Survey on the Delegated Act on potential requirements for Digital Product Passport service providers

Fields marked with * are mandatory.

Introduction

Objectives

Capgemini together with Ecorys have been tasked by the European Commission – DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) to conduct a background study providing input for the **Impact Assessment accompanying a Delegated Act setting out requirements for Digital Product Passport (DPP) Service Providers** under Article 11 of the Ecodesign for Sustainable Products Regulation (ESPR).

The main purpose of the study is to explore and measure the **likely costs and impacts** of **possible requirements on DPP service providers**, and on a possible mandate for a certification scheme to verify compliance with such requirements, by way of this delegated act. This information will help the Commission to decide on what requirements to include and on the possible introduction of a certification scheme.

The **Digital Product Passport** is a key innovation, first introduced into EU law by the ESPR, which aims at **providing easy-to-access digital information on products** to consumers, authorities and all economic actors along the value chain of a good, from raw materials to recycling or disposal - relevant to their specific needs and according to their access rights. The DPP is connected to the product through a unique product identifier, and can be accessed via a data carrier on the product (such as a QR code).

The planned Deleted Act will establish **requirements** for economic operators who store and make available DPPs for their own products or on behalf of others, and those who store backup copies.

The **specific objectives** of setting up requirements for such DPP service providers are to:

- **Safeguard data integrity:** establishing clear requirements that ensures the accuracy, completeness, back-up, continuous accessibility and up to-datedness of DPP data, which is critical for informed decision-making by businesses, consumers, and authorities;

- **Protect data security and privacy**: possibly by mandating adherence to specific standards, the ESPR seeks to prevent unauthorised access, use, or disclosure of sensitive product information;
- **Promote fair competition**: preventing DPP service providers from using data for purposes beyond their mandate (like selling or re-using it for their own gain), prevention of vendor lock-ins ensure fairness in the market.

The objective of this survey is to gather feedback from key stakeholder groups relevant to the study. We would highly appreciate your active support and participation in this survey.

If you have any questions, please do not hesitate to contact **mate.vincze@capgemini.com**, **andrei.ciocan@capgemini.com**, **clara.cotroneo@capgemini.com** and **simone.a.botticini@capgemini.com**.

About this survey

This questionnaire is designed for companies (including SMEs) who are or will be involved in the DPP system as a responsible economic operator required to produce a DPP for its products, and for service providers hosting DPPs on behalf of others, as well as business organisations representing such companies.

Your insights will be essential for understanding the practical implications, market acceptability, and associated costs and benefits of the proposed requirements for operators who will host and make DPPs available to users.

The questionnaire is structured in the following sections:

- Section 0 – General information
- Section 1 – Needs and problems
- Section 2 – Policy options
- Section 3 – Personal information (optional)

Please note that, due to the routing logic applied to make the questions as tailored as possible to the type of respondent, not all questions are immediately visible. The respondents are kindly asked to first answer all questions in Section 0 in order to access the questions in the subsequent sections.
Completing this questionnaire should take approximately 60 minutes.

The findings will directly inform the Impact Assessment for the Delegated Act on DPP service providers.

Note: the questions in this survey, including possible requirements for DPP service providers have been compiled - based on various sources - by the consultants and should not be seen as early indications of the Commission's future decisions regarding the content of the Delegated Act.

Instructions

You can save your answers as a draft on the server and continue later if you wish to, by using the same URL. You can also answer the form offline before submitting it to the server when completed. If you do not know the answer to a question, please feel free to skip it.

If you are an association, we kindly ask you to share the survey with your members using the following **public link** to allow for submission of individual contributions.

https://ec.europa.eu/eusurvey/runner/DPPSP-self-hosters-business-associations

The consultation will run for 4 weeks, from **16 July 2025 to 13 August 2025**, with a possible extension of 2 additional weeks.

We highly appreciate the time you have taken to provide your responses and thank you in advance for your contribution.

