Factual summary report on the online public consultation for the delegated act setting out the requirements for Digital Product Passport service providers

Disclaimer: This document should be regarded solely as a summary of the contributions made by stakeholders who participated in the public consultation on the preparation of a delegated act setting out the requirements for Digital Product Passport service providers. It cannot, in any circumstances, be regarded as the official position of the Commission or its services. Responses to the consultation activities cannot be considered as a representative sample of the views of the EU population.

1. Objectives and approach of the consultation

The Commission launched a public consultation (PC) to gather input for the preparation of a delegated act on requirements for Digital Product Passport (DPP) service providers between 8 April 2025 and 1 July 2025. The questionnaire was available in all official EU languages on the 'Have your say' portal. [1]

The purpose of the consultation was to gather stakeholders' views on the proposed solutions to the identified problems and to provide feedback on additional relevant issues. This delegated act will establish a framework for DPP services. DPP service providers are an essential part of the DPP system, which should be based on a fair and competitive market.

The results of the PC feed into the preparation of the impact assessment of the delegated act. In addition to the PC, the consultation strategy includes [2], a consultation of the SME panel, a targeted online survey, interviews and focus groups with selected stakeholders. This factual summary provides an overview of the responses to the PC. An analysis of the results of all consultation activities (a synopsis report) forms an annex to the Commission's impact assessment Staff Working Document.

2. Who replied to the consultation

The public consultation received a total of **275 valid responses**. Respondents included companies from the private sector (146 out of 275, or 53.1%), business associations (75 out of 275, or 27.3%), followed by EU citizens, academic institutions, NGOs, consumer organisations, trade unions etc. The table below illustrates the distribution of responses by respondent category.

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[1] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14382-Digital-product-passport-rules-for-service-providers/public-consultation_en

[2] https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14382-Digital-product-passport-rules-for-service-providers_en

Stakeholder type	Number of replies	Percentage
Company/business	146	53.1
Business association	75	27.2
EU citizen	13	4.7
Academic/research institution	10	3.6
Other	8	2.9
Public authority	8	2.9
Non-governmental organisation (NGO)	6	2.2
Non-EU citizen	4	1.5
Consumer organisation	3	1.5
Environmental organisation	1	0.4
Trade Union	1	0,4
Total	275	100

In terms of **size**, 39.8% (58 out of 146) of companies who replied to the public consultation are large, followed by micro companies 28.8% (42 out of 146), small companies 17.8% (26 out of 146) and medium companies 13.7% (20 out of 146).

Respondents were asked to indicate **which role they will or intend to assume within the DPP ecosystem**, choosing between four categories:

- Potential DPP service provider (DPP SP): was selected by 33.5% (92 out of 275) of the respondents;
- Responsible Economic Operator (rEO) – this category included manufacturers, authorised representatives, importers, distributors, dealers and fulfilment service providers: was selected by 29.5% (81 out of 275) of the respondents;
- Any other value chain participant or stakeholder – this category included customers, professional repairers, independent operators, refurbishers, remanufacturers, recyclers, market surveillance and customs authorities, civil society organisations, researchers, trade unions, the Commission, or any organisation acting on their behalf: was selected by 32.4% (89 out of 275) of the respondents;
- Other: was selected by 4.7% (13 out of 275) of the respondents.

Among the responsible economic operators, several categories of respondents could be distinguished. The largest group was manufacturers (48 out of 81, or 59.3%), followed by other roles (19 out of 81, or 23.5%), authorised representatives (7 out of 81, or 8.7%), and dealers, importers and fulfilment service providers.

In terms of **geographical distribution of respondents**, the largest share of responses came from Germany (57 out of 275, or 20.7%), followed by Belgium (55 out of 275, or 20%), and Italy (17 out of 275, or 6.2%). In total, responses were received from stakeholders across 40 countries.

3. Summary of the results

Current IT and operational practices of responsible Economic Operators (rEOs) and DPP service providers (SPs)

IT service management practices and costs

Of the responding **rEOs,** 44 out of 81 (or 54,3%) currently use a hybrid IT service management model that combines internal and external resources. Another 28,4% (23 out of 81) of rEOs manage IT services entirely in-house, while a smaller share 13.6% (11 out of 81) relies exclusively on external providers.

