KPMG European Digital Product Passport

Readiness Survey

An overview of where European businesses stand and the sectors most impacted by DPP requirements.

Foreword

The EU's Digital Product Passport (DPP), implemented in 2024, requires nearly all products sold in the EU to declare product origin, materials used, environmental impact, and disposal recommendations.

At the core of the Ecodesign for Sustainable Products Regulation (ESPR), and complemented by the EU Batteries Regulation (EU BR) and the Construction Products Regulation (CPR), the DPP is reshaping how European businesses create value. By establishing a product-level data infrastructure, the DPP is designed to enable trusted information, stronger customer confidence, circularity and operational resilience.

Our KPMG European DPP Readiness Survey results reveal high awareness but uneven readiness. Many organizations have not yet assigned clear ownership nor translated regulatory expectations into operational plans. At the same time, companies recognize the necessary business transformation and interdisciplinary aspect of the DPP, requiring collaboration between IT, Procurement, R&D, Supply Chain, Operations, Legal, Marketing and Commercial functions. This underscores the importance of early action and strong corporate governance.

Key obstacles for implementation include multi-tier supplier data quality, uncertain technical specifications and systems integration while top benefits include enhanced market trust, demand uplift and end-of-life recovery. Transparency is cited as an enabler for trust and comparability of product sustainability.

Early movers are piloting approaches, mapping supplier ecosystems and embedding product-data requirements into design and procurement. These capabilities will likely accelerate scaling of the program as delegated acts (standards definitions) clarify detailed requirements through 2026.

Mike Hayes
Global Climate Change and Decarbonization Leader
Global Head of Renewable Energy
KPMG International

Ruth Guerra
Head of Global ESG Tax and Legal
KPMG in France

The potential implications across sectors are substantial:

Metals (iron, steel, aluminum)

Manufacturers will likely gain deeper product lifecycle intelligence, enabling process optimization, reduced waste, improved quality and more resilient supply networks for key components.

Textiles and footwear

The DPP will help authenticate materials, verify origins, strengthen brand trust and support circular models such as repair, rental and resale — all while preparing for stringent ESPR requirements.

Batteries and energy storage

With battery passport rules already paving the way, companies can benefit from enhanced traceability of critical materials, improved end-of-life recovery and more secure and compliant value chains.

Electronics and ICT

Electronics producers can leverage the DPP to improve repairability, service models, component traceability and compliance with ESPR durability and circularity criteria.

Furniture and mattresses

Visibility on materials, durability and components will support customer trust, enable refurbishment and take-back models and strengthen competitive differentiation.

Other (tires, chemicals)

The DPP aims to enhance material traceability, support fair competition and improve recovery and recycling outcomes through reliable product-level information. Upstream chemical producers will benefit from clearer material flows, improved compliance alignment and strengthened collaboration with downstream manufacturing partners.

This report offers an overview of where European businesses stand across key KPMG European markets and the sectors most impacted by DPP requirements. It also outlines actionable recommendations: set governance, conduct gap assessments, secure resources, engage suppliers early, run pilot projects and prepare flexible roadmaps aligned with evolving technical specifications.

On behalf of KPMG professionals across Europe, we encourage business leaders to use this report to navigate this pivotal moment.

"The Digital Product Passport represents an opportunity to build trust, unlock value and reinforce long-term competitiveness in a rapidly evolving regulatory and market EU environment. We look forward to working with you as you move from compliance readiness to business value creation and competitiveness."

Mike Hayes
Global Climate Change and Decarbonization Leader
Global Head of Renewable Energy
KPMG International

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About the survey

KPMG conducted a multi-country survey across Europe (September–December 2025) to explore awareness, governance, data readiness, supplier engagement, systems and strategic priorities to provide a comprehensive picture of current preparedness to implement Digital Product Passport (DPP) requirements.

KPMG engaged more than 70 organizations of varying sizes, industries and positions in the value chain to ensure the research would provide a representative snapshot of how European organizations have started approaching this regulatory milestone. The survey further considered a range of sectors, each with different levels of exposure to early DPP obligations. Sector definitions, as used throughout this report, consist of:

Metals (iron, steel, aluminum) — focusing on companies that extract, process and manufacture raw metals and heavy industrial components.

Textiles and footwear — focusing on manufacturers and brand-led companies operating in fashion, sportswear and industrial textile segments.

Batteries and energy storage — focusing on companies operating in power electronics and battery technology.

Electronics and ICT — focusing on consumer electronics, semiconductor technology and information communication technology.

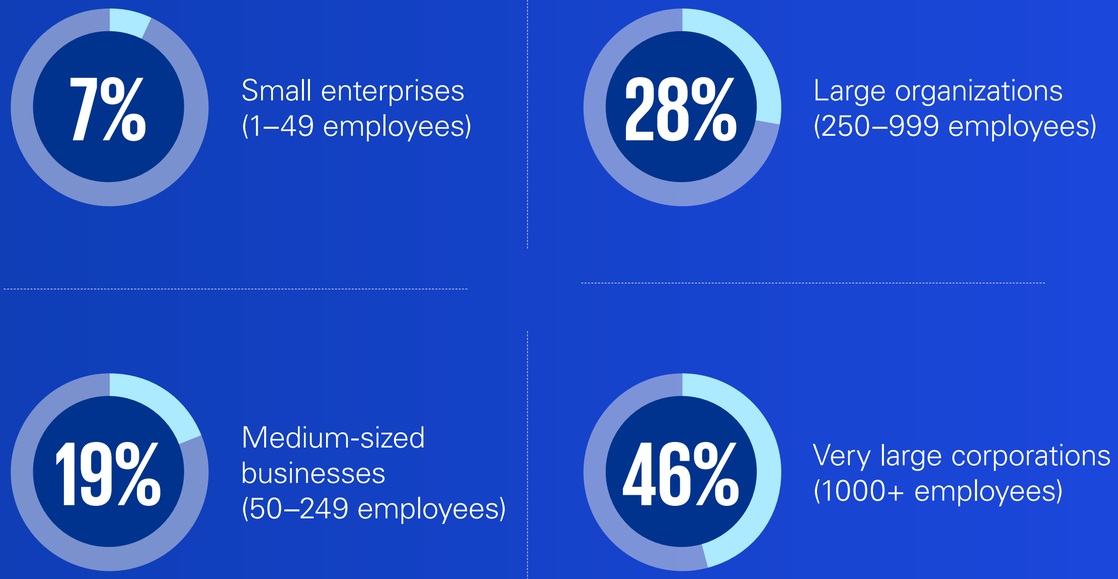
Furniture and mattresses — capturing companies that range from office workplace solutions to high-end home decor and acoustic design.

Other — including tire manufacturers and chemical production.

