



# Ecodesign Forum Expert Group Meeting



19 March 2025

# Ground rules for the meeting

The meeting will be recorded



## Q&A sessions

**Use the Q&A module**  
*(located in 3-dot menu in the bottom right corner of Webex)*  
to ask your questions



## Unanswered question?

If your question was not addressed during the session, there will be an **open floor for questions** at the end of the meeting. The team will also take note of any remaining questions.



## Technical difficulties?

If you have technical issues with WebEx, please submit your questions in writing to the **Host** of the meeting (privately) by using the WebEx chat.

# Today's Agenda



1. Opening
2. Important highlights of recent Digital Product Passport (DPP) policy developments
3. Ecodesign for Sustainable Products Regulation (ESPR)
4. DPP updates in the Construction sector
5. DPP updates in the Textile, Clothing, Leather and Footwear
6. DPP updates in the Iron & Steel sector
7. Harmonized Guarantee Label & Notice new obligations under the Empowering Consumers Directive
8. Final Remarks

# Opening

**DG GROW, Director of Directorate G – Jakub Boratynski**

# Important highlights of recent Digital Product Passport (DPP) policy development

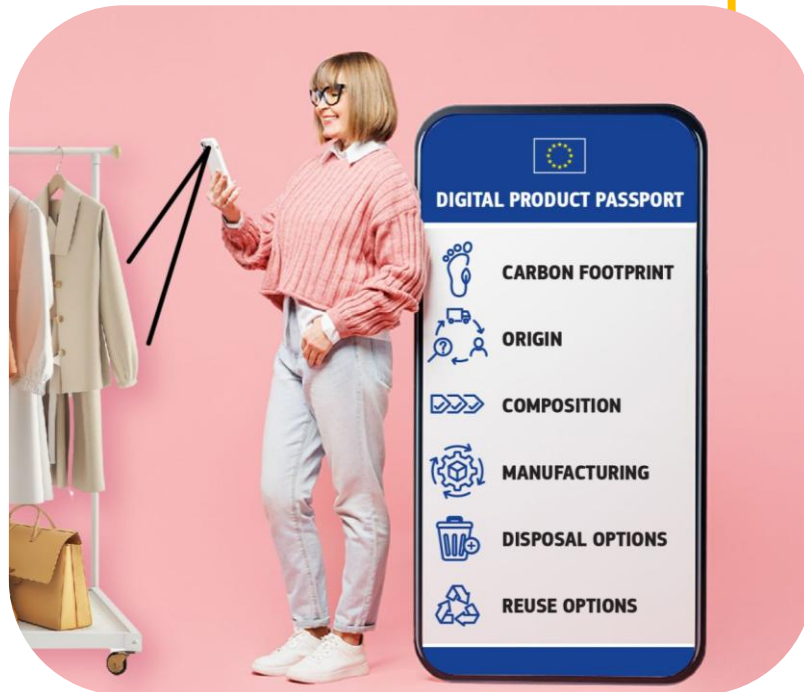
DG GROW, Unit G.2 – Alexandru ION and Hettel VARIK

DG GROW, Unit H.4 - Orsolya DELI-VIDACS and Gian Franco CHIANALE



# *Digital Product Passport state of play – Legal and IT developments*

# Digital Product Passport



A **Digital Product Passport (DPP)** is a digital container of product specific information.

It serves as a digital identity for the product, enabling traceability and transparency throughout its value chain.

# How does it work?



DPP is accessible via a **data carrier** and supported by **technical systems** (web-portal; registry).

DPP data is **product-group specific** (toys, textiles, detergents etc.) and defined through **secondary legislation** processes.

# DPP can contain different types of information:



# Benefits for consumers, businesses and public authorities



## *Consumers*

- **Removal of paper-based instructions** of use by adding them in a digital format in the DPP
- Access to clear, verified data (origin, materials, sustainability) to **compare products** and supporting circular behaviour
- Access additional services related to the products they plan to buy or already own – **instructions of use, repair or maintenance information, accessories information**
- Increase the trust in the **authenticity of products**



## *Businesses*

- Full **traceability of components** and materials to support sustainability reporting and claims
- Centralised digital product data that leads to the **simplification of reporting processes**
- **Digitalise paper-based information**, like instruction of use, allowing for **reducing the costs of printing, shipping and storing** these documents
- Enabling **new business models** by offering customers connected services via the DPP (repair, maintenance, accessories, etc.)
- Enhance the **detection of counterfeiting cases** based on the DPP data usage.



## *Public Authorities*

- Increasingly automated **verification of compliance** using standardised digital product data leading to more efficiency for customs and market surveillance processes
- **Access to harmonised digital product data** that allows authorities to perform risk assessment processes
- **Non-compliant and unsafe product can be flagged** by market surveillance authorities.
- Integration with eSurveillance webcrawler to **detect similar dangerous products**

# Legal framework



- DPP's original legal basis can be found in the **Ecodesign for Sustainable Products Regulation (ESPR)**.
- It will be **complemented through product specific delegated acts** (*textiles, iron & steel and aluminium, tyres, furniture...*).
- **Other EU Regulations/Directives** may include DPP provisions.

# DPP secondary legislation



The DPP secondary legislation, which aims to complete the operational framework of the DPP, is planned for **adoption by mid-2026** and includes the following:

- 1 A **delegated act** setting out the requirements for DPP service providers, as well as a certification scheme to verify their compliance with such requirements where appropriate;
- 2 An **implementing act** setting out procedures to issue and verify the digital credentials of economic operators and other relevant actors;
- 3 An **implementing act** setting up requirements for the Central Registry;
- 4 A **delegated act** establishing rules & procedures on the life cycle management of unique identifiers & data carriers.

# DPP across sectoral legislation

Regulation	Status	DPP Implementation
<b>Batteries and waste batteries</b>	In force	Battery passport via QR code
<b>Marketing of construction products</b>	In force	Construction digital product passport system
<b>Packaging and packaging waste</b>	In force	Harmonised labelling system
<b>Safety of toys</b>	Adopted	Information on compliance, declaration of conformity, CE marking
<b>Detergents and surfactants</b>	Proposal	Technical requirements to be established via implementing acts



**Economic Operators** collect/gather information related to their product to create the DPP

The product's DPP identifiers are created and the DPP is registered in the DPP Registry



**Decentralised Storage**  
DPP CONTENT

The full DPP data is stored with the Economic Operators or DPP Service Providers servers



The Commission's web portal allows stakeholders to find links to DPPs, with access determined by their specific permissions.



**Market Authorities** can search the DPP and check whether the information is correct and compliant



The data carrier links to the DPP product information and **consumers** can make a purchasing decision



**Recyclers and Repairers** can search the DPP information via a data carrier

Once the DPP exists and is registered in the DPP registry, the product can be placed on the market



If a product is imported, **customs authorities** check the DPP provided by the economic operator.



# DPP workstrands



The underlying DPP system will **operate uniformly**, regardless of the product sector



Standardisation work is also being undertaken by CEN-CENELEC to **ensure interoperability** between different elements



The Commission coordinates internally to ensure a good **alignment** between different Commission legislative proposals



The opportunity to integrate **horizontal provisions** through the New Legislative Framework is being analysed

# Supporting businesses along the implementation

The Commission plans to develop:

- Technical guidance documentation for DPP registration and the use of the DPP registry
- DPP readiness campaign to support the industry, including webinars and other events
- Open-source tools to help companies (incl. SMEs) to create DPPs and validate their DPPs structure

# Milestones



The **EU Harmonised Standards** undertaken by CEN-CENELEC is due to be completed by **Q2 2026**.



Launch of the **DPP registry** in **July 2026**.



**Certain types of big batteries** are the first product category for which the DPP becomes mandatory in **February 2027**.



The DPP is being introduced for a **wide range of other products, specified in ESPR Work Programme**, from **the end of 2027 onwards**.

# Priority products set out in the ESPR Work Programme \*\*

## Final products included



Textiles/Apparel

2027\*



Furniture

2028\*



Tyres

2027\*



Mattresses

2029\*

## Intermediate products included



Iron & Steel

2026\*



Aluminium

2027\*



Energy-related products

2026 - 2030\*



ICT products

2029\*

## Products included under the transition rules

\* indicative timeline for adoption

\*\* Document 52025DC0187, COM/2025/187 final



# *Updates on Standardisation*

# DPP Standardisation - overview



- Eight harmonised standards are being developed in close collaboration with JTC24, the **CEN-CENELEC Joint Technical Committee** on the Digital Product Passport.
- 6 standards (*unique identifiers, interoperability, data carrier, API, data exchange protocols and data storage*) are in the final phase of formal approval by CEN/CENELEC, estimated date of publication is April/May.
- Two standards (authentication and access rights management) will be published later.
- The DPP system will be further developed in JTC24 in the future

**Thank you to all the technical experts, the convenors of the working groups and the chairs for the exceptional fast delivery.**

# DPP Standardisation - international



- Global interest in European standardisation is growing, with **multiple countries actively** engaging in the process.
- Ensuring **interoperability across supply chains** remains a fundamental objective for effective implementation. The JTC5 at ISO level which will start its operations in September 2026 is an important step in this direction.
- The European Commission is proactively **monitoring and contributing** to international standardisation developments.



# *DPP Registry Implementing Act*

# DPP Registry Implementing Act Timeline



# DPP Registry Implementing Act

## Overview

### **SECTION 1 GENERAL PROVISIONS**

Subject and scope, definitions and the structure of the registry.

### **SECTION 2 SERVICES OF THE REGISTRY**

Verification requirements for the economic operator and management of its user profile; Access management of Member States; Registration of the Digital Product Passport; Data management of the registration; Data models, Semantic Repository and Technical support.

### **SECTION 3 LOG SYSTEM AND SECURITY OF THE REGISTRY**

Log system, Maintenance and availability of the registry, System security and technical audits and action during Inappropriate or fraudulent use.

### **SECTION 4 FINAL PROVISIONS**

Personal data; responsibilities of economic operators, Commission and Member States; Entry into force.



# *Status update on the New Legislative Framework (NLF)*



# *Status update on the Market Surveillance Regulation (MSR) revision*

**Coffee Break from 10:45 – 11:00am**

# Ecodesign for Sustainable Products Regulation (ESPR)

**DG ENV, Unit B.4 – Wojtek SITARZ**

**JRC-SEVILLA B.5 - Alejandro LOPEZ OLMEDO**

# Ecodesign for Sustainable Products Regulation

# 1. ESPR - Policy context and Working Plan

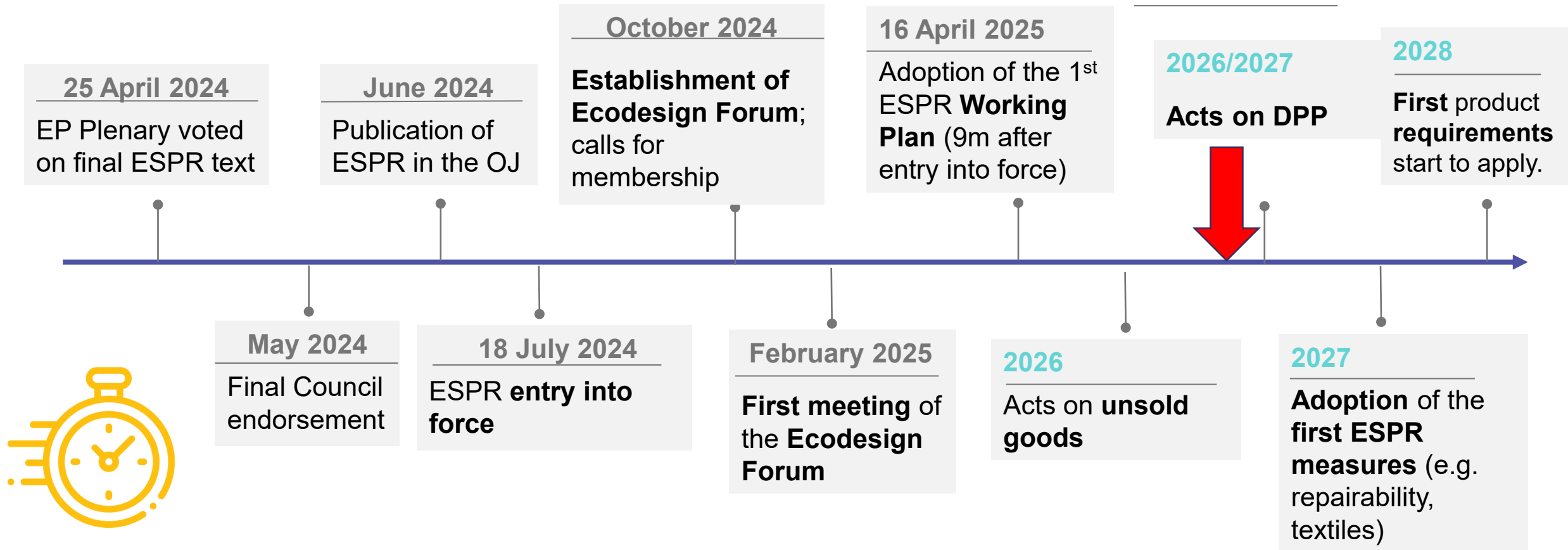
Wojtek Sitarz (DG ENV – Sustainable Products)

# 2. Method for the definition of requirements for the inclusion of data and information in the Digital Product Passport of a product

Alejandro LOPEZ OLMEDO (JRC-SEVILLA)



# ESPR: timeline & milestones



# New Final products included

Product/Measure	JRC ranking	Lead DG	Market size (EU)	Estimated timeline for adoption
<b>Final products</b>				
Textiles/Apparel	1 <sup>st</sup>	ENV+GROW	175 billion EUR (with footwear, 2021)	2027
Furniture	2 <sup>nd</sup>	ENV (TBC)	140 billion EUR (2021)	2028
Tyres	3 <sup>rd</sup>	ENV+GROW	45 billion EUR (2021)	2027
Mattresses	4 <sup>th</sup>	TBC	10 billion EUR (2022)	2029

Note: Information and Communication Technologies (ICT) are not in the list but they are considered covered through horizontal requirements and some energy-related products.

