secondary regulatory processes are still ongoing in terms of product groups, technical implementation details and service provider rules. The European Union is moving towards evaluating products not only through their technical characteristics, but also through durability, repairability, recycled content ratio, environmental impact, lifespan and supply chain information. This approach moves product information away from being a technical file kept within the company and into a more visible data area in terms of market access and customer relations.

For companies, the DPP brings regulatory compliance and product data management together on the same ground. How this data is collected, in which systems it is stored, by whom it is updated and to what extent it can be shared with customers will become increasingly important for companies' compliance capacity and competitiveness. For our exporters, the DPP should be evaluated as a new management agenda that concerns quality, production, purchasing, sustainability, information technology and sales processes together.

Background: Circular Economy and Sustainable Product Policy

The DPP is considered part of the European Union's sustainable product policy. This policy aims for products to be more efficient and traceable throughout their entire life cycle, from design to production, and from use to repair and recycling, beyond being safe and compliant with technical regulations at the time they are placed on the market.

At the basis of this approach lies growing awareness of the limits of the linear production and consumption model. The “take, make, use, dispose” approach increases the need for raw materials, energy consumption, the amount of waste and environmental pressures. Within this framework, the European Union has placed the circular economy model, in which resources are kept in the economy for longer, products are designed to be more durable, and repair and reuse possibilities are strengthened, at the centre of its policy agenda.

The 2020 Circular Economy Action Plan constituted an important threshold in this transformation and aimed to make sustainable products the general norm of the market rather than the exception. This policy line has been carried onto a more concrete legal basis with the Ecodesign for Sustainable Products Regulation. Thus, in addition to energy performance, characteristics such as environmental footprint, resource use, material content, durability, repairability and recyclability are also entering the regulatory field.

This transformation is connected not only with environmental policy, but also with the EU's objectives of industrial competitiveness, resource security, clean production and circular economy. The work plan for the 2025–2030 period also addresses sustainable product rules together with the Clean Industrial Deal and the EU's competitiveness agenda.

The DPP constitutes the data infrastructure of this framework. For a product to be shown as more sustainable, durable or circular, this claim must be based on reliable data. If the materials composing the product, the source of these materials, the recycled content ratio, maintenance and repair information, end-of-life options and environmental impacts are not systematically monitored, sustainable product policy will remain limited in practice.

Within this framework, the DPP is a tool that strengthens the connection between circular economy objectives and product legislation. It aims to make visible the information carried by the product throughout its life cycle, beyond its conformity at the time of sale. In this respect, the competitiveness of products will be evaluated not only through price, quality and technical performance, but also through traceability, data reliability and sustainability information.

Legislative Framework, Scope and Implementation Timeline

Legal basis

The legal basis of the DPP is formed by the European Union's Ecodesign for Sustainable Products Regulation No. 2024/1781. This regulation is not an independent piece of legislation issued directly under the name "Digital Product Passport Regulation". It mainly establishes the general framework for determining ecodesign requirements for sustainable products. The DPP, within this framework, is regulated as one of the main tools that will make product-related information accessible, traceable and usable in a digital environment.

Beyond a digital labelling practice, the DPP is a data and traceability mechanism that carries the EU's sustainable product policy into practice. Elements such as the durability, repairability, recyclability, resource efficiency, recycled content ratio, carbon and environmental footprint of products are becoming more visible within product policy.

Which products may fall within the scope?

When assessing the scope, two levels should be read together. The first level is the general scope of the Ecodesign for Sustainable Products Regulation. This framework has been designed broadly enough to affect a large number of physical product groups, with the exception of certain items such as food, feed, medicinal products and similar categories.

The second level is for which product groups, on which date and with what content the DPP obligation will apply. The broad scope of the general framework does not mean that all products will be subject to a passport obligation at the same time. Implementation will be introduced gradually on the basis of product groups and through secondary regulations.

In the European Commission's 2025–2030 work plan, textiles and apparel, furniture, tyres and mattresses stand out among the first priority product groups; among intermediate products, iron and steel and aluminium come to the fore. The work plan also includes horizontal requirements such as repairability and recycled content and recyclability in electrical and electronic equipment. For some energy-related products, work is also expected to continue under ecodesign and energy labelling.

Batteries also have particular importance as one of the first concrete areas of application for the DPP. For certain types of batteries, the DPP obligation is expected to come into force as of 18 February 2027.

The point that should be noted here is that this list is not a final and unchangeable scope list. Which products will be subject to the passport

obligation, with which data fields, from which date and at what level will become clear as secondary regulations are published on the basis of product groups. Companies should not limit themselves to general product group headings; they should evaluate their own product codes, customs tariff classifications, materials used, supply chain connections and possible data requests from EU customers together.

Who will be affected?

In terms of scope, manufacturers, importers, distributors, authorised representatives and other economic operators that place products on the EU market may be affected by this system. However, the impact of implementation will not remain limited to companies established within the EU; third-country manufacturers selling products to the EU market may also face the data demands of this regulation directly or indirectly.

The issue is of particular importance for our companies exporting goods to the EU. The importer, brand owner or main customer in the EU will request product data from its supplier in order to fulfil its own obligations. If the product enters the EU market and the relevant product group is included in the scope of the DPP, manufacturers in our country may effectively become data providers for this system.

How will implementation work?

In DPP implementation, a data carrier linked to the product will be used. This data carrier may be a QR code, barcode or similar digital access tool. The essence of the implementation is the product information behind this tool.

The information to be included in the passport will vary according to the product group. In general, the identity of the product, technical performance, conformity documents, use and safety information, manufacturer or importer information, material content, maintenance and repair possibilities, recycled content, environmental performance, end-of-life options and data linked to the supply chain may come onto the agenda.

