CIRPASS-2

IDEAS FOR REDUCING THE REPORTING BURDEN USING THE DPP

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Policy context and motivation for this report

- The Ecodesign for Sustainable Products Regulation (ESPR)
  - Introduction of mandatory DPPs for a wide range of products
- Green Deal Industrial Plan
  - DPPs are also positioned as key enablers of the EU's transition to a Net-Zero Industry, as outlined in the.
- eCommerce Communication
  - DPP also considered in the context of addressing eCommerce challenges
- Competitiveness Compact
  - target of cutting regulatory and administrative burdens for businesses
- Omnibus proposal

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IDEAS FOR REDUCING THE REPORTING BURDEN USING THE DPP

DPP

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Burden Reduction

CIRPASS 2 Consultation

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Methodology

- Goal of the consultation
  - Ideas for reporting burden reduction usen the DPP
- CIRPASS-2 consultation
  - Experts from CIRPASS-2 Expert Working Groups (EWGs) and Community of Practice (CoP)
- Period
  - December 2024- February 2025
- Responses
  - 45 responses from representatives of 40 organizations.
- Analysis of the responses
  - 84 consolidated topics derived from the inputs
  - Topics groups in 10 high-level categories
- Focus on a quick-scan analysis
  - Further in-depth analysis on some of the themes→ for additional follow-up analysis and research

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Report structure

IDEAS FOR REDUCING THE REPORTING BURDEN USING THE DPP

Part 1
Burden reduction and facilitation efforts in an international context

Part 2
Results from the consultation
- The 10 high-level categories
- Zoom-in on detected topics per category
- Challenges

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Burden reduction and facilitation efforts in an international context

- International efforts on burden reduction and trade facilitation
  - Trade Facilitation by global organizations such as the World Customs Organization and the World Trade Organization, DG-TAXUD of the European Commission
  - Efforts for decades as digitalization is seen as a key enabler for global trade facilitation efforts in this direction have been going on for decades.
    - *Single Window*
    - *Coordinated Border Management*.

- Other developments
  - The UN/CEFACT Global Trust Registry Project
  - A related project, VC4Trade, will be launched in collaboration with ICC to publish a suite of Verifiable Credential (VC) schema and context files for 36 documents commonly used in trade.

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Results from the consultation
Overview of the High-Level categories

No	HIGH-LEVEL CATEGORIES
I	ONE SOURCE CONSOLIDATED DATA SET
II	AUTOMATED REPORTING/QUERYING
III	AUTOMATED INTERNAL COMPLIANCE CHECKING
IV	STREAMLINING CROSS-REGULATION AND CROSS-JURISDICTION COMPLIANCE
V	DATA ACCURACY/ UPDATES/QUALITY
VI	PROCESS OF ACHIEVING SIMPLIFICATION OF REPORTING
VII	STANDARDIZATION
VIII	MACHINE-READABLE DATA
IX	EXTENDING DPP TO INCLUDE SUB-COMPONENT TRACKING DATA
X	CROSS-ORGANIZATIONAL COORDINATION (e.g., across supply and value chains)

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One source consolidated data set

	I. ONE SOURCE CONSOLIDATED DATA SET
1	One stop place for digital sustainability data
2	Centralized data repository and singe source of truth
10	Expanding benefits to stakeholders
15	Lifecycle and Circular Economy Data Sharing
18	enter information only once
19	DPP consolidating all necessary data for reporting
27	Facilitation of Traceability
29	Improvement of Transparency and Communication
32	Tagging data to reporting requirements and ingesting data once
39	Replace Multiple Systems: Position the DPP as a single, unified tool that replaces the fragmented systems companies currently use for regulatory, sustainability, and quality reporting.
43	Managing CE certifications via one integrated digital system, including all the way to the notified bodies, is far more efficient than paper based approaches as still standard in most EU MS
54	Reduce the digital complexity of data residing in multiple systems using aligned ontologies and upper ontologies

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Automated reporting/ querying