# Intermediate products included

Product/Measure	JRC ranking	Lead DG	Market size (EU)	Estimated timeline for adoption
<b>Final products</b>				
Iron & Steel	1 <sup>st</sup>	GROW	152 billion EUR (2023)	2026
Aluminium	4 <sup>th</sup>	GROW	40 billion EUR (2019)	2028



# Energy-related products included

Energy-related products	Lead DG	Ecodesign requirements	Energy label	Indicative timeline
Low temperature emitters	ENER	No	Yes	Adoption: 2026
Displays	ENER	Yes	Yes	Adoption: 2027
EV chargers	GROW	tbd	tbd	Adoption: 2028
Household dishwashers	ENV	Yes	Yes	Adoption: 2026
Household washing machines and household washer-dryers	ENV	Yes	Yes	Adoption: 2026
Professional laundry	ENV	Yes	tbd	Adoption: 2026
Professional dishwashers	ENV	Yes	tbd	Adoption: 2026
Electric motors and variable speed drives	ENER	Yes	No	Adoption: 2028
Refrigerating appliances (including Household fridges and freezers)	ENER	Yes	Yes	Adoption: 2028
Refrigerating appliances with a sales function	ENER	Yes	Yes	Adoption: 2028
Light sources and (only for ecodesign) separate control gears	ENER	Yes	Yes	Adoption: 2029



# Energy-related products (ctd.)

Energy-related products	Lead DG	Ecodesign requirements	Energy label	Indicative timeline
Welding equipment	GROW (?)	Yes	No	Adoption: end 2030
Mobile phones and tablets	GROW	Yes	Yes	Adoption: end 2030
Local space heaters	ENER	Yes	Yes	<b>Energy label:</b> adoption in 2026 <b>Ecodesign requirements:</b> Adoption mid 2030
Tumble dryers	ENER	Yes	Yes	Adoption: end 2030
Standby and off mode consumption	ENER	Yes	No	Adoption: end 2030

## Transition regime (ESPR Article 79) – to be finalised under the Ecodesign Directive

external power supplies, photovoltaic panels, space and combination heaters, water heaters, solid fuel local space heaters, air conditioners including air-to-air heat pumps and comfort fans, solid fuel boilers, air heating and cooling products, ventilation units, vacuum cleaners, cooking appliances, water pumps, circulators, computers, servers and data storage products, power transformers, professional refrigeration equipment, imaging equipment.

# Horizontal measures included

Product/Measure	JRC ranking	Lead DG	Market size (EU)	Estimated timeline for adoption
<b>Horizontal requirements</b>				
Repairability (including scoring)	N/A	ENV	N/A	2027
Recycled content and recyclability of electrical and electronic equipment	N/A	ENV (+GROW TBC)	N/A	2029



# ESPR – developing ecodesign requirements

Framework legislation

Multiannual work plans

Product-specific measures and Horizontal requirements



Preparatory Study & Impact Assessment

1.5-2 years



Consultation of Ecodesign Forum



Adoption of Measure



18 months in principle

Measure applies



Stakeholder input collected throughout



# DPP – for which products under ESPR?

## ESPR Art 9

*1. The information requirements shall provide that products can only be placed on the market or put into service if a digital product passport is available [...]*

*4. When setting the requirements related to the digital product passport, the Commission may exempt product groups from the requirement to have a digital product passport where:*

*(a) technical specifications of the digital product passport are not available in relation to the essential requirements included in Articles 10 and 11; or*

*(b) other Union law includes a system for the digital provision of information related to a product group which the Commission considers achieves the objectives*



**Mainly meant for products included in the  
European Product Registry for Energy Labelling (EPREL)**

# DPP – for which products under ESRP?

<b>Products under the transition regime</b>	No DPP possible under ESRP
<b>Energy related products under ESRP</b>	DPP mandatory for ESRP information requirements unless product in EPREL TBD case by case, EPREL use likely
<b>Other products under ESRP</b>	DPP mandatory for ESRP information requirements
<b>Horizontal measures under ESRP</b>	DPP possible but not mandatory



# Method for the definition of requirements for the inclusion of data and information in the Digital Product Passport of a product

Alejandro LOPEZ OLMEDO (JRC-SEVILLA)

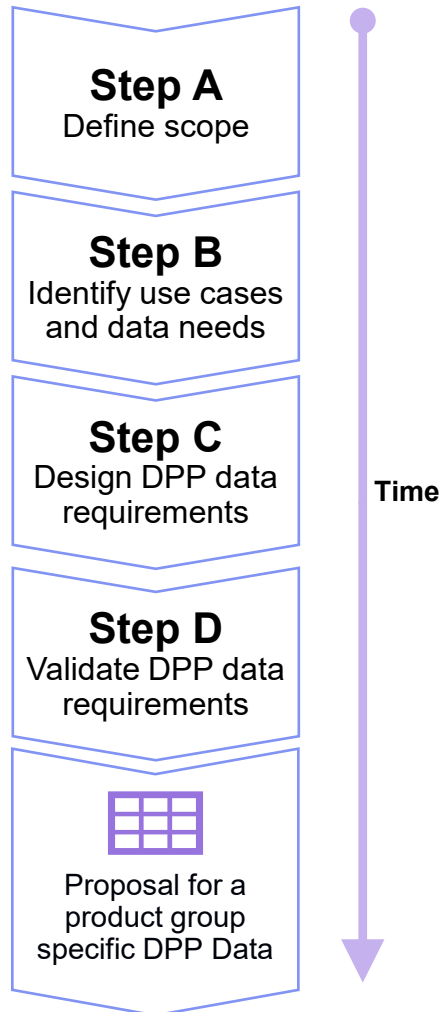


# Scope & limitations



- **Focus on DPP content** (WHAT information is included)
- Does not address technical implementation (HOW)
- Builds on MEER(P) and DPP-related standardization
- Applicable under the ESPR and beyond

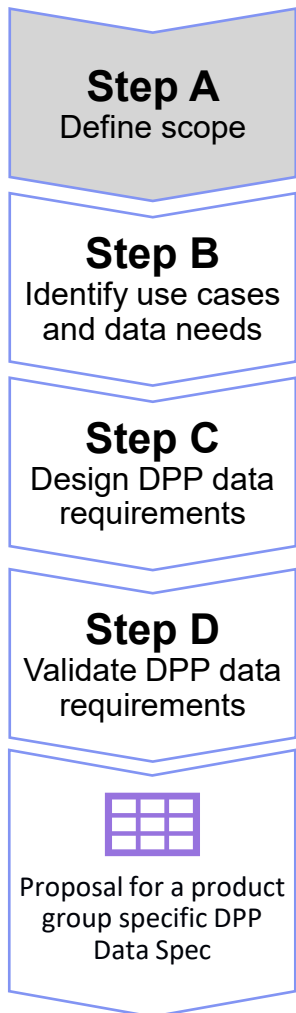
# Guiding principles



- **Policy-driven** – ESPR objectives & Annex I
- **Use-case first** – data with a clear purpose
- **Market-informed** – existing reporting & digital practices
- **Proportionate & feasible** – data availability, maturity



# Approach



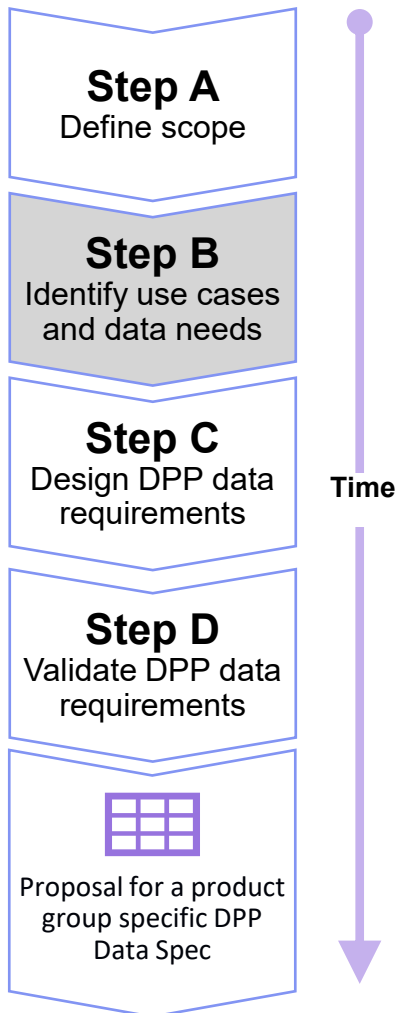
## STEP A:

1. Define the product scope and boundaries
2. Review the policy and legal context
  - 2.1. Define stakeholder profile
  - 2.2. Document the existing standards and vocabularies
  - 2.3. Document the value chain (incl. typical data flows)
3. Assess the current state of data collection, verification and sharing

Supporting guidance: list the research questions



# Approach



## STEP B:

1. Specifying policy-relevant and operational DPP use cases
2. Validate and refine the use cases with stakeholder
3. Catalogue the conceptual data needs
4. Prioritise and classify the data points

**Supporting annexes:** Criteria for selecting the relevant use-cases +  
Generic use cases to be adapted + Guidance on the data points  
categorisation



# Approach

**Step A**  
Define scope

**Step B**  
Identify use cases  
and data needs

**Step C**  
Design DPP data  
requirements

**Step D**  
Validate DPP data  
requirements

  
Proposal for a product  
group specific DPP  
Data Spec



## STEP C:

1. Review, benchmark and adapt the product-specific vocabulary
2. Set DPP data granularity
3. Set DPP access and sharing rights
4. Set DPP requirements on update and maintenance

**Supporting annexes:** Guidance for identifying, reusing, and merging existing product classification vocabularies + General rules to determine granularity levels + Rules for data governance

# Approach

**Step A**  
Define scope

**Step B**  
Identify use cases  
and data needs

**Step C**  
Design DPP data  
requirements

**Step D**  
Validate DPP data  
requirements

  
Proposal for a product  
group specific DPP  
Data Spec



## STEP D:

1. Validate the DPP data specification internally
2. Validate through stakeholders' consultations

## Outcome:

- Proposed DPP data requirements
- Initial stakeholder feedback on relevance and feasibility
- Assessment of data value for priority use cases
- Identification of key implementation challenges

# Thank you



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## **Lunch Break from 12:15 – 14:00pm**

Cold lunch provided (Sandwiches) - In Room 374  
(next door)

Warm Lunch – Cafeteria BREYDEL2 5th Floor

Coffee at 13:30

# DPP updates in the Construction sector

DG GROW, Unit H.1 – Oscar NIETO SANZ

# DPP updates in the Construction sector

Regulation (EU) 2024/3110

*DG GROW H.1*



2024/3110

18.12.2024

**REGULATION (EU) 2024/3110 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL**

**of 27 November 2024**

**laying down harmonised rules for the marketing of construction products and repealing Regulation (EU) No 305/2011**

PE/12/2024/REV/1

*OJ L, 2024/3110, 18.12.2024*

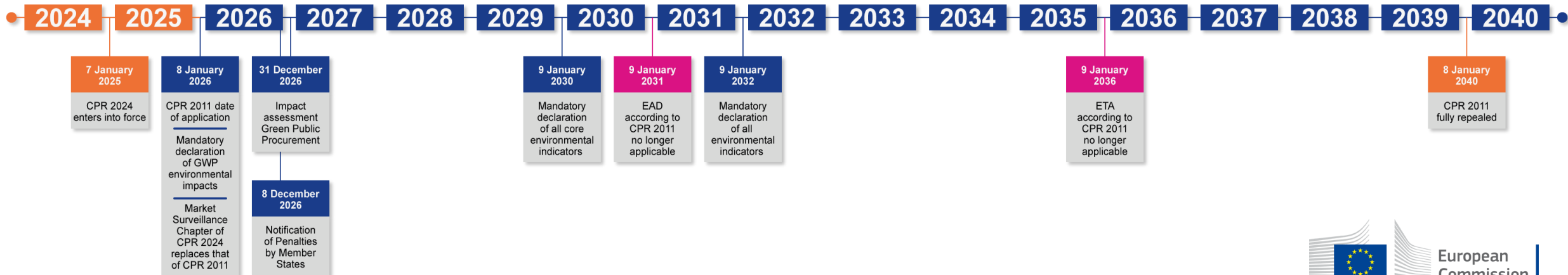
ELI: <http://data.europa.eu/eli/reg/2024/3110/oj>

