

POSITION PAPER

The Digital Product Passport for Apparel

Ensuring competitiveness, circularity,
and data sovereignty in the European
textile sector.

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EXECUTIVE SUMMARY

EURATEX supports the introduction of a Digital Product Passport (DPP) for apparel under the Ecodesign for Sustainable Products Regulation (ESPR) to enhance competitiveness, circularity, sustainability and market surveillance across the EU Single Market.

A well-designed DPP can become a strategic enabler of competitiveness, circularity and compliance; a poorly designed one risks excessive costs, fragmented IT systems, exposure of trade secrets and loss of competitiveness for European companies.

The DPP for apparel must be designed in a way that:

- It will be simple to process, focusing on necessary information required by law
- Protects confidential business information and European data sovereignty
- Ensures proportionality and simple use for SMEs
- Is based on harmonised, interoperable and sector-specific standards
- Guarantees a level playing field, especially for imported products

EURATEX calls on EU institutions to:

1. Limit DPP mandatory content to the minimum legally required information
2. Protect confidential business information through strict access controls and different access rights to the information
3. Guarantee EU-based data infrastructure and data sovereignty
4. Develop harmonised, sector-specific standards before full roll-out
5. Ensure technology neutrality and interoperability
6. Provide a minimum 24–36 months transition period
7. Provide technical support for SMEs
8. Strengthen market surveillance and enforcement for imported products

1. INFORMATION SCOPE AND ACCESS IN THE DPP

The apparel Digital Product Passport must contain only information necessary to fulfil legal requirements set by the ESPR and its Delegated Acts. Information shall be released at **model level**, unless economic operators voluntarily choose to provide more granular data.

Necessary information refers to final product information data such as durability/robustness [1], reusability, recyclability and recycled content, which will be defined based on the JRC study and the Impact Assessment expected by 2026.

[1] Robustness is identified in the JRC 3rd milestone draft report as a proxy for physical durability; the final legal definition of robustness and its parameters are still to be defined.

For key production stages along the value chain (including fibre making, spinning, weaving/knitting, finishing, assembly and recycling), limited information may be included, notably the country where those stages are carried out. This would promote transparency, business knowledge of the value chain and it can valorise sustainable European products. However, the actual feasibility of providing this information must be carefully evaluated considering the capacity of the SMEs to access/provide such information and the need to contain the DPP costs, especially in its first roll out expected until 2030.

Without prejudice to ongoing discussions on the scope and added value of the **Substances of Concern (SoC)** category under the ESPR, information on SoC must enable competent authorities to verify compliance with REACH and ESPR requirements and should build on existing upstream disclosures, notably Safety Data Sheets, given that the textile industry acts as a downstream user of chemical products. SoC traceability should rely on harmonised and digitally standardised data exchange across the global value chain and be implemented in a stepwise manner, starting from existing REACH thresholds and knowledge, focusing on substances present in the final article and expanding only where technical feasibility and international alignment are ensured. Requirements must apply equally to EU and non-EU operators to preserve a level playing field.

Voluntary information, such as environmental labels or certifications, may be included in the DPP, but must not become de facto mandatory. Access to information must always be differentiated by user category (consumers, market surveillance authorities, recyclers). Other information exchanges within the value chain should take place outside the public DPP, based on contractual relations, NDAs or commercial arrangements.

2. CONFIDENTIAL BUSINESS INFORMATION AND DATA SOVEREIGNTY

Confidential business information includes supplier and customer networks, specific materials, formulations and production processes. These elements constitute key competitive assets for European companies and must be protected. Given that multiple actors may interact with the DPP ecosystem, strict safeguards are essential:

- Access limited to what is strictly necessary for each user
- Clear separation between public, restricted and confidential data
- Protection against automated data extraction and misuse

Disclosure of factory names, locations or operator identifiers must remain optional to protect business confidentiality and competitiveness. Information which is not public and which is relevant for recycling should be made available exclusively to recyclers through restricted access in line with ESPR Article 7. The scope and complexity of such information must remain strictly proportionate.

The DPP infrastructure and sector-specific implementations must be **developed, hosted and operated within Europe**. Data storage and processing must remain within the EU to prevent risks linked to inappropriate third-country access, political interference or economic misuse.

Data security, data sovereignty and protection of sensitive company information must be central pillars of the European DPP framework.

3. DATA EXCHANGE, STANDARDISATION AND IT ARCHITECTURE

Data gathering in the textile value chain is currently fragmented, costly and largely manual, relying on multiple proprietary platforms and formats. Without harmonisation, the DPP risks multiplying reporting obligations and increasing complexity, especially for SMEs.

The introduction of DPP and digitalization of information offer the historic opportunity to simplify how SMEs provide data, reducing bureaucracy and costs to fulfil legal or business reporting obligations. EURATEX therefore calls for the development of harmonised, sector-specific standards based on two priorities:

- Defining what information is exchanged, through a **reference semantic model and data structures** tailored to the textile sector.
- Defining how information is exchanged, through **standardised, secure and interoperable exchange protocols**.

The objective is to allow companies, especially SMEs, to provide the same information **only once**, for multiple brands' platforms, proprietary systems and regulatory uses.

Existing and proven standards such as GS1 EPCIS, UN/CEFACT and eBIZ (including TRICK extensions) should be considered as building blocks.

The DPP must remain **technology-neutral**. Companies should be free to choose data carriers (e.g. QR codes, RFID), provided accessibility requirements are met. No specific technology should be mandated, companies must be able to integrate the DPP into existing PLM, / ERP- and IT systems. Companies shall not be vendor locked-in (i.e. dependency) but rely on interoperability across different solution providers.

A decentralised architecture should be favoured, whereby each actor remains responsible for its own data, while interoperability across systems is ensured. Strict conformity checks of DPP solutions are needed to avoid monopolistic situations and guarantee genuine interoperability.

4. SME, COSTS AND IMPLEMENTATION TIMELINE

European SMEs face challenges in adopting the DPP, including limited digital capacity, high personnel costs and reliance on manual data collection processes. Early evidence show implementation costs can range from a few thousand to several hundred thousand euros, depending on complexity. To ensure proportionality and competitiveness, we call for:

- technical support for SMEs
- Transparent pricing models from DPP service providers
- EU-level templates and guidance on required data
- Measures to avoid dependency on proprietary platforms

The DPP must be developed **in stages**, starting with existing and accessible information and expanding over time.

A minimum transition period of **24–36 months** following publication of the ESPR Delegated Act is essential. This timeframe allows businesses to integrate DPP requirements into product development cycles, adjust labelling and traceability systems, and collect supply-chain information without disruption.

5. MARKET SURVEILLANCE AND LEVEL PLAYING FIELD

The DPP must strengthen market surveillance and enforcement, particularly for products imported from third countries. Competent authorities need effective tools to verify the accuracy and credibility of DPP information provided by non-EU operators.

The DPP should facilitate verification of product provenance and compliance with EU legislation, including REACH. Without such tools, the risk of fraud and unfair competition increases, undermining European manufacturers.

Ensuring a level playing field between EU producers and third-country exporters must be a core objective of the DPP framework.