

DPP 2026: the ESPR compliance checklist in 10 steps for EU companies

What you actually need to be ready for the Digital Product Passport before the ESPR deadlines. No jargon, no endless manual audits.

WHO IT'S FOR

Heads of Sustainability, Supply Chain Managers, Compliance Officers in manufacturing, fashion, food & beverage and automotive across the EU.

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Context in 60 seconds

The ESPR (Ecodesign for Sustainable Products Regulation) has been in force since 2024. It makes the Digital Product Passport mandatory in phases from 2027, category by category. Textiles are among the first.

A DPP is not a QR you generate once. It is a structured, verifiable record that follows a product through its whole life: materials, suppliers, repairability, substances of concern, end of life. The data carrier (QR or NFC) is the easy part. The data behind it is the work.

What you lose if you are not ready:

- Exclusion from EU public and private tenders that already list the DPP in their specs.
- Longer, costlier audits, because the data is scattered and unverified.
- Goods held at customs when the passport is missing or incomplete.

The brands that start the data work now will have a passport. The others will have a deadline.

The 10-step checklist

For each step: one "why it matters" line + one "Ask yourself" box.

Step 1 — Map the product categories under ESPR and their estimated deadline

Why it matters: you cannot plan the work until you know which of your products fall under the regulation first and roughly when. Indicative timeline from the ESPR Working Plan 2025-2030 (COM(2025) 187, adopted 16 April 2025): iron & steel delegated act ~2026 (compliance ~2028); textiles & apparel, tyres and aluminium ~2027 (compliance ~2029); furniture & mattresses ~2027-2028; electronics/ICT and construction products ~2028 onward (compliance toward 2030). Two fixed dates are already legal: the EU DPP Registry must be operational by 19 July 2026, and the same date brings the ban on destroying unsold textiles for large companies. Batteries run on a separate track (Battery Regulation EU 2023/1542): the battery passport is mandatory from 18 February 2027. The per-category dates are indicative, real compliance starts only after each delegated act is adopted plus an 18-36 month transition, so treat any category without an adopted act as "in phases from 2027". Ask yourself: which of my product lines is most likely to be in the first wave, and what is its realistic deadline?

Step 2 — Name the internal "DPP owner"

Why it matters: a passport with no owner is data nobody keeps current. One person has to be accountable for the DPP across functions, not a committee that meets quarterly. Ask yourself: if an auditor asked for our DPP data today, whose name would the company give?

Step 3 — Inventory the product data you have vs what is missing

Why it matters: most of the gap is invisible until you list it. You cannot collect what you have not first declared missing. Ask yourself: of the fields a DPP requires, what share can we already prove with a document today?

Step 4 — Map critical suppliers and their current documentation level

Why it matters: a large part of DPP data lives upstream, in suppliers you do not fully control. Mapping who can document what is the longest pole in the project. Ask yourself: which suppliers would block our passport because they cannot yet provide verified data?

Step 5 — Verify material traceability (origin, % recycled, substances)

Why it matters: recycled content and substances of concern are exactly the fields auditors and customs check first, and exactly the ones brands tend to estimate rather than prove. Ask yourself: can we trace our main material back to its origin with evidence, not a supplier claim?

Step 6 — Define the passport data carrier (QR or NFC) and where it lives

Why it matters: the carrier has to survive the product's life and bind to one item, not one SKU. A sticker that falls off or a code anyone can copy is not a passport. Ask yourself: will our data carrier still be readable, and still prove authenticity, years from now?

Step 7 — Align data to sustainability, repairability and end of life

Why it matters: the DPP is meant to drive circularity, so these fields are not optional extras. They are graded, and increasingly part of tender scoring. Ask yourself: can a buyer see how to repair, reuse or recycle our product straight from its passport?

Step 8 — Set a data update process (the DPP is alive, not static)

Why it matters: a passport frozen at launch is wrong within a season. Suppliers change, formulas change, recall status changes. The process to keep it current is the real deliverable. Ask yourself: when a supplier or a material changes, how fast does our passport reflect it?

Step 9 — Prepare provability for audits and tenders (who sees what)

Why it matters: compliance is not having the data, it is being able to show the right slice to the right party on demand, without exposing what they should not see. Ask yourself: could we hand an auditor a verifiable view in minutes, not weeks?

Step 10 — Set internal milestones with 12 to 18 months of margin

Why it matters: mapping suppliers and cleaning data takes 12 to 18 months done properly. Working backward from the deadline is the only plan that survives contact with a real supply chain. Ask yourself: counting back from our first deadline, should the data work already have started?

Mistake #1 to avoid

Treating the DPP as a one-off IT project instead of a continuous data process.

A QR code generated once, bolted on the week before an audit, is the most expensive version of compliance: it looks done, then fails the first time the data is checked or the product changes. The passport is alive. The companies that win treat it as an ongoing process with an owner, a data pipeline and a way to prove authenticity, not a file they ship and forget.

Next step

You do not have to build this alone. Junction automates steps 3 to 9: it collects and enriches product and supplier data, generates the ESPR-compliant passport and keeps it current, and binds one code per product (QR or NFC) that works as both a passport and a certificate of authenticity.

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