# CPR transition harmonised technical specifications

Harmonised standards  
under CPR 2011

## 445 standards

Harmonised technical  
specifications under CPR 2024

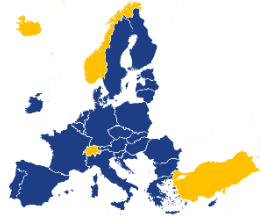


# Product families and priorities



Annex VII

# Harmonised standards development



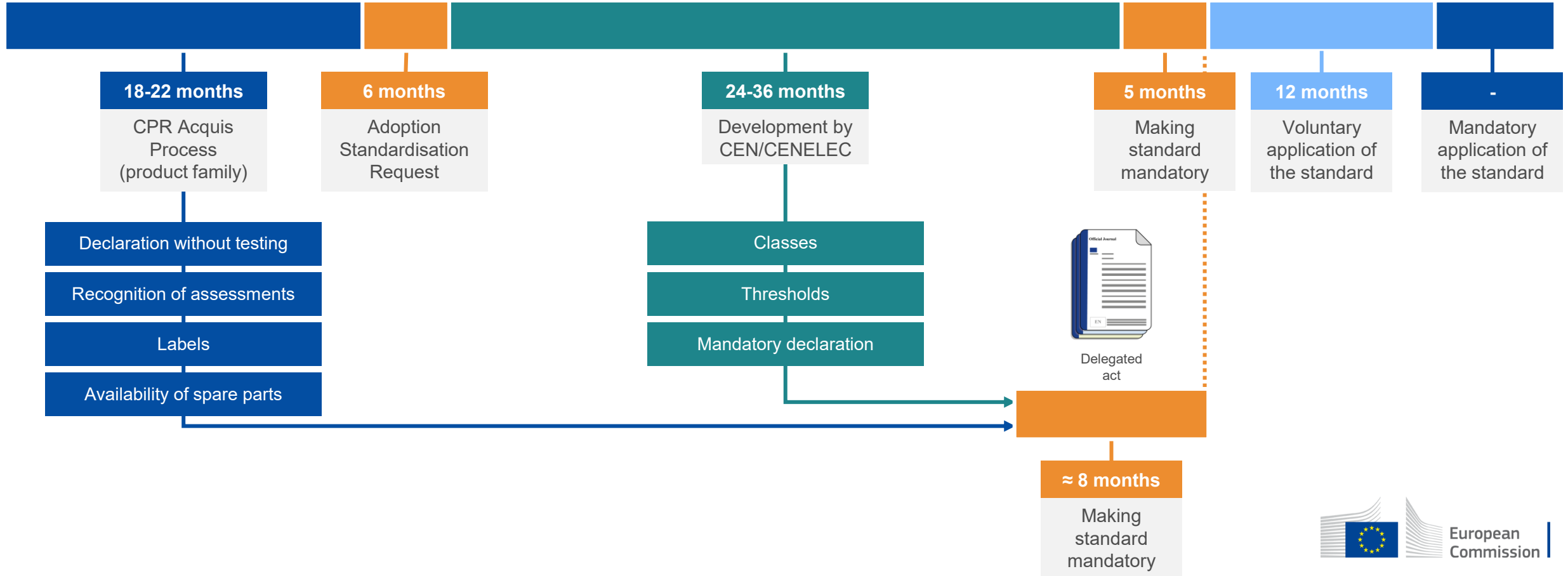
Standardisation request



Candidate harmonised standard

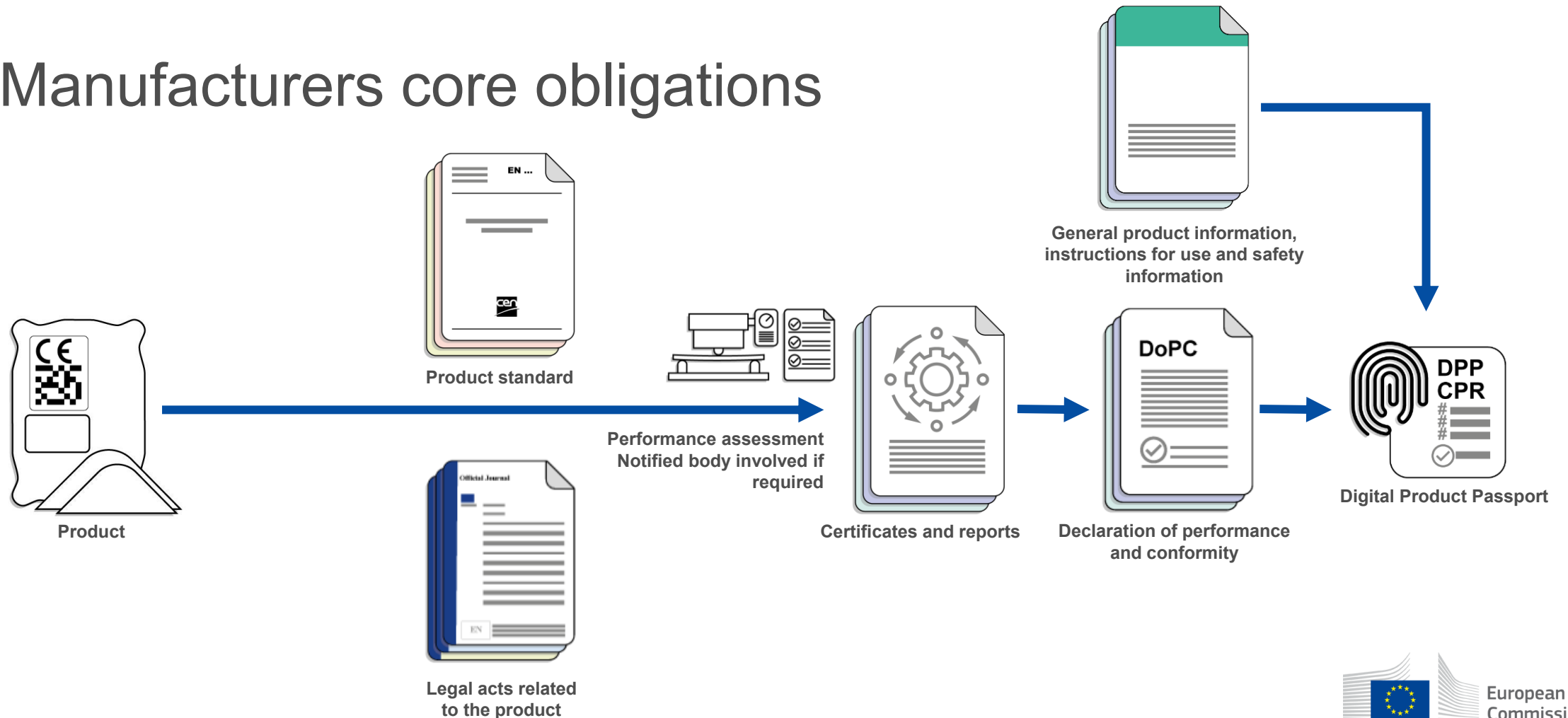


Implementing act

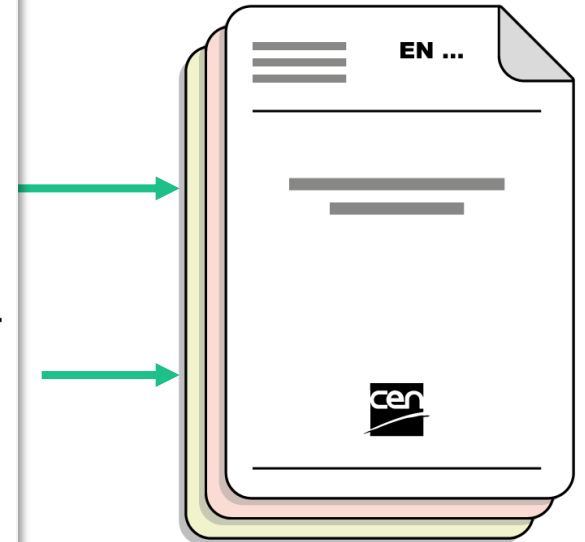
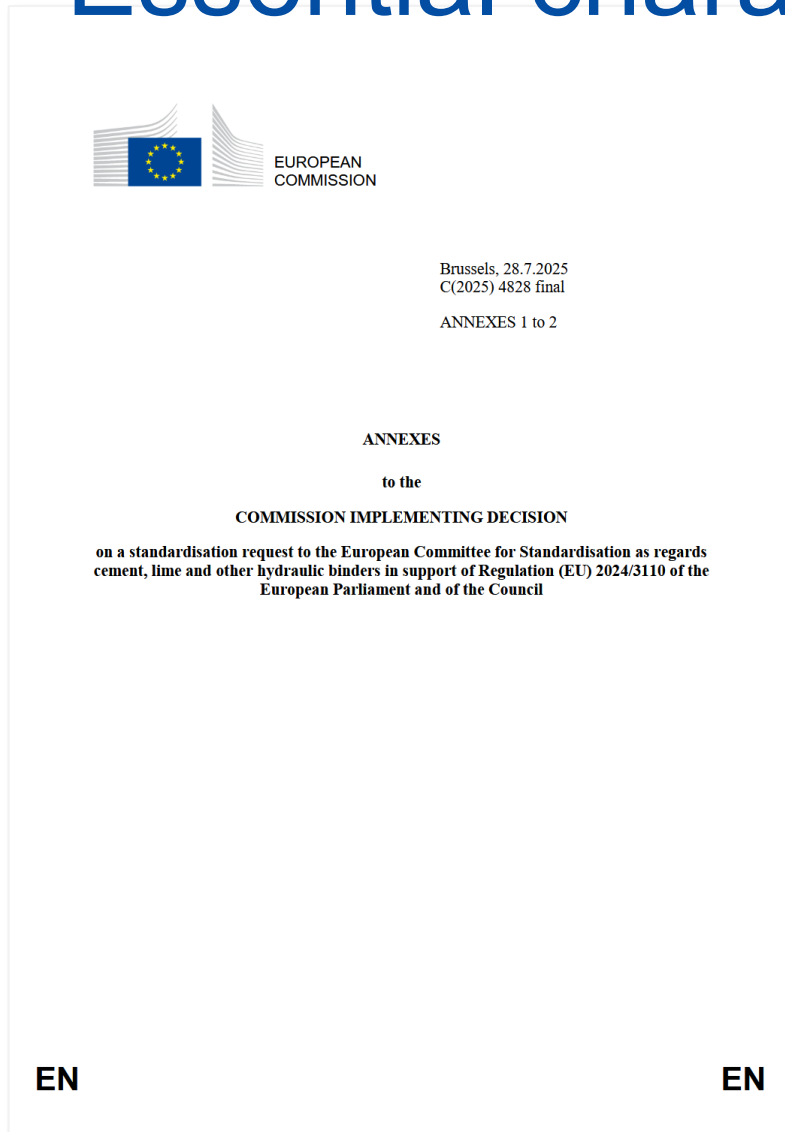


# Placing products on the EU market

## Manufacturers core obligations



# Essential characteristics development



# Essential characteristics development

CEN shall follow the procedures in place for quality verification of harmonised standard before their adoption.

## 2.2. References to standards

The harmonised standards shall only contain unequivocal dated normative references to other CEN standards, CEN ISO standards, ISO standards or parts thereof ('supporting standards'). Supporting standards or parts thereof may neither conflict with Union law nor provide for discretion where such discretion has not been laid down in Union law and shall not include direct or indirect references to national provisions.

Supporting standards shall not include normative references to other standards or parts thereof other than those fulfilling the conditions set out in this point. Where these conditions are not fulfilled, the harmonised standard may clarify the normative reference referred to, including the dates of the chain of references which are applicable.

## 2.3. Essential characteristics

In relation to the assessment and declaration of essential characteristics, the standards shall include the reference assessment method for each essential characteristic (the harmonised standard may offer additional information referring to other supporting standards as regards sampling or testing conditions when needed).

For all essential characteristics, the same methods and criteria for assessing the performance shall apply across products, unless it is found necessary, and justified in writing, to apply particular methods and or criteria in relation to particular products.

For the essential characteristics related to the content and release of emission of dangerous substances, the harmonised standards shall apply assessment methods applicable across materials, consistent with those developed by the Technical Committee dealing with construction products – assessment of release of dangerous substances.

For the essential characteristics related to environmental sustainability, the harmonised standards shall identify and enumerate all the relevant elements of performance related to the whole life cycle of the products concerned. This standardisation work shall be consistent with Annex II of Regulation (EU) 2024/3110, the most updated version of the horizontal standard dealing with sustainability of construction works – environmental product declarations – core rules for the product category of construction products and with the complementary product category rules defined in the harmonised standard listed in Table 2, point 9, of Annex II.

When the declared performance is a numerical value or a class obtained from a numerical value, the harmonised standards shall include the following information for each essential characteristic:

- the physical dimensions according to the SI standard: time (T), length (L), mass (M), electric current (I), thermodynamic temperature (K), amount of substance (N) and luminous intensity (J) a derivation of them or ratio in case of dimensionless quantities;
- the statistical value declared expressed using a specific point, like the fractile (e.g., 50% fractile is the median) and a confidence interval, which indicates the range within which the true value is likely to fall, as well as the probability that this interval contains the true value. In justified circumstances a simpler method, such as setting out a characteristic value can also be applied;
- the units in which the performance is expressed or dimensionless;
- when applicable, the rounding method used for the declaration.

Group	BRCW <sup>1</sup>	Essential characteristic	EU threshold	Class	Comments
common cement	1	minimum standard compressive strength - 28 days	≥ 32.5 MPa	Table 24	mandatory declaration
		maximum standard compressive strength - 28 days		Table 25	
		minimum very early compressive strength - 24 h			
		minimum early compressive strength - 2 days		Table 32	
		minimum early compressive strength - 7 days		Table 33	
		minimum late compressive strength - 56 days			
		minimum late compressive strength - 90 days			
		initial setting time	≥ 45 min		mandatory declaration
		loss on ignition	≤ 5.0%		mandatory declaration only for primary cement (a minimum of 95% clinker) and binary cements with clinker and 36% to 95% of blast furnace slag
		soundness	≤ 10 mm		mandatory declaration
		heat of hydration			
		pozzolanicity - hydroxyl ion concentration			relevant only for pozzolanic cements with a maximum of 55% of a combination of silica fume, natural pozzolana, natural activated pozzolana, fly ash and coal bottom ash and a maximum of 10% silica fume
		pozzolanicity - calcium oxide concentration			relevant only for pozzolanic cements with a maximum of 55% of a combination of silica fume, natural pozzolana, natural activated pozzolana, fly ash and coal bottom ash and a maximum of 10% silica fume
		insoluble residue content	≤ 5.0%		mandatory declaration and threshold only for primary cement (a minimum of 95% clinker) and binary cements with clinker and 36% to 95% of blast furnace slag
		sulphate content			
		chloride content	≤ 0.10%		mandatory declaration, threshold not applicable to binary cement with clinker and a maximum of 95% of blast furnace slag and to composite cements with a minimum of 35% clinker, a maximum of 59% of blast-furnace slag and a maximum of 20% of natural pozzolana, natural activated

Standardisation request

# Essential characteristics development

Standardisation  
request

Group	BRCW <sup>1</sup>	Essential characteristic	EU threshold	Class	Comments
		minimum standard compressive strength - 28 days	≥ 32.5 MPa	Table 24	mandatory declaration

In relation to the assessment and declaration of essential characteristics, the standards shall include the reference assessment method for each essential characteristic (the harmonised standard may offer additional information referring to other supporting standards as regards sampling or testing conditions when needed).

- (a) the physical dimensions according to the SI standard: time (T), length (L), mass (M), electric current (I), thermodynamic temperature (K), amount of substance (N) and luminous intensity (J) a derivation of them or ratio in case of dimensionless quantities;
- (b) the statistical value declared expressed using a specific point, like the fractile (e.g., 50% fractile is the median) and a confidence interval, which indicates the range within which the true value is likely to fall, as well as the probability that this interval contains the true value. In justified circumstances a simpler method, such as setting out a characteristic value can also be applied;
- (c) the units in which the performance is expressed or dimensionless;
- (d) when applicable, the rounding method used for the declaration.

# Essential characteristics development

Group	BRCW <sup>1</sup>	Essential characteristic	EU threshold	Class	Comments
		minimum standard compressive strength - 28 days	≥ 32.5 MPa	Table 24	mandatory declaration

## TEMPLATE

Table ZA.1.1 includes the essential characteristics related to [name of product A-n as given in the standardization request] for the intended use [intended use 1-n as given in the standardization request] and the applicable assessment and verification systems according to the delegated act adopted by the EC: [code of the EC legal act, adopted by the EC] [(insert here the No. of OJEU)].

Table ZA.1.1 - relevant clauses for product [A-n] and intended use [1-n]

Essential characteristic	Clause	Clause method	Symbol	Reference document	Reference document clause	Quantity	Unit	Value kind	Possible values	Boundary values	AVS	Notes
[name of essential characteristic 1 as given in the standardization request]	4.[x]	5.[x]	[symbol]	[EN...]	[X]	[X]	[unit]	[value kind]	[class]	[threshold/declared]	[X]	[note]
...	...	...	...	...	...	...	...	...	...	...		...

CEN Guide 36

# Essential characteristics development

Essential characteristic	Clause	Clause method	Symbol	Reference document	Reference document clause	Quantity	Unit	Value kind	Possible values	Boundary values	AVS	Notes
[name of essential characteristic 1 as given in the standardization request]	4.[X]	5.[x]	[symbol]	[EN...]	[X]	[X]	[unit]	[value kind]	[class]	[threshold/declared]	[X]	[note]
...	...	...	...	...	...	...	...	...	...	...		...