Survey respondents

More than 70 diverse organizations participated in the survey:

Figure 1: Company size categories of survey respondents



Geographical reach

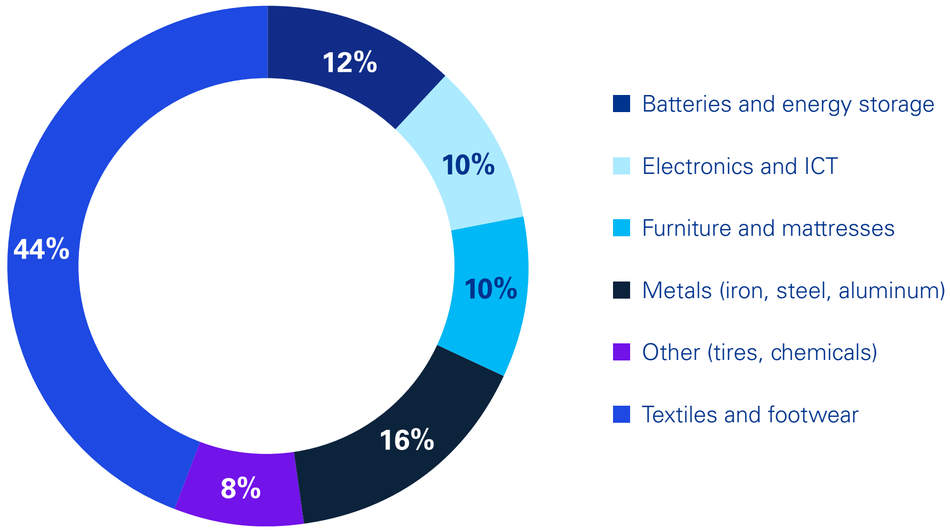
The survey leveraged the expertise of KPMG member firms in: Austria, Belgium, Czech Republic, Denmark, Finland, France, Germany, Italy, Netherlands, Norway, Slovakia, Spain and Sweden.

Industry representation

The survey achieved strong representation across the industries most impacted by forthcoming DPP regulations. Participation was strongest in Textiles and apparel (44 percent), reflecting the high level of regulatory attention and supply chain complexity in this industry, followed by **metals** (16 percent), providing valuable insight from material intensive sectors facing increasing transparency requirements. **Batteries and energy storage** (12 percent) and **electronics and ICT** (10 percent) were also well represented — two categories where DPP obligations are already more advanced and technically detailed. **Furniture and mattresses** (10 percent) and **other** sectors (8 percent) also provided responses ensuring additional diversity in regulatory exposure and data-sharing needs.

Collectively, this mix of sectors and business sizes provides a robust view of DPP readiness across both high-impact and emerging categories.

Figure 2: Industry breakdown of survey respondents



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Decoding the Digital Product Passport

The DPP is established under the Ecodesign for Sustainable Products Regulation (ESPR), Regulation (EU) 2024/1781, which entered into force on 18 July 2024. ESPR expands eco-design beyond energy-related products and foresees product-group requirements via delegated acts, which define mandatory sustainability and circularity standards. As a framework, ESPR covers all physical goods placed on the EU market, excluding food, feed and medicinal products. The DPP is also a delivery mechanism for the EU's broader industrial strategy. The Clean Industrial Deal uses procurement and lead-market tools that will rely on product-level data carried by the DPP, while the forthcoming Circular Economy Act aims to scale circular material markets where DPP information becomes the common evidence base.

The DPP is a standardized, product-specific record that accompanies an item throughout its lifecycle. It makes product information accessible to authorized stakeholders via a unique identifier (e.g., QR, NFC, RFID). The DPP aims to enable informed choices, facilitate repair, reuse and recycling, and strengthen market surveillance. The DPP will also serve product-compliance purposes, such as markings, safety information and declarations.

Additional categories such as chemicals, detergents and toys may be covered as the regulatory program evolves, whereas some already feature DPP like requirements (e.g., the Construction Products Regulation for construction products; and the EU Batteries Regulation for batteries). Access to product information shall follow a strict need-to-know principle to ensure only authorized stakeholders can retrieve relevant data.

Who is impacted and how

Obligations apply to manufacturers (EU and non-EU placing products on the EU market), importers, distributors, retailers and fulfilment service providers. Depending on the product group, obligations can also impact service providers handling data storage, access control and integrity.

Compliance obligations

For each applicable product:[1]

- A DPP must be created and kept complete; it must contain all mandatory information specified in the product group's delegated act.
- Data must meet the essential requirements in Articles 9 and 10 of ESPR and be verified per the relevant rules.
- Companies will need role-based data access, verified information (composition, substances of concern, origin, footprint, durability, repairability, recyclability) and compliant storage/backup practices.
- A backup must be maintained by a certified service provider.
- The data carrier/identifier must be made available to dealers and online marketplaces.

Commission work plan and priority waves (2025–2030)

The Commission's ESPR Working Plan (2025–2030) prioritizes early product waves based on environmental impact and circularity potential (including Joint Research Centre insights).[2] Early waves commonly cited include:

- Textiles, apparel, furniture (including mattresses) and tires
- Iron, steel and aluminum (intermediate materials)
- Energy-related products
- ICT/consumer electronics
- Construction products

Further waves are expected to follow via dedicated delegated acts.

[1] https://unece.org/sites/default/files/2024-11/7Nov_pm_9TFAI_3a_API_1_EC_Auricchio%5B1%5D.pdf
[2] https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52025DC0187

Implementation timeline for DPP

Implementation follows a phased approach aligned to ESPR's framework and product group schedules:

2024–2025
regulatory and technical foundations; standardization work progresses.

2026 (expected)
launch of an EU level digital registry for in-scope companies to store or reference DPP data; release of DPP system standards by CEN/CENELEC; adoption of the delegated act on DPP service providers (defining data management, access rights and technical responsibilities)

2027
first mandatory DPP application in batteries (per EU Batteries Regulation).

2027–2030
sequential adoption of the delegated acts for priority product groups. Each product category becomes subject to binding DPP obligations ~18 months after adoption of its specific delegated act.

By 2030
Broad expansion across major categories, establishing a common digital information layer that supports transparency, circular models and product level governance.

Where dates are forward-looking, they remain expected/anticipated until formal acts are published. Exact data models, transition periods and verification rules will be set in the delegated acts.

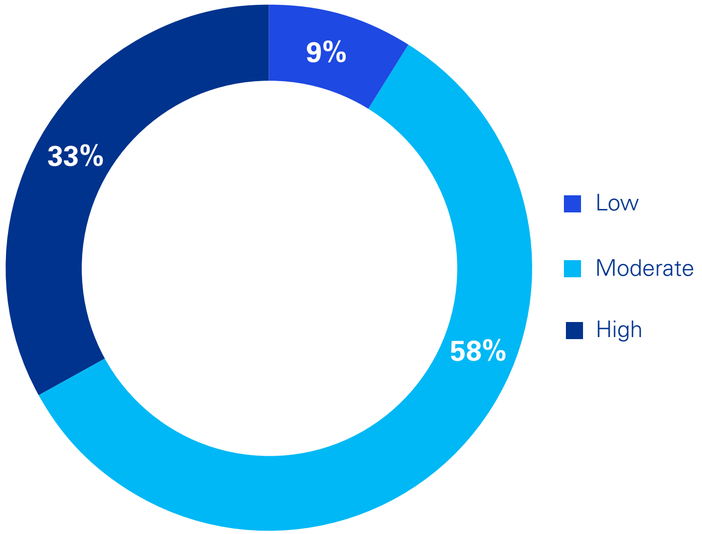
In brief: DPP is the EU's product level information backbone. It is compliance-critical yet designed to unlock customer trust, circularity and operational value, provided companies address data quality, supplier engagement, and system integration early and systematically.

Readiness status across EU: Who's prepared and who's falling behind?

Awareness is high while operational understanding lags

Awareness of the DPP in the market is high. According to the survey, 97 percent have heard of the DPP and 64 percent self-identify as very knowledgeable. However, the depth of understanding is uneven. Only 33 percent report high understanding of requirements and implications for their company, whereas 58 percent have moderate understanding and 9 percent low. Many respondents understand what the DPP is, but fewer have internalized how the DPP translates into concrete obligations or actions. This creates a risk of overconfidence and can mask gaps in operational readiness. While the market is aware and motivated to implement the DPP, most companies need structured enablement to translate awareness into implementation readiness. As delegated acts for product groups have not yet been published, these are not surprising results.