Please find attached the **privacy statement** and the **accreditation letter from DG GROW.**
Privacy_Statement_DG_GROW.pdf
Accreditation_Letter_DG_GROW.pdf

Section 0: Introductory questions

* 0.1 Are you responding to this survey as an individual business or on behalf of an organisation representing businesses' interests? Please select the applicable category:
- ○ Individual business
- ● An association/organisation representing businesses

* 0.2 Please select the country in which your organisation is established from the list:
- ○ Austria
- ● Belgium
- ○ Bulgaria
- ○ Croatia
- ○ Cyprus
- ○ Czech Republic
- ○ Denmark
- ○ Estonia
- ○ Finland
- ○ France
- ○ Germany
- ○ Greece
- ○ Hungary
- ○ Iceland
- ○ Ireland
- ○ Italy

○ Latvia

○ Liechtenstein

○ Lithuania

○ Luxembourg

○ Malta

○ Netherlands

○ Norway

○ Poland

○ Portugal

○ Romania

○ Slovakia

○ Slovenia

○ Spain

○ Sweden

○ Other

* 0.3 What is the geographic scope of your organisation's operations?

○ Local or regional

○ National

◉ European

○ Global

* 0.4 Approximately how many businesses do you represent (directly or via member organisations)?

> around 3 million enterprises in the construction sector within the European Union and Switzerland

* 0.5 Does your organisation represent rather large businesses or SMEs?

○ Only large enterprises

○ Rather large enterprises

○ Large enterprises and SMEs equally

○ Rather SMEs

◉ Only SMEs

* 0.6 You have the option to respond to the survey from two possible perspectives: on behalf of companies that will host a DPP or a backup, or on behalf of companies that will use a third-party service provider to host their DPPs. Please indicate which perspective you choose:

○ Perspective of companies that will host/self-host a DPP or a backup

◉ Perspective of companies that will use a third-party service provider to host their DPPs

* 0.7 For which of the following product groups are the companies represented by your organisation the responsible economic operators (traders that place the product on the EU internal market) required to make a DPP available? Please select all that apply

(Note: the product groups below were either chosen as first priorities for the introduction of Digital Product Passports under ESPR or have product regulations that also foresee product passports)

ESPR Sectors

- ☐ Textiles
- ☐ Apparel
- ☐ Furniture
- ☐ Mattresses
- ☐ Tyres
- ☑ Iron and steel
- ☑ Aluminium
- ☐ None of the above

* Non-ESPR Sectors

- ☑ Construction products
- ☐ Batteries for electric vehicles, bikes or scooters, and industrial batteries
- ☐ Toys
- ☐ Electronic products
- ☐ Machinery
- ☐ Other

* 0.8 On a scale from 1 (not familiar at all) to 4 (very familiar) how familiar are you with Digital Product Passports introduced under the Ecodesign for Sustainable Products Regulation (as well as the Batteries Regulation)?

- ⚪ Not familiar at all (1)
- ⚪ Rather unfamiliar (2)
- ⦿ Rather familiar (3)
- ⚪ Very familiar (4)

* 0.9 Are the companies represented by your organisation preparing to compile and make available - as responsible Economic Operators - DPPs for their products?

- ⚪ Yes
- ⦿ Not yet, but planning to
- ⚪ No

* 0.9.1 Can you elaborate on what preparations the companies you represent are undertaking or planning (e.g. preparing guidance to members, training personnel etc)?

> we have been developing guidance and plan to develop more once the delegated act is ready

* 0.10 Are there any other initiatives (public or private) similar to the DPP that your organisation is active in (e.g., EPREL for energy-related products, digital food labelling, digital passports for proving the authenticity of apparel etc.)?.

- ⚪ Yes

⊙ No

Section 1: Needs and problems

1.1 How important are the following needs connected to the regulation of DPP service providers for companies your organisation represents?

Regulation scope and definitions

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Clear legal definitions (including range of DPP service providers and activities covered by the Delegated Act)	○	○	○	●	○	○
* Clear description of the legal obligations for independent third-party DPP service providers and other DPP hosters	○	○	○	●	○	○
* Clarification of the nature and scope of backup services to be provided by DPP service provider	○	○	●	○	○	○

Data sharing and data-based services

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Allowing DPP integration with existing company IT systems (ERP, supply chain management, sustainability reporting, etc.)	○	○	○	◉	○	○
* Clear rules on mandatory business-to-business data sharing (restrictions, safeguards)	○	○	◉	○	○	○
* Allowing the utilisation of data generated during hosting the DPP for other purposes (e.g. feedback information to responsible economic operator, internal statistical purposes)	○	◉	○	○	○	○
* Possibility to offer, or allow other providers to offer, add-on data services (e.g. around product lifecycle events such as repair)	○	○	○	◉	○	○