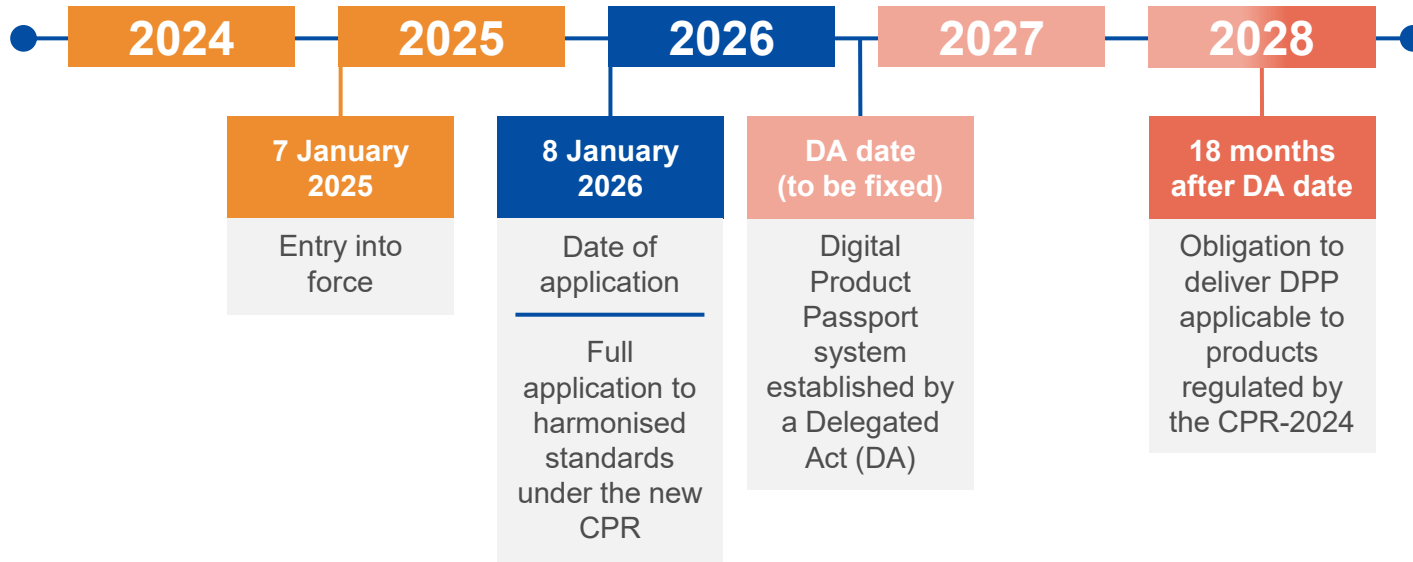
Essential characteristic	Clause	Clause method	Symbol	Reference document	Reference document clause	Quantity	Unit	Value kind	Possible values	Boundary values	AVS	Notes
minimum standard compressive strength - 28 days	4.1	5.1		EN 196-1:2016		ML-1T-2	MPa	≥	classes	32.5 MPa	1+	

# Environmental sustainability

Essential characteristic	Clause	Clause method	Symbol	Reference document	Reference document clause	Quantity	Unit	Value kind	Possible values	Boundary values	AVS	Notes
reference service life	4.[x]	5.[x]		EN15804:2012 +A2:2019 +AC:2021		T	years	=			3+	
climate change - total	4.[x]	5.[x]	...	EN15804:2012 +A2:2019 +AC:2021		M	kg CO <sub>2</sub> eq.	≤			3+	
climate change - fossil	4.[x]	5.[x]		EN15804:2012 +A2:2019 +AC:2021		M	kg CO <sub>2</sub> eq.	≤			3+	
climate change - biogenic	4.[x]	5.[x]		EN15804:2012 +A2:2019 +AC:2021		M	kg CO <sub>2</sub> eq.	≤			3+	
climate change - land use and land use change	4.[x]	5.[x]		EN15804:2012 +A2:2019 +AC:2021		M	kg CO <sub>2</sub> eq.	≤			3+	
...												

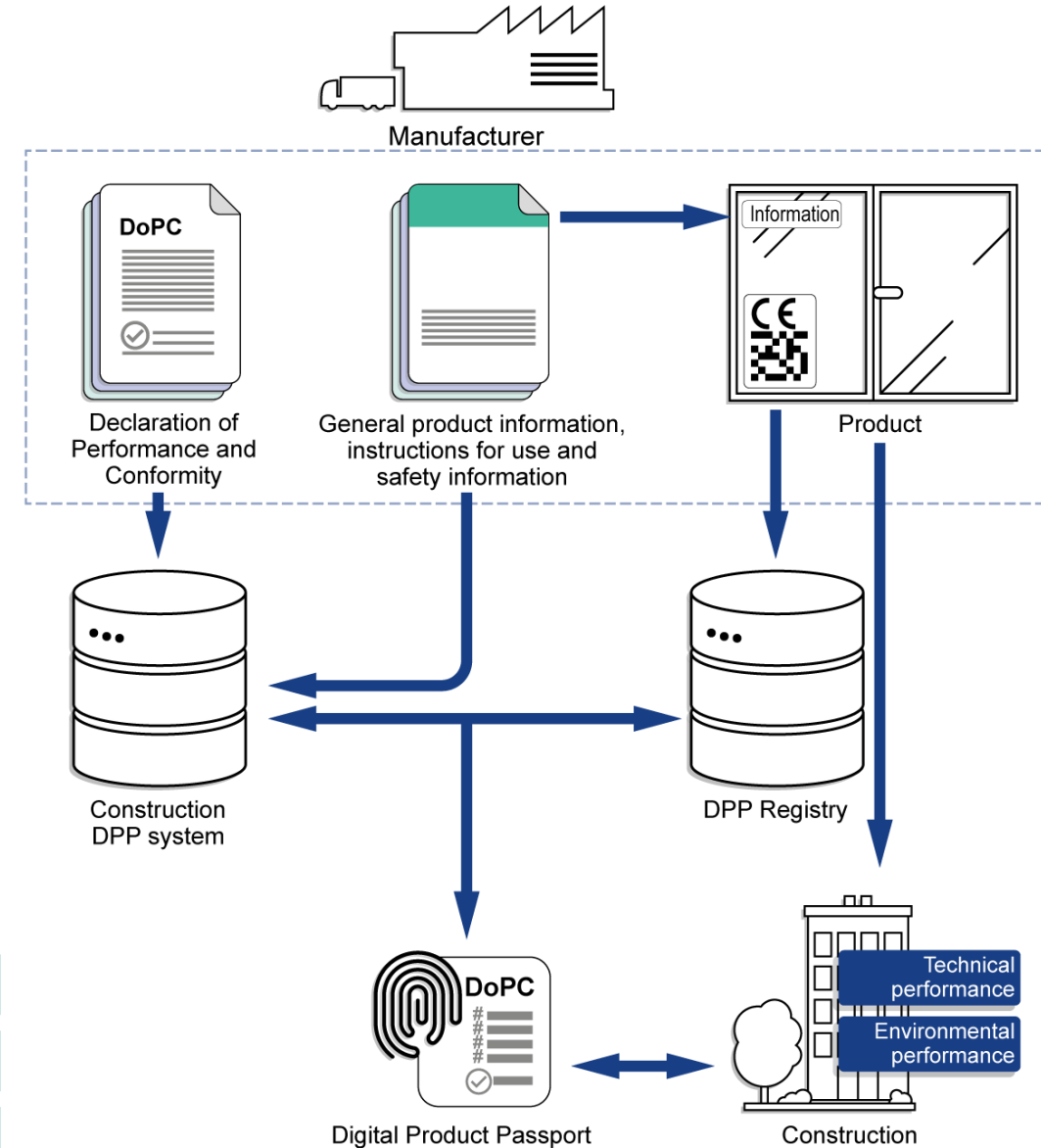
LCA indicators included in EN 15804 are always included in all standards

# Digitalisation



## Information

based on open standards	structured
machine-readable	searchable
developed with an interoperable format	transferable through an open interoperable data exchange network without vendor lock-in



ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

CONSTRUCTION PRODUCTS REGULATION (CPR)

CPR Delegated Act Article 75

Harmonised technical specifications and European assessment documents

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

## Unique identifiers

Unique product identifier

dpp:3234567890126

Unique operator identifier

dpp:VAT:AT U14589505

Unique facility identifier

dpp:ISO3166-2:BE

## Data carriers



## ESPR Registry

Stores in a secure manner unique identifiers

Other DPP data to be stored

## Web portal

Information  
Digital Product  
Passport

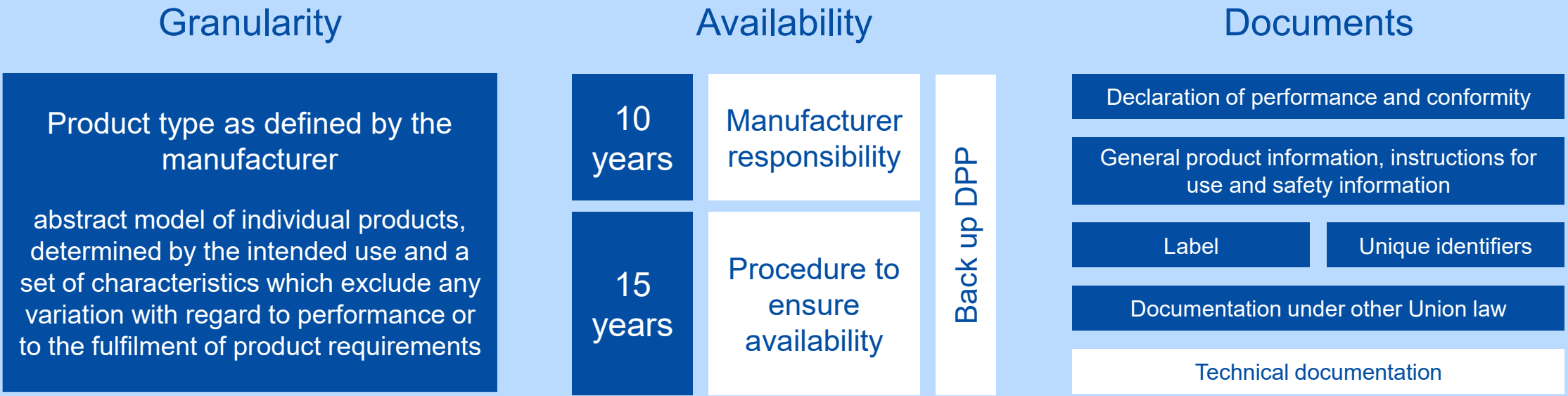
# CONSTRUCTION PRODUCTS REGULATION (CPR)