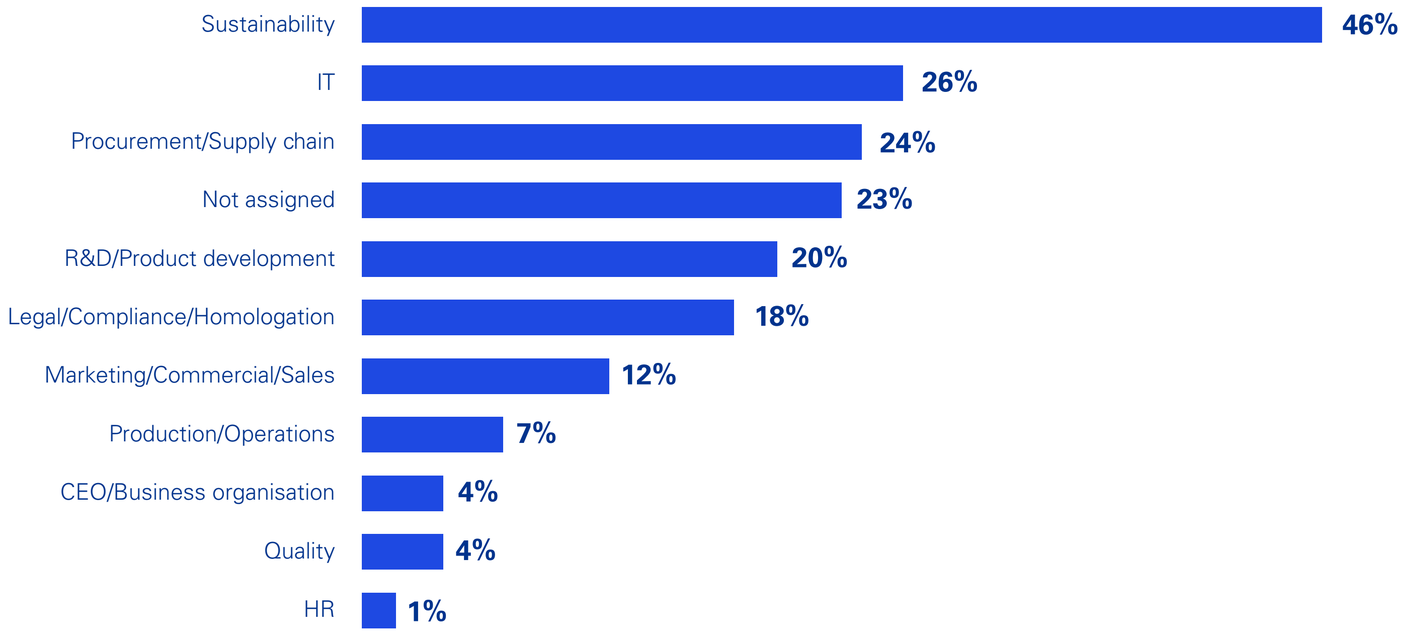
Figure 3: Awareness levels of the DPP among participating companies



For companies, the key challenge is achieving operational clarity around the DPP; that is, specifically defining ownership, determining the required data, establishing the approach to identifiers and data carriers and ensuring suppliers can provide the necessary information. In the near term, organizations should focus on appointing a cross-functional owner to steer DPP work; validating which product groups fall within scope and when their delegated acts take effect; and designing the data model and system architecture, including identifier strategy, access control and the supporting data infrastructure. Strengthening supplier engagement is essential — embedding DPP-related data obligations, substances-of-concern tracking and update cycles into contracts. Companies should pilot DPP implementations for prioritized product categories to better understand the required effort and the implications for data flows, systems and downstream processes. Finally, targeted training and enablement efforts are needed to elevate teams from moderate to high understanding, using structured playbooks and feedback loops to build competence and confidence across functions.

Ownership tends towards sustainability, but governance gaps persist

Figure 4: Departments responsible for implementing the DPP



Exploring the governance gap

The data shows that responsibility for implementing the DPP is concentrated primarily within Sustainability teams (46 percent), indicating that most companies still frame the DPP as a sustainability-led and compliance-led initiative rather than a product or business transformation. Significant involvement from IT (26 percent), Procurement/Supply Chain (24 percent) and R&D/Product Development (20 percent) highlights the inherently cross-functional nature of the DPP, which requires coordinated efforts across data systems, supplier engagement and product architectures.

However, 23 percent of survey respondents report "Not assigned," pointing to a notable governance gap and a lack of clear ownership in many organizations. Strikingly, the Design and Finance functions are not mentioned, suggesting that critical upstream and economic dimensions such as embedding data attributes in product design and assessing business implications are often overlooked. Overall, while companies recognize that the DPP spans multiple functions, clear leadership and full lifecycle integration are still missing.

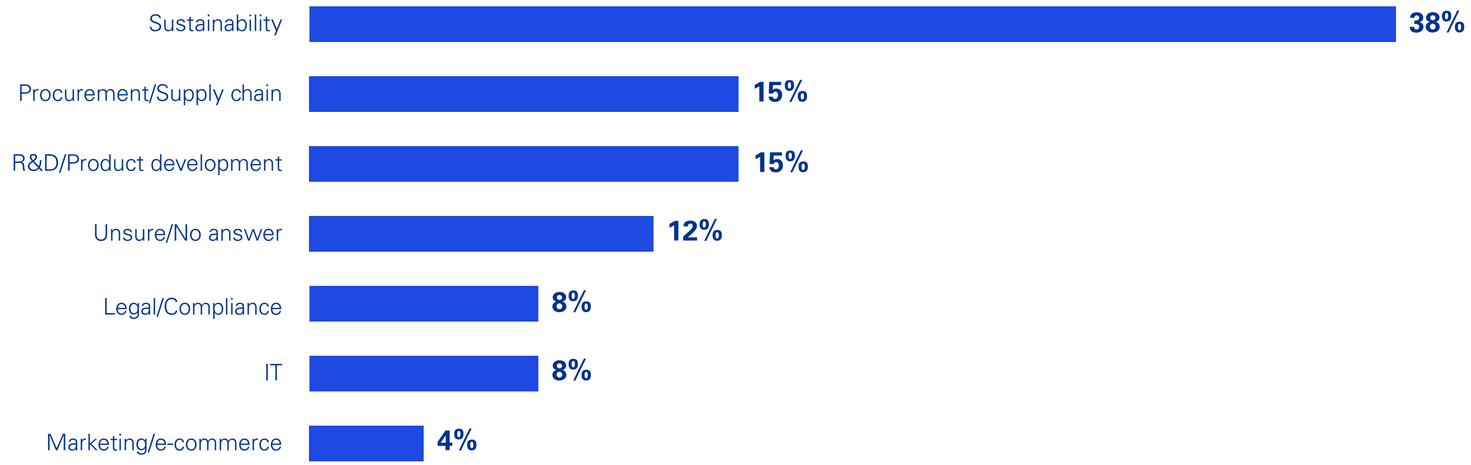
Where ownership is not yet embedded across functions, uncertainty dominates

Based on the responses when ownership is not assigned (23 percent), Sustainability (38 percent) is viewed as the natural accountable owner of DPP, reflecting the topic's environmental compliance-led nature, while R&D/Product Development (15 percent) and Procurement/Supply Chain (15 percent) emerge as the critical execution hubs where product and supplier data are created and governed. On the other hand, Legal/Compliance (8 percent) and IT (8 percent) are seen as essential enablers, legal for regulatory interpretation and auditability, IT for the data platform and integrations rather than sole owners. Marketing/eCommerce (4 percent) is underrepresented, signaling that customer-facing value cases will likely mature in later phases. Twelve percent of respondents remain unsure on where to allocate the responsibility internally.

