



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.

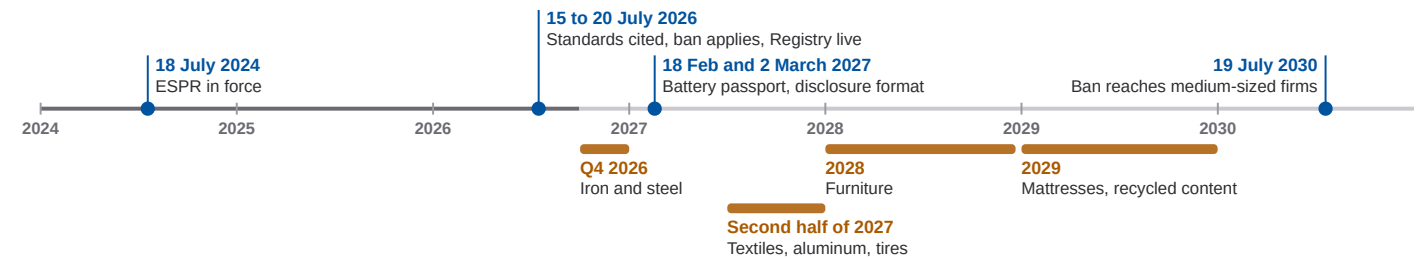
19 July 2026

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

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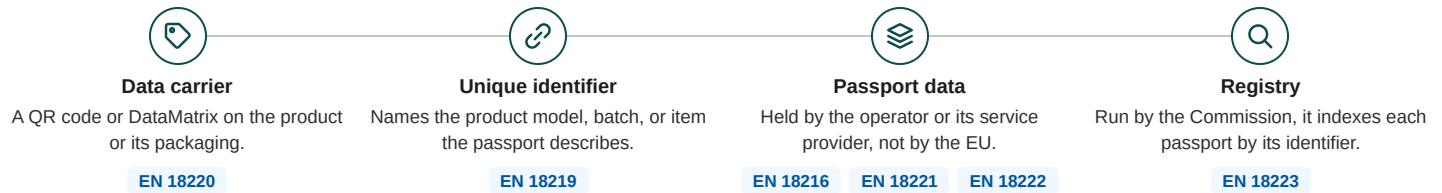
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Regulated products will carry a digital passport, and batteries are first.

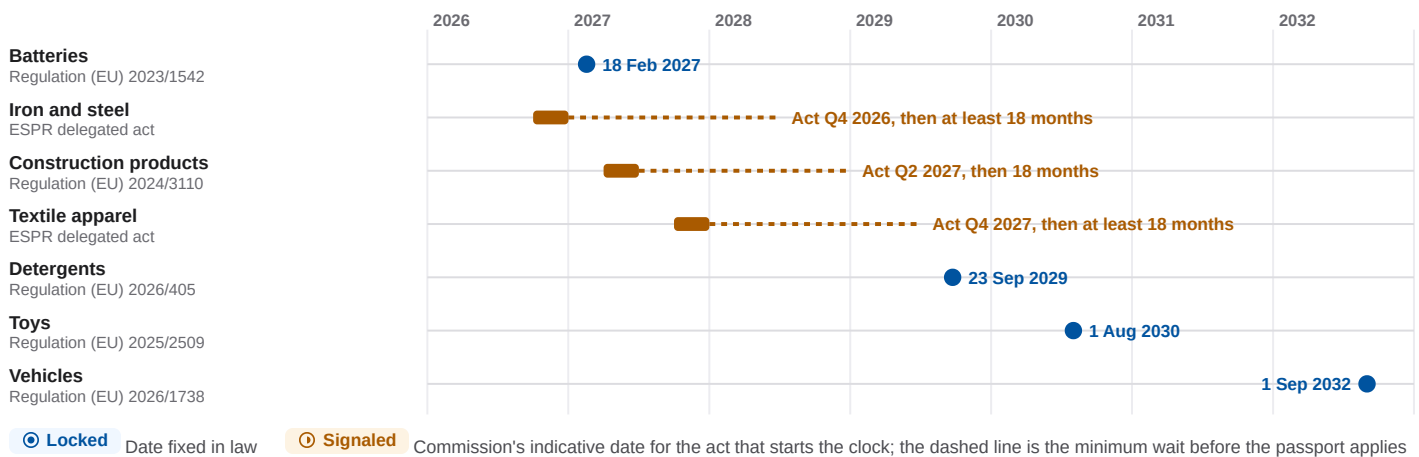
A digital product passport is a structured data record linked to a product through a data carrier such as a QR code. ESPR sets the common architecture, and each product law decides when its own passport becomes mandatory. The EU registry is live and the first six standards are cited, so the build specification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

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