CPR Delegated Act Article 75

Harmonised technical specifications and European assessment documents

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

## CONSTRUCTION PRODUCTS REGULATION (CPR)



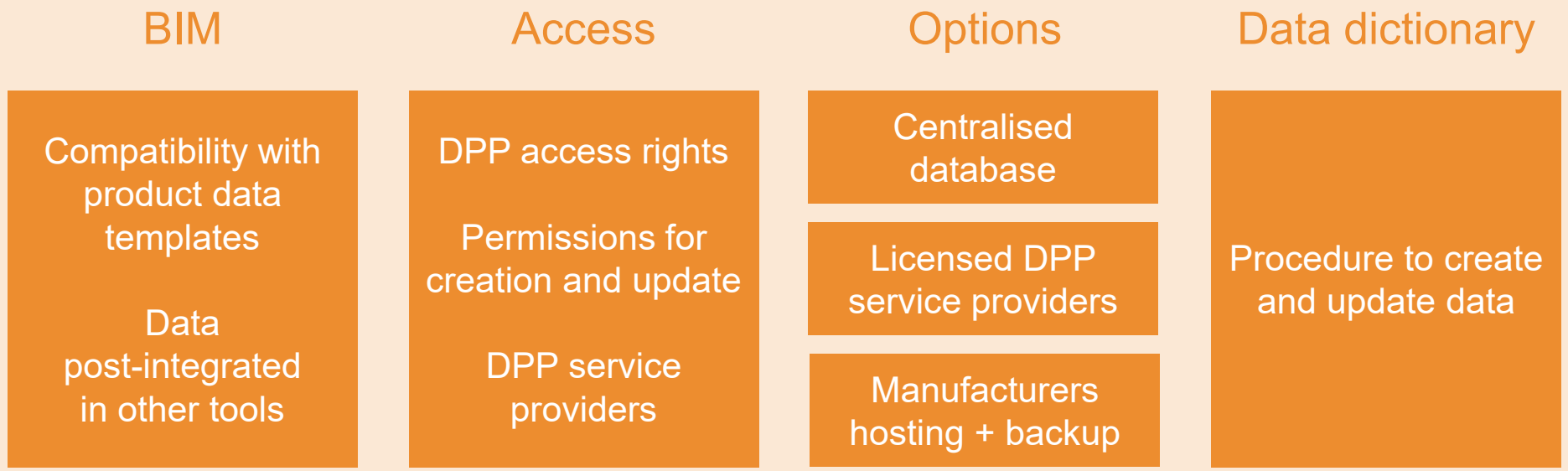
### CPR Delegated Act Article 75

### Harmonised technical specifications and European assessment documents

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

## CONSTRUCTION PRODUCTS REGULATION (CPR)

### CPR Delegated Act Article 75

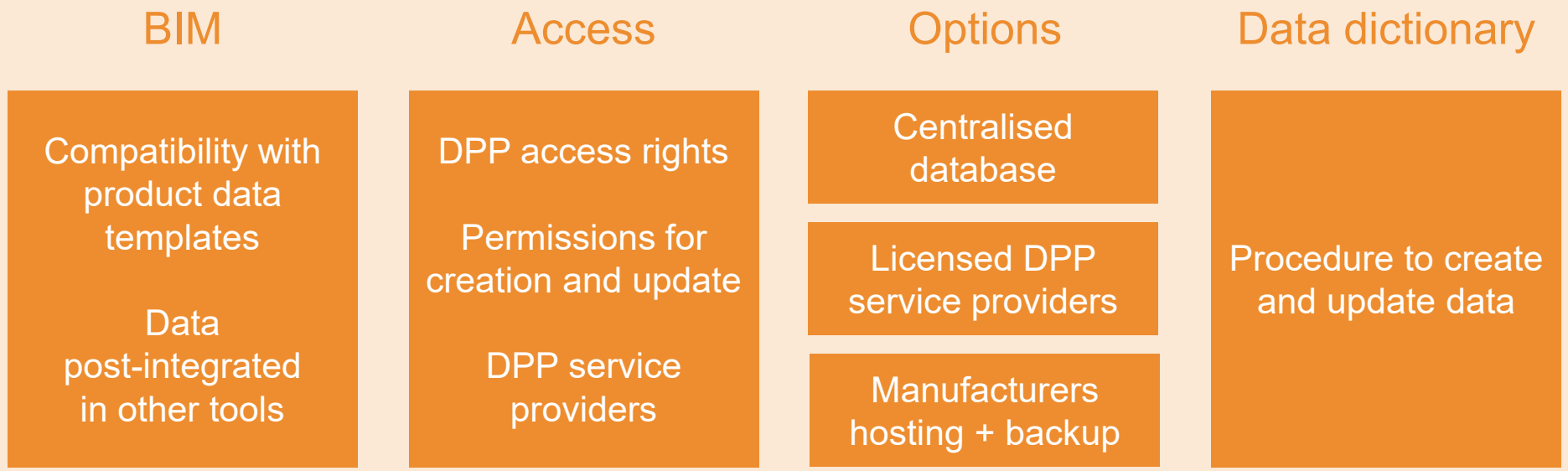


Harmonised technical specifications and European assessment documents

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

## CONSTRUCTION PRODUCTS REGULATION (CPR)

### CPR Delegated Act Article 75



Harmonised technical specifications and European assessment documents

# ECODESIGN FOR SUSTAINABLE PRODUCTS REGULATION (ESPR)

## CONSTRUCTION PRODUCTS REGULATION (CPR)

### CPR Delegated Act Article 75

#### Harmonised technical specifications and European assessment documents

Human and machine-readable format

Standards and EAD provide guidelines to ensure interoperability

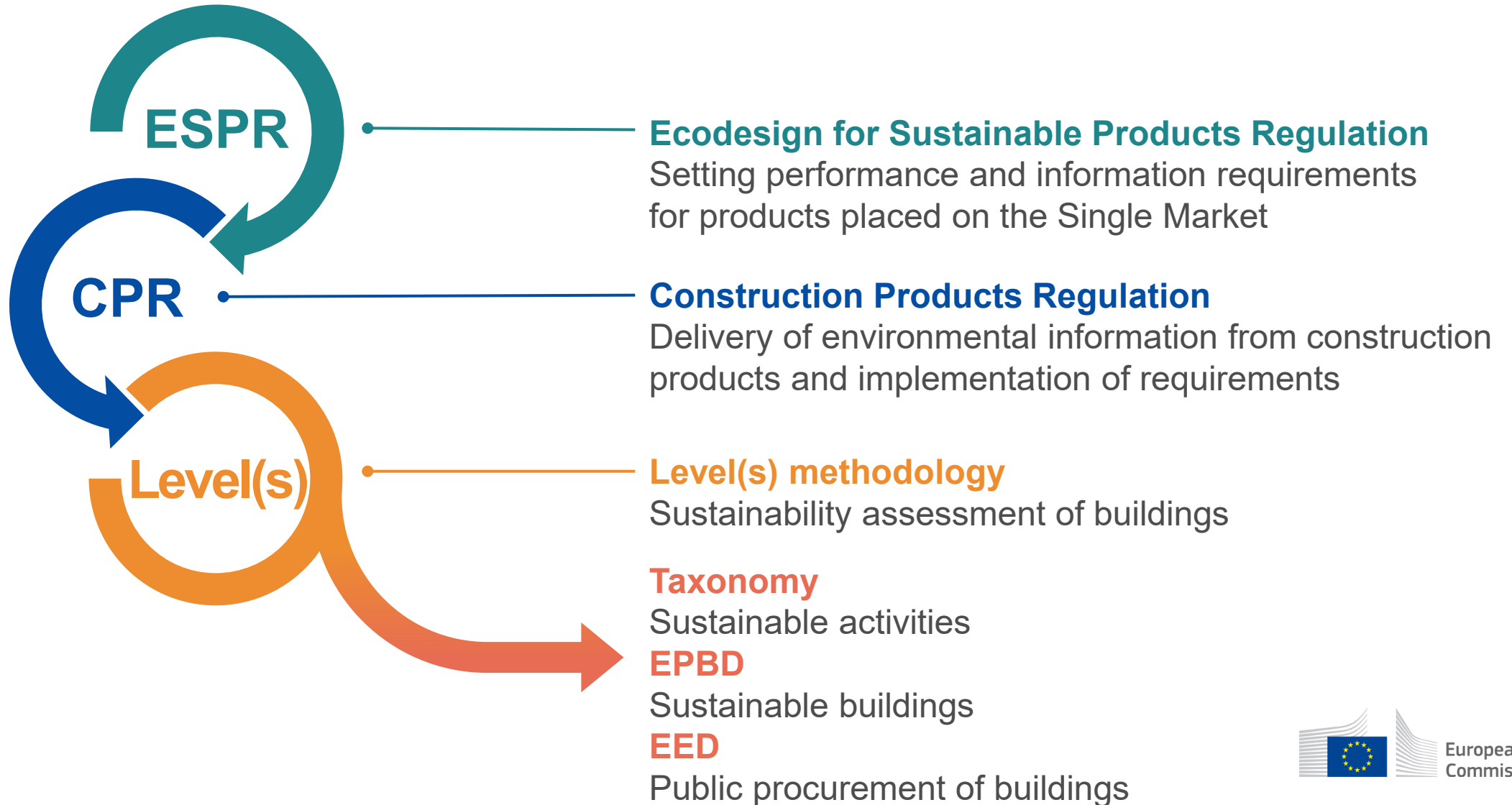
Information provided in a structured way in tables in a section of the harmonised standards or EAD

Technical content developed by technical experts without the need for IT training

Structured data to be digitalised using IT tools or as part of the DPP service provider contract

Citation of harmonised standards and EAD trigger the implementation/update of the data dictionary

# EU Regulatory framework





# Key messages

DPP under CPR is implemented through product standards

Horizontal structure is shared with other DPP systems

Data hosting is established separately

Data availability is established in 25 years and may be prolonged

Data structure is built on existing BIM templates but adapted to the regulatory framework

# Thank you



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# DPP updates in the Textile, Clothing, Leather and Footwear

JRC-SEVILLA B.5 – Maria GONZALEZ TORRES

# DPP updates in the Iron & Steel sector

**DG GROW I.4 - Stamatis SIVITOS**

**JRC-SEVILLA B.5 - Sara BLANCO**

**ChainTraced - Victor ANDERSSON and Daniel ERIKSSON PITT**

# Iron & steel sector

DPP Ecodesign Forum

Stamatis Sivitos – Policy Officer - GROW I.4. Sustainable Products




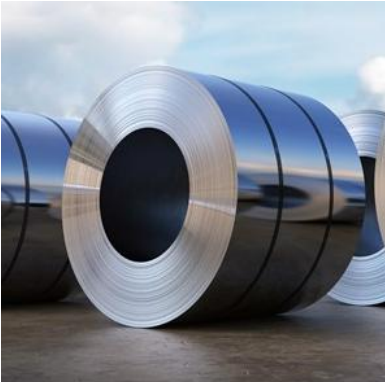

Sara Blanco Pérez – Project Officer - JRC B.5. Circular Economy and Sustainable Industry

# ESPR in the EU steel policy framework



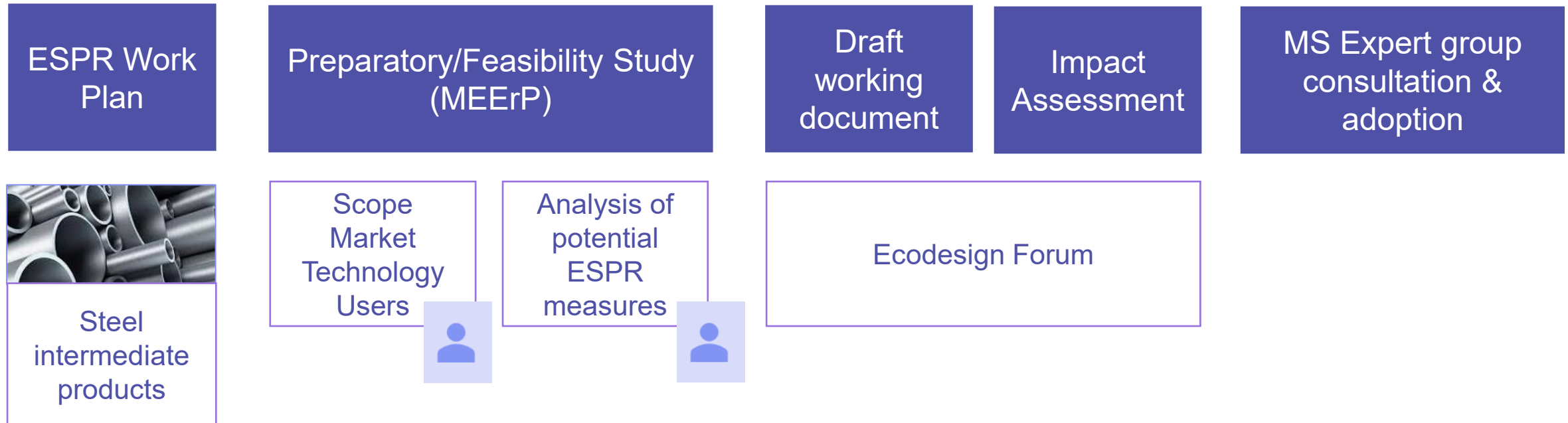
- ESPR introduces product-level sustainability requirements for steel products, supported by the Digital Product Passport (DPP).
- It will be developed in synergy with the other EU legislation addressing specific aspects of the steel sector:
  - CBAM / EU ETS
  - Construction Product Regulation
  - REACH/RoSH
  - IAA (newly announced)

# Intermediate steel products

<p>Hot rolled coil</p>  <p>Source: EUROMETAL (<a href="#">link</a>)</p>	<p>Cold rolled coil galvanised</p>  <p>Source: EUROMETAL (<a href="#">link</a>)</p>	<p>Wire rod</p>  <p>Source: EUROMETAL (<a href="#">link</a>)</p>
<p>Electrical sheet</p>  <p>Source: ArcelorMittal (<a href="#">link</a>)</p>	<p>Stainless steel</p>  <p>Source: Acerinox (<a href="#">link</a>)</p>	

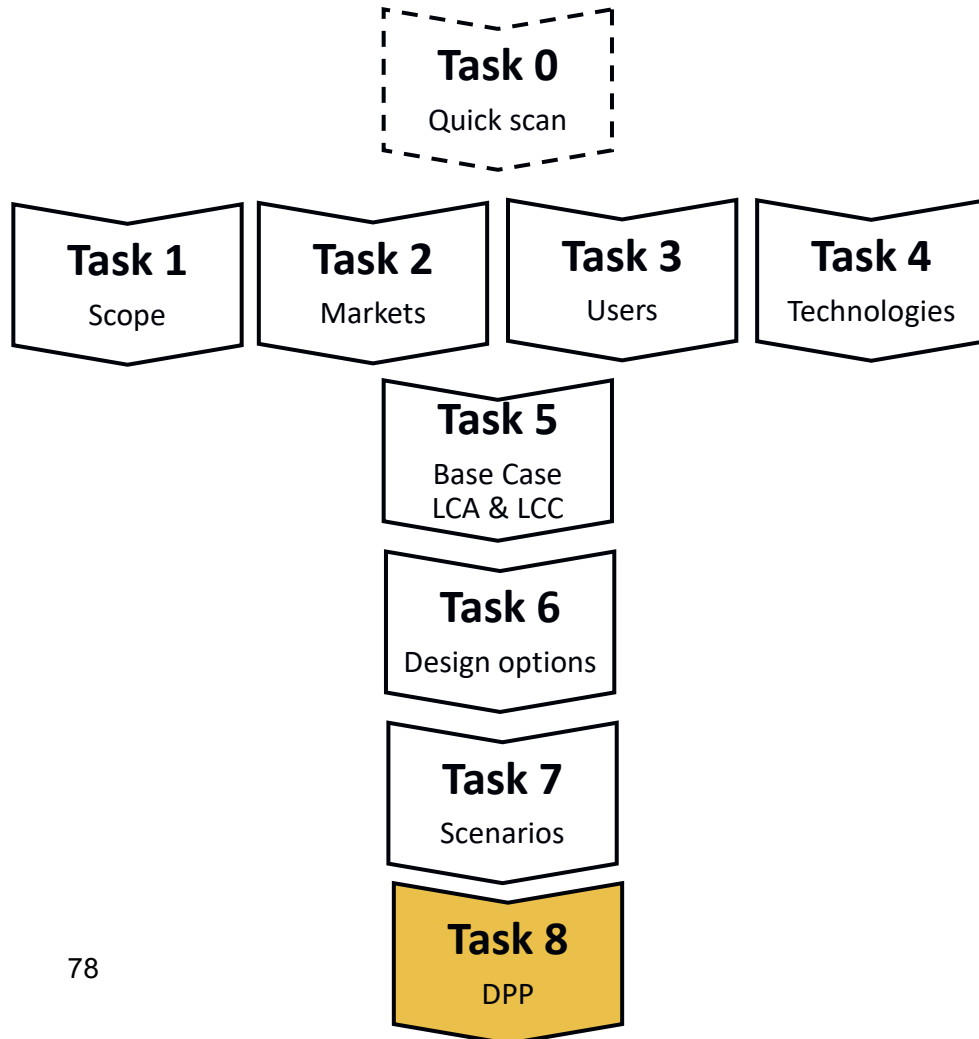


# ESPR iron & steel timeline



# ESPR iron and steel: preparatory study

## MEErP Methodology



- Based on MEErP methodology, including the latest additions such as the DPP methodology...**but with a tailored approach**
- Participatory approach, involving broad stakeholders' consultation
- Separate workstream on the feasibility of specific requirements, such as carbon footprint declaration, recycled content

# Approach for DPP content

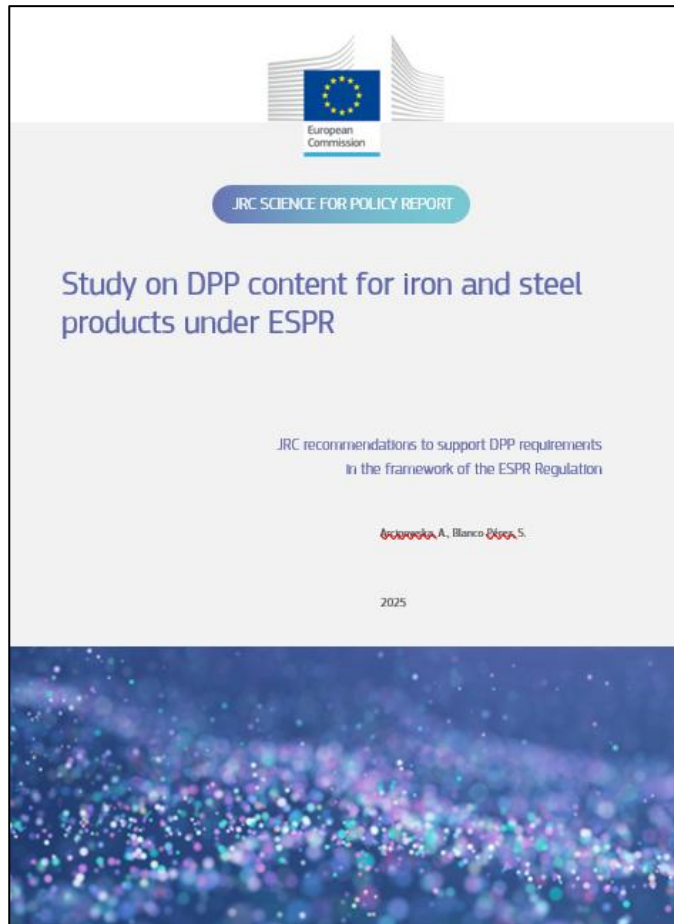
	Perceived Value	Industry Data Availability	Effort vs Value	Key Barriers	Policy relevance
Mandatory	High	High (widely implemented)	High value / Low effort	Low or none	Baseline option
	High	Medium–low (early adopters)	High value / Medium–high effort	System adaptation; lack of harmonised methods	High policy impact
	Medium	Medium (fragmented practices)	Medium value / Medium effort	Data quality; consistency; granularity	Simplification or aggregation
	Medium–low	Low (no established practice)	Low–medium value / High effort	Cost; feasibility; confidentiality	High risk; possible deferral
Voluntary	High	Medium–high	High value / Low–medium effort	Low	Voluntary disclosure / best practice
	Low	Low	Low value / High effort	High	Low priority

Multidimensional assessment of DPP data requirements:

- Policy relevance
- Stakeholder value
- Current industry practices
- Effort–value balance



# ESPR steel content proposal



- ❖ DPP content proposal v1 developed as a test case for the DPP methodology, with limited industry consultation.
- ❖ A feasibility assessment will be carried out with the steel industry, supported by an external consultant.
- ❖ Results will be integrated into the report and shared before the next stakeholder meeting (13 April 2026).