The question on **the costs of outsourced IT management services** was answered by 16 rEOs. Of these, 14 indicated that they used a hybrid model (partly with the internal IT department and partly with an external provider), and 13 of them reported related costs between 1% and 5% of their annual turnover. The remaining company indicated costs between 6% and 10% of their annual turnover. The other 2 out of 16 that replied, used only an external service provider and they reported related costs between 1% and 5% of their annual turnover.

When it comes to **the IT service management models of potential DPP SPs** (particularly in areas such as customer service, security, and software development), 50% of DPP SPs (46 out of 92) manage IT services entirely in-house, while 46,7% (42 out of 92) use a hybrid model that combines internal departments with external providers.

48 out of 81 of the responding rEOs (or 59.3%) and 82 out of 92 of responding DPP SPs (or 89.1%) reported **hosting their company data in cloud environments**.

45 out of 81 (or 55.6%) of the responding rEOs and 67 out of 92 DPP SPs (or 72.8%) indicated that **they regularly audit their IT services**.

DPP Availability

Minimum acceptable level of DPP availability

To assess expectations regarding the reliability of the DPP system, all stakeholder groups were asked to indicate **their minimum acceptable level of DPP availability over a 365-day period**, **based on four predefined thresholds (90%, 95%, 98%, and 99%)**. The majority selected 99% year-round uptime as the minimum acceptable level, reflecting the need for reliable and resilient DPP infrastructure. An exact breakdown can be seen in the figure below.

Figure 1: Stakeholders expectations for minimum level of DPP availability, N = 262
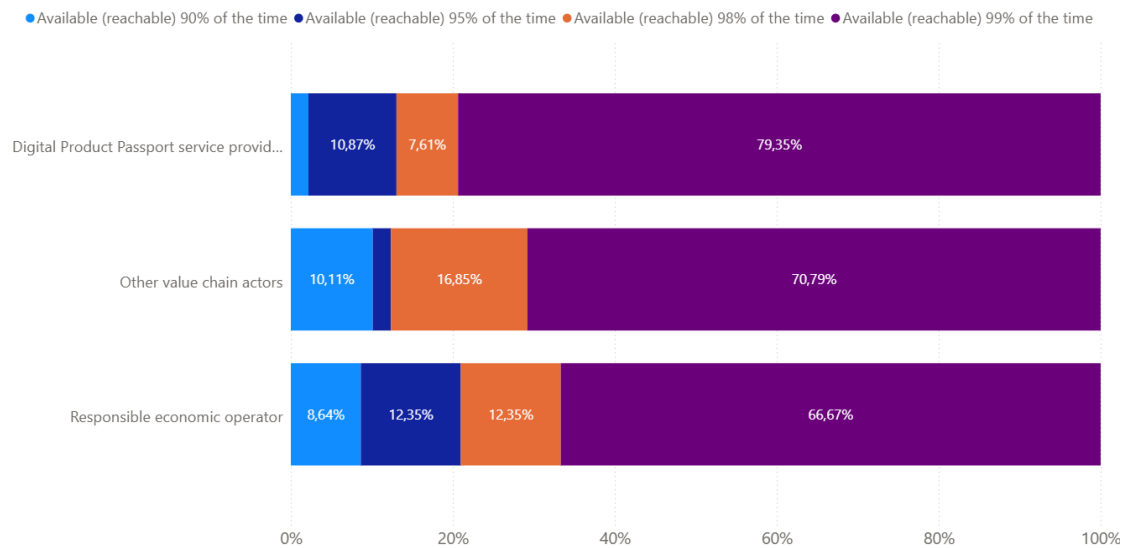
Measures to ensure DPP availability – DPP Service Providers and other value chain actors' perspectives

Regarding the **measures that potential DPP SPs intend to take to ensure the availability of the DPP**, the results were as follows:

Measures that potential DPP SPs intend to take to ensure the availability of the DPP	Number of respondents	Percentage of respondents
Monitoring and alerts	86	93.5
Scalable infrastructure	81	88
Redundant servers	80	87
Distributed-denial-of-service protection	77	83.7
Load balances	74	80.4
Failover clustering	71	77.2
Other	19	20.7
Total	92	100

Impact of DPP unavailability on the business activities of Economic Operators

rEOs were asked to estimate **the potential financial impact of not having access to DPP data** at critical business moments, such as import, sales or recycling.