	II. AUTOMATED REPORTING/QUERYING
3	Automated reporting based on data integrated in the DPP
5	Reduced risk of errors and non-compliance (through the DPP automates data entry to EU central registry)
7	A unified platform for reporting (simplifying multi-jurisdiction reporting)
20	single extraction process (and guidance based on consensus)
33	Reports based on tagged system and central pool of data
34	Validation of commercial claims [ecolabeling] by checking compliance to traceability standards (through using certification from certification authority (CA) and transaction certificate (TC). Specialized exclusively for products that meet recognized traceability standards (GRS, ICS, GOTS)

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Streamlining cross-regulation and cross-jurisdiction compliance

11	Automated Linkage to Global Reporting Frameworks (e.g. Ellen MacArthur Foundation (EMF) Plastics Pact reporting criteria, Carbon Disclosure Project (CDP)- voluntary but aligned with EU's Corporate Sustainability Reporting Directive (CSRD)
12	Integrating Circularity Indicators and Metrics (integrated in DPP) to facilitate product-specific circularity evaluations- e.g. ISO 59020; Material Circularity Indicator (MCI) or Circular Transition Indicators (CTI)
13	Streamlining Cross-Regulation Reporting
14	Interoperability Across Jurisdictions
15	Lifecycle and Circular Economy Data Sharing
21	DPP ability to integrate seamlessly with both national and European control systems
31	Enhancing Compliance with Sustainable Financial Reporting Using the DPP via -Automated ESG Data Integration required by CSRD and Taxonomy Regulation -Alignment with the EU Taxonomy for --Sustainable Activities -Transparency Across Value Chains (e.g. Scope 3 emissions) -Real-Time Stakeholder Reporting -Interoperability with Global Standards (e.g. GRI, SASB, TCFD), ISO 59040
34	Validation of commercial claims [ecolabeling] by checking compliance to traceability standards (through using certification from certification authority (CA) and transaction certificate (TC). Specialized exclusively for products that meet recognized traceability standards (GRS, ICS, GOTS)
35	Validation of commercial claims (for recycled and organic products) is granted when compiling with recognized CoC standards, certified standards backed by audits (GRS,RCS, OCS, GOTS), relying on audits of independent CAs. These standards verify environmental sustainability but also working conditions.

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Data accuracy/ updates/ quality

8	Supported by advanced technologies for data verification, data integrity and real-time monitoring
9	Manufacturer responsibilities (about engagement of suppliers including conduct, selection, audits, data arrangements)
22	Machine learning and AI linked to DPP to enhance efficiency, validation of data, identify errors, to improve processes and circularity index
24	Continuously manufactured semi-finished products, such as steel or aluminium strips, should be provided with continuous coding over their entire length
25	Material coding, including concerns for high speed processing and readability (human/machine/OCR) and retrieval of data (REST API)
26	Allowing for additional information in DPP for semi-finished products to increase value added
36	Brands can use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data

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Challenges

	Challenges
C1	The effort to develop a single tool to record all the data would be too expensive (due to variation of products, customers, production plants, suppliers, access to ingredients data).
C2	Difficult to integrate data in a common server (CSRD and EUDR some info not linked to product (HR data)
C3	Difficulty on avoiding company level calculation due to reliability and granularity issue of the data sets (e.g. CO2 primary data)
C4	While there are for sure a few possibilities for the DPP to reduce the reporting burden from existing policies and standards, DPP must not become a reporting burden itself
C5	In discussions with the market and companies there is currently a strong focus and impression of the DPP as the next "supply chain transparency reporting tool. But the goal and success of DPP is to enable circular business models to reach climate goals and increase profitability.
C6	Many people focus on what data should everyone report in DPP and long lists. But discussion should be more focussed on what we really need for the R strategies.
C7	Many companies just ask for "DPP reporting compliance". This would generate billions of DPPs ending up "in the drawer" and creating additional energy waste.
C8	Instead of making the DPP even more complex and confusing for companies now by moving existing reporting policies into the DPP and thus overloading it, let's first make sure the DPP itself is limited to the minimum of data reporting and fully focused on impact for the circular economy.