While the Sustainability function within an organization may remain the natural accountable owner for the DPP, a key consideration is the need to progressively shift day-to-day ownership and execution toward the functions that generate, validate and operationalize the required data — namely Product development/R&D and Procurement/Supply Chain. Under the proposed operating model, Sustainability sets the direction and helps ensure regulatory alignment, but Product and Supply Chain should become the true engines of delivery, embedding DPP requirements into product-development cycles, BOM (bill of materials) structures, supplier onboarding and materials documentation.

This shift is essential because the bulk of DPP effort lies in data creation, verification and integration — activities that cannot be owned by the Sustainability function alone. Legal and IT then play focused enabling roles, with Legal translating regulatory nuances into operational rules and IT providing the infrastructure and automations that the Product and Supply Chain functions rely on. The implication is a maturity transition, where Sustainability moves from hands-on driver to strategic overseer and operational ownership migrates to the teams closest to the data and the processes that power the DPP end-to-end.

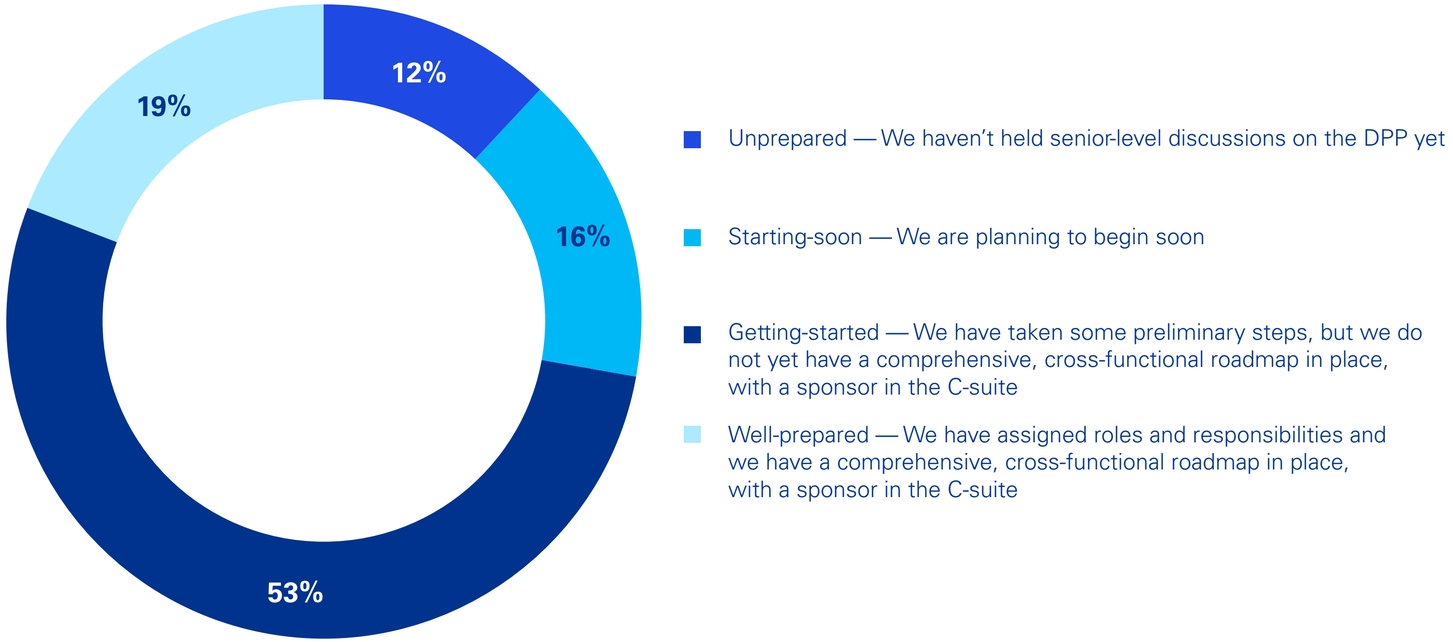
Figure 5: Departments perceived as most appropriate for DPP Implementation among companies without assigned responsibility



While most organizations are 'getting started', mature readiness is rare

Most companies are still in the early or emerging stages of readiness. With 53 percent just "getting started", they have initiated some preliminary actions but lack a fully defined, cross-functional roadmap with C-suite sponsorship. Only 19 percent describe themselves as "well-prepared," with clear governance, assigned roles and an executive-backed roadmap in place. A further 16 percent are "starting soon," indicating intent but not yet execution and 12 percent remain unprepared, with no senior-level discussions initiated. Overall, momentum is building, but a majority have not reached a mature level of DPP readiness; true strategic alignment supported at the executive level is still the exception.