59 out of 81 (or 72.8%) of the responding rEOs indicated that they could not yet estimate the financial impact. Meanwhile, 17.3% (14 out of 81) anticipated a financial impact in the case of recurring events, and 9.9% (8 out of 81) in the case of a single event.

Data exchange mechanisms

Stakeholders were asked to indicate their **preferred data exchange method**, manual (e.g. email, Excel), automated (e.g. APIs), or a combination of both.

44 out of 92 (or 47,8%) of the responding DPP SPs preferred fully automated solutions, while 48 out of 92 (or 52,2%) preferred hybrid approaches that combine manual and automated exchanges. Responding rEOs show a similar split, with 51.9% (42 out of 81) favouring hybrid models and 45.7% (37 out of 81) favouring automation. 56 out of 89 (or 62.9%) of other value chain actors express a preference for hybrid models, while 36% (31 out of 89) opted for automated methods.

DPP Add-on services

In addition to the mandatory backup and hosting of DPPs, the ESPR allows **DPP SPs to offer other value-added services to rEOs**.

Both stakeholder groups were invited to select as many options from a predefined list of services as applicable to them.

- **Enabling updates of DPP information**: 82.6% (76 out of 92) of DPP SP intend to offer these services, and 61.7% (50 out of 81) of rEOs are interested in receiving them;

- **Hosting (storing) the DPPs**: 77.2% (71 out of 92) of DPP SP intend to offer these services, and 54.3% (44 out of 81) of rEOs are interested in receiving them;

- **Offering reporting tools and services**: 76.1% (70 out of 92) of DPP SP intend to offer these services, and 54.3% (44 out of 81) of rEOs are interested in receiving them;

- **Registering the DPP in the Digital Product Passport registry**: 78.3% (72 out of 92) of DPP SP intend to offer these services, and 16.3% (43 out of 81) of rEOs are interested in receiving them;

- **Querying services in relation to DPP data**: 78.3% (70 out of 92) of DPP SP intend to offer these services, and 50.6% (41 out of 81) of rEOs are interested in receiving them;

- **Creating unique identifiers**: 67.4% (62 out of 92) of DPP SP intend to offer these services, and 46.9% (38 out of 81) of rEOs are interested in receiving them;

- **Creating the data carrier**: 64.1% (59 out of 92) of DPP SP intend to offer these services, and 42% (34 out of 81) of rEOs are interested in receiving them;

- **Other**: 29.3% (27 out of 92) of DPP SP intend to offer other services, while 16.4% (13 out of 81) of rEOs are interested in receiving other services.

Cybersecurity standards

This section illustrates the **extent to which rEOs and DPP SPs currently apply cybersecurity standards to their IT solutions**.

78.3% of DPP SP (72 out of 92) stated that they already apply such standards to their IT solutions or tools used and approximately 9.7% (9 out of 92) of them answered negatively. On the other hand, 46.9% (38 out of 81) of rEOs confirmed that such standards are applied, while a share of 9.8% (8 out of 81) answered negatively. 12% (11 out of 92) of DPP SPs and 43.2% (35 out of 81) could not provide an answer.

Importance of key DPP characteristics

To assess which DPP features stakeholders consider most relevant/important, rEOs, DPP SPs, and other value chain actors were asked **to rate the importance of seven specific DPP-related characteristics**.

