

Digital product passport – rules for service providers

Fields marked with * are mandatory.

Introduction

This consultation relates to the digital product passport (DPP) as set out in the Ecodesign for Sustainable Products Regulation[1] (ESPR). The ESPR sets out a framework to improve the environmental sustainability of products and to ensure free movement in the single market by setting ecodesign requirements that products must fulfil to be placed on the market or put into service.

The DPP will electronically register, process and share product information among supply-chain businesses, authorities and consumers, including on a product's sustainability and circularity. This information will improve the understanding and monitoring of supply chains and enable consumers to make well-informed choices based on sustainability criteria. DPPs will gradually be introduced for product groups placed on the EU market based on ESPR delegated acts and other applicable sectoral legislation. As a start, from 18 February 2027, [DPPs will become mandatory for certain types of batteries](#).

To prepare for these first product groups to be covered, the Commission is working on a delegated act setting out the requirements for DPP service providers, in areas such as:

- information security and (information) services of DPP data that responsible economic operators entrust to DPP service providers;
- the financial viability of the DPP service providers to guarantee long-term access to DPP information; and
- assurance for businesses that DPP service providers comply with the requirements.

DPP service providers[2] will store and process DPP data on behalf of responsible economic operators (e.g. producers, importers, etc.) that decide not to provide these services themselves. For responsible economic operators that decide to host the DPPs themselves, the DPP service providers will store the DPP's mandatory backup copy. The Commission will carry out an impact assessment to assess potential options for the requirements, their possible effects, and the viability of putting in place a certification scheme to ensure compliance with the requirements. In setting out this framework, the Commission aims to help responsible economic operators comply with the ESPR requirements.

[1] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. ELI: <http://data.europa.eu/eli/reg/2024/1781/oj>.

[2] According to Article 2(32) of the ESPR, a digital product passport service provider is a 'natural or legal person that is an independent third-party authorised by the economic operator which places the product on the market or puts it into service and that processes the digital product passport data for that product for the purpose of making such data available to economic operators and other relevant actors with a right to access those data under this Regulation or other Union law'.

About you

* Language of my contribution

- ☐ Bulgarian
- ☐ Croatian
- ☐ Czech
- ☐ Danish
- ☐ Dutch
- ☒ English
- ☐ Estonian
- ☐ Finnish
- ☐ French
- ☐ German
- ☐ Greek
- ☐ Hungarian
- ☐ Irish
- ☐ Italian
- ☐ Latvian
- ☐ Lithuanian
- ☐ Maltese
- ☐ Polish
- ☐ Portuguese
- ☐ Romanian
- ☐ Slovak
- ☐ Slovenian
- ☐ Spanish
- ☐ Swedish

* I am giving my contribution as

- ☐ Academic/research institution
- ☒ Business association
- ☐ Company/business

- ☐ Consumer organisation
- ☐ EU citizen
- ☐ Environmental organisation
- ☐ Non-EU citizen
- ☐ Non-governmental organisation (NGO)
- ☐ Public authority
- ☐ Trade union
- ☐ Other

* First name

Frank

* Surname

KOOS

* Email (this won't be published)

koos@eurowindoor.eu

* Organisation name

255 character(s) maximum

EuroWindow AISBL

* Organisation size

- ☒ Micro (1 to 9 employees)
- ☐ Small (10 to 49 employees)
- ☐ Medium (50 to 249 employees)
- ☐ Large (250 or more)

Transparency register number

Check if your organisation is on the transparency register. It's a voluntary database for organisations seeking to influence EU decision-making.

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Please state whether you will be replying to the questionnaire as:

[*] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. ELI: <http://data.europa.eu/eli/reg/2024/1781/oj>.

- ☒ a possible responsible economic operator (*i.e. manufacturer, authorised representative, importer, distributor, dealer or fulfilment service provider*)
- ☐ a possible digital product passport service provider (*i.e. a natural or legal person that is an independent third party authorised by the economic operator which places the product on the market or puts it into service and that processes the digital product passport data for that product for the purpose of making such data available to economic operators and other relevant actors with a right to access those data under the Ecodesign for Sustainable Products Regulation [*] or other EU law*)
- ☐ any other value chain actor, such as a possible customer, professional repairer, independent operator, refurbisher, remanufacturer, recycler, market surveillance and customs authority, civil society organisation, researcher, trade union, the Commission, or any organisation acting on their behalf.