Figure 6: DPP Readiness levels among participating companies

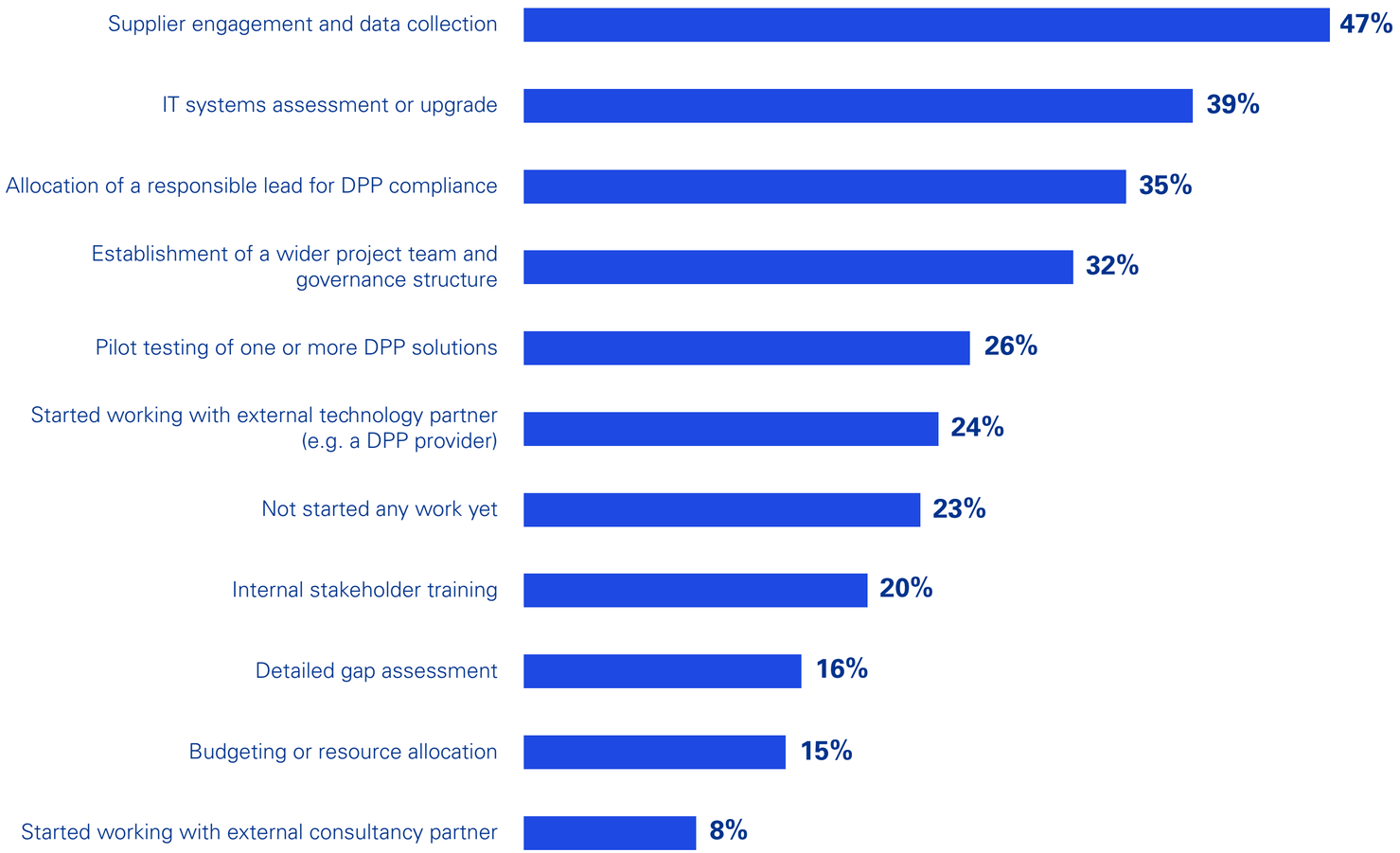


This hesitation is reasonable since many organizations are waiting for greater regulatory clarity. The delegated acts defining detailed DPP standards and the EU-level DPP registry are expected in 2026, meaning key technical specifications — data models, interoperability requirements, specific technologies, verification rules and registry interactions — are not yet fully finalized. As a result, companies may be reluctant to commit to a comprehensive cross-functional roadmap or major system investments before the regulatory framework is fully stable. The current pattern reflects a rational "wait-and-prepare" posture: early exploratory steps have begun with full-scale implementation likely to accelerate once delegated acts are released and uncertainty declines.

Supplier data and IT upgrades lead; comprehensive strategies still forming

The data shows uneven progress. The most common action is supplier engagement and data collection (47 percent), reflecting the centrality of upstream data readiness. Strong momentum is visible in IT systems assessment or upgrade (39 percent) and allocation of a responsible DPP lead (35 percent) — both essential prerequisites for implementation. Around one-third have established a wider project team and governance (32 percent) and one-quarter have initiated pilot testing (26 percent) or started collaborating with external technology partners (24 percent). However, 23 percent have not started any work. Smaller proportions have engaged external consultancy (8 percent), conducted detailed gap assessments (16 percent) or secured budgeting (15 percent). The pattern suggests that many remain in an exploratory phase without a comprehensive strategy.

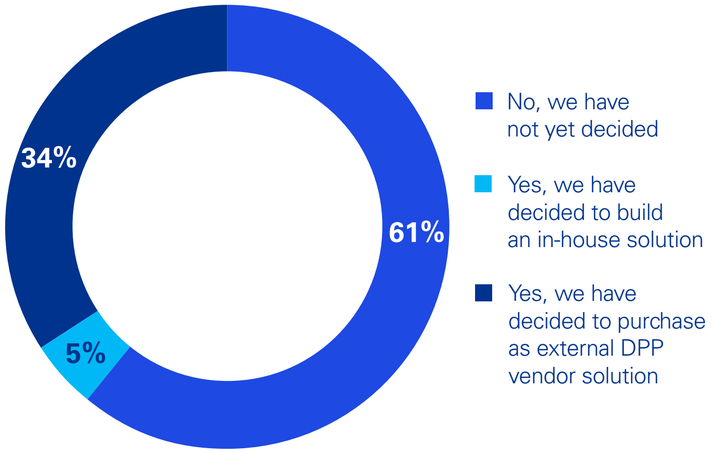
Figure 7: Actions taken by companies to prepare for the DPP implementation



Build-versus-buy remains undecided for DPP solutions; preference tilts to external providers

A clear majority (61 percent) have not yet decided whether to build or buy, reflecting ongoing uncertainty around future regulatory requirements and the 2026 delegated acts that will define technical standards and the EU DPP registry. While 5 percent intend to build in-house, suggesting limited appetite for proprietary development given complexity and interoperability needs, 34 percent have chosen to buy an external DPP vendor solution, signaling a preference for proven, scalable platforms that can adapt as regulations evolve. Overall, the market remains cautious pending further clarity.

Figure 8: Companies' decisions on whether to build or buy a DPP solution

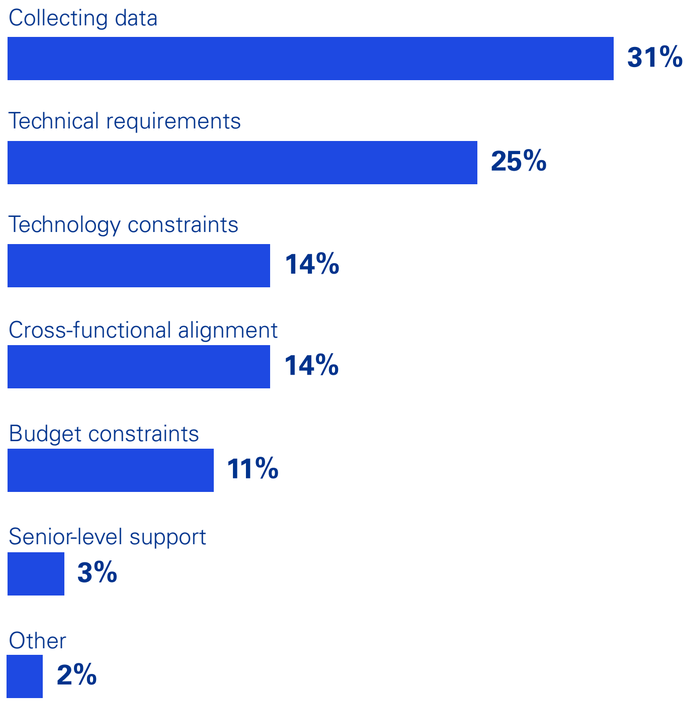


Barriers to compliance: complexity, cost and culture

Preparing for implementation and the challenges associated

The most frequently cited challenges are collecting data from suppliers and the wider value chain (31 percent), understanding technical requirements (25 percent), technology constraints (14 percent), cross-functional alignment (14 percent), budget constraints (11 percent), senior-level support (3 percent) and other (2 percent)

Figure 9: Key challenges reported by companies in preparing for the DPP Implementation



Engaging complex supply chains

A central challenge is engaging suppliers across complex, multi-tier supply chains to provide accurate, standardized and up-to-date data. Many suppliers currently lack the necessary systems, resources or regulatory awareness to deliver structured DPP data. In addition, expectations related to data ownership, confidentiality and liability are often unclear.

Ensuring high-quality supplier data requires significant effort in supplier onboarding, continuous follow-up and internal controls to validate and monitor data quality. Since DPPs rely heavily on upstream data, insufficient supplier engagement can result in incomplete or unreliable passports, creating risks related to regulatory compliance, delayed market access and reputational harm.

At the same time, effective supplier engagement is critical to realizing the value of DPPs. Strong participation enables improved traceability, more credible sustainability claims, better risk identification and the development of more transparent and resilient supply chains.

Sector-specific insights

Downstream, consumer-facing sectors such as **textiles and footwear, electronics and ICT** and **furniture and mattresses** articulate the most advanced and nuanced concerns with DPP implementation, reflecting generally higher regulatory maturity and closer proximity to end users. These sectors highlight the burden of securing high-quality, verifiable data from suppliers especially in Tier 2 and beyond. The challenges extend beyond basic compliance to issues of supplier enablement, data quality, auditability, customer interfaces and the long-term permanence of product passports.