Which data will be included in the passport, whether the passport will be created at product, model, batch or item level, where the data carrier will be located on the product, packaging or document, and which actors will have access to which information will be determined by regulations to be issued on the basis of product groups. This structure shows that the DPP is designed as a system connected not only with consumer information, but also with supply chain, market surveillance, customs controls, repair, reuse and recycling processes.

Implementation timeline and consultation processes

DPP implementation will not start for all products at the same time. The main legislation is in force; however, obligations based on product groups, data fields, technical standards, the registry system and service provider rules are becoming clear gradually.

One of the first concrete areas of implementation is batteries. For certain types of batteries, the DPP obligation is expected to come into force as of 18 February 2027. This date shows that the system has turned from a distant policy objective into a mechanism connected to an implementation timeline.

For other product groups, definitive obligations will be determined as the relevant secondary regulations are published. Therefore, companies need to follow not only the main Regulation, but also the regulatory timeline concerning their own sectors and product groups.

Some topics regarding the technical infrastructure of the DPP are still being shaped through consultation and impact assessment processes. The European Commission is carrying out work on issues such as how product passport data will be stored, which rules service providers will be subject to, data security, backup, access rights, standardisation, API infrastructure and interoperability between systems. This process shows that the DPP is not merely a code to be placed on the product; it requires a reliable, up-to-date, accessible and long-term preservable digital data infrastructure.

In this context, the correct approach for companies is to review their product portfolio, material and supplier data, technical files and digital data infrastructure from today, without waiting for the final regulations to be fully completed.

Preparation Areas for Companies

Product group obligations related to the DPP will become clear gradually. Nevertheless, the direction of the main legislation and the Commission's work on technical infrastructure require companies to start preparing today. This preparation covers the joint assessment of product data, supplier information and digital infrastructure.

In this context, the first step is to review the product portfolio placed on the EU market. Companies should assess which product groups their products are related to, whether they are among the priority sectors and which data requests may come from EU customers. In making this assessment, product codes, product groups, materials used and supply chain connections should be taken into account together.

The second area is how product data is managed within the company. Technical information, conformity documents, material content, user instructions, maintenance and repair information, recycled content and environmental performance data are held in different departments in many companies. The DPP system may make it necessary for this data to be managed in a more consistent, up-to-date and traceable manner.

The third area is supplier data flow. The final product manufacturer may not produce all product-related information internally. Information on materials, components, semi-finished products and packaging will come from suppliers. Therefore, which data will be obtained, in which format, how often and how it will be verified should be planned from today.

Finally, digital infrastructure and internal responsibilities should be reviewed. Keeping product data in separate files or in different departmental records may make it difficult to respond to customer and regulatory demands in the future. It is important to clarify data ownership and update responsibilities of quality, purchasing, production, sustainability, information technology, legal and sales departments.

In addition to being a compliance obligation for companies, the DPP may also create value in terms of data quality, transparency and traceability. Properly managed product data can enable supply chain risks to be seen more clearly, strengthen consumer and customer information and support sustainability-related product claims in a more concrete manner. In this respect, the DPP can be evaluated as a tool that strengthens the relationship between data management and competitiveness.

The Importance of the DPP for Our Exporters

Although the DPP is developing as a regulation aimed at the European Union internal market, its impact will also extend to companies producing outside the EU. Our companies that export directly to the EU or supply European manufacturers, brand owners, importers and retailers may, over time, face more detailed and verifiable product data requests.

Considering Türkiye's strong trade relationship with the EU, this issue should not be evaluated as a limited technical compliance topic. In sectors connected to EU value chains, such as automotive supply industry, machinery, electrical and electronic products, textiles, furniture, metals, aluminium, iron and steel, packaging and construction products, information such as material content, supplier information, recycled content, durability, repairability, environmental performance and end-of-life information may become part of customer expectations.

For our exporters, the critical point is that the need for data will spread throughout the supply chain. The importer or brand owner in the EU may

request product-related information from its supplier in Türkiye in order to fulfil its own obligations. In this case, companies working for the EU market may effectively become one of the data providers of this system.

For unprepared companies, the main risk is that product data will not be ready at a level that meets customer demands. Incomplete product bills of materials, scattered supplier information, the disconnected progression of technical documents and sustainability data, or insufficient digital infrastructure may create a disadvantage in supplier assessments.

By contrast, for companies that manage product data regularly, the DPP may also create an area of opportunity. Companies that can monitor material and supplier data, present environmental performance information and link technical conformity documents with sustainability data may become more reliable suppliers for EU customers.

For our exporters, the DPP reveals the need to strengthen corporate data capacity, supply chain management and digital infrastructure. While the importance of the product being of high quality, safe and compliant remains, the ability to demonstrate these characteristics with data will become one of the new elements of competitiveness.

Conclusion and Assessment: Product Data as the New Field of Competition

The Digital Product Passport points to a new data-based era in the European Union's product legislation. This transformation does not eliminate the existing product compliance system; it adds the accuracy, timeliness and traceability of product data to traditional elements such as technical conformity, safety, CE marking and market surveillance.

Beyond a digital record application, the DPP represents a transformation that strengthens the role of product data in market access and customer relations. The material content, durability, repairability, recycled content ratio, environmental performance and end-of-life options of the product will become more visible.

For our exporters, this process shows that competition in the EU market is becoming increasingly data-based. While the importance of the product being of high quality, safe and compliant remains, the ability to demonstrate these characteristics with data will also become one of the new elements of competitiveness. Reviewing product portfolios, supplier data flows, technical files and digital infrastructures without waiting for the final regulations to be completed will enable companies to prepare more strongly for future market conditions.



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