

SME-focused consultations in support of DPP adoption

Sophie Charpentier – Chalmers Industriteknik

09/10/2025

Objectives

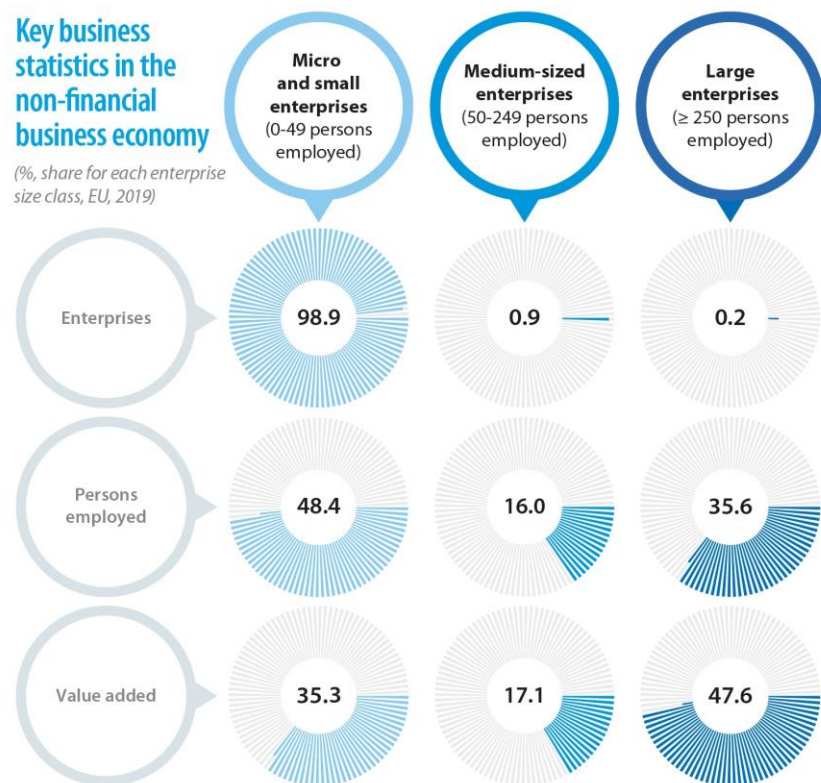
- 1 Identify **challenges and opportunities** for SMEs
 - Keep up with the **regulatory context**
 - **Issue and maintain DPPs** for their products
 - **Use and update issued DPPs** in downstream value chain
- 2 Explore how **DPP-as-a-Service providers (DPPaaS providers)** can support SMEs in their uptake of DPPs
- 3 Provide a list of **recommendations** to **policy makers**
- 4 Develop dedicated **communication** and **training materials**

Core Objective 3 of CIRPASS-2

Empower SMEs in
their uptake of
DPPs

Why focusing on Small and Medium-sized Enterprises (SMEs) ?

99.8% of European companies are SMEs



EU: estimates made for the purpose of the Key Figures on European business publication.

ec.europa.eu/eurostat

ESPR Regulation, Chapter V, article 22

SMEs, particularly micro-enterprises, require tailored support such as guidance, digital tools, and access to resources, to effectively comply with the Regulation and integrate sustainability into their value chains.

Small and medium-sized enterprises

1. In the context of programmes from which **SMEs, in particular micro-enterprises**, can benefit, the Commission shall **make sure there are** initiatives which help **those enterprises** to integrate environmental sustainability including energy efficiency in their value chain.
2. When adopting delegated acts pursuant to Article 4 the Commission shall, where appropriate, accompany those acts with **digital tools, such as for life cycle assessment calculation, and** guidelines, covering specificities of SMEs, **in particular micro-enterprises**, active in the product or product group sector affected for facilitating the application of this Regulation by **those enterprises**. **The Commission shall consult SMEs representative organisations in the drafting of the guidelines.**

Member States shall take appropriate measures to help SMEs, **in particular micro-enterprises**, apply ecodesign requirements set out in delegated acts adopted pursuant to Article 4. **Member States shall consult organisations that represent SMEs on the kind of measures SMEs consider useful.**

Those measures shall at least include ensuring the availability of one-stop shops or similar mechanisms to raise awareness and create networking opportunities for SMEs, **in particular micro-enterprises**, to adapt to requirements.