# DPP content (proposal)

Product classification  
and identification

Unique ID  
Global Trade Identification No.  
Commodity Codes

Product & product  
information

Unique facility Identifier(s)  
Responsible operator information  
Origin & melt

Environmental  
performance

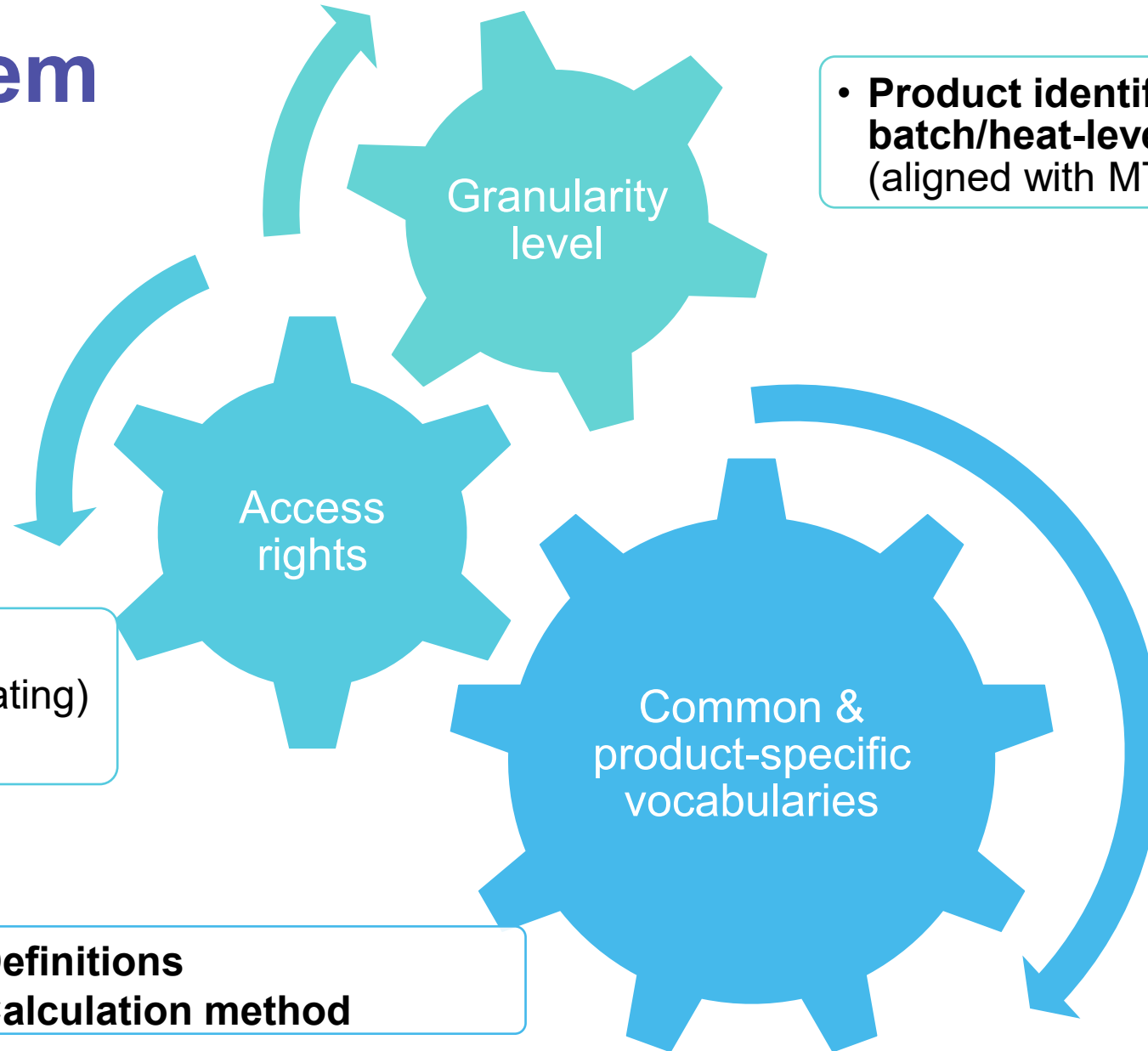
Carbon footprint  
Recycled content  
Substances of Concern  
Conformity declaration

Voluntary fields

Mechanical properties (based on MTC)  
Compliance data OUL



# DPP system



- **Product identification on batch/heat-level**  
(aligned with MTC practice).

- Public** (e.g. ID)
- Legitimate interest** (coating)
- Authority only** (DoC)

- **Definitions**
- **Calculation method**

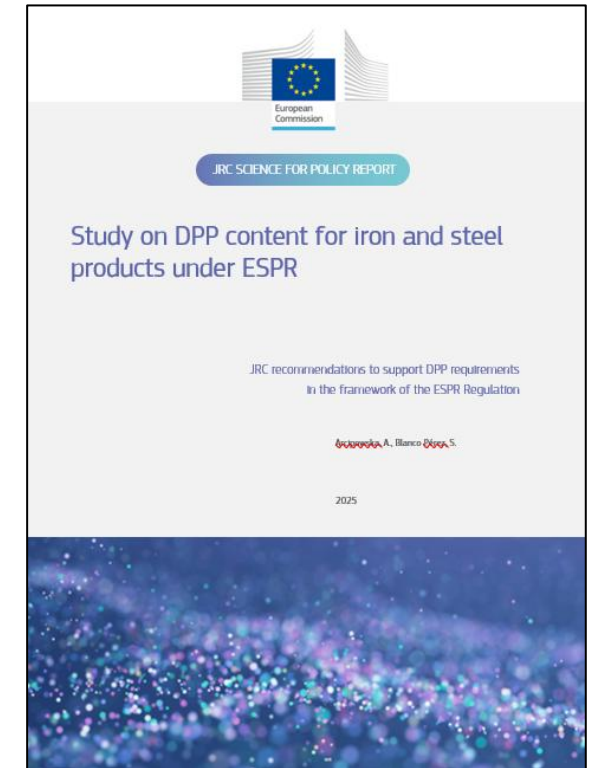


# Readiness check

- ❖ Complement information on the current industry practices:
  - Which data is collected and on which granularity level?
  - Which standards and methods are most commonly used?
  - Which verification methods
  - Value and effort
- ❖ What is the digitalisation level in the steel industry



Input to  
the DPP  
content  
proposal

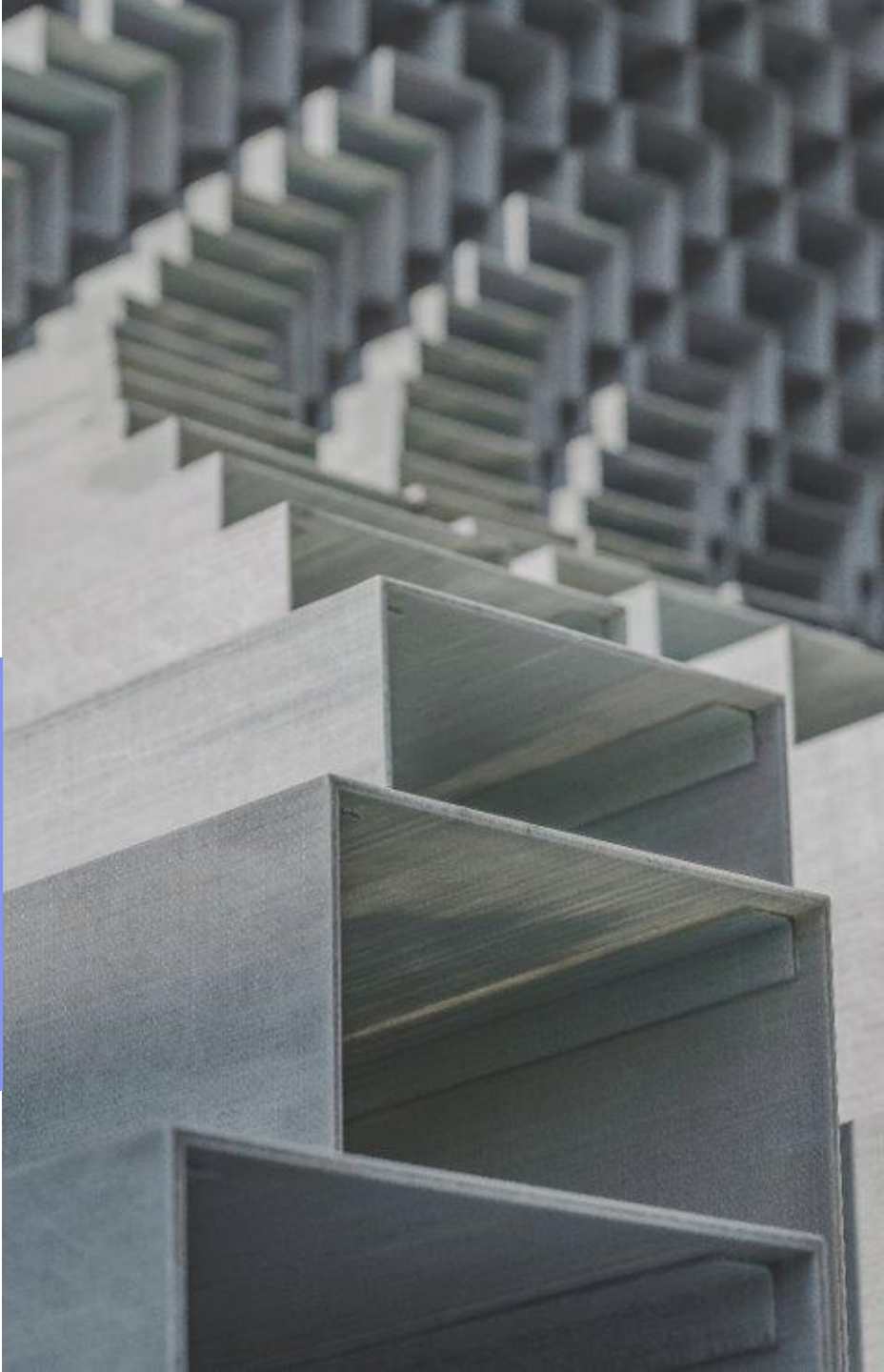


# Stakeholder meeting

2<sup>nd</sup> Stakeholder Meeting 13<sup>th</sup> April 2026



**SCAN ME!**



# Thank you



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# Digital Product Passport for Iron and Steel – DPP Readiness check

Validation of DPP content against industry  
data practice

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Ecodesign Forum 260319





## FOUNDED

2019

## OFFERING

Product level data exchange and traceability

## PRIMARY MARKET

Metallic value chain

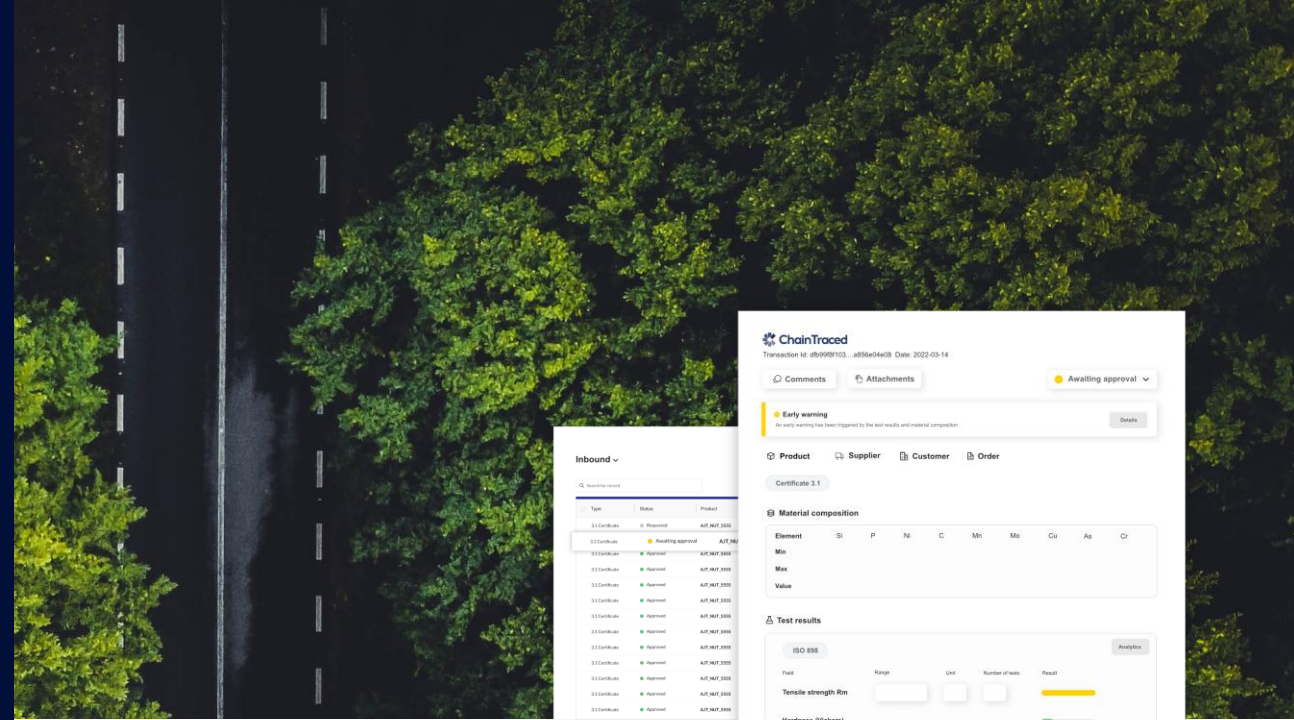
## GEOGRAPHY

Global

## BUSINESS IDEA

“Leading the transformation of global value chains with trusted data, seamless collaboration, and sustainable transparency.”