* Country of origin

Please add your country of origin, or that of your organisation.

This list does not represent the official position of the European institutions with regard to the legal status or policy of the entities mentioned. It is a harmonisation of often divergent lists and practices.

- | | | | |
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| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Martin |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> Samoa |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> San Marino |
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| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Saudi Arabia |
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| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Serbia |
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| <input type="radio"/> Argentina | <input type="radio"/> Ethiopia | <input type="radio"/> Malta | <input type="radio"/> Sierra Leone |

<input type="radio"/> Armenia	<input type="radio"/> Falkland Islands	<input type="radio"/> Marshall Islands	<input type="radio"/> Singapore
<input type="radio"/> Aruba	<input type="radio"/> Faroe Islands	<input type="radio"/> Martinique	<input type="radio"/> Sint Maarten
<input type="radio"/> Australia	<input type="radio"/> Fiji	<input type="radio"/> Mauritania	<input type="radio"/> Slovakia
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<input type="radio"/> Bahamas	<input type="radio"/> French Guiana	<input type="radio"/> Mexico	<input type="radio"/> Somalia
<input type="radio"/> Bahrain	<input type="radio"/> French Polynesia	<input type="radio"/> Micronesia	<input type="radio"/> South Africa
<input type="radio"/> Bangladesh	<input type="radio"/> French Southern and Antarctic Lands	<input type="radio"/> Moldova	<input type="radio"/> South Georgia and the South Sandwich Islands
<input type="radio"/> Barbados	<input type="radio"/> Gabon	<input type="radio"/> Monaco	<input type="radio"/> South Korea
<input type="radio"/> Belarus	<input type="radio"/> Georgia	<input type="radio"/> Mongolia	<input type="radio"/> South Sudan
<input checked="" type="radio"/> Belgium	<input type="radio"/> Germany	<input type="radio"/> Montenegro	<input type="radio"/> Spain
<input type="radio"/> Belize	<input type="radio"/> Ghana	<input type="radio"/> Montserrat	<input type="radio"/> Sri Lanka
<input type="radio"/> Benin	<input type="radio"/> Gibraltar	<input type="radio"/> Morocco	<input type="radio"/> Sudan
<input type="radio"/> Bermuda	<input type="radio"/> Greece	<input type="radio"/> Mozambique	<input type="radio"/> Suriname
<input type="radio"/> Bhutan	<input type="radio"/> Greenland	<input type="radio"/> Myanmar/Burma	<input type="radio"/> Svalbard and Jan Mayen
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<input type="radio"/> Bonaire Saint Eustatius and Saba	<input type="radio"/> Guadeloupe	<input type="radio"/> Nauru	<input type="radio"/> Switzerland
<input type="radio"/> Bosnia and Herzegovina	<input type="radio"/> Guam	<input type="radio"/> Nepal	<input type="radio"/> Syria
<input type="radio"/> Botswana	<input type="radio"/> Guatemala	<input type="radio"/> Netherlands	<input type="radio"/> Taiwan
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<input type="radio"/> Brazil	<input type="radio"/> Guinea	<input type="radio"/> New Zealand	<input type="radio"/> Tanzania
<input type="radio"/> British Indian Ocean Territory	<input type="radio"/> Guinea-Bissau	<input type="radio"/> Nicaragua	<input type="radio"/> Thailand
<input type="radio"/> British Virgin Islands	<input type="radio"/> Guyana	<input type="radio"/> Niger	<input type="radio"/> The Gambia
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<input type="radio"/> Burkina Faso	<input type="radio"/> Honduras	<input type="radio"/> Norfolk Island	<input type="radio"/> Tokelau
<input type="radio"/> Burundi	<input type="radio"/> Hong Kong	<input type="radio"/> Northern Mariana Islands	<input type="radio"/> Tonga
<input type="radio"/> Cambodia	<input type="radio"/> Hungary	<input type="radio"/> North Korea	<input type="radio"/> Trinidad and Tobago
<input type="radio"/> Cameroon	<input type="radio"/> Iceland	<input type="radio"/> North Macedonia	<input type="radio"/> Tunisia
<input type="radio"/> Canada	<input type="radio"/> India	<input type="radio"/> Norway	<input type="radio"/> Türkiye
<input type="radio"/> Cape Verde	<input type="radio"/> Indonesia	<input type="radio"/> Oman	<input type="radio"/> Turkmenistan
<input type="radio"/> Cayman Islands	<input type="radio"/> Iran	<input type="radio"/> Pakistan	<input type="radio"/> Turks and Caicos Islands
<input type="radio"/> Central African Republic	<input type="radio"/> Iraq	<input type="radio"/> Palau	<input type="radio"/> Tuvalu
<input type="radio"/> Chad	<input type="radio"/> Ireland	<input type="radio"/> Palestine	<input type="radio"/> Uganda
<input type="radio"/> Chile	<input type="radio"/> Isle of Man	<input type="radio"/> Panama	<input type="radio"/> Ukraine
<input type="radio"/> China	<input type="radio"/> Israel	<input type="radio"/> Papua New Guinea	<input type="radio"/> United Arab Emirates
<input type="radio"/> Christmas Island	<input type="radio"/> Italy	<input type="radio"/> Paraguay	<input type="radio"/> United Kingdom
<input type="radio"/> Clipperton	<input type="radio"/> Jamaica	<input type="radio"/> Peru	<input type="radio"/> United States
<input type="radio"/> Cocos (Keeling) Islands	<input type="radio"/> Japan	<input type="radio"/> Philippines	<input type="radio"/> United States Minor Outlying Islands
<input type="radio"/> Colombia	<input type="radio"/> Jersey	<input type="radio"/> Pitcairn Islands	<input type="radio"/> Uruguay
<input type="radio"/> Comoros	<input type="radio"/> Jordan	<input type="radio"/> Poland	<input type="radio"/> US Virgin Islands
<input type="radio"/> Congo	<input type="radio"/> Kazakhstan	<input type="radio"/> Portugal	<input type="radio"/> Uzbekistan
<input type="radio"/> Cook Islands	<input type="radio"/> Kenya	<input type="radio"/> Puerto Rico	<input type="radio"/> Vanuatu
<input type="radio"/> Costa Rica	<input type="radio"/> Kiribati	<input type="radio"/> Qatar	<input type="radio"/> Vatican City
<input type="radio"/> Côte d'Ivoire	<input type="radio"/> Kosovo	<input type="radio"/> Réunion	<input type="radio"/> Venezuela
<input type="radio"/> Croatia	<input type="radio"/> Kuwait	<input type="radio"/> Romania	<input type="radio"/> Vietnam
<input type="radio"/> Cuba	<input type="radio"/> Kyrgyzstan	<input type="radio"/> Russia	<input type="radio"/> Wallis and Futuna
<input type="radio"/> Curaçao	<input type="radio"/> Laos	<input type="radio"/> Rwanda	<input type="radio"/> Western Sahara
<input type="radio"/> Cyprus	<input type="radio"/> Latvia	<input type="radio"/> Saint Barthélemy	<input type="radio"/> Yemen
<input type="radio"/> Czechia	<input type="radio"/> Lebanon	<input type="radio"/> Saint Helena, Ascension and Tristan da Cunha	<input type="radio"/> Zambia
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Democratic
Republic of the
Congo

