



SBS, EBC and SMEUnited joint statement on the implementing arrangements for the Digital Product Passport Registry

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SBS, EBC and SMEUnited welcome the setup of the Digital Product Passport (DPP) Registry as an important first step towards the implementation of the wider DPP system and ecosystem under the Ecodesign for Sustainable Products Regulation (ESPR).

At the same time, it is essential to ensure that the implementation of the DPP Registry remains proportionate, operationally feasible and accessible for SMEs.

In this regard, we reiterate the importance of achieving the following:

1. **Minimise implementation costs** for SMEs, including costs linked to software, IT integration, verification procedures, cybersecurity, external service providers and recurring operational fees. The system should not create disproportionate financial burdens or indirectly favour larger companies with advanced digital infrastructures.
2. **Avoid double reporting and unnecessary administrative burdens.** Existing EU and national systems, databases and authentication mechanisms should be reused where equivalent mechanisms already exist in order to prevent duplication of data submissions and verification procedures.
3. Provide **practical support measures** such as guidance documents, templates, helpdesks and training to facilitate implementation by SMEs. It is important that such support is available in all EU languages and remains easily accessible for SMEs. Financial and non-financial support measures should also be considered to support the transition towards the new system.
4. Ensure that **registration and verification requirements remain manageable and proportionate for SMEs**, as existing eIDAS-related systems can already be difficult to use in practice. Many SMEs may not yet have access to such digital identity infrastructures. Existing national and EU authentication systems should therefore be reused wherever possible to avoid duplicate procedures and unnecessary costs. Re-verification obligations

may also create additional administrative burdens for SMEs and should therefore remain proportionate. Verification obligations across the value chain should also be clearly defined and limited to what is strictly necessary to ensure traceability and compliance.

5. **Ensure user-friendliness and operational feasibility** for SMEs, many of which do not have advanced digital capacities, dedicated IT departments or cybersecurity expertise. The system should remain compatible with existing SME workflows. Cybersecurity requirements should primarily be ensured through appropriate protections within the Registry itself in order to avoid disproportionate investments by SMEs in IT systems and training.
6. **Guarantee open, standardised and interoperable APIs** to avoid vendor lock-in and dependence on proprietary ecosystems. At the same time, the Commission's manual web interface should remain fully functional and sufficient for compliance, without requiring SMEs to purchase additional software, develop proprietary technical solutions or rely on external IT consultancy services. Optional API connectivity should not become a de facto prerequisite for SME compliance.
7. Ensure **that harmonised data models and semantic interoperability requirements remain sufficiently flexible** to accommodate evolving technologies, sector-specific production realities and heterogeneous industrial environments. Overly rigid data structures may be difficult for SMEs to implement and may not fully reflect dynamic production processes or commercially sensitive information.
8. **Ensure data confidentiality and cybersecurity**, particularly regarding commercially sensitive information, know-how and supply-chain data. Access to sensitive information should remain limited to competent authorities and the Commission where strictly necessary.

Moreover, some **important aspects of the DPP registry setup and governance would benefit from further clarification**, including:

- **Define the allocation of responsibilities and liabilities between DPP service providers, economic operators and other value chain actors** to ensure legal certainty and proportionality. Limit responsibility to only data that an economic operator generates, controls or can reasonably verify. In distributed value chains, unclear allocation may lead to duplication of effort or compliance risks for SMEs. Avoid extending liability to upstream or third-party data and prevent overlapping or cumulative obligations;
- **Specify the relationship between the European Commission registry and DPP service providers**, including their respective roles, responsibilities and interaction mechanisms;
- **Support and define the use of European and other relevant standards for data formats**, interoperability requirements and semantic structures, where appropriate ;
- **Define contingency, backup and recovery arrangements** in case of system failure, cyber incidents or temporary unavailability of the registry;
- **Clarify the management of connected, repaired, refurbished or remanufactured products**, including whether unique identifiers remain stable or evolve throughout the lifecycle, and how links between related products and identifiers will be maintained.



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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European Builders Confederation (EBC) is the European non-profit professional organisation representing and promoting the interests SMEs and craftsmen in the construction sector, in close coordination with its national member organisations.

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SMEUnited is the association of Crafts and SMEs in Europe with 67 member organisations from over 30 European countries. SMEUnited represents national cross-sectoral SME federations, European SME branch organisations and associate members. SMEUnited is a recognised employers' organisation and European Social Partner.

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