

Webinar

Navigating the Digital Product Passport: What are Your Compliance Obligations?

18 June, 2025





Q&A
Session

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Meet the Team



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Mission Statement

Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change

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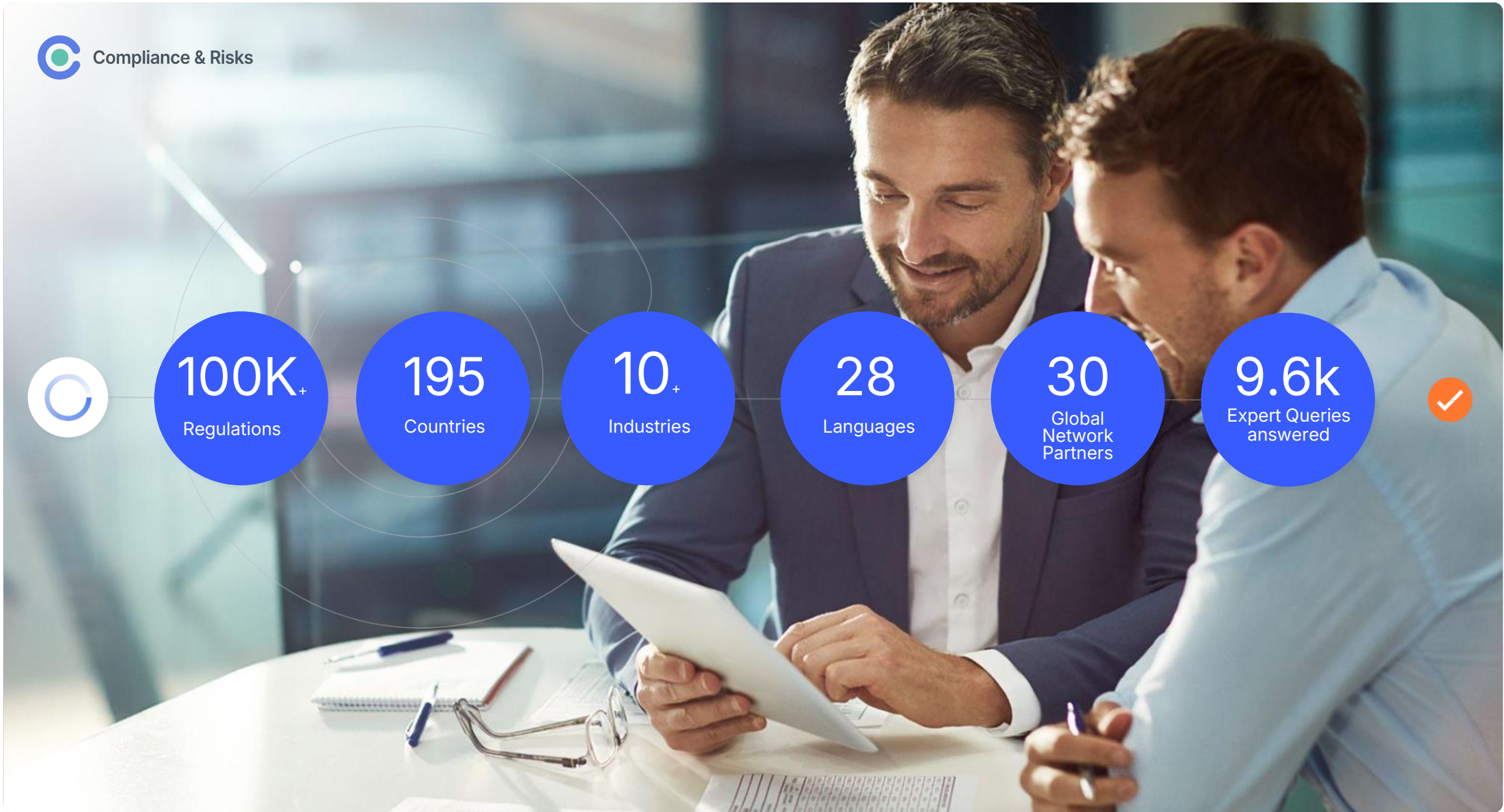
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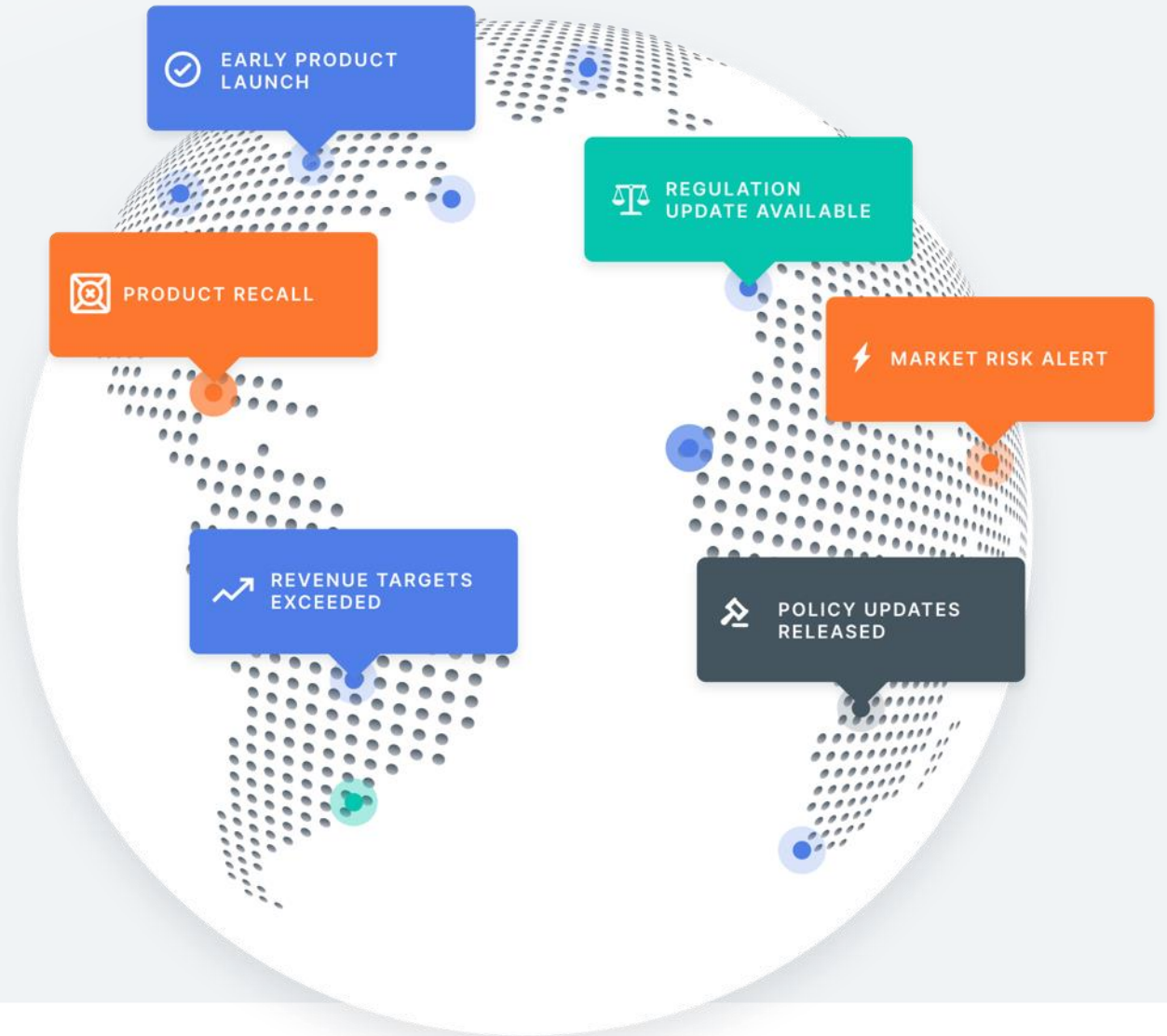
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WHAT WE DO