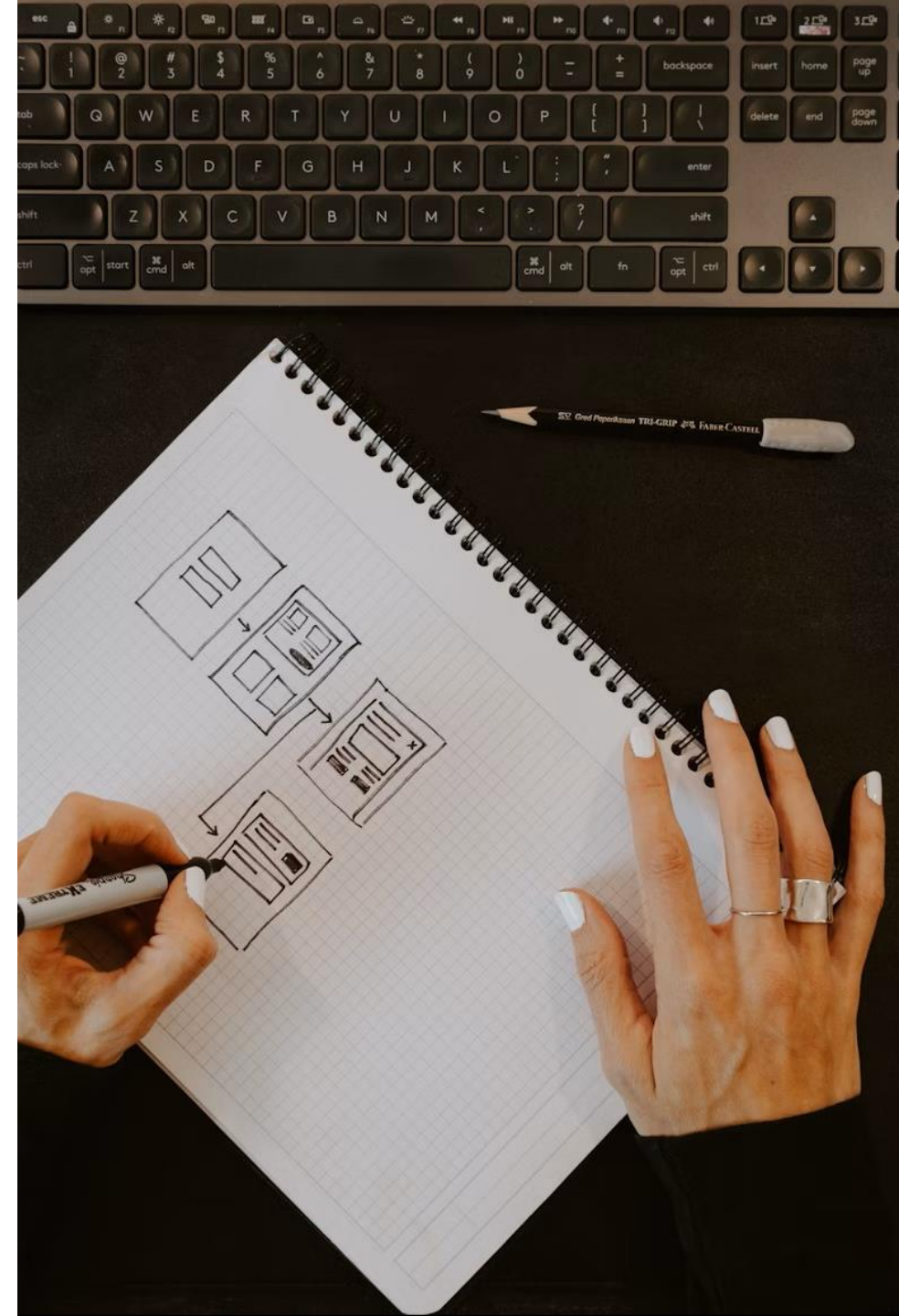
In addition, without prejudice to applicable State aid rules, such measures may include:

