

EuroWindowor Feedback on draft implementing act on Digital Product Passport Registry

EuroWindowor, the European association representing manufacturers of windows, doors and curtain walling, welcomes the opportunity to contribute to the public consultation on the draft Implementing Regulation on the Digital Product Passport (DPP) Registry pursuant to Article 13(5) of the Ecodesign for Sustainable Products Regulation (ESPR), Regulation (EU) 2024/1781.

The draft Implementing Regulation explicitly includes construction products covered by Article 76 of the Construction Products Regulation (EU) 2024/3110 within its scope (Article 1(1)(c)). This establishes a direct regulatory link between the ESPR-based DPP registry and the construction products sector: manufacturers of windows, doors and curtain walling will be required to register digital product passports in the registry established under the ESPR framework, even though the underlying obligation originates from the CPR.

EuroWindowor would like to draw attention to the **need for coherent timing between this implementing act and the development of harmonised technical specifications under the CPR**. The DPP data requirements for construction products will be defined in the harmonised standards currently under development. This Implementing Regulation should ensure that the DPP registry and its data models are operationally ready and tested before sector-specific DPP obligations take effect, and that no registration obligations arise before the relevant data scope has been defined through harmonised standards.

It is essential to highlight that the European window, door and curtain walling manufacturing is **almost exclusively composed of small and medium-sized enterprises (SMEs)**. The vast majority of manufacturers are small craft businesses, often with fewer than 10 employees, limited IT infrastructure and no dedicated digitalisation departments. Any obligation arising from this Implementing Regulation will directly and significantly affect these SMEs. While SMEs are disproportionately affected, it should be noted that many of the challenges identified in this feedback apply to all economic operators regardless of size, including the larger manufacturers in the sector as well as component suppliers. The proposed solutions should therefore be designed to benefit all economic operators.

While EuroWindowor supports the overall objectives of transparency, sustainability and circular economy as pursued by the DPP, we identify a number of provisions in the draft Implementing Regulation that will pose considerable challenges for SMEs. Our comments and corresponding amendment proposals are set out below.

1 Verification requirements are disproportionately complex for manufacturers – including SMEs (Articles 4 and 5)

The draft Regulation requires economic operators to obtain "verified" status through qualified electronic signatures or qualified electronic seals issued by qualified trust service providers in accordance with Regulation (EU) No 910/2014 (eIDAS). For legal persons established in the EU, this means obtaining a qualified electronic seal supported by a qualified certificate, issued by a qualified trust service provider (Article 4(2)(a)).

Practical challenge: Most manufacturers in the window, door and curtain walling sector have never used qualified electronic seals or signatures. Obtaining and maintaining these instruments involves significant cost (~300–800 € per year) and administrative effort (1–2 days), including contracting a qualified trust service provider, managing certificates and ensuring renewal within the three-year verification cycle (Article 4(4)). Many micro-enterprises lack the in-house expertise to navigate these processes.

Another practical challenge is the implications Article 4 has in terms of automating DPP uploads. Given that Article 8 specifies registration at model, batch or item level, automation of registry access and data exchange processes is essential for practical compliance at scale.

Proposed amendment: The Commission should introduce a **simplified verification pathway for SMEs**, for example by allowing verification through existing national business registers or other established identification systems already in use in Member States. Trade associations should be authorised to verify their member companies through a recognised procedure. Where the DPP registry is integrated with existing EU systems such as EPREL that use the same level of verification, double verification should not only be avoided (as stated in Recital 9) but the scope of recognised equivalent systems should be explicitly expanded.

While Recital 9 indicates the Commission's intention that at least one person should always be linked to the registry account for profile management, this requirement is not reflected in a binding operative provision. Article 6 merely provides that verified economic operators 'may delegate access rights to users acting on their behalf' (Article 6(1)), without specifying minimum staffing or organisational requirements for registry accounts. This gap between the recital's intent and the operative articles creates legal uncertainty: it is unclear whether a registry account must be managed by a named natural person, whether it can be managed entirely through automated systems or whether company-level access without a designated individual is permissible. Clarification on this point is needed.