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Compliance & Risks

Your Battery's EU Travel Permit

Unpacking the Digital Product Passport



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EU Batteries & Waste Batteries Regulation 2023/1542

- Repeals the existing Battery Directive (2006/66/EC) as of **18 August 2025**
- The first EU law to address **entire battery life cycle**.
- Aims for a **circular, carbon-smart** battery industry: sustainable materials sourcing, durability, performance labeling, and recycling targets.



EU Batteries & Waste Batteries Regulation 2023/1542

Who is Responsible?

Economic operators - natural or legal persons involved in making batteries *available* or *putting them into service* in EU.

- Manufacturer
- Supplier of Battery Cells/Modules
- Authorized Representative (*written mandate*)
- Importer
- Distributor
- Fulfilment Service Provider

Key Definitions:

Placing on the market: First supply for distribution or use in the EU

Putting into service: First actual use in the EU

EU Batteries & Waste Batteries Regulation 2023/1542

Covers all battery types as *products* and batteries *in products* under one law.

Applies to **ALL** batteries on the EU market or putting into service:

- Portable
- Starting, Lighting & Ignition (SLI)
- Light Means of Transport (LMT)
- Electric Vehicle (EV)
- Industrial



EU Batteries & Waste Batteries Regulation 2023/1542

Battery Passport (Article 77)

- Unique **electronic record**
- Functions as a digital certificate of conformity and transparency
- **From 18 February 2027**
- **Access Mechanism:** Permanent QR Code



EU Batteries & Waste Batteries Regulation 2023/1542

Scope of the Application

- A full DPP is mandatory from 18 **February 2027**, for the following categories:
 - **Electric Vehicle (EV) Batteries**
 - **Light Means of Transport (LMT) Batteries**
 - **Industrial Batteries > 2 kWh**
- **Other Categories (Portable & SLI Batteries):** Do not require a full DPP but must still have a QR code linking to a more limited set of general and end-of-life information.



EU Batteries & Waste Batteries Regulation 2023/1542

Data Requirements & Access Tiers

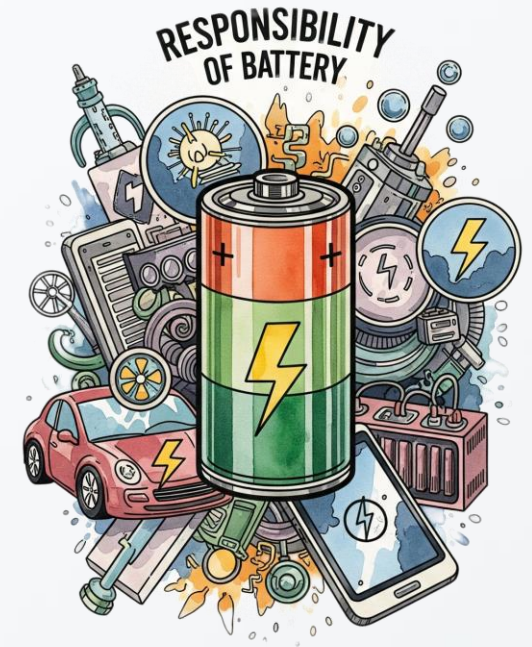
- **Publicly Accessible Information:**
 - General Info
 - Key Declarations
- **Restricted Access (Owners, Repairers, Remanufacturers):**
 - Operational Data
 - Service Information
- **Confidential Data (Notified Bodies & Authorities):**
 - Compliance Verification
 - Technical Substantiation



EU Batteries & Waste Batteries Regulation 2023/1542

Who is Responsible?