- (a) financial support, including by giving fiscal advantages and providing physical and digital infrastructure investments;
- (b) access to finance;
- (c) specialised management and staff training;
- (d) organisational and technical assistance

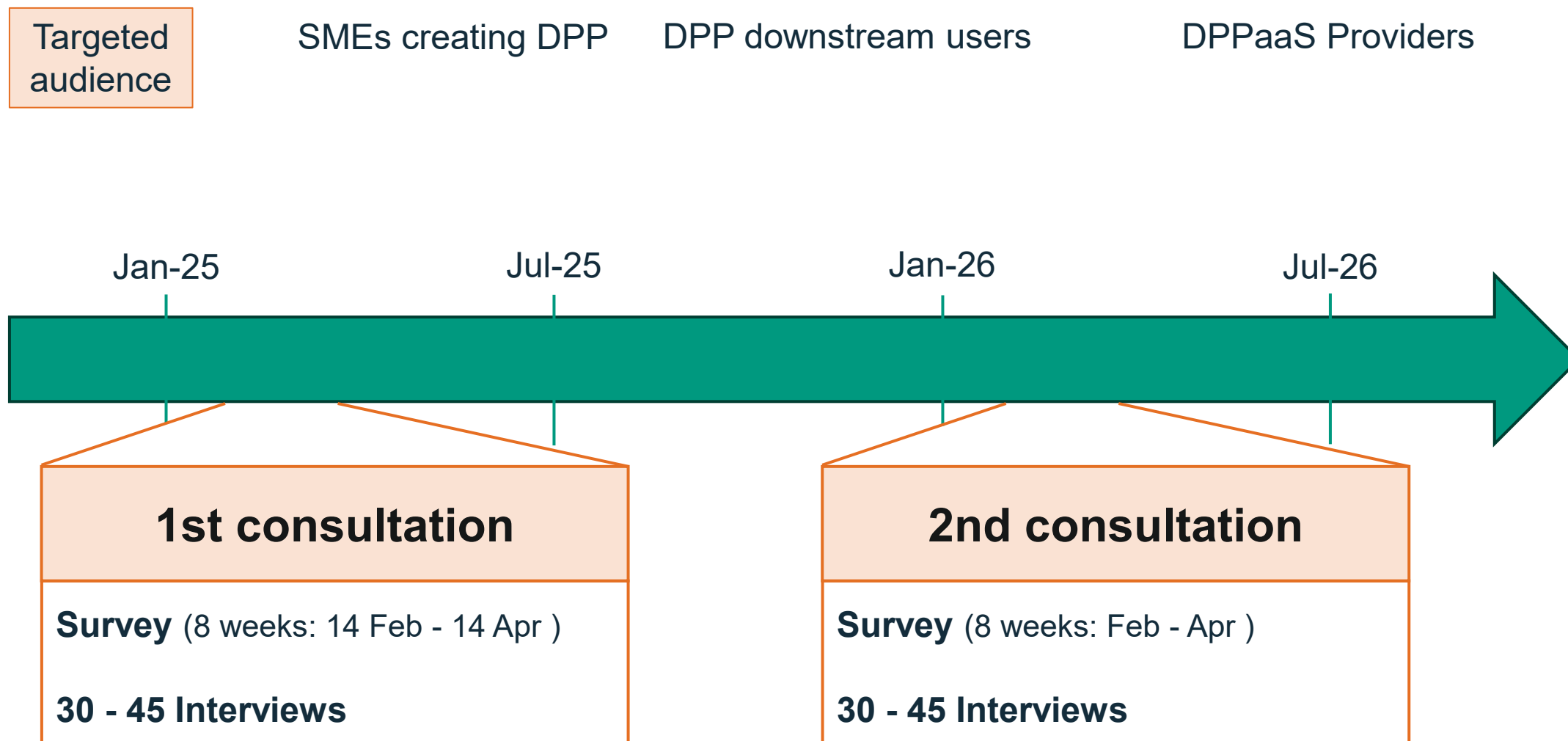
Methodology



- Leverage **inputs from SMEs / DPPaaS providers** in the Expert Working Groups of WP2 and **pilots** in WP3
- Run **2 consultations** sent to a large number of SMEs to:
 - clarify what they perceive as specific challenges and opportunities
 - validate the recommendations
- Hold **interviews/workshops** with the **3 types of stakeholders** (DPP creators, downstreams users and DPPaaS providers | about 50 SMEs) in the value chain to get more in-depth understanding of the key challenges and opportunities



Consultation timeline



Consultation outreach strategy

- **The consultation was distributed to two main stakeholder pools:**
 - CIRPASS-2 Community, including:
 - Companies involved in pilot projects (WP3)
 - Members of Expert Working Groups and the Community of Practice
 - Broader CIRPASS-2 contact lists / LinkedIn
 - External Stakeholders:
 - Identified via WP5 and CIRPASS-2 partner networks
 - Including contacts with limited DPP experience, such as national trade associations via Digital Europe's network

Key Insights from SMEs Responses



■ Low Engagement

- Low response rate of DPP creators and users, and mostly from SMEs engaged in circular economy or transparency initiatives
- “Wait and see” attitude dominates due to regulatory uncertainty and priority given to current business
- Most engaged respondents are service providers—see DPP as a strong business opportunity.

■ Limited Awareness of Regulation

- DPP creators are often unaware of evolving EU regulations
- Information comes mainly from trade associations (except for those participating in DPP-projects)
- DPPaaS providers are well-informed and often involved in regulatory and standardization efforts.



Key Insights from SMEs Responses (cont'd)



■ Key perceived Challenges

- **For DPP creators:** High cost of standardized data acquisition across the value chain and lack of internal resources - reliance on external providers
- **Data gap:** Low willingness to share product design data (detailed composition and disassembly) perceived as confidential and costly whereas key for recyclability and reparability
- **SMEs have no centralized IT system:** data spread over multiple IT systems incl. Excel. Potential integration problem to access data for DPPaaS Providers.
- **For DPP downstream users:** costs & effort, technical barriers (automation is not widespread, but would be necessary to benefit from DPP), lack of practical relevance for small products