The Commission should clarify and emphasise that automation will be a viable option for compliance, while explicitly outlining the consequences of Article 4 in this regard. Ensuring the availability of automated solutions is essential for facilitating a smooth and efficient implementation of the Digital Product Passport.

Clarification of the scope of 'other verified value chain actors' (Articles 5 and 20)

Articles 5 and 20 introduce obligations for 'value chain actors other than the economic operator', referring to actors such as repairers, refurbishers, remanufacturers and recyclers (Recital 8). However, the draft Regulation does not address the situation where an economic operator voluntarily provides or forwards DPP data for products it incorporates but is not legally required to register — for example, a window manufacturer that chooses to include DPP information for steel profiles or glass units sourced from upstream suppliers.

It must be clarified whether such voluntary data sharing would result in the manufacturer being classified as an 'other verified value chain actor' under Article 5, thereby triggering the verification requirements and liability obligations under Article 20. Without such clarification, manufacturers may refrain from voluntary data sharing altogether, which would undermine the DPP's objective of supply chain transparency and its potential to support circular economy goals.

The Commission should provide clear guidance confirming that economic operators who voluntarily forward or reference DPP data for upstream products do not thereby assume the status and obligations of an 'other verified value chain actor' under Articles 5 and 20.

2 IT security obligations create a disproportionate burden (Article 19(3))

Article 19(3) requires each verified economic operator to implement "appropriate technical and organisational security measures to its IT systems and credentials used to access the registry, to prevent any unauthorised access to or modification of registration data through its IT system". The operator retains full liability even when a third party is authorised to register DPPs on its behalf (Article 19(4)).

Practical challenge: This obligation effectively imposes cybersecurity and IT governance standards also on small manufacturing businesses that typically lack dedicated IT departments. The term "appropriate technical and organisational security measures" is undefined and could be interpreted very broadly, creating legal uncertainty for economic operators. In practice, many

especially small window and door manufacturers rely on basic IT infrastructure and would need to invest disproportionately in security assessments, tools and training.

Proposed amendment: The Regulation should provide **clear and proportionate guidance** on minimum IT security requirements for SMEs, ideally through a Commission-published reference guide. The provision should explicitly state that proportionality to the size and resources of the economic operator shall be taken into account when assessing "appropriateness" of measures. The Commission should consider offering a **centrally managed secure access solution** (for example two-factor authentication via the registry interface) that removes the burden of local IT security measures from the economic operator.

3 API-based registration presupposes digital maturity that SMEs lack (Articles 3(b) and 8(5))

The draft Regulation provides two channels for DPP registration: a secure user interface (website) and an API (Article 8(5)). While the web interface is a welcome alternative to the API, the overall system architecture — including mandatory data structuring according to common data models and semantic definitions from the semantic repository (Article 11) — requires a level of digital competence that goes far beyond the current capabilities of most SMEs in the construction products sector.

Practical challenge: Even using the web interface, manufacturers will need to prepare data in compliance with specific data models, controlled vocabularies and semantic specifications (Article 12). This requires understanding of structured data formats and machine-readable standards that is typically absent in small craft enterprises manufacturing windows and doors.

Proposed amendment: The Commission should develop and provide **free-of-charge, user-friendly data entry tools** (such as guided form-based templates) as part of the secure user interface that translate plain-language product data into the required semantic format automatically. Additionally, the Commission should provide **sector-specific guidance documents and training materials**, developed in close cooperation with industry associations such as EuroWindoor, well in advance of the application date.

Additionally, many data elements required for construction products will already be provided in the Declaration of Performance and Conformity (DoPC) and existing technical documentation under the CPR. The Commission should ensure that data already available through existing regulatory documentation can be referenced or imported into the DPP registry without requiring re-entry, to avoid duplication of effort and potential inconsistencies between different data sources.

4 Registration granularity requirements may be unworkable for made-to-order products (Article 8)

Article 8(2) requires DPP registration at the level (model, batch or item) specified in the relevant Union law. For construction products such as windows, doors and curtain walling, which are overwhelmingly manufactured to order and customised to specific building requirements, neither standard "model" nor "batch" classifications reflect actual production practice. Each product can differ in dimensions, glass specifications, profiles, hardware and performance characteristics.