- If the battery placed on the market offline or if online but the online seller is established in the EU and it is placed on the market from inside the EU
- If the battery placed on market is from outside the EU
- If the online seller is not established in the EU and the battery is marketed to EU customers
- If the online seller is not established in the EU and the battery is marketed to non-EU customers



EU Batteries & Waste Batteries Regulation 2023/1542

Transfer of Responsibility: A Critical Legal Shift

The Foundational Principle: The economic operator who *initially places the battery on the market* BUT there are two scenarios where this legal responsibility must be transferred:

Case 1: Placing a Second-Life Battery on the Market

Case 2: Take-over of an Unused Battery



EU Batteries & Waste Batteries Regulation 2023/1542

The Compliance Timeline

- **IMMEDIATE PRIORITY: August 18, 2025**
 - **Supply Chain Due Diligence** policies must be operational and third-party verified.
- **NEXT UP: February 18, 2026**
 - **Carbon Footprint Declaration** for rechargeable industrial batteries >2kWh is required.
- **GET READY: August 18, 2026**
 - New physical **Labeling Requirements** apply, including CE marking.
- **GO-LIVE: February 18, 2027**
 - The **Digital Product Passport** must be live and accessible for all specified battery categories.

EU Batteries & Waste Batteries Regulation 2023/1542

Conclusion: Preparing for the Future of Product Regulation

- **Act Now:** Prioritize due diligence and carbon footprinting immediately.
- **Integrate:** This is a cross-functional challenge for legal, procurement, IT, and sustainability teams.
- **Innovate:** Leverage the DPP as a driver for digital transformation and a tool for competitive advantage.
- **The Blueprint:** The Battery Passport is the pilot program for the EU's broader **Ecodesign for Sustainable Products Regulation (ESPR)**.





ESPR

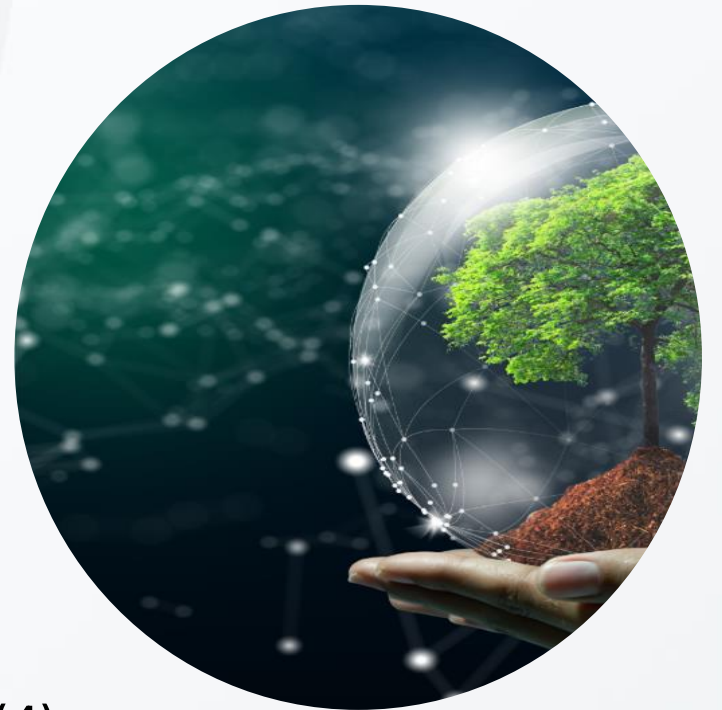


EU Ecodesign for Sustainable Products Regulation

Regulatory Framework to make sustainable products the norm across all products placed on the EU market (18 July 2024)

Performance Requirements:

- **Circular Economy:** durability, reusability, upgradability, repairability, recyclability etc.
- Energy, Water Use & Resource **efficiency**
- Minimum Recycled Content
- Carbon and Environmental Footprint
- Remove worst performing products from the market
- Delegated Acts - Date of application: 18 months after EIF (Art. 4(4))



