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FEICA general position and principles on Digital Product Passports (DPPs)

FEICA welcomes the digitalisation of value chain information and sees the Digital Product Passport (DPP) as an important tool to make legally required information available in a harmonised digital format across the EU.

To ensure that the DPP delivers legal certainty, supports innovation, and strengthens the competitiveness of European industry, FEICA considers it essential that the system is *fully harmonised at EU level, proportionate, technically feasible, and protective of commercially sensitive data* throughout the value chain.

- **Harmonisation and legal certainty**

The DPP represents an important step towards EU-wide harmonisation. Once implemented, *no additional mandatory requirements should be introduced at Member State level*, as this would undermine harmonisation efforts.

- **Digitalisation of upstream information**

FEICA believes that the upstream information required to prepare DPPs should also be fully digitalised. Voluntary concepts such as Digital Material Passports (DMPs)¹, which are being discussed in several sectors, can provide a useful general approach to support this objective.

- **Enhance economic competitiveness**

Harmonised and machine-readable product representation enhances information exchange across value chain actors and fosters innovation and product enhancement. It will also reduce data management costs and speed up time to market. All these factors are essential to increase economic competitiveness.

- **Conditions to facilitate effective digitalisation**

To enable an efficient, workable and interoperable system:

- All *horizontal (non-sector-specific) aspects* should be harmonised under the ESPR and used across all DPP-relevant product legislations.
- *Terminology and common IT language* should be harmonised in a machine-readable format through a European harmonised data dictionary
- The DPP should contain *as much data as needed but as little as possible*. 'Nice-to-have' data creates unnecessary effort for the industry. Any further expansion of data requirements should be phased and evidence-based, taking place step by step and informed by implementation experience, methodological maturity, and technological progress. This process should be developed in close alignment with economic operators, their industry associations, and relevant authorities, including market surveillance and customs, to ensure proportionality, feasibility, and legal clarity.

- **Data use and confidentiality**

- The content of the DPP should be *limited to information relevant to value chain communication* and not used for enforcement purposes.
- *Data ownership should remain with the company*. The DPP could include a link or reference to a company contact point, allowing authorities or other stakeholders to request additional information directly from the data owner, with an agreed response time.
- *Meta-Data* (for example relationships between companies in the supply chain) is sensitive and needs to be protected.
- Current regulatory deadlines must not force digital data exchange before the technical feasibility of protecting sensitive data is established.

¹ *Digital Material Passports* are a machine-readable passports for several industries (e.g. chemical, automotive, batteries sectors) sharing key compliance, sustainability, circularity and quality data to enable efficient, future-ready B2B information exchange for relevant sectors.

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