Practical challenge: If item-level registration is required, Articles 8(3) and 8(4) additionally mandate linking batch and model identifiers where such design exists. For custom-manufactured products, this creates an unreasonable administrative overhead, as each individually configured product would need a separate registration and associated unique identifiers. The volume of registrations could be extremely high relative to the size and turnover of the enterprise.

Proposed amendment: The Regulation should explicitly recognise that **made-to-order and custom construction products** may be registered at model-family, product-type or project level, rather than at individual item level, where the product characteristics are defined by a common type or product family. The provision in Recital 12 acknowledging that "unique products, such as handmade goods" do not require **batch and model identifiers should be extended** to include custom-manufactured construction products.

This challenge is compounded in complex supply chains. Component suppliers — for example hardware manufacturers whose fittings may consist of 20 to 30 individual items — have no information about which specific window or door (batch) their items will be assembled into. The responsibility for linking items to batches and models must therefore rest with the economic operator that assembles the final product, not with the component supplier.

Moreover, parametric product systems that can be configured in millions of variants — varying by dimensions, performance levels, glass specifications and hardware combinations — must be allowed to be registered at model or product-family level. Requiring individual DPPs for each parametric variant would be neither proportionate nor practicable.

5 Proof of registration and account continuity require clarification (Articles 9 and 10(4))

Article 9(1) provides that the verified economic operator shall be able to generate proof of registration 'at any given time', but the proof remains available for only 90 calendar days (Article 9(4)). For construction products with service lives of several decades, this raises practical questions: economic operators may need to regenerate proof of registration long after the initial registration, for example in the context of building permits, insurance claims or product liability cases.

Article 9 leaves unclear the operational modalities for generating proof of registration. The Commission should clarify whether multiple authorised users within the same organisation can access this function, and whether the process of generating proof can be automated — both of which are essential for companies operating with multiple sites or complex organisational structures.

Furthermore, Article 10(4) provides for account deletion when a user is no longer responsible for registry activities. However, the Regulation does not address continuity scenarios that are common in practice: personnel changes, corporate restructuring, mergers and acquisitions, partial sale of business units, or insolvency. In such cases, it must be clear how registry accounts and associated DPP registrations are transferred to a successor entity. For holding companies, it should also be clarified whether a parent company can act as verified economic operator on behalf of its subsidiaries.

Proposed amendment: The Commission should clarify that **proof of registration can be regenerated at any time** during the retention period of the DPP, not limited to the initial 90-day window. The Regulation should also **include provisions for account transfer and succession**, including clear rules for corporate restructuring, mergers and insolvency, to ensure that DPP registration data remains accessible and attributable to a responsible entity at all times.

The Commission should provide the option of registering multiple authorised users per company, as reliance on a single user creates vulnerabilities, particularly in the event of personnel changes. Furthermore, clarification is needed on whether the regulation permits company-level access as opposed to individual user access. Finally, the provisions regarding the automation of processes remain unclear and require further elaboration (see also Comment 1 / Comment 5 regarding the need for automation). These considerations are also relevant for Article 18.

6 Helpdesk availability is insufficient for an EU-wide industry (Article 13)

The helpdesk service is available only during the Commission's working days and "normal working hours". No dedicated multilingual support or industry-specific guidance channels are foreseen.

Practical challenge: economic operators across 27 Member States operate in different languages and time zones. A helpdesk limited to Commission working hours in Brussels, without guaranteed multilingual support, may be inadequate for **economic operators** in the construction sector that encounter technical difficulties during the registration process.

Proposed amendment: The Commission should establish **multilingual helpdesk support** in all official EU languages and consider extending service hours. The Commission should also explore **cooperation agreements with national industry associations and chambers of commerce** to provide first-line technical support at national level, particularly during the initial implementation phase.

7 The DPP should serve as a practical enabler of circular construction (Articles 10, 11, 12, 19)

EuroWindow supports the overall circular economy objectives of the ESPR. Windows, doors and curtain walling are long-lived products with **typical service lives of 30 years or more** and their components — profiles, glass units, hardware, seals — can often be reused or refurbished if the right information is available. The DPP should therefore be viewed not only as a compliance and control tool, but also as a **practical enabler of reuse, refurbishment and second-life use** in circular construction.