Managing increased data complexity and volume

Companies also face challenges related to data management. Many indicate that they do not yet fully understand the final technical requirements of DPPs, which is expected since the EU's delegated acts defining detailed requirements are being rolled out from early 2026. Although greater regulatory clarity will support preparation, uncertainty lingers in the near term.

DPP implementation requires companies to collect and manage significantly larger volumes of product and component level data across multiple systems, including ERP, procurement platforms, product lifecycle management tools and compliance systems. Mapping, integrating and maintaining this data consistently across systems is a substantial operational challenge.

Addressing these challenges requires new ways of working and closer collaboration across functions such as Legal, Compliance, Sustainability, Procurement, Internal Audit, IT and business functions. While companies acknowledge that DPPs will introduce additional costs, budget constraints or securing C-level support were not identified as a primary challenge in this study.

Sector-specific insights

In general, upstream and less-consumer-exposed sectors such as **metals** tend to highlight challenges in understanding the scope, requirements and regulatory timeline. While supplier data is also a concern in these sectors, it is discussed more in terms of data availability and responsibility boundaries rather than verification or audit readiness.

Industrial Manufacturing sectors, such as **batteries and energy storage** share the same challenges, but highlight governance, systems integration and internal alignment only slightly. Challenges revolve around downstream execution and change management.

Beyond compliance: unlocking competitive advantage and value-creation opportunities

The key business benefits expected from DPP implementation are:

- Strengthening trust in a company's brand or products (61 percent)
- Increased demand for products with high sustainability performance (36 percent)
- Enabling recovery, reuse or recycling of materials at the end of product life (36 percent)

From compliance to strategic value

Across industries, the DPP is shifting from a perceived regulatory checkbox to a strategic lever, with most survey respondents identifying multiple business benefits from DPP implementation. Enhanced trust in brand and products remains the top benefit (61 percent), followed by demand uplift (36 percent) and end-of-life value opportunities (36 percent). These findings confirm that credible product-level information — covering traceability, durability, repairability and clear end-of-life pathways — is increasingly viewed as a catalyst for growth rather than merely a compliance obligation.

Trust that differentiates

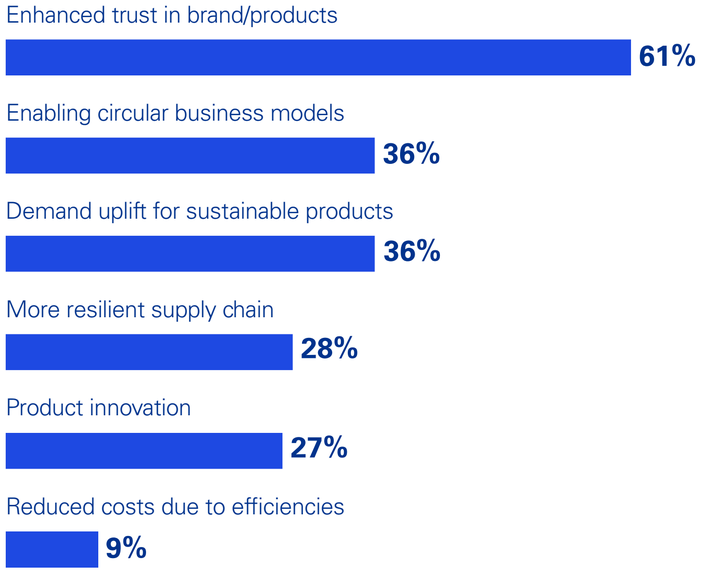
Brands and manufacturers expect DPP to provide comparable, verifiable attributes such as material composition, environmental footprints and repair options that strengthen their market positioning. This trust signal is most pronounced in consumer-facing sectors and in categories subject to rigorous procurement scrutiny.

Sector-specific insights

Trust is the most highly valued attribute among companies in the **textiles and footwear** sector (dominant narrative against fast-fashion or low-transparency competitors), **furniture and mattresses** (aligns with product-level transparency and customer reassurance at purchase and post-sale) and **metals** (trust underpins low-footprint differentiation and public/private procurement credibility). In **textiles and footwear**, interview feedback also linked transparency to risk management through better value-chain visibility and indicated that DPP can strengthen brand equity.

Note: Transparency is identified as an enabling factor identified by 23 percent of respondents, serving as a driver of trust and comparability. The **furniture and mattresses** sector stands out, with 44 percent citing transparency — particularly regarding materials, finishes and replaceable components — as a key differentiator.

Figure 10: Main potential benefits reported by companies in implementing the DPP



Enabling circularity and innovation

One in three companies anticipate new circular business models — such as repair, resale, refreshing, product-as-a-service — as lifecycle information becomes more structured and accessible. Product innovation (27 percent) also ranks prominently among expected benefits, reflecting the role of transparent data in enabling design-for-repair and design-for-reuse decisions.

Sector-specific insights

For **furniture and mattresses** and **textiles and footwear,** reuse, repair, take-back and component traceability are paramount. In **electronics and ICT,** growing interest is apparent in service-based models, take-back schemes and (used) parts harvesting and recyclability.

Demand and customer experience

With 36 percent of respondents expecting demand uplift for products with better sustainability performance, DPP is increasingly seen as a preference driver for buyers and retailers that require credible data. Respondents also associate the DPP with enhanced reporting capabilities and more informed decision-making (e.g., Scope 3 calculations and product portfolio management). This reinforces the view that higher-quality data and access to dynamic information sources can strengthen both market traction and internal confidence.

Sector-specific insights

In **electronics and ICT,** the commercial momentum is strong with retailers and manufacturers expecting measurable demand uplift when sustainability data is credible and easy to validate. For **metals,** procurement decisions are increasingly driven by validated low-impact materials, positioning environmental integrity as a source of competitive advantage. Meanwhile, in **furniture and mattresses,** customers prioritize transparency on material origins, product durability and serviceability, reinforcing the perception that clear information enhances confidence both at purchase and throughout the product lifecycle. Within Industrial manufacturing, several companies reported rising customer expectations for environmental information, making DPP data beneficial when incorporated into tenders and contractual requirements.

Operational resilience and supplier relations

Supply chain resilience emerges as a key anticipated benefit (28 percent), complemented by strengthened supplier relationships and enhanced risk management. Feedback highlights a clear underlying driver: the value realized increases significantly as supplier data quality improves and systems become more seamlessly integrated.

Sector-specific insights

In **furniture and mattresses** and **electronics and ICT,** DPP is seen as a lever to improve supply chain resilience by improving component traceability and enhancing supplier data quality. For **textiles and footwear,** visibility into Tiers 2–3 suppliers is a recurring theme, albeit secondary to trust and circularity.

36 percent

of respondents expecting demand uplift for products with better sustainability performance, DPP is increasingly seen as a preference driver for buyers and retailers that require credible data.

Respondents also associate the DPP with enhanced reporting capabilities and more informed decision-making (e.g., Scope 3 calculations and product portfolio management).

Final recommendations for 'future-proof' readiness

'Future proofing' your DPP journey

Survey respondents shared the following insights:

01

Start early

Although many of the detailed technical requirements are still pending final confirmation from the EU, there is already sufficient clarity on the overall direction to begin preparations. Early movers are reviewing what is likely to be included in the requirements and mapping their supply chains. They are assigning responsibilities and governance models, assessing existing technologies and gaps and starting to collect data that is highly likely to be required, such as Scope 3 emissions.