Technical specifications / Performance requirements

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Guidelines on the frequency of backups, the amount of data to be stored, data retrieval requirements and quality standards for data storage	○	○	◉	○	○	○
* Ensuring DPP technical flexibility for data preservation of products with long lifecycles	○	○	○	◉	○	○
* Allowing the use of lower level of granularity (e.g. item-level) than required in upcoming sectoral DPP regulation	○	○	◉	○	○	○
* Ensuring that all requirements are technology-neutral, not advantaging or disadvantaging certain technologies	○	○	○	◉	○	○
* Ensuring a high level of standardisation and clear data transfer protocols to ease data transfer and portability between DPP service providers	○	○	○	◉	○	○

Economic effects of regulation

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Having affordable hosting services	◎	◎	◎	◉	◎	◎
* Ensuring a level playing field among DPP service providers or other custodians of DPPs	◎	◎	◎	◉	◎	◎
* Avoiding the risk of market concentration among DPP service providers (e.g. from strict certification or financial requirements)	◎	◎	◎	◉	◎	◎
* Harmonised requirements across all EU Member States (EEA members)	◎	◎	◉	◎	◎	◎

1.2 Please elaborate on any additional need(s) in relation to the regulation of DPP service providers, you consider important:

Construction SMEs must retain access to their product data without incurring additional costs or restrictions. The system should support SME-level service providers such as federations or chambers. Proportionate certification requirements and simplified options are needed for those handling low-risk products or operating in limited markets.

1.3 What are the key decision criteria for companies that do not self-host a DPP for choosing a DPP service provider? Please rate the following criteria according to their importance.

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* The price of DPP hosting services				●		
* Guaranteed ease of switching to another provider (no lock-in)				●		
* Provider's guarantees and credentials for information security			●			
* High service level guaranteed by provider (service operational and accessible)			●			
* User-friendly tools and service offered				●		
* Provider being established in Europe		●				
* Provider's long experience in business		●				
* Provider's experience with similar customers		●				
* Large size of provider's customer base	●					
* Financial stability of the provider			●			
* Certification attesting the provider's compliance		●				

Section 2: Policy options

E. DPP (and DPP data) portability requirements

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Not feasible	Do not know	Not applicable to our organisation

J. Third-party dependency risks requirements

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Not feasible	Do not know	Not applicable to our organisation

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
A. Technical accessibility						

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
B. Content accessibility						

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
C. Background information and user interaction						

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
D. Reducing user nuisance						

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

E. Value-added data services	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation

2.1 Please rate the importance for each potential requirement DPP service providers should ensure when hosting the DPPs of the companies you represent.

A. Access rights management, information system security and business confidentiality requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Implementing differentiated data access mechanisms to ensure that only authorised parties can modify DPP data and that restricted data points are accessible only to approved stakeholders	○	○	◉	○	○	○
* Application of upcoming identity management standards (developed by European Standardisation Organisations)	○	◉	○	○	○	○
* Implementing an attribute-based access control system to restricted product passport information	○	◉	○	○	○	○
* Recording changes in access rights without delay	○	◉	○	○	○	○
* Having appropriate IT-security and cybersecurity safeguards in place to prevent unauthorised access and data breaches	○	○	○	◉	○	○

B. Data storage, archiving and persistence requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Securely archiving historical passport data, preserving a comprehensive record of past information	○	◉	○	○	○	○
* Making the DPP accessible for at least the expected lifetime of the product (or as required in product-specific delegated acts)	○	○	○	◉	○	○
* Ensuring that DPPs are rendered inaccessible to users when the defined retention period passes	○	◉	○	○	○	○

C. Data authenticity, reliability and integrity requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Ensuring that the originality and integrity of DPP data is technically verified	○	○	◉	○	○	○
* Requirements for DPP service providers to record the identity of economic operator or authority producing or updating DPP data and perform validation activities to ensure DPP data conformity*	○	○	◉	○	○	○
* Keeping logs of access history of economic operators and authorities producing or amending DPP data	○	○	◉	○	○	○
* Ensuring that DPP data displayed is the most up-to-date version, changes are reflected without delay	○	○	◉	○	○	○

"Data conformity" refers to checks such as ensuring that mandatory fields are completed, data formats are correct, narrative semantics are appropriate, and digital certificates are valid and not revoked.