☐ Denmark

Lesotho

☐ Liberia

Saint Kitts and
Nevis

☐ Saint Lucia

Zimbabwe

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. **For the purpose of transparency, the type of respondent (for example, 'business association', 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published.** Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

* Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

☐ Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

☒ Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

☒ I agree with the [personal data protection provisions](#)

Questions linked to providing and receiving digital product passport-related services

Specific questions to possible responsible economic operators

* Do you do business outside of EU?

☐ I do business [my business partners / target audience is] only in the EU

☐

I do business [my business partners / target audience is] in the EU and outside of the EU

- ☐ I do business [my business partners / target audience is] only outside of the EU
- ☒ Other (please explain)

* If you chose "Other", please explain.

The business partners / target audience of windows and door manufacturers is mainly in the EU, but also outside of the EU (e.g. Switzerland and Norway) and some companies are worldwide on different continents active.

* What is your approximate % of market activity that is targeted outside of the EU?

very small

* Are you already a responsible economic operator for a specific product category?
Please choose the option that best describes your situation.

- ☐ I am a manufacturer
- ☐ I am an authorised representative
- ☐ I am an importer
- ☐ I am a distributor
- ☐ I am a dealer
- ☐ I am a fulfilment service provider
- ☐ I am none of the above
- ☒ Other (please explain)

* If you chose "Other", please explain.