Digital Product Passport

- **Product Performance:** Repairability or durability score, carbon or environmental footprint based on classes
- **Unique identifiers** for product, operator, and facility
- **Information** on installation, use, and repair (durability)
- Data for **end-of-life treatment** operators
- Details on **Substances of Concern**
- Declaration of **conformity**
- Manufacturer/importer information
- **DPP Service Provider** hosting a back up of the copy of DPP



— Transparency across Value Chain

Different access rights to information in the DPP

Customers, manufacturers, importers and distributors, dealers, repairers, refurbishers, remanufacturers, recyclers, and competent national authorities

Deadline - 19 July 2026: EU Commission to set up Digital registry to store unique identifiers

EU Commission: Web portal to search information included in the DPP.



DPP Standards

Contained in a Data carrier on **or** in the product, its packaging or on documentation accompanying the product.

Harmonised standards to be developed by **CEN/CENELEC** by end of 2025:

- Unique identifiers,
- Data carriers;
- Access rights management and business confidentiality,
- interoperability, data processing,
- data storage, archiving, data authentication, and
- Application Programming Interfaces (APIs) for the product passport lifecycle management

DPP Standards Development

CEN/CENELEC:

- Actively engaging with National Standard Body (for example German Institute for Standardization (DIN))

UNECE/ISO Joint Initiative Development of **International Standard Project:**

- "*Digital Product Passport - Part 1: Overview and Fundamental Principles*"
- (ISO/PWI 25534-1) (Core principles for developing a global DPP standard system)



EU ESPR - Priority Products

**Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025 - 2030
(published April 2025)**

4 New Final Products:

- Textiles/ Apparel (2027); Tyres (2027); Furniture (2028); Mattresses (2029)

2 New Intermediate Product Groups:

- Iron and Steel (2026); Aluminium (2027)

2 Horizontal Measures:

- Repairability (including scoring) (2027)
- Recycled content and recyclability of EEE (2029)

EU ESPR - Priority Products

Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025 - 2030

16 Energy Related Product: (Ecodesign and Energy Label 2026 - 2030)

- **4 New:** Low-temperature emitter, EV chargers, Professional Laundry, Prof. dishwashers
- **2026:** Low-temperature emitters (energy label), household and professional dishwashers, household and professional washing machines, Local space heaters (energy label only)
- **2027:** Electronic Displays,
- **2028:** EV chargers, electric motors, Household refrigeration, refrigeration with direct sales function,
- **2029:** Lighting products
- **2030:** Welding equipment, Mobile phones and tablets, Local Space heater (ecodesign), Tumble dryers, standby and off mode.

Textiles

Timeline for Adoption: 2027

- **Excludes Footwear (Sustainability study by end of 2027)**
- **Scope: JRC study suggested definition:** Includes any product containing at least 80% textile fibres by weight.
- **Must work with:** Textile Labelling Regulation (currently under review)



DPP Textiles Study - Parliamentary Research Service (July 2024)