Victor Andersson, founder and CEO

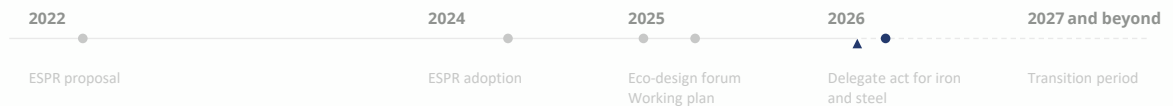


Strong partnerships and innovation initiatives across the industry, supporting companies on their journey toward digital product traceability



# Purpose of the study

- Proposed DPP requirements for steel are currently under development under ESPR
- Assessing practical feasibility requires input from operational industry practice
- This study maps how material and environmental performance data is created and exchanged in current industry practice
- *DISCLAIMER: All the proposed findings shown in this presentation are draft, and as such potentially subject to change.*



METHODOLOGY & COVERAGE

# Industry representation across the steel value chain

## Coverage

- Steel producers and downstream manufacturers
- Cross-functional participation (sustainability, material compliance, quality, IT, sales and sourcing)

## Format

- Semi-structured interviews (60–90 min)
- No audit style – operational dialogue
- Anonymized & aggregated input

## 39 companies represented

36% - Steel producer

52% - Manufacturing

12% - Industry expertise



# Validating DPP assumptions against operational practice

## 1 Framing & dialogue setup

**Helping bring industry reality into an early regulatory phase**

**Why this dialogue**

- DPP requirements for steel
- Practical feasibility needs

**Our role**

- Bring industry practice into
- Considerations for industrial
- Sense-check emerging steel
- Aggregated and anonymized

**Methodology**

**A reality check grounded in practice, not ideal conditions**

**Context & constraints**

- Uncertainty** - Preparatory phase/Requirements not finalized
- Responsibility** - Cross-functional and distributed knowledge and ownership
- Time** - Availability and time constraints
- Maturity** - Heterogeneous value chain and maturity

**Our approach**

- Structured interviews (60-90 min)
- Low participation threshold
- Role-based perspectives
- Aggregated and anonymized input
- Feasibility sense-checking

## 2 Structuring current practices

**Identification & classification**  
Understanding how product information is linked to material in practice

**Introduction**

Establishing scalable and efficient traceability systems starts with how data is identified in practice. In the steel industry, traditional identification approaches, such as certificates, designations, and batch-based references, are effective within specific operational contexts, but are not always designed for our current systems or organizations. This section explores how steel is identified in current operational practice.

Hierarchy	Description	Current identification
Company level	Manufacturer, Importer, Supplier, Customer	Global identifiers (e.g. ISO, DUNS, GLN, L2B) Internal IDs or other codes
Model level	Steel grade / product specification	Steel grade and designation acc. EN 10227 EN 10130, EN 10210 Internally unique product numbers or globally unique product numbers (GPN, etc.)
Batch level	Heat / cast / production batch	Heat number or GPN number
Item level	Individual coil / plate / sheet / rod / flange	Bundle ID or Serial number

**Suggesting questions**

- How are steel products or material flows typically identified in daily operations today?
- How is the digital and physical product linked today?
- How does identification and traceability capability differ between your product groups (e.g. with, without, long products, metal powder)?
- If not, what have been the main considerations around this effort in detail?
- What challenges and limitations do you experience with current identification practices?
- Are global identifiers used today, or considered?

## 3 Cross-cutting assessment

**Bridging current data practices and future expectations**

- Granularity** - What level of detail is realistic in practice?
- Sensitivity** - What data can be shared, and with whom?
- Effort & value** - What does it take, and where is the value created?

**DIGITAL PRODUCT PASSPORT**

Attributes: Material, Weight, Dimensions, etc.

Filters: Material, Weight, Dimensions, etc.

Buttons: Add, Edit, Delete, etc.

Focused on current operational practice – not preferred future state.

## KEY OBSERVATIONS FROM THE STUDY

- Digitalization and data reality
- Practical feasibility and Effort vs Value
- Industry feedback & voluntary input



DIGITALIZATION & DATA REALITY

# Assessing proposed DPP content against existing industry practices

CERTIFICATO DI COLLEGIO INDOCON 713 2348788 PAG. /

ALUMECO AP5  
 MILL TEST CERTIFICATE  
 DOCUMENTO TECNICO  
 STAINLESS STEEL COILS

PRODOTTORE: ALUMECO AP5  
 IDENTIFICAZIONE: 2348788  
 DESCRIZIONE: ALUMECO AP5  
 DIMENSIONI: 1500x2000x2

Elemento	Descrizione	Valore	Unità	Limite
CE	Carbonio	0,025	%	0,025
SI	Silicio	0,01	%	0,01
MN	Manganese	0,01	%	0,01
P	Fosforo	0,005	%	0,005
S	Zolfo	0,005	%	0,005
NI	Nickel	10,0	%	10,0
CR	Cromo	18,0	%	18,0
N	Azoto	0,01	%	0,01
Cu	Coppio	0,01	%	0,01
Mo	Molibdeno	0,01	%	0,01
Ca	Calcio	0,005	%	0,005
Mg	Magnesio	0,005	%	0,005
Al	Alluminio	0,005	%	0,005
Se	Selenio	0,005	%	0,005
Co	Cobalt	0,005	%	0,005
Bi	Bismuto	0,005	%	0,005
As	Antimonio	0,005	%	0,005
Sn	Stagno	0,005	%	0,005
Pb	Piombo	0,005	%	0,005
Ag	Argento	0,005	%	0,005
Au	Oro	0,005	%	0,005
Fe	Ferro	100,0	%	100,0

**Mill Test Certificate**

Alumeco Ap5  
 1500x2000x2  
 ALUMECO AP5

**Declaration of Conformity**

Alumeco ApS hereby declare that the common stainless steel alloys listed below can be used as material and goods, which are intended to have contact with foods:

Alloy Number	Name acc. EN10088-1	ANSI
T.4301	X2CrNi18-9	304
T.4307	X2CrNi18-9	304L
T.4401	X2CrNiMo17-12-2	316
T.4404	X2CrNiMo17-12-2	316L

The declaration is based on:  
 THE EUROPEAN PARLIAMENT AND COUNCIL REGULATION (EU) no. 1935/2004  
 "The fundamental principle in this regulation is that the materials and the goods, which are intended for direct or indirect contact with foods, must be so inactive that they do not give materials the foods in amounts that can involve any danger to the human health or cause an unacceptable change of the food composition or a degradation of their organoleptic quality."  
 REGULATION OF THE COMMISSION (EU) no. 2023/2006  
 Relative to this regulation that concerns "Good procedure of manufacturing the material and goods in contact with foods" the principal purpose for Alumeco ApS considers ensuring our customers with full traceability via batch- and certificate control.

**Declaration:**  
 In the guidelines from the Danish, French and other European authorities, the above listed stainless steel alloys are fully compliant with the Good Manufacturing Practice (GMP). For more information we strongly recommend reading the guidelines.

Ex:  
[Food contact materials - metals and alloys \(nordcon.org\)](#)

The declaration does not include:  
 • Future surface treatments

**EPD**

Steel production  
 Steel recycling  
 Manufacturing  
 Applications

**Hot rolled steel plates**

Environmental Product Declaration (EPD)  
 in accordance with ISO 14025 and EN 15804+A1  
 S-P-01818, version 1.0  
 UN CPC 412

**CERTIFICATE OF VERIFICATION**  
 RECYCLED CONTENT CLAIM VERIFICATION

For the period 01.01.2024 – 31.12.2024 DEKRA Assurance Services as an independent partner confirms the verification of the recycled content claim of

4020 Linz, Austria

for the Steel Slab and Casting Production in accordance with ISO 14021

It can be confirmed that the recycled content in steel slab and casting production at the Linz production site in 2024 is on average 25% (24.3% pre-consumer scrap, 0.5% post-consumer scrap)

The following subjects were verified by DEKRA Assurance Services GmbH:

- Calculations for above mentioned period
- Supporting evidence for the calculations

Further details can be found in the verification report ("Report 120320041") dated 07.10.2025 which provides a detailed overview on goal and scope, process, assessment and result of the verification.

The recycled content claim verification is subject to periodic surveillance and only valid for the above-mentioned period.

**Material certificate (MTC)**

- Manufacturer
- Product number
- Steel grade
- Heat / Lot / Item id
- Chemical properties (FMD)
- Mechanical properties
- Country of origin Melt & Pour

**Material Compliance Declaration**

- Chemical properties (SoC/SVHC/DoC)

**Product Carbon Footprint**

- PCF
- ...

**Recycled content**

- Recycled content
- Pre / Post consumer scrap

# Operationally established – digitally heterogeneous across domains

Data domain	Data practice	Reporting level	Operational maturity	Digital exchange reality
<b>Identification &amp; Marking</b>	Heat / Lot / Item ID	Heat / Lot / Item	● High	<b>Heat-, lot- and item-based identification is operationally established;</b> digital persistence and marking formats vary across actors.
<b>Material Data</b>	Mill Test Certificates (EN 10204)	Heat / Lot / Item	● High	<b>Digitally generated;</b> predominantly exchanged as PDFs with core system linking
	Material Declarations (DoC/SDS/REACH/IMDS/DoP)	Product Group / Product	● High	<b>Manually generated;</b> document-based exchanged, stored in file systems, varying system linkage in selected industries
<b>Environmental Performance</b>	PCF (EPD-based / ISO 14067 with variations / CBAM)	Product Group / Product	● Medium – High	<b>Tool-based calculations;</b> exchange mainly document-based rather than structured data flows
	Recycled Content declarations	Site / Product Group	● Medium (heterogenous)	<b>Average-based reporting;</b> no observed industry practice on how to data is exchanged
<b>Origin</b>	Material origin (Country of Origin & Melt & Pour)	Heat / Lot / Item	● High	<b>Embedded in MTC,</b> operational for trade

# Operationally established – digitally heterogeneous across domains

Data domain	Data practice	Reporting level	Operational maturity	Digital exchange reality
Identification & Marking	Heat / Lot / Item ID	Heat / Lot / Item	● High	<b>Heat-, lot- and item-based identification is operationally established;</b> digital persistence and marking formats vary across actors.
	Mill Test Certificates (EN 10204)	Heat / Lot / Item	● High	
Material Data	Material Declarations (DoC/SDS/REACH/IMDS/DoP)	Product Group / Product	● High	<b>Manually generated;</b> document-based exchanged, stored in file systems, varying system linkage in selected industries
	PCF (EPD-based / ISO 14067 with variations / CBAM)	Product Group / Product	● Medium – High	<b>Tool-based calculations;</b> exchange mainly document-based rather than structured data flows
Environmental Performance	Recycled Content declarations	Site / Product Group	● Medium (heterogenous)	<b>Average-based reporting;</b> no observed industry practice on how to data is exchanged
	Origin		● High	

1. Operational traceability exists at heat, lot and item level


2. Compliance and material data are typically reported at product or product group level

3. Environmental performance data is calculated and reported at higher aggregation levels

## PRACTICAL FEASIBILITY AND EFFORT VS VALUE


# Potential DPP content aligned with current industry practice

### Scenario 1: Integrate with current data exchange practice for MTC (Heat/ lot / item level)

 **DIGITAL PRODUCT PASSPORT** Heat / Lot / Item


**Identification & classification**

ID	Heat / Lot / Item	Category
EU-STEEL-00012458	H-2023-11847	Steel product
Steelgrade	Standard	Operator
S355J2+N	EN-10025-2	European Steel Producer

 Environmental performance


- Product Carbon Footprint
- Recycled content

Product

 Technical & material data

- Mechanical properties
- Chemical properties

Heat / Lot / Item


 Origin & traceability

Heat / Lot / Item

#### Implications


- + Integrating sustainability in current data exchange practice provides **higher impact and ease continuous data exchange**
- + Enables **production optimization** and circularity gains
- **Slightly higher implementation effort** (ID alignment & marking, system integration, governance)

### Scenario 2: Add DPP requirements as a stand-alone sustainability reporting requirement

 **DIGITAL PRODUCT PASSPORT** Product


**Identification & classification**

ID	Category	Steelgrade
EU-STEEL-00012458	Steel product	S355J2+N
Standard	Operator	
EN-10025-2	European Steel Producer	

 Environmental performance

- Product Carbon Footprint
- Recycled content

Product

 Material data

- Material conformity declaration

Product

#### Implications


- + **Quicker implementation** with smaller scope, only focused on sustainability data and **product level data only**
- Value primarily linked to **compliance and sustainability**
- Digital Product Passport requires **one additional data exchange practice** on top, assumed to add **higher cost to maintain**

#### Remarks

- Lowest level of identifier should be flexible as it depends on product and application (heat, lot or item level)


## PRACTICAL FEASIBILITY AND EFFORT VS VALUE

# Industry feedback on Methodological choices for environmental performance

 **DIGITAL PRODUCT PASSPORT**

**Identification & classification**

ID	Heat / batch	Category
EU-STEEL-00012458	H-2023-11847	Steel product
Steel grade	Standard	Operator
S355J2+N	EN-10025-2	European Steel Producer

 Environmental performance

- Product Carbon Footprint
- Recycled content

Product

### Environmental performance considerations

- **Methodology decision with defined category rules is welcomed** to ease comparability
- **Building on, or aligning with existing EPD / ISO 14067** → lower transition effort and alignment with current industry practice
- **Aligning CBAM and potentially other instruments with current Product Carbon Footprint methodology** is welcomed, not the other way around
- **Recycled content currently shows lower standardisation and urgency**

### Potential pitfalls

- **Complex transition into new methodology** where currently underlying data cannot be utilized

## Industry feedback on data alignment and methodological clarity

- A broad preference for **harmonising existing material data handling** (Material Declarations and MTC), including **mechanical properties and origin**
- A smaller subset favours limiting DPP content primarily to sustainability-related data (SoC, PCF, Recycled Content)
- Ensure **clarity and consistency in methodological standards** for environmental performance (PCF and Recycled Content)
- **Acknowledge existing investments and established market practice** in environmental performance reporting

## NEXT STEPS

- Support formalization of the content proposal



# Harmonized Guarantee Label & Notice new obligations under the Empowering Consumers Directive

DG JUST B.1 - Jeroen VAN LAER



# Harmonised Guarantee Label & Notice: new obligations and opportunities under the Empowering Consumers for the Green Transition Directive

*Ecodesign Forum Expert Group Meeting  
19 March 2026*

**Jeroen Van Laer**  
Policy officer Sustainable Consumption  
JUST B.1 – Consumer Policy and Sustainability  
Directorate B – Consumers  
Directorate-General Justice and Consumers

# Legal context (1)

## Directive (EU) 2024/825 on Empowering Consumers for the Green Transition (ECGT)

- **Overall objective:**
  - Better protection against misleading green commercial practices: greenwashing and early obsolescence practices
  - Better information on sustainability aspects: durability, reparability, legal guarantee rights
- **Targeted amendments** to two key existing horizontal consumer laws:
  - Unfair Commercial Practices Directive (UCPD)
  - Consumer Rights Directive (CRD)
- **Overall approach** of these EU consumer laws **remains unchanged**
  - E.g. does not regulate intrinsic characteristics of goods, services or companies but focuses exclusively on how these are presented to consumers in B2C context
- **Timeline**
  - Directive adopted on 28 February 2024
  - Implementing Regulation adopted on 25 September 2025
  - Q&A document published in November 2025
  - Transposition Directive by 27 March 2026
  - Application Directive from 27 September 2026





