



Euroconsumers' Feedback on Commission Draft Implementing Regulation on the Digital Product Passport Registry

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Euroconsumers¹ welcomes the opportunity to provide feedback on the **Draft Implementing Regulation for the Digital Product Passport Registry**. Together with our members in Belgium, Italy, Spain, Portugal, Poland, and Brazil, we support the objectives of the registry and the technical foundations laid by this draft. Supported by our work on the CIRCTHREAD project, we wish to highlight two aspects where we believe the draft legislation could be strengthened, for the benefit of consumers and traders.

Data Quality Assurance: Validation, Verification, and Third-Party Certification

Article 8(6) limits the Commission's automatic verification to formal checks only: the existence of mandatory fields, semantic conformity, correct granularity level, and validity of electronic signatures. While this provides a necessary foundation, it is insufficient to underpin **a credible data quality system**.

These provisions establish a **formal validation regime**. They confirm that data is present, correctly structured, and properly signed. They say nothing about whether the data is accurate. There is no provision for accuracy spot-checks or audits, no third-party verification mechanism, no certification scheme for high-risk or high-volume registrants, and no liability framework for inaccurate or misleading submissions that falls short of the "fraudulent use" threshold addressed in Article 17.

This gap matters because the registry is the **authoritative record** on which the entire DPP system depends. A registry that validates format but not content will accumulate compliant-looking, but substantively unreliable data, and the downstream actors who most need to rely on it will disengage.

Euroconsumers' consumer research of over 5,600 respondents across Belgium, Italy, Portugal, and Spain), conducted under the **CIRCTHREAD project**, clearly illustrates the stakes². Energy consumption, expected lifespan, and ease of repair consistently rank as consumers' most vital information needs at the point of purchase. Yet only 15–20% of consumers report feeling well informed when dealing with product breakdowns, and only 22–32% when facing end-of-life decisions. These are the lifecycle phases the DPP is designed to address. These figures suggest that the value of the DPP system will be judged by consumers not on its formal completeness, but on the **accuracy and practical usefulness of the information** it contains. A registry that passes semantic validation but permits inaccurate substantive data will fail to close the information gaps consumers identify as most critical.

The same research also highlights that consumer participation is conditional on trust. Over 60% of respondents are willing to contribute information, such as reporting breakdowns,

¹ <https://www.euroconsumers.org/>

² <https://circthread.com/download/deliverable-3-3-product-circular-design-decisions-framework-overview-and-technical-description/>

repairs, or end-of-use events, but only where clear benefits are provided. Around 63% of Spanish respondents would register in such a platform only if their data is anonymised, and more than 50% cite privacy concerns as a primary barrier to engagement. These findings reinforce the importance of **robust data protection safeguards**, but they also point to a broader dynamic: consumer trust in the DPP system as a whole depends on confidence that the data it contains is reliable. A system perceived to host unverified or potentially misleading product information will struggle to achieve the participation rates on which its value depends.

Against this backdrop, the draft regulation contains a material gap. Article 19 places responsibility for accuracy on the economic operator but provides **no enforcement mechanism or incentive structure** to give that obligation practical effect. There is no provision for accuracy verification, no third-party audit mechanism, no certification scheme, and no liability framework for the submission of inaccurate or misleading data.

We therefore recommend that the regulation should establish a **legal basis for accuracy verification mechanisms beyond the formal checks in Article 8(6)**. These could include spot-checks or audits, third-party certification for high-volume registrants, and proportionate liability for inaccurate submissions.

The DPP system's ultimate success will not be measured by the sophistication of its technical infrastructure, but by whether it delivers **meaningful, trustworthy product information** to the people who need it most.

Consumers are not simply the end recipients of that information — **they are the principal drivers of DPP uptake** and, as our research demonstrates, **active potential contributors to the data ecosystem** the system depends on. Their engagement will determine whether the DPP becomes a genuinely transformative tool. As the Commission continues to build out the DPP framework, we urge it to keep the consumer perspective central: not as an afterthought to be addressed once the infrastructure is in place, but as a design principle embedded from the start.

Euroconsumers stands ready to provide further evidence to support the Commission's work on this regulation and the associated delegated acts.



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