User-friendliness

Figure 2: Distribution of importance ratings on user-friendliness of the DPP, by stakeholder type. N = 262
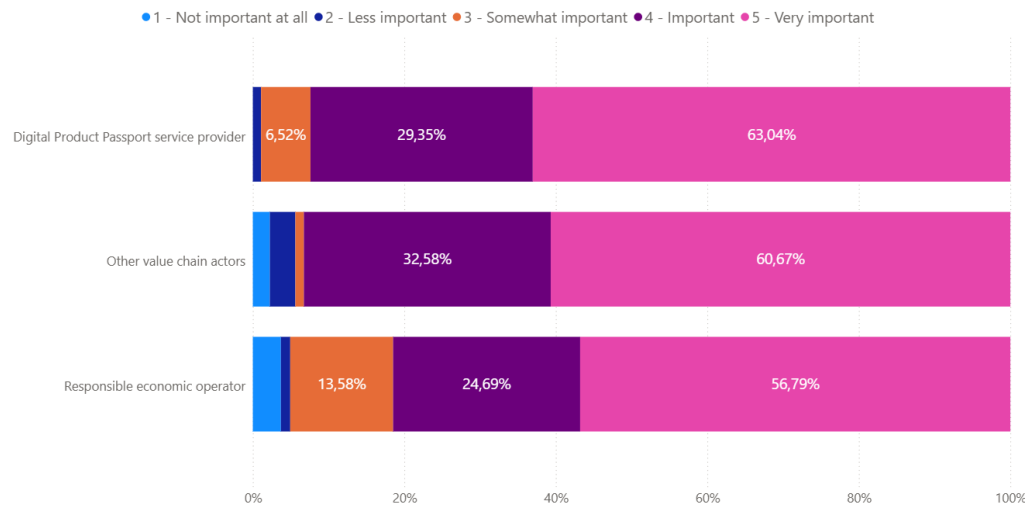
46 out of 81 (or 56.8%) of the responding rEOs and 58 out of 92 (or 63.04%) of the responding DPP SPs rated **user-friendliness** as "*Very important*". Of other value chain actors 60.7% (54 out of 89) choose it as their highest rating.
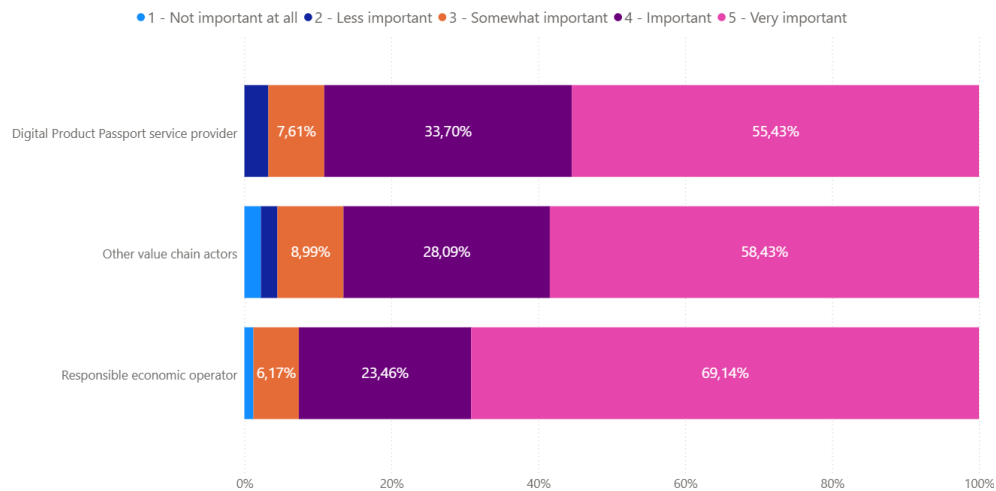
Data security

Figure 3: Distribution of importance ratings on data security of the DPP, by stakeholder type. N = 262
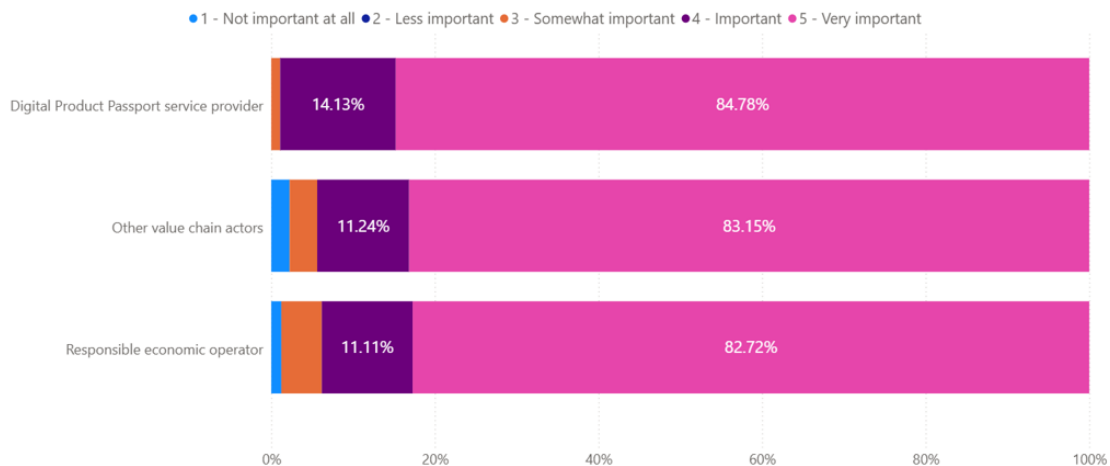
67 out of 81 (or 82.7%) of the responding rEOs, 78 out of 92 (or 84.8%) of the responding DPP SPs, and 74 out of 89 (or 83.2%) of other value chain actors rated **data security** as "Very important".

