Assent

Faster Intelligence. Stronger Supply Chains.

Your DPP Readiness Timeline



Introduction

If keeping your business on track and ahead of risks is your priority, then the time to start collecting supply chain data for product passport deadlines is now.

Product passports, including Digital Product Passports (DPPs) and Digital Battery Passports, will soon be the standard way manufacturers and distributors are expected to deliver verified supply chain data to customers and regulators. Mandatory requirements are set to begin in 2027, but market-driven customer demands for reliable data are rising now. If your data foundation isn't strong, revenue and relationships are on the line well before formal deadlines even hit your calendar.

Protecting your business, and your bottom line, with DPP readiness requires centralized data management, aligned internal teams, and automation that scales as customer requests accelerate.

Key Dates to Know

Delegated acts for the Ecodesign for Sustainable Products Regulation (ESPR) will specify DPP content based on product groups.

July 2024	ESPR adopted and enters into force
2026	Delegated acts for iron and steel
August 2026	Digital labeling requirements for the Packaging and Packaging Waste Regulation (PPWR) apply (can be used in DPPs)
2027	Delegated acts for aluminum, textiles, and tires, and horizontal measure (repairability scoring) for Information and communications technology (ICT)
February 2027	Digital Battery Passport requirements to take effect
Beyond 2027	Incremental rollout of delegated acts for other product groups

Barriers & Risks

Getting ready for DPPs is especially challenging because of several major factors:

Customer pressure: Early delegated acts can trigger a cascade of customer data requests you aren't prepared to handle, even before formal enforcement occurs.

Data gaps: The supply chain data needed to meet regulatory obligations, like those under ESPR, is often not mapped, validated, or scalable without centralized solutions.

Data siloes and manual programs: Data completeness and reliability suffer if product, part, and supply chain data live in separate manual systems.

Lacking internal alignment: Work related to DPP readiness must be prioritized and resourced appropriately across your organization, with participation from teams like product, quality, compliance, procurement, and IT.

Product design mismatch: Current design timelines don't always support emerging regulatory compliance requirements, increasing the risk of costly redesigns.

Readiness Timeline

This timeline helps you tackle these challenges head-on. It shows recommended steps and the teams responsible, but timelines will vary based on your industry and program maturity.

Phase 1: Strategic Foundation

Your proactive steps to prepare your data, compliance, and organizational infrastructure before product rules are finalized.

TEAMS: EXECUTIVE LEADERSHIP, LEGAL, SUSTAINABILITY

Step 0: Organizational Alignment & Sponsorship

- Host internal workshops educating teams on ESPR/DPP requirements, expected customer demand, and non-compliance risk.
- Formalize executive sponsorship and establish a cross-functional task force (R&D, IT, legal, procurement) to break down departmental silos.

TEAMS: IT, PROCUREMENT, QUALITY MANAGEMENT, ASSENT

Step 1: Prep Your Data Infrastructure

- Work with Assent to centralize existing material data.
  - Recycled content
  - SVHCs
  - SCIP notifications
  - Substances of concern (SOCs)
- Extract relevant data from product reports, material specifications, and FMDs.

TEAMS: COMPLIANCE, PRODUCT R&D

Step 2: Gap Analysis

- Audit existing technical files against ESPR framework requirements (e.g., recycled content, carbon footprint, SOCs) and relevant methodology studies.
- Designate internal data stewards responsible for closing gaps.

TEAMS: PRODUCT R&D

Step 3: Design for Compliance & Circularity

- Integrate Design for Disassembly and Material Substitution strategies (removing hazardous substances), and/or technical justifications if no alternatives are available, into current product roadmaps.
- Review product longevity, repairability, and remanufacturing potential against anticipated ESPR category requirements.
- Review product design life cycles both for timing and impact on innovation quota.
- Establish the means necessary for EU unique product identifier (UID) scheme mapping against your namespace(s).

Phase 2: Regulatory Execution

These steps focus on specific compliance and the actual passport launch.

COMPLIANCE, QUALITY MANAGEMENT, TEST LABS

Step 4: Compliance & Conformity

- Conduct formal conformity assessments based on the delegated act for your product category.
- Update technical documentation and draft the EU Declaration of Conformity.
- The draft will reveal any missing information.

IT, DATA, ASSENT

Step 5: DPP Orchestration & Hosting

- Work with Assent to create your DPP with audit-ready supply chain data.
- Define access levels (consumer vs. recycler vs. regulator).
- Finalize hosting and designated backup provider, UIDs and mapping, and backup protocols.

MARKETING OPS, SALES, EXPORT

Step 6: Labeling & Market Entry

- Affix the data carrier (QR code, NFC, or RFID) and the CE marking to the product/packaging.
- Ensure DPP is live in the EU registry before placing the product on the market.

Build a Solid Data Foundation With Assent

DPPs are more than just compliance paperwork. They enable transparent, verifiable product claims, help you build strong relationships with your customers, and unlock continued market access.

Start now to build a centralized, audit-ready data foundation with Assent that will scale alongside increasing requirements and help you overcome barriers to DPP readiness. We automate your supply chain data management and supplier engagement, and help you navigate regulatory changes with guidance from our team of experts.

See how we help you protect your business and get ready to create DPPs that are accurate, verifiable, and market-ready.

Contact Us

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