D. DPP (and DPP data) portability requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Requirements to ensure seamless transition between DPP service providers (when changing provider)	○	○	○	●	○	○
* Requirements to ensure the deletion of customer data who changed DPP service providers (i.e. economic operator responsible for the DPP)	○	●	○	○	○	○

E. Accessibility requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Ensuring compliance with minimum network reliability requirements	◎	◎	◉	◎	◎	◎
* Requirements for DPP service providers to ensure that DPP data loading speed is comparable to that of major websites (fast response times) (access response time requirements)	◎	◉	◎	◎	◎	◎
* Requirements to ensure that DPP data is accessible most of the time (complying with target set in Delegated Act)	◎	◎	◉	◎	◎	◎
* Ensuring compliance with minimum incident response and recovery plans requirements	◎	◎	◉	◎	◎	◎

F. Application Programming Interfaces (APIs) integration and access

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Integrating API ensuring seamless CRUD (Create, Read, Update, Delete) operations on products passports for authorised economic operators and authorities	○	○	●	○	○	○
* Integrating API ensuring seamless queries on DPP data at scale (where relevant) by authorised add-on systems or services (e.g. by authorities)	○	●	○	○	○	○

2.2. Are there any other requirements you consider crucial for DPP service providers that will host the DPPs of the companies you represent? Please specify.

The DPP framework should explicitly allow SME cooperatives or federations to act as service providers under proportionate conditions. "Easy package" solutions tailored to low-risk or low-volume manufacturers must be supported.

2.3 Please rate the importance of the following possible requirements for making the DPP system user-friendly for the companies you represent, as well as consumers and others using it.

A. Technical accessibility

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Making DPPs accessible on all relevant devices: desktop computers, smartphones, tablets, in-store touchscreens etc.	○	○	●	○	○	○

B. Content accessibility

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Intuitive, easy-to-understand user interfaces with clear structure and visual elements, standard layouts and icons	○	○	●	○	○	○
* Automated multilingual support so that consumers can access DPPs in their preferred language	○	●	○	○	○	○
* High-contrast modes for visually impaired users	●	○	○	○	○	○

C. Background information and user interaction

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Providing basic information on the DPP system, the completeness and reliability of DPP data in clear language, and a FAQ	○	○	●	○	○	○
* Allowing consumers to provide feedback (indicating technical problems, DPP content errors, asking questions)	○	●	○	○	○	○
* Providing link to relevant authority's webpage for consumer complaints	○	●	○	○	○	○

D. Reducing user nuisance

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Avoiding too burdensome anti-bot authentication	○	◉	○	○	○	○

E. Value-added data services

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Offering consumers various add-on data services (product comparisons, identification of suitable replacement components, mapping repairers, price estimations for resale, etc.)	○	◉	○	○	○	○
* Allowing third-party mobile apps or web portals to re-use DPP data (with consideration of applicable legal restrictions)	○	◉	○	○	○	○
* Enabling smart home devices to access DPP data of other products in the household	◉	○	○	○	○	○

2.4 Are there other requirements for DPP service providers to ensure that DPP is user friendly?

> For SMEs, the system must be simple to understand and operate. This means that the user interface should allow fast onboarding, and that standard templates should be available for product categories with fixed or limited parameters. In addition, service providers should offer support in preparing DPP content for micro and small enterprises with limited digital capacity.

*2.5 Are you in favour of asking DPP service providers for a certification that could give assurance about their compliance with the requirements, even if it increases hosting fees? What methods of certification, if any, do you think would be necessary?

- ☐ No certification
- ☐ Self-certification
- ☑ Hybrid: self-certification and third-party certification
- ☐ Certification by a third party
- ☐ Do not know

2.6 Would you rather agree or disagree with geographic restrictions for DPP service providers?

	1 – Fully disagree	2 – Rather disagree	3 - Neither	4 – Rather agree	5 – Fully agree	Do not know
* Requiring all DPP service providers to be established in the European Economic Area (EEA)*	○	○	○	◉	○	○
* Requiring DPP service providers (also) hosting backups to be established in the EEA	○	○	○	◉	○	○
* Requiring all DPPs to be stored on servers within the territory of the EEA	○	○	○	◉	○	○
* Requiring backup copies to be stored on servers within the territory of the EEA	○	○	○	◉	○	○
* No geographic restrictions on DPP service providers	○	◉	○	○	○	○

Apart from the EU member states, Norway, Iceland, Liechtenstein are also members of the European Economic Area, having access to the Internal Market and are bound by its rules

*2.7 What are the main reasons for your choices above? Please briefly describe:

> Construction SMEs must have clear guarantees that their business data, access credentials and product information remain within a jurisdiction where they have enforceable legal rights and data protection is robust.