02

Explore grants or incentives to accelerate preparation

Companies preparing for the DPP are increasingly exploring EU and national grants and incentives to accelerate innovation and implementation. Public funding can help mitigate investment risk in product data, interoperability and pilot DPP solutions.

03

Look beyond data and focus on circularity performance

Selected environmental and circularity indicators will be publicly available through the DPPs. As companies will be benchmarked based on this information, many see this as a trigger to strengthen their environmental and circularity performance. This may include actions such as reducing Scope 3 emissions or improving product recyclability.

04

Prioritize supplier enablement and change management

Effective change management is central to successful DPP implementation. Adequate time and resources should be allocated to project management, internal alignment and stakeholder enablement. This can include embedding DPP requirements into product-design processes, clarifying ownership across functions, and enabling suppliers and partners with clear data expectations, tools and guidance to support consistent and scalable data exchange across the value chain.

05

Use pilot projects to build awareness and engage stakeholders

Many of the companies studied have already conducted DPP pilot projects; for example, testing data availability and maturity for selected products. These pilot projects help organizations identify and engage relevant stakeholders and suppliers, assess current data architecture and technology setups and uncover gaps. While pilot projects do not guarantee compliance, they do serve as effective tools for raising awareness and aligning both internal and external stakeholders around the DPP agenda.

06

One size does not fit all

Companies face different challenges in DPP implementation and have varying levels of maturity in terms of skills, systems and data. As a result, there is no single solution or standard pathway to DPP compliance. For some organizations, adopting an external DPP point solution may be appropriate, while others may already have suitable systems in place and need to focus primarily on data availability and quality. The key is to understand one's starting point, strengths and gaps, and then build a tailored roadmap accordingly.

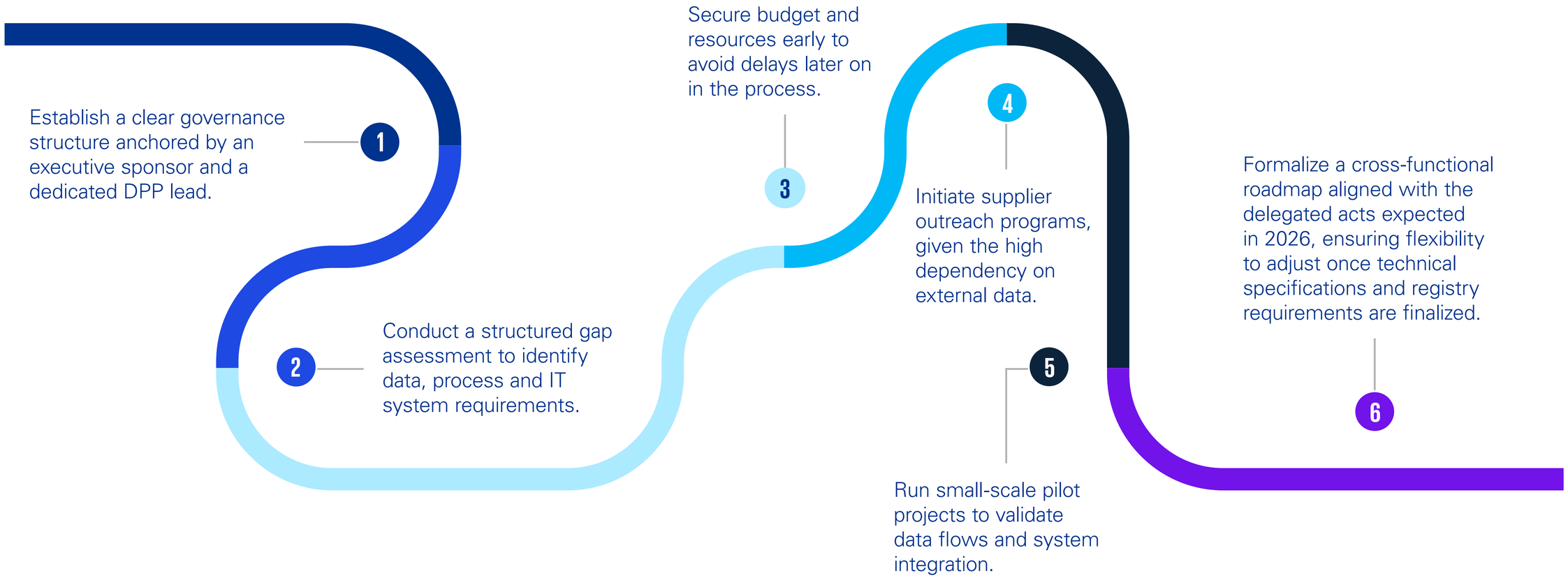
07

Leave room for uncertainty

The detailed technical requirements for DPPs may be defined through delegated acts and then published on a rolling basis for different industries. While many companies feel confident about the overall direction and ambition level, it remains important to plan for uncertainty and evolving requirements.

A practical roadmap to accelerate readiness

To accelerate readiness, companies are encouraged to:



Local initiatives

KPMG firms operate across the EU, including in the countries below, and is already helping countries navigate the DPP, as well as other circular economy and sustainability services.

Austria

In Austria, specific national guidelines for ESPR are still emerging. Yet, the focus is on setting necessary boundaries for the implementation of the ESPR; for example, by way of adjusting the action plan for sustainable public procurement or national stakeholder involvement via WKO, BMK and naBe. From a KPMG perspective, we see significant momentum in this area, demonstrated by our active involvement in several circular-economy projects within the machine and plant engineering sector — a key industry for the DPP implementation.

Belgium

Belgium prioritizes awareness and coordination over a national or regional DPP program. FPS Economy informs stakeholders on Regulation 2024/3110 and DPP requirements for construction products while Walloon agencies organized an information webinar. VLAIO supports circular business development through guidance, partner matchmaking and advice on funding options. VLAIO is a longstanding client and partner of KPMG Belgium. Most DPP progress is industry-led, via pilot projects, EU or nationally funded ecosystem projects and compliance services. NBN underpins adoption through European standards and CEN workshop agreements publication on generic DPP design, automotive electronics and plastics recycling.

Czech Republic

The Czech Republic has not yet introduced any major national initiatives for DPP. The agenda is monitored and managed by the Ministry of Industry and Trade, which primarily focuses on tracking European standards and upcoming requirements. Its efforts in relation to EU frameworks are mainly aimed at informing and preparing Czech businesses, rather than implementing concrete national measures.

Denmark

In Denmark, market initiatives to enhance DPP readiness are predominantly led by industry associations and voluntary network groups, typically consisting of industry peers. Pilot projects and start-ups are increasingly launched, as the implementation deadline is approaching. From a public perspective, the Danish Business Authority is both the primary responsible agency for technical implementation of the ESPR and DPP in Danish frameworks, as well as for the development of supporting measures for Danish businesses, such as tools to guide and automate data collection, processing and display. Furthermore, Danish Standard Foundation, the national standardization organization, has established a working group consisting of experts, such as from platform providers, industry associations, NGO's and consultancy firms, to inform the development of DPP standards in the technical body for of The European Committee for Standardization.

Finland

Finnish organizations are preparing for the implementation of the ESPR and the DPP through collaboration between public authorities, research institutions, industry organizations and companies. A key initiative is FINNPASS, which supports companies with practical guidance and tools for DPP readiness. Finland also participates in the EU-funded CIRPASS2 project. Ministries advance ESPR and DPP objectives through legislation, while the Circular Economy Finland network accelerates the transition by promoting sustainable product design, lifecycle thinking and improved access to product information.

