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Digital Product Passport

APPLiA Comments on the potential EU Digital Product Passport

APPLiA would like to understand in detail how a Digital Product Passport (DPP) would provide an added value for the sustainability of home appliances for the various actors (consumers, recyclers, repair companies, etc) who would be using it. To help develop this tool in the most suitable way, we need to understand the intended benefit of a DPP for each actor and whether it should also include information about the life of an individual product after it has entered the market (e.g about the potential repair of each unit).

Applying digital solutions for product information, such as a DPP, could be useful if it is feasible, relevant, effective and if the DPP has been constructed to be useful for each specific actor and their needs. It is crucial to ensure that information collected will ultimately add value to actors in the supply chain and to consumers. This must be thoroughly assessed on a sector by sector, product by product level to ensure that the efforts and impacts of having a DPP positively contribute to a significant increase in the sustainability of products.

For our sector, much reliable information is already available related to the sustainability of products. Home appliance products have been subject to a wide range of EU environmental legislation for many years. The Energy Labelling Framework legislation has established an EU-wide regulation and labelling system for energy-related products which reduces their environmental impact. The Energy Label, and its related so-called Product Information Sheet, informs the consumer on the product's environmental impact during its use phase, where it is at its greatest. As of 1 January 2019, suppliers (manufacturers, importers or authorised representatives) need to register their appliances, which require an energy label in the European Product Database for Energy Labelling ([EPREL](#)), before selling them on the European market. Similarly, manufacturers are providing information to consumers (upon request) on the presence of substances-of-very-high-concern (SVHC) in products to comply with REACH Article 33. The new [SCIP database](#) also implements this latter REACH Article, with some extra mandatory information requirements on SVHC in articles/products to inform waste treatment operators.



It is important that already existing data formats and sources are used to prevent confusion and overlapping/contradicting requirements. The information displayed in the DPP should be drawn directly from the legally mandated EU databases already housing product information (e.g EPREL, SCIP), Any information appearing in the DPP should be subject to robust impact assessment, on a product-by-product level and underpinned by recognised standards. Data security and access rights should be a priority to ensure any confidential, business sensitive information is protected from unauthorised access and liability for data loss and other technical damage must be clarified.

The information in the DPP needs to be correct and trustworthy for the DPP to be a success. This is also important to ensure that competition is not distorted between companies/importers that may have a very different ambition level when it comes to providing information in the DPP. e.g the consequences if some companies provide no, incomplete, or incorrect information. If this has no practical negative consequence, such actors gain a competitive advantage over companies who try to provide correct and complete information. Therefore, to prevent a scenario that would promote incorrect behaviour, effective enforcement of the content in the DPP is essential. Enforcement can only be performed if the information requirements are clearly specified, and measurement standards are available to clarify how the complex information should be established (e.g. how energy efficiency or recyclability should be evaluated for each product).

For the digital information to be effectively verifiable and enforceable, the criteria for the type of information to be included in the DPP must be legally and strictly defined by the European Commission centrally, even if the tool functions via a decentralised system. APPLiA is convinced that, to secure the success of this policy, the data format and functionality must be specified centrally. This does not necessarily imply that the data must be stored in one central database. Of course, in addition to the specified information, it could also be possible for manufacturers to also provide other types of product information they felt could be relevant to users. A similar approach has been used in the implementation of the EPREL database.

The one providing the information to the DPP should be the one responsible for its correctness and completeness. Measures that ensure the legal certainty on which market surveillance depends are crucial to ensure a level playing field, avoid free-riding, and secure the tool can deliver on the environmental objectives.

APPLiA - Home Appliance Europe represents home appliance manufacturers from across Europe. By promoting innovative, sustainable policies and solutions for EU homes, APPLiA has helped build the sector into an economic powerhouse, with an annual turnover of EUR 50 billion, investing over EUR 1.4 billion in R&D activities and creating nearly 1 million jobs.