# Legal context (2)

## Problems identified in IA report concerning guarantees/durability information:

- Information on '**expected lifespan**' hardly available for consumers
- Information on '**guaranteed lifespan**' available through **commercial guarantees**
- Information on commercial guarantees, and the way consumers being charged, often **unclear, imprecise** or **incomplete**

## Commission Implementing Regulation 2025/1960 (under CRD) to specify the design and content of:

- harmonised notice on legal guarantee of conformity
- harmonised label for commercial guarantee of durability

## Requirements for both label and notice:

- Easily recognisable and understandable for consumers
- Easy to use and reproduce for producers and traders



# Legal context (3)

## Harmonised notice on legal guarantee of conformity

- Main elements of legal guarantee, incl. minimum duration of two years and a general reference to duration under national law
- Location: Displayed in a prominent manner **at shop level**, for example on a poster in an eye-catching way on a wall in the shop

## Harmonised label on commercial guarantee of durability

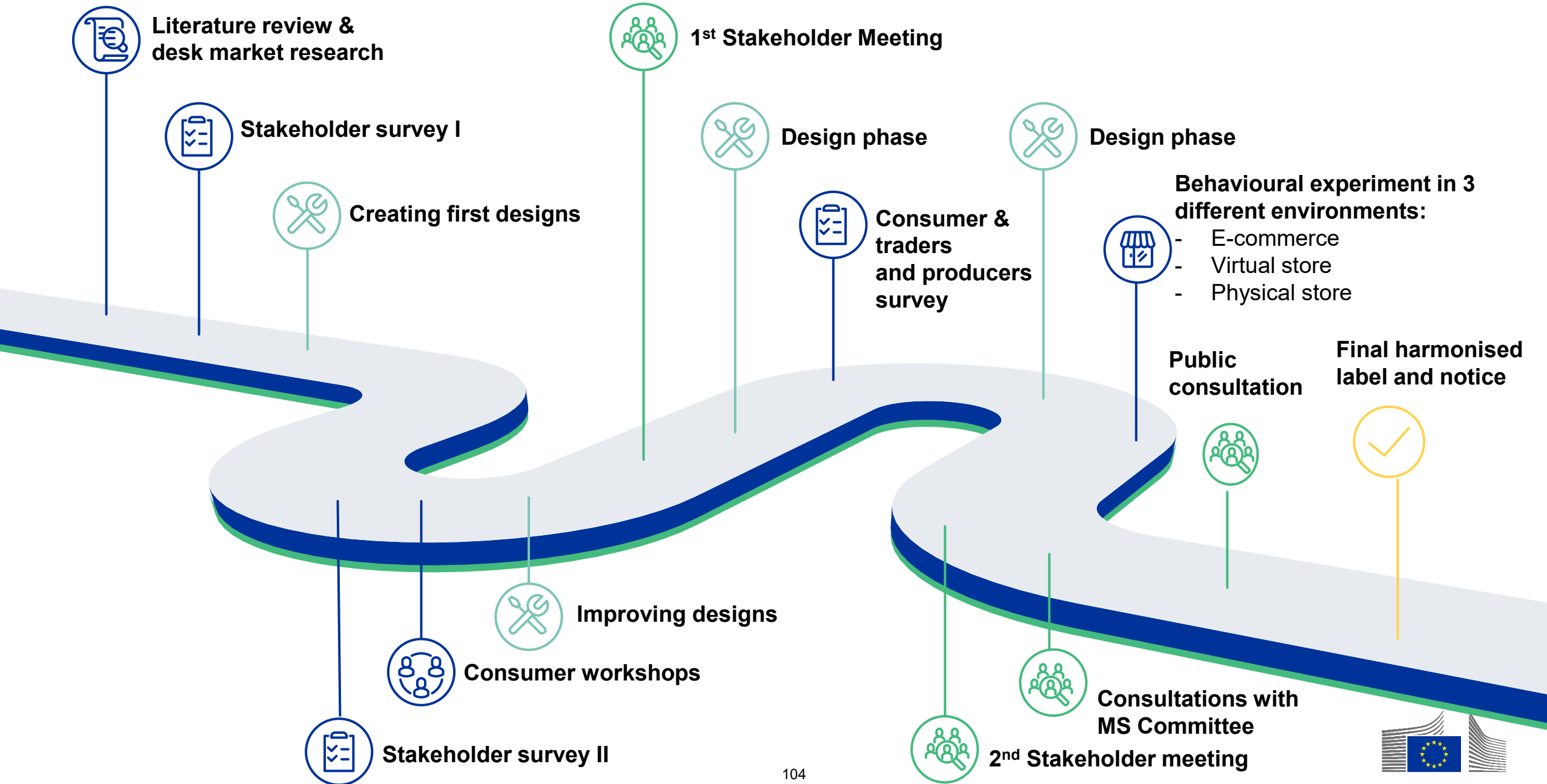
- Existence and duration of voluntary commercial guarantee + reminder of the existence of the legal guarantee
- Offered by producer at no additional cost, covering the entire good, duration beyond 2 years and producer makes info available to trader
- Location: Displayed directly **on a particular product** or packaging or in a prominent manner next to product (e.g. on shelf)

## Objectives

- increase consumers' awareness of their rights under the legal guarantee of conformity
- increase the availability of commercial guarantees of durability and consumers' awareness and understanding thereof



# Preparatory study 2024-2025 for harmonised notice and label



# Key conclusions preparatory study

- **Confirms effectiveness** of both the harmonised notice and label
- **Added value** for both **consumers** and **businesses**
- Consumers **interested to choose** for high-quality, longer-lasting products
- Behavioural experiment shows that **more respondents chose the higher-priced product with a longer commercial guarantee of durability** in all three environments **compared to a “no label” scenario**.
- The harmonised label **remains effective in the presence of other labels**, such as the EU energy label, a repair score or durability index.
- **Price premium that consumers willing to pay** for products with the harmonised label **should also incentivise producers** to produce high-quality and longer-lasting products and eventually use the label.





# LEGAL GUARANTEE

## Minimum two-year legal guarantee protection for goods sold in the European Union.

Consumers can claim their rights under the legal guarantee of conformity, for example if goods:

- ✔ do not match the description;
- ✔ do not function as intended.

**Sellers are liable** for any lack of conformity which existed when the goods were delivered, and which becomes apparent within the legal guarantee period. Sellers in such a situation are required to offer:

- ✔ **free repair or free replacement;**
- ✔ in some cases, a **price reduction or full reimbursement.**

Some countries have a longer legal guarantee period. For second-hand goods, a shorter period may apply, but not less than one year.

For more information on your rights in a specific country, scan the QR code below or ask the seller.



[europa.eu/youreurope/guarantees](https://europa.eu/youreurope/guarantees)

## What to do if you receive non-conforming goods:

- 1 Contact the seller as soon as possible to report the issue;
- 2 Provide proof of purchase, such as a receipt, invoice, or bank statement.

**GARAN** 

Sellers and producers may also offer commercial guarantees, which apply independently from the legal guarantee. For example, you may see this GARAN label representing a **commercial guarantee of durability** offered by the producer at no additional cost and covering the entire good.

# Harmonised notice





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# Harmonised notice

- Minimum two years legal guarantee under Directive (EU) 2019/771





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# Harmonised notice

- Minimum two years legal guarantee under Directive (EU) 2019/771
- Reminder of possible longer guarantee period under national law
- Scannable QR code to Your Europe portal





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# Harmonised notice

- Minimum two years legal guarantee under Directive (EU) 2019/771
- Reminder of possible longer guarantee period under national law
- Scannable QR code to Your Europe portal
- Reminder on common situations and remedies available





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# Harmonised notice

- Minimum two years legal guarantee under Directive (EU) 2019/771
- Reminder of possible longer guarantee period under national law
- Scannable QR code to Your Europe portal
- Reminder on common situations and remedies available
- Practical information on the steps consumers can take





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- Minimum two years legal guarantee under Directive (EU) 2019/771
- Reminder of possible longer guarantee period under national law
- Scannable QR code to Your Europe portal
- Reminder on common situations and remedies available
- Practical information on the steps consumers can take
- Indication of additional commercial guarantees





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# B/W version of Harmonised notice

- In e-commerce only in colour, but in physical shops either in colour or in B/W
- Minimum size A4 in physical shops, but may be printed in larger formats (A3, A2, A1)



# Webpage behind the QR code on harmonised notice (EN language version)

## Guarantees

- On this page
- Legal guarantee
- Commercial guarantees
- Second-hand goods
- Digital content and digital services
- Continuous supply
- Your data in exchange for content or service
- Where to get help

### Legal guarantee

Under EU rules, if the goods you buy turn out to be faulty or do not look or work as advertised, the seller must **repair or replace them at no cost**. If this is impossible or the seller cannot do it within a reasonable time and without significant inconvenience to you, you are entitled to a **full or partial refund**. You always have the right to a **minimum 2-year guarantee** from the moment you received the goods. However, national rules in your country may give you extra protection.

The 2-year guarantee period starts as soon as you receive your goods.

If a defect becomes apparent within 1 year of delivery, you don't have to prove it existed at the time of delivery. It is assumed that it did unless the seller can prove otherwise. In some EU countries, this period of "reversed burden of proof" is 2 years.

Goods bought from private individuals are not covered by these rules.

Some EU countries have a longer legal guarantee period under their national law. To find out more about your rights, select your country below:

Choose country

Austria	Germany	Malta
Belgium	Greece	Netherlands
Bulgaria	Hungary	Norway
Croatia	Iceland	Poland
Cyprus	Ireland	Portugal
Czechia	Italy	Romania
Denmark	Latvia	Slovakia
Estonia	Liechtenstein	Slovenia
Finland	Lithuania	Spain
France	Luxembourg	Sweden

Web address English language version of the notice:

[europa.eu/youreurope/guarantees](https://europa.eu/youreurope/guarantees)

Webpage available in all official languages of the EU, like the harmonised notice itself



# GARAN



Brand/Trademark

Model identifier

# XX



**BG** Гаранция от производителя в години | **CS** Záruka výrobce v letech |  
**DA** Producentgarantiens varighed i år | **DE** Herstellergarantie in Jahren |  
**EL** Εγγύηση παραγωγού σε έτη | **EN** Producer guarantee in years | **ES** Garantía del productor en años | **ET** Tootja garantii aastates | **FI** Tuottajan takuu vuosina |  
**FR** Garantie du producteur en années | **GA** Rátháíocht an táirgeora de réir blianta | **HR** Jamstvo proizvođača u godinama | **HU** Gyártói jótállás években |  
**IT** Garanzia del produttore in anni | **LT** Gamintojo garantija metais | **LV** Ražotāja garantija gados | **MT** Garanzija tal-produttur fi snin | **NL** Producentengarantie in jaren | **PL** Gwarancja producenta w latach | **PT** Garantia do produtor em anos |  
**RO** Garanția producătorului în ani | **SK** Záruka výrobcu v rokoch | **SL** Garancija proizvajalca v letih | **SV** Tillverkarens garanti i antal år

## Harmonised label

- Language neutral design



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## Harmonised label

- Language neutral design
- Title **GARAN** with a tick-mark symbol
- **G Symbol** as a visual reminder of the legal guarantee



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Brand/Trademark

Model identifier



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## Harmonised label

- Language neutral design
- Title **GARAN** with a tick-mark symbol
- **G Symbol** as a visual reminder of the legal guarantee
- Duration and calendar symbol representing years



# GARAN



Brand/Trademark

Model identifier

# XX



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## Harmonised label

- Language neutral design
- Title **GARAN** with a tick-mark symbol
- **G Symbol** as a visual reminder of the legal guarantee
- Duration and calendar symbol representing years
- **QR code** leading to “Your Europe Portal” webpage



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## Harmonised label

- Language neutral design
- Title **GARAN** with a tick-mark symbol
- **G Symbol** as a visual reminder of the legal guarantee
- Duration and calendar symbol representing years
- **QR code** leading to “Your Europe Portal” webpage
- “**producer guarantee in years**” in all official languages of the European Union



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## Editable elements



# B/W version possible in physical shops



# How to display the label?

To be displayed **in a prominent manner** and **in a way that allows consumers to easily identify** which particular good benefits from such commercial guarantees of durability.

In e-commerce, possibility to show nested display:



In physical shops, **minimum size label 95 × 100 mm**, but **flexibility on how to display the label** at the point of sale: on the packaging, on the good, on the shelf.



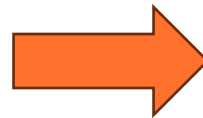
# Webpage behind the QR code on harmonised label



## Commercial guarantee of durability

Select your language

<input type="text" value="български"/>	<input type="text" value="Latviešu"/>
<input type="text" value="čeština"/>	<input type="text" value="Lietuvių"/>
<input type="text" value="Dansk"/>	<input type="text" value="magyar"/>
<input type="text" value="Deutsch"/>	<input type="text" value="Malti"/>
<input type="text" value="Eesti"/>	<input type="text" value="Nederlands"/>
<input type="text" value="Ελληνικά"/>	<input type="text" value="polski"/>
<input type="text" value="English"/>	<input type="text" value="português"/>
<input type="text" value="español"/>	<input type="text" value="română"/>
<input type="text" value="français"/>	<input type="text" value="Slovenčina"/>
<input type="text" value="Gaeilge"/>	<input type="text" value="Slovenščina"/>
<input type="text" value="hrvatski"/>	<input type="text" value="suomi"/>
<input type="text" value="italiano"/>	<input type="text" value="svenska"/>



## Commercial guarantee of durability

This label represents a "commercial guarantee of durability" expressed in years. The guarantee is offered by the producer at no additional costs, covering the entire good and with a duration of more than two years.



It represents a commitment from the producer to you as a consumer on the **durability** of a good. More specifically, it is a commitment that **the good will maintain its required functions and performance** through **normal use** for the number of years indicated on the label. Otherwise, the producer must repair or replace the good at no cost. The producer has to describe the exact terms in the **commercial guarantee statement**.

As a consumer in the EU you also benefit from legal guarantee rights against the seller. The **legal guarantee** applies **independently** of any commercial guarantee.



GARAN label available  
for use as of

**27 September 2026**



# Thank you!

More information:

[http://data.europa.eu/eli/reg\\_impl/2025/1960/oj](http://data.europa.eu/eli/reg_impl/2025/1960/oj)

[https://commission.europa.eu/live-work-travel-eu/consumer-rights-and-complaints/sustainable-consumption\\_en#harmonised-notice-and-label-on-product-guarantees](https://commission.europa.eu/live-work-travel-eu/consumer-rights-and-complaints/sustainable-consumption_en#harmonised-notice-and-label-on-product-guarantees)

# Final Remarks

**DG GROW G.2 Head of Unit – Stefka DZHUMALIEVA**

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# Thank you!

Contact: [GROW-DIGITAL-PRODUCT-PASSPORT@ec.europa.eu](mailto:GROW-DIGITAL-PRODUCT-PASSPORT@ec.europa.eu)