France

In France, DPP's implementation is supported by institutional coordination and operational pilots. GS1 leads a DPP Interest Community to anticipate ESPR requirements, share best practices and develop sectoral pilots, while AFNOR coordinates national standardization efforts. At the operational level, Ecosystem, Fnac Darty and Arianee are running an advanced DPP pilot for household appliances. French stakeholders also contribute to CIRPASS and CIRPASS-2, helping shape EU data models and large-scale pilots. Since October 2025, brands can voluntarily publish apparel's environmental performance through the official French government portal, anticipating DPP and harmonized labelling schemes.

Germany

Germany is rapidly advancing its DPP readiness through a coordinated effort involving standardization bodies, federal initiatives and industry-led pilots. Key players include DIN, Germany's national standards organization and DKE, the commission for electrical engineering standards, which are developing norms to support EU regulatory frameworks and strengthen export-oriented businesses. Other organizations include Platform Industrie 4.0, a government-backed alliance, promoting global interoperability, or Fraunhofer, which research provides strategic guidance for companies on how to integrate DPP standards and enhance competitiveness.

Italy

Italy is advancing the DPP through the Ecodesign Working Group at the Ministry of Environment and Energy Security (MASE), supported by the National Agency for New Technologies, Energy and Sustainable Economic Development (ENEA). The working group unites institutions, research bodies and industry to position DPP as a tool for competitiveness, especially in relevant national sectors such as fashion and furniture, as part of the National Strategy for the Circular Economy.[3]

Netherlands

The Netherlands is a frontrunner in DPP implementation under the ESPR, driven by early mobilization, strong public-private coordination and an interoperability-first approach. In 2025, the Ministry of Economic Affairs launched a national DPP program and established a Centre of Excellence for DPP to coordinate standards, pilots and EU alignment. Textiles and construction sectors are already piloting DPPs, supported by NEN and GS1 Netherlands, with a strong focus on machine-readable data, common identifiers and cross-sector data sharing ahead of mandatory application from 2027.

[3] https://www.mase.gov.it/portale/- ediato-il-tavolo-ecodesign-piu-sostenibilita-senza-frenare-l-innovazione

Norway

Norway has not yet introduced any major national initiatives for the DPP. The most notable activity is led by Standards Norway, which participates in European standardization work (CEN/CENELEC) and provides guidance to Norwegian businesses on upcoming requirements. Their efforts in relation to EU frameworks focus on informing and preparing businesses, but at a general level rather than through concrete national measures.[4]

Slovakia

The Slovak Republic is preparing to implement the ESPR Regulation, including elements of the DPP. Cooperation is being established between the Ministry of the Environment and the Ministry of Economy to support this process. Regarding the EUBR, partial measures have already been introduced at the national level, focusing on product conformity and market availability. Further steps for full implementation are currently under internal discussion. **KPMG in Slovakia** is ready to support companies through this transition. We help organizations assess readiness, design data strategies and engage suppliers to meet upcoming requirements. Early preparation will enable Slovak businesses to turn compliance into a competitive advantage, strengthen customer trust and unlock opportunities in circularity and innovation.

Spain

Spain is advancing in its preparation for the DPP through European standardization work and sector-driven initiatives. Companies in textiles and industrial materials lead pilots on traceability, data preparation and environmental-footprint models, while many join EU working groups such as CIRPASS. Key challenges include regulatory uncertainty, technology adaptation and data quality, but the DPP is seen as an opportunity to boost transparency and circularity.

Sweden

Sweden is advancing DPPs through early adopters like Volvo Cars and multiple funded initiatives. Key agencies such as Energy Authority, Growth Agency, Vinnova and Formas support pilot projects across sectors. Projects like Trace4Value, SwePass and Pass4Sustainability build infrastructure and knowledge. **KPMG in Sweden** supports companies with readiness assessments, gap analyses, stakeholder engagement, data collection, roadmaps and implementation. KPMG also collaborates with software providers and academia conducting DPP research.

[4] https://standard.no/en/news/digital-product-passports-data-driving-the-circular-economy/

About the report

Limitations

This survey provides a point-in-time view of Digital Product Passport preparedness across selected European industries and should be interpreted with certain limitations in mind.

All regulatory references — including timelines, sector coverage and requirements — are based on information available as of mid-January 2026, prior to the adoption of key delegated acts and may evolve as further guidance is issued.

For some survey questions, respondents could select multiple answers. Therefore, the reported percentages in the figures may not add up to 100 percent.

Findings reflect the perspectives of participating organizations only; reported levels of awareness and readiness apply to respondents and may not capture organizations that did not respond, including those potentially less aware of or less prepared for Digital Product Passport requirements. In addition, while the survey spans multiple countries, industries and company sizes, it is not statistically representative of the full EU business population and should be viewed as indicative of emerging trends rather than a definitive benchmark.

Authors

Chiara Catgiu
Senior Manager, Global Decarbonization Hub, KPMG International, and Senior Manager, Climate Change and Sustainability Services, KPMG in Italy

Joy Jadam
Senior Manager, Global Decarbonization Hub
KPMG International

Riikka Leppanen
Senior Manager, ESG Advisory
KPMG in Finland

Annette Korin
Senior Consultant, ESG Advisory
KPMG in Finland

Additional contacts

Kristel Boyes
Director, Global Decarbonization Hub, KPMG International, and Director, ESG Advisory, KPMG in the Netherlands

Your KPMG local contacts

Austria

Ulrike Regner
Senior Manager
Head of Consulting Salzburg
KPMG in Austria

David Schwarzinger
Manager, Decarbonization and Circular Economy
KPMG in Austria

Belgium

Dijana Spasojevic
Executive Director
EU Institutions Account
KPMG in Belgium

Floris de Smet
Advisor, EU Institutions Account
KPMG in Belgium

Czech Republic

Anna Vaníčková
Manager
ESG Advisory
KPMG in Czech Republic

Denmark

Christian Møllegaard
Partner
ESG Advisory
KPMG in Denmark

Nicolai Hoffman
Manager, ESG Advisory
KPMG in Denmark

Finland

Anu Muurinen
Partner
ESG Advisory
KPMG in Finland

Riikka Leppänen
Senior Manager
ESG Advisory
KPMG in Finland

France

Stéphanie Grandjean Mateos
Director, Circular Economy
KPMG in France

Mina Bishop
Senior Manager
Circular Economy
KPMG in France

Germany

Eun-Hye Cho
Partner
Regulatory Advisory
KPMG in Germany

Karol Trejo Enríquez
Manager, Regulatory Advisory
KPMG in Germany

Italy

Lorenzo Solimene
Partner, Climate Change and Sustainability Services
KPMG in Italy

Chiara Catgiu
Senior Manager, Global Decarbonization Hub, KPMG International, and Senior Manager, Climate Change and Sustainability Services, KPMG in Italy

Netherlands

Arnoud Walrecht
Partner
ESG Advisory-Circular Economy
KPMG in the Netherlands

Norway

Kia Klavenes
Head of ESG Advisory
KPMG in Norway

Knut Anders Gjersøe
Manager, Head of ESG Tech
KPMG in Norway

Slovakia

Michal Maxim
Associate Partner
Financial Services
KPMG in Slovakia

Katarína Havlíková
Assistant Manager
ESG Advisory
KPMG in Slovakia

Spain

Marta Contreras
Partner, Audit ESG Assurance
KPMG in Spain

Blanca Martínez
Manager ESG Advisory
KPMG in Spain

Sweden

Timothy Gore
Director,
Sustainability Advisory
KPMG in Sweden

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