



## SBS reply to Call for Evidence on Digital product passport – rules for service providers

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SBS welcomes the opportunity to provide feedback on the rules and requirements for Digital Product Passport (DPP) service providers and looks forward to contributing further to the evaluation process. The Ecodesign for Sustainable Products Regulation and the DPP will enhance transparency, circularity, and resource efficiency, empowering SMEs to drive sustainable innovation. However, the successful implementation of these requirements will demand targeted support to help SMEs navigate compliance and adaptation challenges.

We appreciate the possibility of externalising DPP management for SMEs that are resource-constrained or prefer not to manage it themselves. However, it is equally important to empower those SMEs preferring to manage their DPPs independently by providing comprehensive training and support, including subsidising transition costs.

The **definition of DPP service providers should allow for SME associations to be able to offer these services to their members**. They are the most aware of SMEs and market needs, can offer tailored guidance, reduce costs, foster trust, and enhance accessibility, ultimately facilitating a smoother transition to sustainable practices.

Additionally, to ensure an effective framework, SBS emphasizes the following critical factors for rules governing service providers:

- **Affordability:** Ensure DPP services are accessible to all, especially microenterprises.
- **Privacy and Security:** Safeguard sensitive business information with end-to-end data encryption.
- **Data Harmonisation and Interoperability:** Align data standards, particularly for automatic data transfer and data exchange, across the DPP and other EU regulatory and reporting frameworks to ensure compatibility with other reporting systems, standardised data formats, and protocols.
- **Allow to change DPP Service Provider:** Guarantee the possibility to change DPP service providers easily, ensure interoperability between DPP service providers systems and procedures, and establish mechanisms for the seamless transfer of data and information.
- **Data Portability and Availability:** Allow data owners to export and reuse their data for other purposes and other systems, simplifying reporting obligations. Guarantee that, if a DPP service provider ceases

operations, SMEs maintain access to their data through appropriate safeguards and continuity measures.

- **Mechanisms for Missing Data:** Establish effective processes to address gaps in product information, particularly for components sourced from outside the EU.
- **SME Support and Empowerment:** Provide tailored support and training to help SMEs independently establish and manage their DPPs.

SBS is committed to supporting the successful implementation of the Digital Product Passport and its associated requirements, advocating for a balanced approach that empowers SMEs through targeted support, clear definitions, and affordable, secure, and interoperable solutions.

For additional information, please contact:

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Small Business Standards (SBS) is the European association representing and supporting small and medium-sized companies (SMEs) in the standardisation process, both at European and international levels.

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