Phase 1: "Minimal & simplified DPP" for textile by 2027

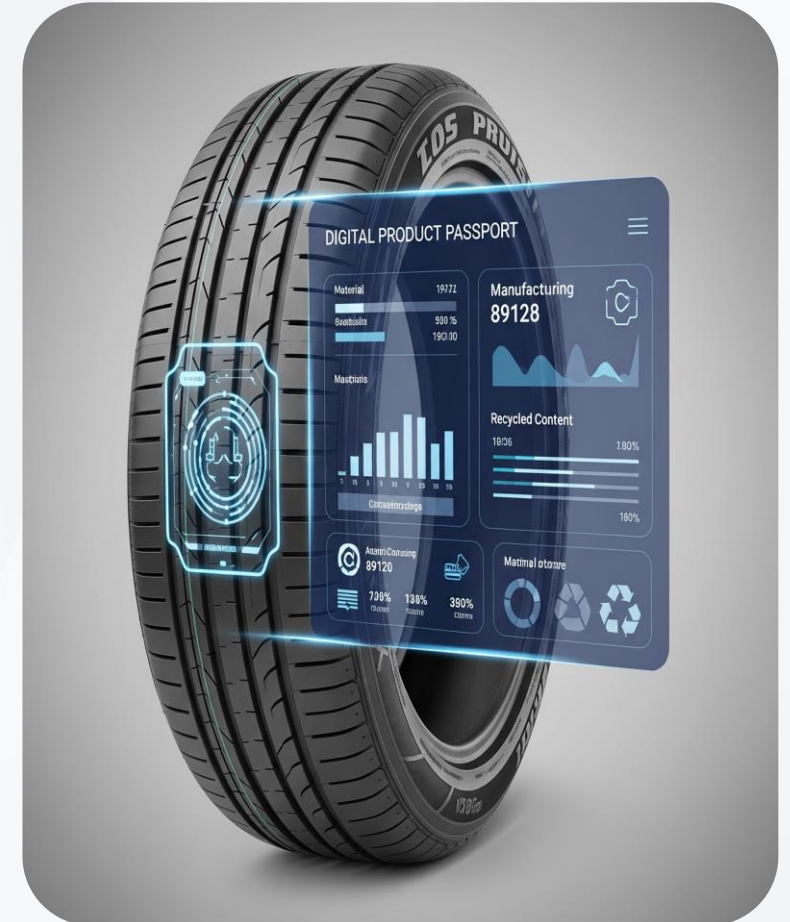
Phase 2: "Advanced DPP" for textile by 2030

Phase 3: "Full circular DPP" for textile by 2033

Tyres

Timeline for Adoption: 2027

- **Scope: JRC study suggested definition:** Cars tyres, vans tyres and heavy-duty vehicles tyres
- **Currently Regulated:** Tyre Labelling Regulation (EU) 2020/740
- **Why?** Potential to improve recyclability and recycled content waste management of end-of-life tyres.



Furniture

Timeline for Adoption : 2028

Scope: JRC study suggested definition

- Free-standing or built-in units
- primary function: storage, placement or hanging of items
- surfaces where users can rest, sit, eat, study or work
- For indoor or outdoor use.

Why? Potential to improve resource use, affecting production and supply of materials



Mattresses

Timeline for Adoption: 2029

- **Scope: JRC study suggested definition:** Limited to mattresses for indoor use.
- **Why?** High potential to improve waste generation, lifetime extension and material efficiency.



How to Prepare?

Key Sources

Cirpass2 Project:

- Innovation Action project funded by the EU Digital Europe Programme that will be ongoing until April 2027.
- Project is looking at DPP Functionality in 4 Sectors: Textiles, electrical and electronic equipment, tyres and construction materials.

Public Consultation:

- EU Commission until 1 July 2025 for service providers who will store and process DPP data on behalf of responsible economic operators that decide not to provide these services themselves