However, several provisions of the draft Implementing Regulation create obstacles to this objective or leave critical questions unanswered:

- **Data retention is too short for construction products.**

Article 10(3) provides for automatic deletion of registration data after ten years where Union law does not specify a different duration. Article 75(2)(i) of the CPR (EU) 2024/3110 already extends the availability of the DPP for construction products to 25 years. While this is a significant improvement over the ten-year default, 25 years remains shorter than the typical reference service life of windows and doors, which can exceed 30 years. For the purpose of this implementing act, it is important that **the registry is technically capable of maintaining registration data for at least 25 years**, and that the system architecture does not create obstacles to any future extension of this period in subsequent delegated acts under the CPR.

- **Data models must include reuse-relevant information.**

The data models under Article 11(2) currently reference only data required by ESPR delegated acts and other applicable Union legislation. They do not explicitly foresee circularity-relevant attributes. The Semantic Repository established under Article 12 should include standardised attributes for **disassembly, repairability and reusability** — such as information on reversible connections, replaceable parts, cross-generation compatibility and material composition relevant to reuse.

- **Liability rules discourage reuse.**

Article 19 assigns full responsibility for data accuracy to the registering verified economic operator, including where third parties act on its behalf (Article 19(4)). In reuse scenarios, products may carry older data, may have undergone partial refurbishments or supplier changes. Economic operator that actively support reuse should not face unlimited liability for data they did not originally generate and cannot fully verify after years of product use. The Commission should clarify **liability boundaries in reuse contexts** and consider a "best available information" principle for DPP updates after a product's initial life cycle.

- **Update responsibilities over multiple life cycles are unclear.**

The draft Regulation provides for versioning and logging of data changes (Article 10(2)), but does not address who is responsible for updating DPP information after refurbishment, upgrading or reinstallation — particularly where the original manufacturer may no longer exist. The Commission should develop **clear and realistic rules on update responsibilities**, including guidance on when updates are no longer expected or required.

- **Interlinkages between data models**

Clarification on Article 11's requirement that "all data contained within a digital product passport shall be structured in accordance with the common data models and semantic definitions" is needed. The Commission should clarify the relationship between the common data models under Article 11 and data already provided through the Declaration of Performance and Conformity (DoPC) and existing technical documentation under the CPR. Information should be consolidated to avoid duplication between the registry and companies' existing regulatory documentation.

Proposed amendments:

1. The registry must be technically designed to support retention periods of at least 25 years as required by the CPR, and the system architecture should not create obstacles to any future extension.
2. Article 11(2) should be supplemented with a new point (c) referencing circularity-relevant data, including disassembly instructions, reusability assessments and material composition.
3. Article 19 should be complemented by guidance clarifying liability boundaries where data is used in reuse scenarios, limiting the operator's liability to data it actually provides or modifies.
4. The Commission should publish sector-specific guidance, developed in cooperation with industry associations such as EuroWindow, on update responsibilities across multiple product life cycles.
5. The Commission should consider the technical data that companies are already obliged to provide via DoPC – avoiding duplication of requirements and data exchange is crucial to ensure a proportionate implementation.

8 Conclusion

EuroWindow supports the objectives of the Digital Product Passport and recognises the value of a well-functioning registry for transparency and market surveillance. However, the current draft Implementing Regulation has been designed without sufficient regard for the realities of SME-dominated sectors such as the window, door and curtain walling industry.

We strongly urge the Commission to integrate the principle of proportionality into the operative provisions of this Regulation, to develop practical support tools and guidance tailored to SMEs, and to provide adequate transitional timelines for the construction products sector.

EuroWindow remains available for constructive dialogue and is prepared to support the Commission in developing sector-specific solutions that achieve the objectives of the DPP while remaining practicable for manufacturers.



About EuroWindowor AISBL – EuroWindowor AISBL was founded as an international non-profit Association, in order to represent the interests of the European window, door and facade (curtain walling) sector. Our 20 national associations speak for European window, door and facade manufacturers that are in direct contact with consumers, and thereby having large insights on consumers' demands and expectations. We are at the forefront interacting with dealers, installers and consumers buying windows and doors, and the companies behind the associations cover selling all over Europe.

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