Access rights

Figure 5: Distribution of importance ratings on access rights management for the DPP, by stakeholder type. N = 262

51 out of 92 (or 55.4%) of the responding DPP SPs, 56 out of 81 (or 69.1%) of the responding rEOs, and 52 out 89 (or 58.4%) of other actors rated **access rights** as "*Very important*". Less than 10% of respondents in any group considered access rights to be only "*Somewhat important*" or unimportant.

Cyber resilience

Figure 6: Distribution of importance ratings on cyber resilience of the DPP, by stakeholder type. N = 262
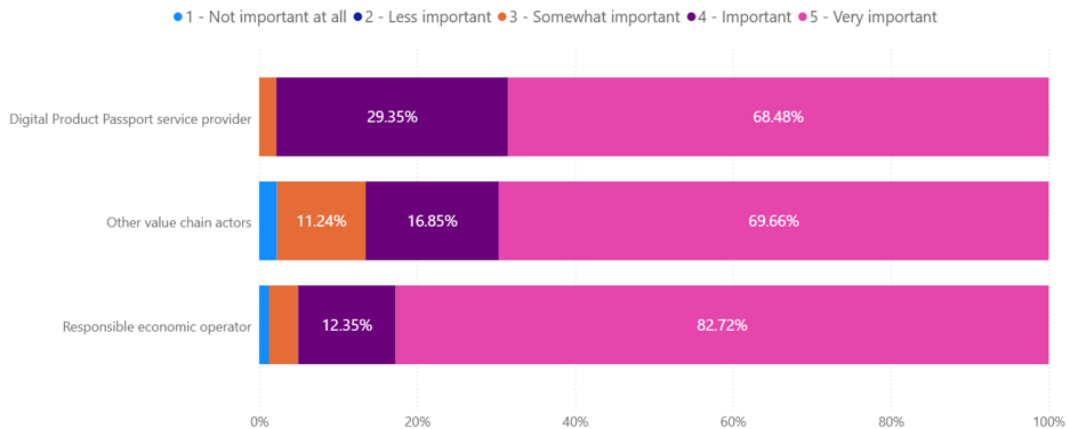
67 out of 81 (or 82,7%) of the responding rEOs, 63 out of 92 (or 68,48%) of responding DPP SPs, and 62 out of 89 (or 69,66%) of other value chain actors rated **cyber resilience** as "Very important".

Support services

Figure 7: Distribution of importance ratings on DPP-related support services, by stakeholder type. N = 262
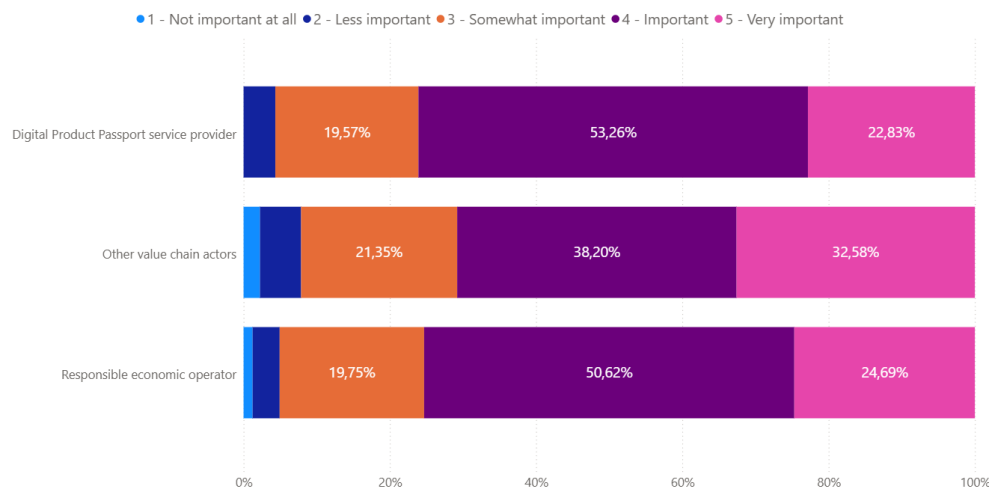
49 out of 92 (or 53.3%) of the responding DPP SPs and 41 out of 81(or 50.7%) of the responding rEOs rated support services as "Important", and a further 22.8% or 21 out of 92 for DPP SPs and 24.7% or 20 out of 81 for rEOs indicated that as "Very important". Other value chain actors selected "Very important" in a proportion of 32.6% (or 29 out of 89) and 38.2% of them (or 34 out of 89) considered this "Important".