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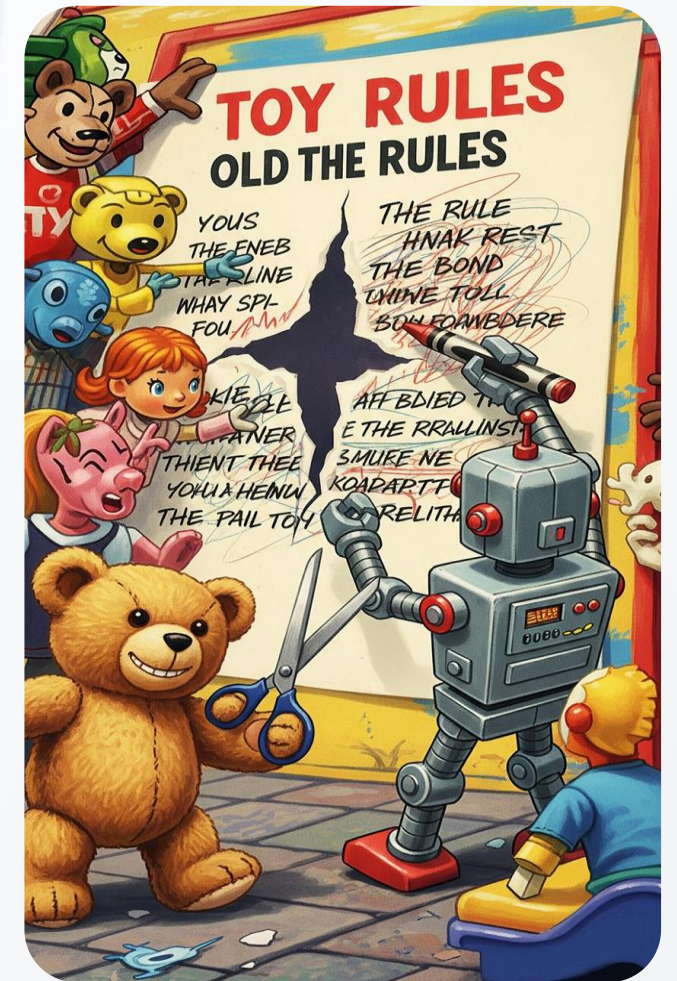
Toys



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Why Update the Toy Safety Rules?

- Addressing Gaps: EU review found the 2009 Directive had weaknesses in practice some risks weren't fully covered (e.g. certain harmful chemicals, online sales loopholes).
- Health Concerns: New scientific evidence on chemicals affecting children (e.g. endocrine disruptors) called for stricter protections.
- Digital Age: Toys have evolved (smart toys, online marketplaces) – old rules didn't fully cover cyber security or internet sales.
- Uniform Enforcement: As a Regulation (not a Directive), the rules will apply uniformly across all EU countries, improving compliance and market fairness.



Stronger Chemical Safety Measures

- **Ban on Harmful Chemicals:** New regulation prohibits endocrine disruptors and other toxic substances in toys (beyond the earlier ban on CMRs).
- **PFAS & Bisphenols Banned:** Per- and polyfluoroalkyl substances (PFAS) and the most dangerous bisphenol chemicals can no longer be used in toys
- **Allergens & Other Toxins:** Fragrance allergens are banned in toys for young children (under 36 months) and mouth-contact toys
- Stricter limits set for heavy metals and nitrosamines in all toys
- **Safety Assessments:** Manufacturers must do a thorough chemical safety evaluation for each toy (considering combined exposure to multiple chemicals)



Introduction of the Digital Product Passport

- **Every Toy Gets a Digital Passport:** All toys must carry a Digital Product Passport (DPP) – typically via a QR code on the product/packaging.
- **What's in the DPP:** The passport is an electronic record with key info: the toy's unique ID, manufacturer details, compliance certificates (CE mark, standards met), safety warnings, and even an image of the toy.
- **Accessible to All:** Consumers, customs officers, and regulators can scan the code to instantly access the toy's safety and compliance information.
- **Why It Matters:** The DPP improves traceability – it helps customs and market inspectors spot non-compliant toys quickly, especially among online imports, and gives consumers transparent info about the toy's safety.

Enhanced Enforcement & Online Sales

- **Closing Online Loopholes:** The new rules apply equally to toys sold online – no more evading safety checks by selling directly from outside the EU
- Online marketplaces must ensure toys on their platforms comply with EU safety requirements.
- **Marketplaces' Duties:** E-commerce platforms will be legally required to help verify toy compliance – for example, they must allow display of the CE mark, safety warnings, and a DPP link/QR code on toy listings before a sale is made.
- **Stronger Market Surveillance:** National authorities get greater powers to inspect and remove dangerous toys from the market (offline and online). With the DPP system, inspectors and customs can more easily identify non-compliant products and stop them
- **Fair Competition:** These enforcement measures ensure imported toys (often 80% of our market) meet the same standards as EU-made toys, so compliant businesses are not undercut by unsafe, cheap imports.