EuroWindow is a business association representing manufacturers of windows, doors and curtain walling.

* What benefits and costs would you see for consumers and other stakeholder groups deriving from the use of a digital product passport?

Benefits: Easy availability of data, but often too late in the process as documentation will only be available after placing the products on the market and not in the tender phase of the project.
Cost: That will depend a lot on the chosen requirements on the service providers. If 3rd party certification will be required the cost is likely to be higher than if no such requirement is introduced.

* How do you manage your IT services (e.g. financial information, product data, etc.)?

- ☐ With an internal IT department only
- ☐ Partly with an internal IT department and partly with an external service provider
- ☐ With an external service provider only
- ☒ Other (please explain)

* If you chose "Other", please explain.

The window sector has a very diverse structure, but is clearly dominated by SMEs, which often work with product-specific software from specialised software houses or system suppliers. A few large companies also have their own IT departments.

* Do you host your company data in cloud services (e.g. with Microsoft, Amazon, etc.)?

- ☐ Yes
- ☐ No
- ☒ I don't know

* Do you audit your IT services?

- ☐ Yes
- ☐ No
- ☒ I don't know

* How likely is it that you will host your DPP data?

- ☐ Very likely
- ☒ Rather likely
- ☐ Neutral
- ☐ Not very likely
- ☐ Highly unlikely
- ☐ I don't know

* If a service provider is hosting the original DPP, what kind of measures should the service provider need to put in place to ensure that the DPP is always available for all users?

Availability such as that of company websites is sufficient. Higher requirements are not necessary.

* In your opinion, what should be the minimum level of DPP availability (within 365 days) that the service provider should offer?

- ☒ Available (reachable) 99% of the time
- ☐ Available (reachable) 98% of the time
- ☐ Available (reachable) 95% of the time
- ☐ Available (reachable) 90% of the time

* Please explain your opinion about minimum level of availability

It is usually not a problem for data centres to ensure this level of availability. High availability is needed not to stop manufacturing when DPP needs to be uploaded.

* Please estimate what the financial impact on your business would be if your access to the DPP data were to fail e.g. at the moment of import, at the moment of sales, during a recycling process?

- ☐ If a single event (please explain)
- ☒ If a recurring event (please explain)
- ☐ I don't know / cannot estimate

* If you chose "recurring event", please explain.

In the case of standard construction products for recurring events: loss of sale
In the case of project specific configured construction products: no impact at all.
Single event, annoying but not estimated to influence sale directly.

* Would you exchange data with a DPP service provider manually (e.g. via email and /or manual operations in excel) or would you use an automated solution?

- ☐ Manual
- ☐ Automated
- ☒ Both manual and automated

You can provide more details for your answer on manual/automated solution if you wish

According to the new Construction Products Regulation (CPR, Regulation (EU) 2024/3110), approximately 50,000 window manufacturers will have to create and upload around 76 million DPPs for windows each year in future (usually every single window needs a different DoPC and thus a separate DPP), which can generally only be done automatically. In individual cases at Micro Enterprises, manual input may also be preferred.

* According to the Ecodesign for Sustainable Products Regulation[*], responsible economic operators must make available a backup copy of the digital product passport through a DPP service provider that is an independent third party. Please indicate what kind of additional services you would be interested in receiving from the DPP service provider, beyond hosting your DPP or keeping the backup copy of your DPP(s)?

[*] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. ELI: <http://data.europa.eu/eli/reg/2024/1781/oj>.

- ☐ Creating the DPP
- ☐ Creating the data carrier
- ☐ Creating unique identifiers
- ☐ Registering the DPP in the Digital product passport registry
- ☒ Hosting (storing) the DPP
- ☒ Querying services in relation to DPP data
- ☐ Enabling updates of DPP information
- ☒ Offering reporting tools and services
- ☐ Other (please explain)

How would you rate the importance/relevance of the following elements /characteristics relating to the DPP?

	1 - Not important at all	2 - Less important	3 - Somewhat important	4 - Important	5 - Very important
* User-friendliness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Data security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Cyber resilience	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Access rights	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* Support services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

* A wide(r) range of services (automisation, interconnections with other relevant tools, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Certifications	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

You can give additional explanation to the previous question if you wish.

* Do you currently apply any cybersecurity[*] standards to your IT solutions/tools used?

