

SBS Reply to the Consultation on rules for DPP Service Providers

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INTRODUCTION

The certification of Digital Product Passport (DPP) service providers is crucial to ensuring trust, security, and interoperability within the evolving DPP ecosystem. Certification frameworks must balance the need for assurance with accessibility, proportionality and affordability, particularly for Small and Medium-sized Enterprises (SMEs). SBS reply to the European Commission's [Consultation on rules for DPP Service Providers](#) outlines key considerations and recommendations for developing an effective and inclusive certification approach.

1. CERTIFICATION IMPORTANCE AND ADDED VALUE

Certification (or third-party conformity assessment) fosters **trust and confidence** in service providers managing sensitive product data, which is fundamental for widespread DPP adoption. Certified service providers should demonstrate compliance with essential security, privacy, and operational standards, vital in complex supply chains involving multiple stakeholders.

However, **certification should not become a barrier to market entry or disproportionately increase costs, especially for SMEs**. The process must be **accessible and streamlined** to avoid excluding smaller, innovative providers or fostering dependency on a limited number of large providers.

2. HYBRID, FLEXIBLE AND RISK-BASED CONFORMITY ASSESSMENT PROCESS

Due to the diversity of products, economic actors, supply chains, and associated risks, a one-size-fits-all conformity assessment model is neither practical nor effective. **A hybrid model is recommended:**

- **Self-declaration:** Suitable for low-risk and less complex scenarios, allowing providers to declare compliance with basic standards, enabling cost-effective and rapid market entry.

- **Third-party Accredited Certification:** Required for high-risk or critical sectors, ensuring rigorous independent verification. Utilizing existing cybersecurity certification frameworks prevents duplication and maintains compatibility with established standards.

Both **self-declaration and third-party certification should be based on harmonised European standards**. This would ensure coherence, legal certainty, and mutual compatibility across different service providers and sectors. A clear reference set of applicable standards must be defined to avoid fragmentation and ensure transparency for all actors involved.

A hybrid conformity assessment model best addresses the diverse needs of the various sectors. As an example, SMEs active in construction rely on sectoral or cooperative service providers (e.g., federations or trade associations) that may initially lack capacity for full certification but could begin with self-declaration of compliance and progressively move towards accredited certification.

Similarly, in sectors like textiles and furniture, numerous SMEs operate independently or produce low-risk, customized products. A tiered certification approach ensures proportionality—allowing self-declaration for simpler cases while applying stricter certification for higher-risk or regulated items. This balanced model facilitates market access without imposing excessive burdens.

This tiered approach guarantees **proportionality, cost-effectiveness and adaptability** while maintaining trustworthiness.

3. ADDRESS SME SPECIFIC NEEDS

SMEs play a vital role in European industries such as construction, manufacturing, and crafts. Certification frameworks must **consider SME capacities**, which often include limited resources and technical expertise.

- Certification schemes should **include SME organisations and cooperative and sectoral providers** (e.g., federations, trade associations, chambers of commerce) that support SME communities.
- SMEs that autonomously manage data for their DPPs, and do not provide service provider services, should be exempt from mandatory third party certification requirements. Tailored support and training must be guaranteed for those SMEs who choose to independently establish and manage their DPPs.
- Providing “**easy package**” DPP options tailored for SMEs with simpler products or lower risk reduces administrative and financial burdens, enhancing competitiveness.
- SMEs must retain **freedom to choose their service providers** to prevent vendor lock-in or monopolistic control by major IT providers.

- The availability of **publicly endorsed or open-source tools** and reference software will further lower barriers to SME participation.

4. ENSURE CONSISTENCY AND ALIGNMENT ACROSS LEGISLATION

The DPP framework intersects with multiple legislative instruments (such as the Ecodesign for Sustainable Product Regulation (ESPR) and Construction Products Regulation (CPR)).

To prevent fragmentation:

- Certification and conformity assessment requirements should be **harmonised and interoperable** across relevant legislation to avoid inconsistencies and duplicative compliance.
- Harmonised standards should serve as the common basis for certification and self-declaration across all relevant legislative instruments. This would ensure coherence, and avoid duplication.
- Clear, consistent **guidance and proportionate obligations** laid down in delegated acts will reduce administrative complexity for all stakeholders.
- Legislative alignment fosters a **unified market approach**, facilitating smoother adoption and integration of DPPs.

5. GUARANTEE DATA ACCESSIBILITY AND FAIR COST STRUCTURES

DPP data hosted by service providers must be as accessible as possible to manufacturers and authorised stakeholders without undue restrictions or additional charges.

- Providers should not impose **excessive fees or restrictive commercial terms** that could limit data access or create dependency.
- Responsibilities for **updating and maintaining DPP data** (including updates from repair or lifecycle changes) must be clearly defined to avoid unfair costs or administrative burdens, especially on SMEs and downstream actors.
- Economic operators must have ownership and control over the data they provide through DPP registries or other DPP service providers to ensure reliability and data confidentiality.

CONCLUSION

Conformity assessment of DPP service providers is essential to build trust and ensure the security and reliability of the Digital Product Passport ecosystem. Conformity assessment

Small Business Standards aisbl

Rue Jacques de Lalaing 4 - 1040 Brussels, Belgium

info@sbs-sme.eu

Transparency Register 653009713663-08

www.sbs-sme.eu

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schemes, including both self-declaration and third-party certification, must be based on harmonised standards to ensure consistency, transparency, and compatibility across sectors. These schemes must be **flexible, risk-based, and inclusive**, taking into account the specific context and capacity of SMEs , while fostering a competitive and innovative market.

Adopting a **hybrid model** aligned with existing legislation, supported by accessible tools, harmonised standards and affordable and proportionate cost, will enable widespread DPP adoption while safeguarding data integrity and stakeholder interests.

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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