



The EU now writes product rules one product group at a time.

The Ecodesign for Sustainable Products Regulation, (EU) 2024/1781, has been in force since 18 July 2024. It sets the frame, and a separate delegated act sets the requirements for each product group, normally including a digital product passport. None of those acts had been adopted by 30 September 2026, but the duties written into the regulation itself are already running.

What already applies

15 July 2026

Decision (EU) 2026/1736 cited six DPP standards in the Official Journal. A passport built to them is presumed to meet ESPR Articles 10 and 11.

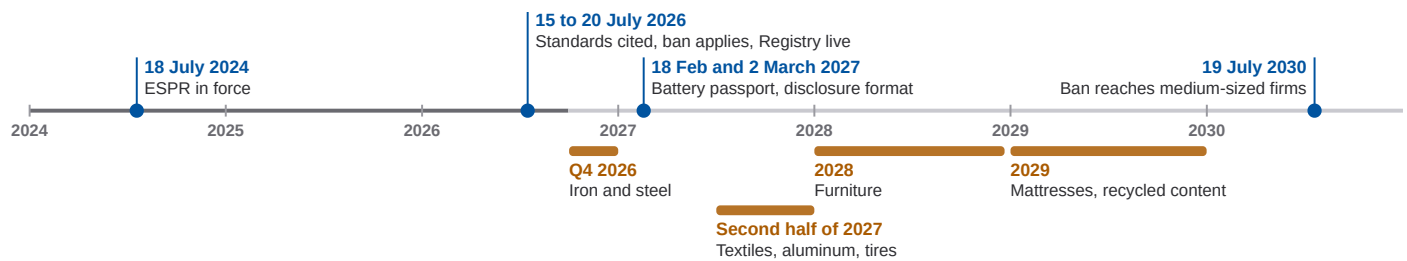
19 July 2026

Large enterprises may no longer destroy unsold apparel, clothing accessories, or footwear, except under the derogations in Regulation (EU) 2026/296.

20 July 2026

The Commission launched the DPP Registry, which indexes each passport by its unique identifier. Regulation (EU) 2026/1778 sets how it works.

What is fixed, and what is still indicative



Date fixed in law



Commission's indicative date to adopt the act; the rules apply after a transition

Darker axis: time passed by 30 September 2026

How a product group gets its rules



Working Plan

The Commission names priority product groups. The first plan, adopted April 2025, runs to 2030.



Study and consultation

A preparatory study, then consultation, including public feedback on the draft act.



Delegated act adopted

Performance, information, and passport requirements for that group.



Transition

The act applies at least 18 months after it enters into force, save in duly justified cases (Art. 4(4)).



Rules apply

A product in the group can be placed on the EU market only if it meets the act and its passport is available (Art. 9(1)).

Who carries it

The manufacturer, which includes a brand that markets a product under its own name, makes sure the product meets its act and has its passport. Before placing a product on the market, an importer must check that it complies (Art. 29), and a distributor must check that it is linked to its passport before making it available (Art. 30). Placing the product on the EU market is what triggers the duties, not where the company is based. A manufacturer may appoint an Authorized Representative by written mandate (Art. 28(1)); the regulation permits this but does not require it.

Iron and steel is expected first

Its consultation has closed, and the Commission indicates adoption in Q4 2026. Batteries run on their own law: the battery passport applies from 18 February 2027 under Regulation (EU) 2023/1542, on the same passport infrastructure.

Decisions to make now

- Which of your products sit in a Working Plan group, and which act reaches you first
- Who owns ESPR internally, and with what budget
- Whether you can issue unique product identifiers and data carriers to the cited standards
- Which supplier data your passports will need, and when to ask for it
- For apparel and footwear, how unsold stock is handled and disclosed

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

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

Every date, with its evidence label espratlas.com/timeline

If your company is outside the EU espratlas.com/espr-for-non-eu-companies

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

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