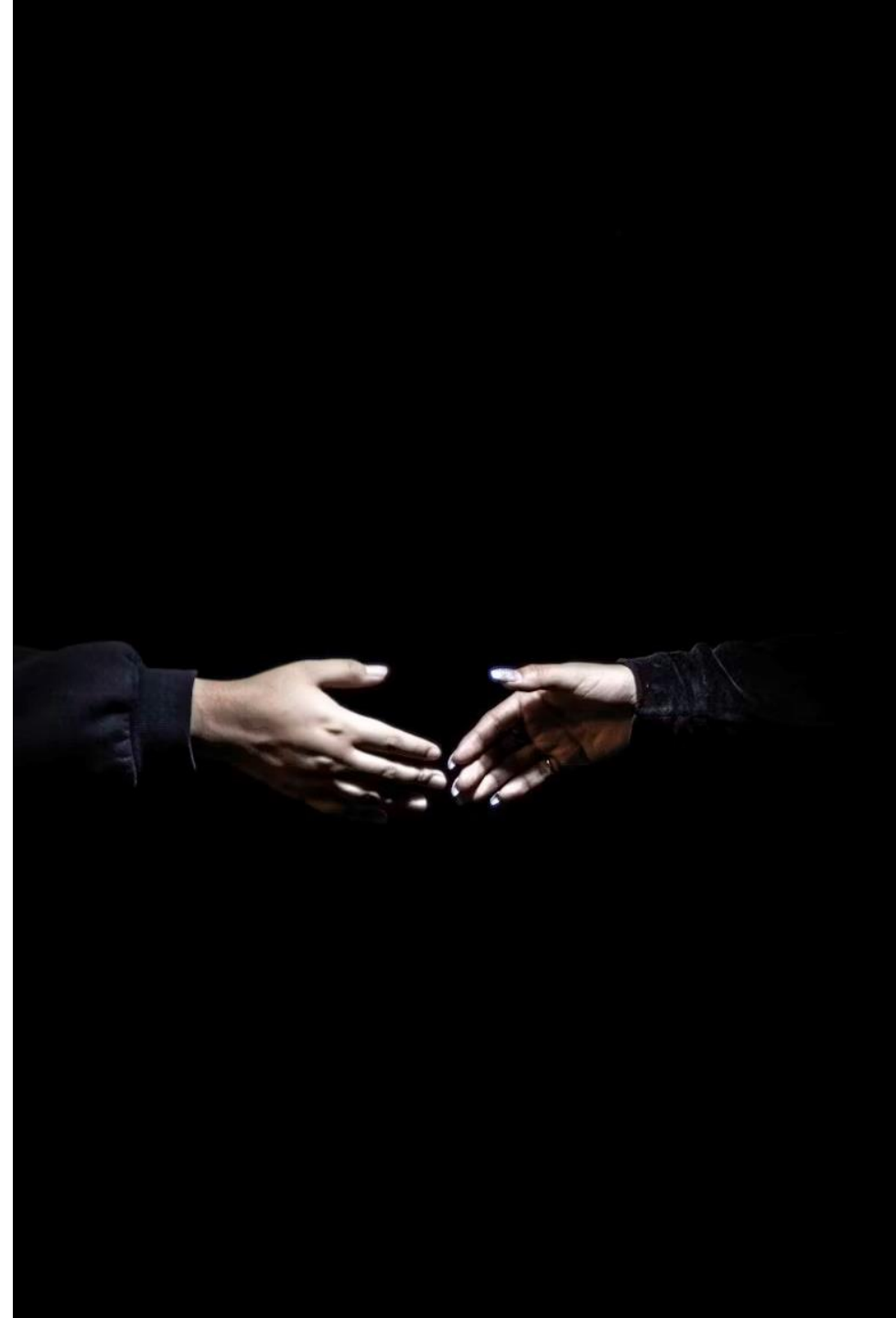


Key Insights from SMEs Responses (cont'd)



■ Key foreseen Benefits

- **No strong trend** in terms of perceived benefits
- **For DPP creators:** compliance, new business models and improved product design
- **For maintenance users:** (faster) access to information on material composition as well as repair and spare part information
- None of the recycling companies interviewed (except in the automotive sector) see major benefits in the DPP, mainly because they work at large scale rather than on individual products.



Key Insights from SMEs Responses (cont'd)



■ Market Misalignment

- **Maturity gap** - significant disconnect between the maturity of DPP creators/users and the capabilities/focus of DPPaaS providers
- Few service providers currently offer targeted support for DPP data acquisition and product marking/UID



Next steps – Consultation 2

- **Identification of interesting Lead User Cases for each type of actors**

- Analysis of the journey of SMEs already operating in the market
- Help to elaborate relevant and specific questions (survey/interviews)
- Focus on economic value, market-ready solutions and real SME cases
- Lead User Cases will be one of the sources for the elaboration of questions

- **Focus**

- Get a better understanding of challenges/opportunities faced by actors for DPP set-up and use

- **Goal**

- **Targeted questions** for Consultation 2 to **validate** recommendations

Thank you!

www.cirpass2.eu

Contact us : info@cirpass2.eu

 [@cirpass2-dpp](#)

 [@cirpass2_dpp](#)

 [@cirpass2_dpp](#)