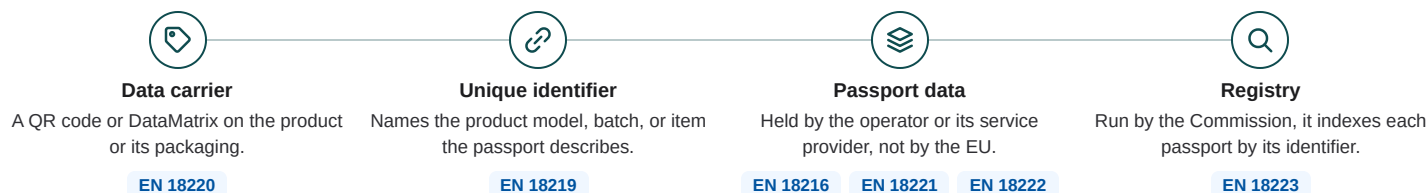




Regulated products will carry a digital passport, and batteries are first.

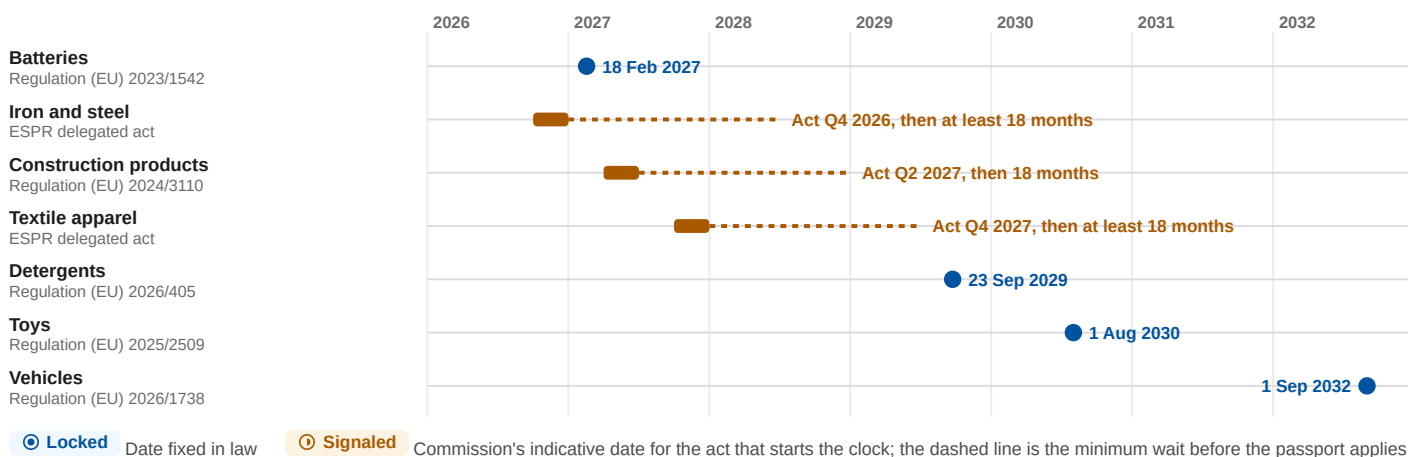
A digital product passport is a structured data record linked to a product through a data carrier such as a QR code. ESPR sets the common architecture, and each product law decides when its own passport becomes mandatory. The EU registry is live and the first six standards are cited, so the build specification exists before the first deadline on 18 February 2027.

How a passport works



The chips are the six standards cited by Decision (EU) 2026/1736 on 15 July 2026. Building to them is voluntary, but a passport that conforms is presumed to meet ESPR Articles 10 and 11. Two more, EN 18239 on access rights and security and EN 18246 on authentication and integrity, were published on 15 September 2026 and had not been cited by 30 September.

When each passport becomes mandatory



Who is responsible

The economic operator placing the product on the EU market is responsible for the passport and its registration, even when a service provider performs the registration and the lifecycle updates. The registry is an index, not a data warehouse: it stores the identifier and the operator reference, while the passport content sits with the operator or its platform.

Still moving

The Omnibus IV regulation that amends ESPR awaits Parliament's first-reading vote, with an indicative plenary date of 23 November 2026. The construction passport waits on a delegated act the Commission indicates for Q2 2027, and battery passport content is set by Annex XIII of Regulation (EU) 2023/1542.

Decisions to make now

- Which product laws reach you, and in what order
- Whether your passport platform conforms to the six cited standards, written into the contract
- Who registers your passports: your own team or a service provider
- Whether you can issue unique identifiers and data carriers at model, batch, or item level
- Which supplier data the passport needs, and how you will contract for it

Most of these need a budget owner or a legal sign-off.

The passport, the registry, and the standards espratlas.com/digital-product-passport

Your product category espratlas.com/sectors

Your obligations by role espratlas.com/find-your-obligations

Questions on your own portfolio: Dave Hartter, Principal, dave@hartteradvisory.com, linkedin.com/in/davehartter

Independent reference, status as of 30 September 2026. Not legal advice: EU acts and Commission timelines change, so verify obligations and dates against the Official Journal and with counsel before acting. © 2026 Hartter Advisory, LLC.