Extract from the challenges table of the report

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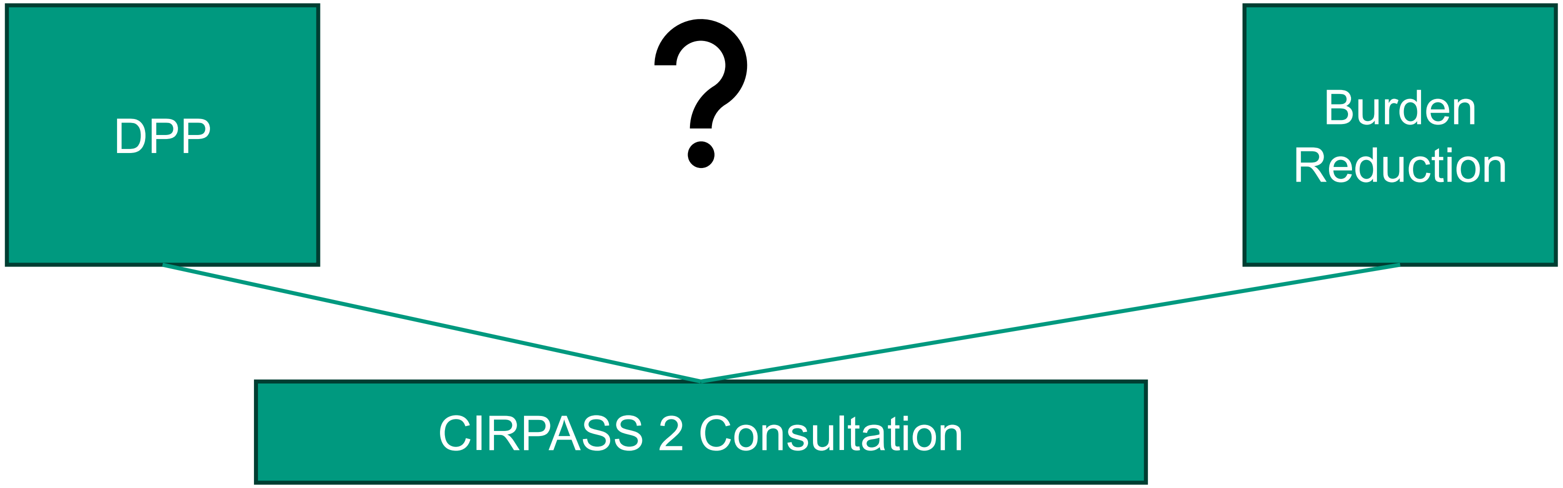

Opportunities

No	HIGH-LEVEL CATEGORIES
I	ONE SOURCE CONSOLIDATED DATA SET
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Challenges

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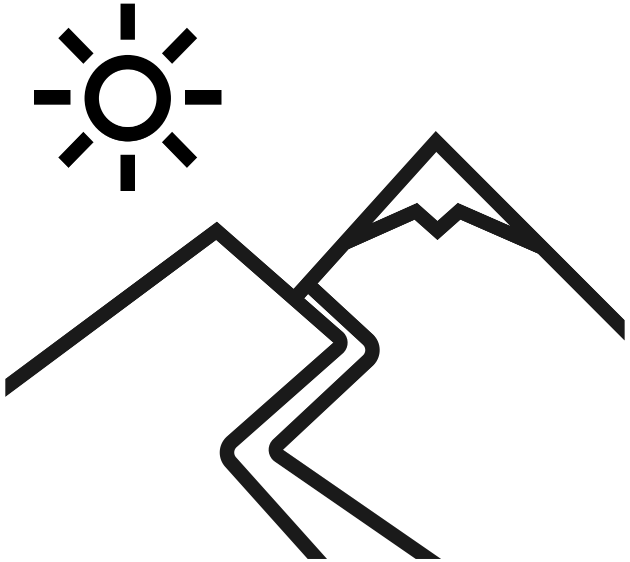
DPP and burden reduction- what next?

CIRPASS 2
Digital Product Passport

- This report- quick scan and first attempt to identify relevant themes
- This report should not be seen as an end result but as a beginning of a conversation about this important topic.



Follow-up paper- ISM'2025 Conference

Chawla, K. Rukanova, B., Dao, A., Tan, Y.H. Bernier, C. (2025). Digital Product Passport and Administrative Burden Reduction: Potential for Streamlining Cross-legislative and Cross-jurisdiction Compliance. Proceedings of ISM'2025 (forthcoming)

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