A wide(r) range of services (automation, interconnections with other relevant tools, etc.)

Figure 8: Distribution of importance ratings on having a wide range of services linked to the DPP, by stakeholder type. N = 262
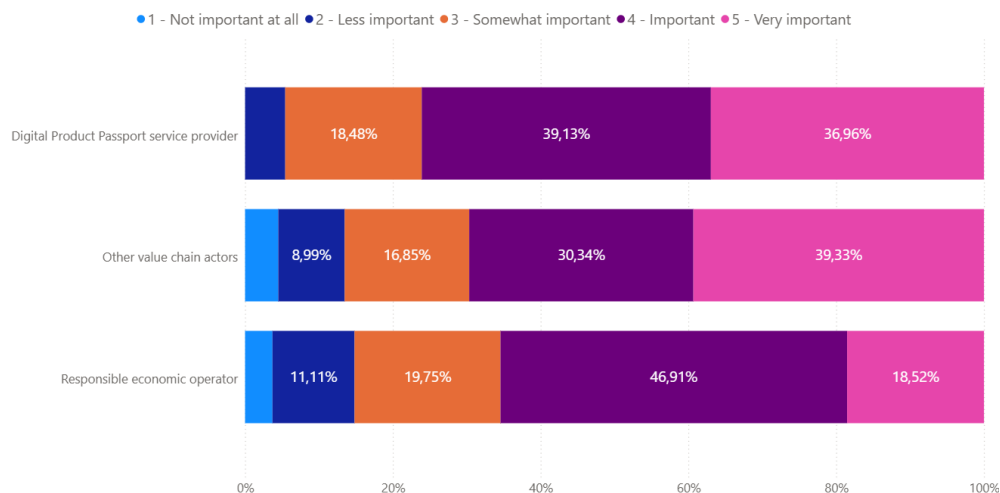
70 out of 92 (or 76.1%) of the responding DPP SPs, 53 out of 81 (or 65.4%) of the responding rEOs, and 62 out of 89 (or 69.7%) of the other value chain actors considered having **a wide range of services linked to the DPP** "*Important*" or "*Very important*".

Certification schemes

The following section explores detailed stakeholder views on the certification of DPP SPs.

Importance of certification of DPP service providers

All three stakeholder groups were asked **how important certification of DPP SPs** is to them. The chart below shows the distribution of responses by stakeholder type.

79% of rEOs (64 out of 81), 79.8% (71 out of 89) of other value chain actors, and 76.1% (70 out of 92) DPP SPs considered **certification of DPP SPs** to be either "Rather" or "Extremely" important.

The willingness of responsible Economic Operators to bear additional costs for certified service providers

The rEOs were also asked to **what extent they were willing to bear the additional costs associated with using certified service providers**. 7.4% (6 out of 81) of rEOs "fully agreed" and 24.7% (20 out of 81) "somewhat agreed" to bear extra costs, while 16.5% (13 out of 81) "somewhat disagreed" and 11.1% (9 out of 81) "fully disagreed". 32.1% (26 out of 81) remained neutral on this matter.

Preferred certification model for DPP service providers

Stakeholders were asked to share their views on **the most suitable certification process for DPP SPs**. Respondents were presented with six certification model options. 76 out of 275 (or 27.6%) of the responding stakeholders preferred a hybrid certification model combining self-declaration with certification by an accredited party. 62 out of 275 (or 22.5%) preferred a certification issued by Conformity Assessment Bodies accredited by the Commission. 53 out of 275 (or 19.3%) indicated their preference for a certification issued by Conformity Assessment Bodies accredited by Member States (MSs) through national accreditation bodies. The remaining options, including self-declaration, certification by the European Commission (EC), and other models, each received around 10% of the preferences.