Specific Rules for Digital & Connected Toys

- **New Safety Requirements:** Smart toys and connected toys (those with digital functions, internet connectivity, etc.) are explicitly addressed. Manufacturers must ensure these toys do not pose risks to children's mental health or cognitive development.
- **Privacy & Cybersecurity:** Although primarily a toy safety law, it links with digital regulations – connected toys must be designed with data protection and cybersecurity in mind (e.g. guarding against hacking or misuse of child data).
- **AI and Content:** If a toy uses AI or interactive content, it should be age-appropriate and free from harmful content or bias. The EU's upcoming AI Act will also apply to high-risk AI in toys (e.g. those that affect learning or behavior).
- **Parental Controls:** The new standards encourage features that allow parental supervision of connected toys (for example, controlling online features or content) to ensure digital play is safe.

Implications for Manufacturers & Stakeholders

- **Manufacturers:** Must reformulate products to remove newly banned chemicals (e.g. replace PFAS-based materials). Also need to perform more rigorous testing and documentation
- **Compliance & Documentation:** Every toy now requires a Digital Product Passport – companies must set up systems to compile and maintain this data (and possibly adjust packaging to include QR codes).
- **Importers/Retailers:** Importers have to ensure toys from abroad meet all new criteria and must submit DPP information at EU borders for customs checks. Retailers (online and offline) must verify that the toys they sell carry the proper compliance markings and passports.
- **Online Marketplaces:** Platforms like Amazon or eBay now bear legal responsibility to vet toy listings for safety compliance.



Timeline for Implementation

- **28 July 2023:** European Commission published the proposal for the new Toy Safety Regulation
- **Early 2024:** European Parliament and Council reviewed and amended the proposal. (Parliament adopted its first reading position in March 2024; Council agreed its position in May 2024).
- **11 June 2025:** The regulation is ready for formal adoption, pending final votes
- **July or September:** Formal adoption and Entry into Force – the Regulation will be published in the EU Official Journal and become law 20 days later.
- **Transition Period (~4.5 years):** Industry and authorities have 54 months from entry-into-force to fully implement the new requirements.
- Existing toys can continue to be sold during this phase, but by spring 2030 all toys on the EU market must comply with the new Regulation.
- **Target:** 2030 – full compliance deadline. The old Toy Safety Directive will be repealed at the end of the transition.



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Trends and Takeaways



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Other Key Trends

- **DPP:** Requirement under new Construction Products Regulation (declaration of performance and conformity, safety information and instructions for use).
- **DPP Digital Circularity Vehicle Passport:**
 - Latest draft 11 June.
 - Draft Regulation for Circularity of Vehicles (DPP to include parts containing lead, mercury, cadmium or hexavalent chromium, as well as a declaration on the % of recycled content).
- China is developing a strategy and development of the DPP.
 - **China:** Draft Standard on the general requirements for DPP.
 - China News on plans to launch a "digital Battery ID card".

Key Takeaways

- **Batteries:** Implementation of battery passport by *18 February 2027* for LMT, EV and Industrial battery with >2 kWh.
- **EPSR/ Batteries Public Consultation** - EU Commission on Requirements for Service providers (1 July).
- **Ecodesign/ Energy Labels: 2026** timeline for adoption of 6 ERP Products:
- **ESPR - 2027 Timeline for Adoption for New Products:** Textiles, Tyres, Aluminium, Repairability (horizontal measure).
- Development of **Standards** for DPP by CEN/Cenelec by end of 2025.
- **Toys:** Formal adoption/ Entry into Force will probably be approved July or September depending on outcomes of Plenary sessions.
- **Toys:** Transition Period (~4.5 years): Industry and authorities have 54 months from entry-into-force to fully implement the new requirements.

Questions?



Lets Talk



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