[1] Cybersecurity is defined as 'activities necessary to protect network and information systems, the users of such systems, and other persons affected by cyber threats', as laid down in Regulation (EU) 2019/881 of 17 April 2019 on ENISA (the European Union Agency for Cybersecurity) and on information and communications technology cybersecurity certification and repealing Regulation (EU) No 526/2013 (Cybersecurity Act).

- ☐ Yes
- ☐ No
- ☒ I don't know

* When using the DPP, what kind of standards do you consider necessary for ensuring data security? Please name the standards and explain.

This could include securing the data integrity using a hashing mechanism like SHA-256, securing data authenticity using qualified digital signatures, or using encryption techniques when securing restricted data.

Data security is generally understood as a process of safeguarding digital information throughout its entire life cycle to protect it against corruption, theft or unauthorised access. It covers all: (i) hardware, software, storage devices, and user devices; (ii) access and administrative controls; and (iii) organisations' policies and procedures. You can consider any standards that you find relevant, whether international, EU or national.

We have no expertise to answer this.

* Do you have any specific concerns regarding DPP data that will be processed by downstream users such as repairers and recyclers?

- ☒ Yes
- ☐ No
- ☐ I don't know

* Please tell us about those concerns and how you would mitigate them.

Sometimes products fulfil e.g. anti-violence characteristics (like explosion or bullet resistance) what must be protected from unauthorised persons. Often, there is also project specific information on product performance included which belongs to contracting partners and perhaps to market surveillance only. Therefore, DPP data shall always be treated confidential and access to parts needs to be linked to specific authorisation for proven interest.

Questions linked to possible certification of DPP service providers

* How important would it be for you that the DPP service providers are certified service providers?

- ☐ Extremely important
- ☐ Rather important
- ☐ Neutral
- ☒ Rather unimportant
- ☐ Not important at all
- ☐ I don't know

* What do you see as the added value of using a certified service provider rather than an uncertified one, or why do you think a certificate is not important?

We do not see any reason that the service provider should have any higher legal obligation than the manufacturer.

For smaller companies without internal IT policies an IT security certification or similar can give trust to using the software.

For a specific DPP certification we could image a voluntary data infrastructure "certification" would be possible (fulfilling BIM, data dictionary standards etc.) and what could make a software provider relevant for big manufacturers compared to making their own system.

* How far do you agree with the following sentence: 'I am willing to bear extra costs for using a certified service provider'?

- ☐ Fully agree
- ☐ Somewhat agree
- ☐ Neutral
- ☐ Somewhat disagree
- ☐ Fully disagree
- ☒ Other (please explain)

* If you chose "Other", please explain.

For some manufacturers this might be a route to go especially if you do not have so much expertise inhouse, but it should be up to each single manufacturer to make the decision so a certification should be voluntary.

*** In your opinion, what would be the most appropriate certification process for DPP service providers?**

[1] DPP service providers would sign a self-declaration.

[2] DPP service providers would be certified by a combination of self-declaration and certification by an accredited third party based on already-existing accreditation schemes.

[3] The European Commission would be in charge of certifying DPP service providers.

[4] The European Commission would oversee the accreditation of conformity assessment bodies, which will certify DPP service providers.

[5] The certification would take the form of an accreditation – as the last level of public control in the European conformity assessment system. This would imply that the accreditation of conformity assessment bodies is overseen by national accreditation bodies.

- ☐ Self-declaration[1]
- ☐ Hybrid certification process based on self-declaration and certification by an accredited third party[2]
- ☐ Certification of service providers by the European Commission[3]
- ☐ Certification by conformity assessment bodies + accreditation of these bodies by the European Commission[4]
- ☒ Certification by conformity assessment bodies + accreditation of these bodies by Member States (national accreditation bodies)[5]
- ☐ Other (please explain)

*** Please explain why you consider the option you selected at the previous question to be the most appropriate.**

But certification should be voluntary.

Final remarks

*** Please provide any further comments or additional information here:**

It should be possible that manufacturers or group of manufacturers can become their own service provider.
A certification scheme should be voluntary to save burden and costs.
As often project specific confidential data is included in the DPP, the data shall always be treated confidential and access to parts needs to be linked to specific authorisation for proven interest.

* Would you be interested in participating in a targeted consultation?

☐ Yes

☒ No

Please upload any additional documents (e.g. position papers) to support your contribution to the consultation.

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Contact

GROW-DIGITAL-PRODUCT-PASSPORT@ec.europa.eu