Scanning the Chemical Industry: Unpacking the Digital Product Passport

WHITE PAPER

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Disclaimer

The following document contains key points based on the discussions during the event *'Scanning the Chemical Industry: Unpacking the Digital Product Passport'* in June 2025, and was developed by Cefic and the European Association of Chemical Distributors (FECC). This document was reviewed by the participants of the event. It is not an official position of Cefic or FECC.

The final document may be used as a basis for external communication on issues related to the Digital Product Passport (DPP), such as public consultations and engagement with policymakers. The document will be shared with the representatives of the European Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs (DG Grow) who attended the workshop and are leading the Digital Product Passaport development.

Scanning the Chemical Industry: Unpacking the Digital Product Passport

Background

The Digital Product Passport (DPP) will be an important tool for making product-specific information available to actors along the entire value chain of a product, enhancing transparency on the product's compliance, materials, technical and environmental performance, and end of life recommendations, among others. Even though the DPP was introduced by the Ecodesign for Sustainable Products Regulation (ESPR), its implementation is expanding to other pieces of legislation, such as the Batteries and Detergents Regulations, aiming to cover nearly every product sold in the EU market.

The ESPR and other pieces of legislation will determine product-specific information requirements, defining what a DPP should contain. In parallel, the EC is working on secondary legislation, defining the operation of DPP systems, including requirements for DPP service providers, procedures to issue and verify the digital credentials of economic operators and other actors, requirements for the Central Registry, and rules and procedures on the life cycle management of unique identifiers and data carriers. These will be accompanied by standards and protocols which are being developed, such as CEN CLC JTC 24 "Digital Product Passport – Framework and System" and ISO in ISO/PWI 25534-1 – "Digital Product Passport part 1: Overview and fundamental principles".

The DPP is being introduced for a wide range of products. Certain types of batteries will be the first product category for which the DPP becomes mandatory in February 2027, followed by toys, construction materials, detergents, and the product groups covered by the first working programme of the ESPR.

Our perspective on the DPP

The European Chemical Industry and the European Chemicals Distributors view the DPP as an important tool which should increase transparency and facilitate traceability of chemicals present in final products. In addition to informing consumers on final product data, the DPP can play a key role in market surveillance to help prevent fraudulent products in the market, notably imported products. Adequate enforcement is crucial to help oversee accuracy, competitiveness, innovation, and a level playing field across European and non-European companies.

While the DPP is intended to support digitalised information sharing throughout the value chain, a gradual implementation must be strategically planned to help prevent imposing unnecessary administrative, financial, or time-related burdens on value chain participants. The following concerns have been identified by the industry.

Industry needs and recommendations: Six key points

1- Value chain collaboration

In the early stages, the DPP is already intended to cover various products within the chemical industry's value chain. Consequently, the development of DPP systems and information requirements will affect how and what information is shared along the value chain. Access to information should be on a need-to-know basis and it will be important to preserve confidential information, restricting access only to those that need it.

To help ensure efficient and meaningful data exchange across the value chain, early alignment of what data is required, how it should be determined, how it should be structured, and how it will be communicated is of high importance. Without coordination, there is a significant risk that, in order to comply with their own requirements, downstream users—particularly end-product manufacturers—may initiate numerous, uncoordinated data requests or DPP schemes, creating a complex and costly burden for upstream suppliers as well as potentially conflicting data requirements. There is a distinct market for DPP and, as multiple systems emerge, the potential for fragmentation grows, especially for base material suppliers who may be asked to provide data/information to several platforms simultaneously. To mitigate this, an interoperable and sector agnostic DPP system and a horizontally harmonised data vocabulary and data determination approach would help promote consistency, reduce complexity and costs, especially for industries located upstream to multiple end-product value chains.

Open dialogue across the value chain as well as with policymakers is essential, and all value chain stakeholders—from end-product manufacturers to upstream producers—must be involved in shaping practical, interoperable and verifiable solutions.

2- Workability of the system for all

It is essential to prioritize the development of a DPP system that is workable, user-friendly, transparent, efficient and simple for all who will use it. This can help ensure that companies do not face financial or time constraints when adopting DPPs and supports the SMEs who may face additional burdens due to limited resources, lack of availability of requested information and expertise. Ideally, once DPPs are implemented, the system should remain resilient and compatible with the introduction of new legislation or modifications to current laws and coherence should be maintained across all legislative frameworks.

Chemical distributors stress the need for effective enforcement mechanisms and reliable, transparent, accurate and comparable data on imported goods, supported by harmonised standards (e.g. ISO) and sector-specific rules to help ensure consistent and accurate data collection and sharing. Close collaboration between industry and regulators is essential, alongside the development of secure, and verifiable interoperable IT systems for data input. Joint efforts are needed to help define common data communication methods and standardised

questionnaires for chemical users, while also addressing concerns around market segmentation and system integration.

3- Templates and terminology

The successful implementation of DPP will ultimately depend on the consistency and accuracy of information shared along the value chain. All actors in the value chain should be able to interpret the information they receive from suppliers and communicate their own information in a manner that is consistent, clear and unambiguous. Therefore, implementing DPP templates and harmonised terminology throughout the value chains will be essential. Harmonising the submitted data is essential to help ensure it is clear, comparable, and valuable across a wide range of industries and sectors in our economy.

4- Implementation time

The DPP aims to digitalise information sharing throughout the value chain, with the primary objective of optimising the efficiency and speed of this process. However, not all actors in the value chain have the same starting point. While larger organisations have typically already implemented digital processes and possess greater familiarity with these systems, smaller businesses - such as micro, small, and medium-sized enterprises, which represent 99% of all companies - are still becoming accustomed to the concept. The implementation of DPPs should start with basic information to enable all actors to adapt. 18 months may not be sufficient time to enable implementation of systems, familiarisation with how they work and communication to the upstream and downstream value chains. Additionally, a staggered introduction roadmap of data requirements, starting with high priority metrics first and adding supplementary metrics with time, could be a pragmatic implementation strategy.

Sufficient time must be allowed for dialogue and alignment across the value chain, starting with a pragmatic approach that allows for secondary data, alongside primary data, to help support early progress and maintain ongoing growth.

5- Data assurance

It is essential that the submitted data is accurate and comparable, leveraging harmonised methodologies (e.g. ISO) and approved third-party databases (e.g. ecoinvent, Sphera LCI database, etc.). Data assurance should be approached pragmatically, for example - through periodic audits of sample data points - rather than requiring certification or verification of each individual data point. This can help avoid unnecessary cost increase on products for European consumers. Data verification requirements must be clarified to avoid duplication and existing assurance schemes applied to data due to other pieces of legislation should be leveraged; verifying the methodology behind data calculations may often be sufficient, rather than verifying every individual data point.

6- Labelling requirements

The inclusion of labelling requirements for end-products into the DPP – instead of on the products themselves - should be considered. As more elements must be communicated on product labels, including them in the DPP can help to avoid information-dense multilingual labels on packaging.

For any questions, please contact:

Dr. Eric de Deckere
Cefic Sustainability Director
ede@cefic.be

Diana Khrystych
Trade & Sustainability Manager
dkh@fecc.org