Joint statement on the Draft standardisation mandate on Digital Product Passport

In the context of the European Commission Draft Standardisation Request on the Digital Product Passport (DPP), we, representatives of ten associations, are **concerned about the provisions requiring the data carrier to include six cross-sectoral basic data elements that can be consulted offline:** (I) DPP owner; (ii) unique operator identifier; (iii) facility identifier; (iv) unique product identifier; (v) additional product identifier (optional); (vi) and product group (information on the type of product).[1]

These provisions would not add to information that is already generally found on pack (ie DPP owner and main facility) or is already implicit in the product description, which is also provided on the packaging (ie product group). Most crucially, these provisions would likely negatively affect the readability of the data carrier and lead to larger packages, while bringing economic operators unnecessary costs and complexities:

- **Readability challenges.** Experience has shown that encoding more than 70 characters may negatively affect the printing/encoding and scanning/reading of the data carrier. The more the information on a data carrier, the more complex its design. This makes it take much longer or even makes it impossible to scan a data carrier. In addition, companies may be tempted to reduce the quiet space around the data carrier, further hindering its readability. As a result, readability challenges risk discrediting the whole concept of a DPP, limiting its role in increasing information for consumers, value chain operators and regulators.

- **Risk of larger packages.** The more information embedded on the data carrier (eg QR code), the larger the data carrier needs to be. There is a risk that a larger data carrier would lead companies to design larger packages, contrary to the objectives of the Packaging and Packaging Waste Regulation to minimise packaging size as much as possible. The risk is especially acute for small packages, where the space for a data carrier is by nature limited.

- **Unnecessary offline data.** Most of the six cross-sectoral basic data elements are already partly present on the product packaging, including data on the DPP owner (generally the manufacturer), the facility and the type of product. The Consumer Rights Directive mandates that the trader provides information on, amongst others, the *'main characteristics of the product or service'* and *'the identity of the trader'* in a *'clear and comprehensive manner.'*

- **Unnecessary financial costs.** Complex data carriers require specialised printing technologies, resulting in significant financial investments. Given identifiers do not provide offline data and much of the data is explicitly (see above) or implicitly (type of product) available on the product or its packaging, these costs are unnecessary and would divert scarce resources from truly sustainable investments (eg improved product design).

- **Reduced standardisation and interoperability.** More complicated data carriers would limit the potential for standardisation, contrary to the Ecodesign for Sustainable Products Regulation's ambition to increase the consistency of data carriers.

Recommendations

To minimise overpackaging and maintain the readability of data carriers, while still allowing for DPP users to access basic information offline, we recommend that:

1. **Only the Unique Product Identifier (UPI) is encoded in the data carrier.**
2. **All the other cross-sectoral basic data can be either accessible on pack or through the Product Passport Registry:**
   - ➤ The information on the **DPP owner** is present on pack;
   - ➤ The **facility identifier** can be easily traced back from the UPI. Through the **Product Passport Registry** managed by the Commission (Art. 12 of the ESPR), users can access the unique facility identifier associated with the UPI encoded in the data carrier;[1] and
   - ➤ The **information on the product group** can be easily identified from the packaging, in accordance with the Consumer Rights Directive.
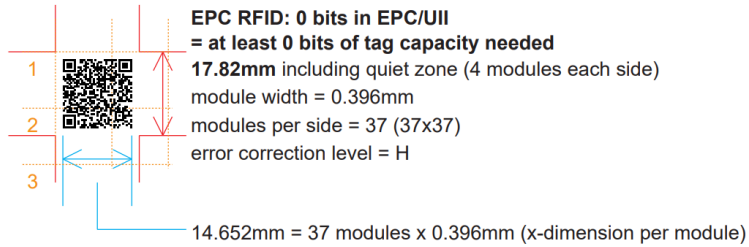
We call on the European Commission to address the above concerns and amend the Standardisation Request on the DPP to ensure the readability of the data carrier and avoid unnecessary costs and complexities for economic operators.

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[1] According to Art. 12 of ESPR, By [2 years from entering into force of this Regulation], the Commission shall set up and manage a digital registry ('the registry') storing in a secure manner at least **the unique product identifier, the unique operator identifier, the unique facility identifiers**

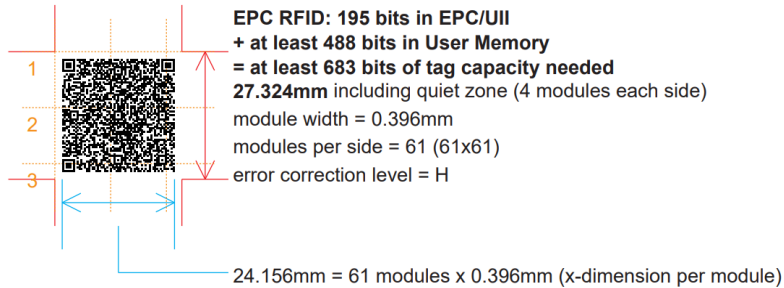## Annex 1: Examples of the impact of overloading data in data carrier

Example 1: GTIN and a 15-digit Batch Number encoding in a GS1 Digital Link URL

URL = HTTPS://EXAMPLE.COM/01/09526000134350/10/ABCD1234XYZ7890

EPC RFID: 0 bits in EPC/UII
= at least 0 bits of tag capacity needed
17.82mm including quiet zone (4 modules each side)
module width = 0.396mm
modules per side = 37 (37x37)
error correction level = H

14.652mm = 37 modules x 0.396mm (x-dimension per module)

Example 2: Example 1 + SN with special characters and the five cross-sectoral basic data elements

URL = HTTPS://EXAMPLE.COM/01/09526000134350/10/ABCD1234XYZ7890/21/1234ABCD%25%26%25789xyz?417=9526007890129&416=9526007890129&240=49-ABCabc-323751-8&99=ConsumerElectronic

EPC RFID: 195 bits in EPC/UII
+ at least 488 bits in User Memory
= at least 683 bits of tag capacity needed
27.324mm including quiet zone (4 modules each side)
module width = 0.396mm
modules per side = 61 (61x61)
error correction level = H

24.156mm = 61 modules x 0.396mm (x-dimension per module)

Example 3: Example 2 + additional control data elements and non-Latin characters in domain name

URL = https://xn--99zt52a.w3.mag.keio.ac.jp/01/09526000134350/10/ABCD1234XYZ7890/21/1234ABCD%25%26%25789xyz?417=9526007890129&416=9526007890129&240=49-ABCabc-323751-8&99=ConsumerElectronic&8030=_opUnDI_QnEAVLWpKddIfepGsH-3rd2jU326-bCozHAdDFSd-p2-K-FM

EPC RFID: 195 bits in EPC/UII
+ at least 888 bits in User Memory
= at least 1083 bits of tag capacity needed

35.244mm including quiet zone (4 modules each side)
module width = 0.396mm
modules per side = 81 (81x81)
error correction level = H

32.076mm = 81 modules x 0.396mm (x-dimension per module)