> Requiring EEA-based providers and servers ensures alignment with EU law, reinforces cybersecurity and prevents dependencies on third-country infrastructures that may be subject to different or conflicting regulations.

2.8 What would be the consequences of a possible requirement for DPP service providers to be established on the territory of the European Economic Area (EEA)?

Please indicate to what degree you agree with the following:

	1 – Fully disagree	2 – Rather disagree	3 - Neutral	4 – Rather agree	5 – Fully agree	Do not know
* The personal data of customers would be better protected (access credentials and logged access events)	○	○	○	○	◉	○
* The sensitive commercial data of customers derived from access patterns (e.g. number of consumers accessing or repairing a specific product) would be better protected	○	○	○	○	◉	○
* Disputes between DPP service providers and their customers (e.g. handling of access credentials, unavailability of service) would be resolved more easily	○	○	○	○	◉	○
* The range of apps or web portals creating new information from DPP data (e.g. product comparisons, personalised recommendations) would be reduced	○	○	◉	○	○	○
* Some products produced outside the EU would not be available anymore	○	◉	○	○	○	○
* The overall costs of the DPP system would increase, indirectly raising product prices	○	○	◉	○	○	○

2.9 What would be the consequences of a restriction on DPP service providers to store DPP data on servers within the territory of the European Economic Area (EEA)?

Please indicate to what you degree agree with the following:

	1 – Fully disagree	2 – Rather disagree	3 - Neither	4 – Rather agree	5 – Fully agree	Do not know
* The personal data of customers would be better protected (access credentials and logged access events)	○	○	○	○	⦿	○
* The sensitive commercial data of customers derived from access patterns (e.g. number of consumers accessing or repairing a specific product) would be better protected	○	○	○	○	⦿	○
* Disputes between DPP service providers and their customers (e.g. handling of access credentials, unavailability of service) would be resolved more easily	○	○	○	⦿	○	○
* The range of apps or web portals creating new information from DPP data (e.g. product comparisons, personalised recommendations) would be reduced	○	○	⦿	○	○	○
* Some products produced outside the EU would not be available anymore	○	⦿	○	○	○	○
* The overall costs of the DPP system would increase, indirectly raising product prices	○	⦿	○	○	○	○

2.10 Would there be any other important consequences? Please briefly describe:

Storing DPP data in the EEA reinforces digital sovereignty, improves transparency for users, and ensures better protection against third-country interference. It also simplifies liability and dispute resolution. However, care should be taken that SMEs are not forced into overly expensive cloud services or tied to large IT providers without alternatives.Small operators based in the EU should be supported.

2.11 DPP service providers might be asked to demonstrate their financial viability. Overall, considering costs and advantages, would you rather agree or disagree with the following possible requirements for DPP service providers?

	1 – Fully disagree	2 – Rather disagree	3 - Neither	4 – Rather agree	5 – Fully agree	Do not know
* Business continuity requirements, such as a mandatory business continuity						

plan and/or exit strategy that ensure the transfer of DPPs and redirection of queries to another provider	○	○	○	●	○	○
* Mandatory insurance for DPP service providers to ensure continuity of service in case of financial challenges, by reimbursing transfer to another provider for instance	○	○	●	○	○	○
* Requirements to disclose ownership and capital structure information, and meet certain minimum criteria, to be eligible to provide DPP services	○	●	○	○	○	○
* Requirement to contribute to a reserve fund (a fixed % of annual turnover for instance) to ensure continuity of service, by funding transfer to another provider for instance	○	●	○	○	○	○

* 2.12 What are the main reasons for your choices above? Please briefly describe:

> Ensuring service continuity is essential for trust and long-term compliance. However, overly strict financial requirements could exclude smaller service providers, including industry-led initiatives or cooperative solutions for SMEs. A mandatory insurance scheme may be workable if affordable. Reserve funds and capital thresholds risk concentrating the market and limiting diversity. Proportionality is essential.

Section 3: Personal information (optional)

You can submit your responses anonymously. If you would like to hear about the results of the survey, or if we can contact you for further information, please share your contact details with us below.

3.1 Your organisation's name:

> European Builders Confederation

3.2 Your email address:

> e.tsiala@sbs-sme.eu

3.3 Can we contact you

- ● Yes
- ○ No

Contact

Contact Form