

The EU Digital Product Passport and What It Will Ask of Indian Suppliers

Yash Khatri

Founder, SourcingFrom

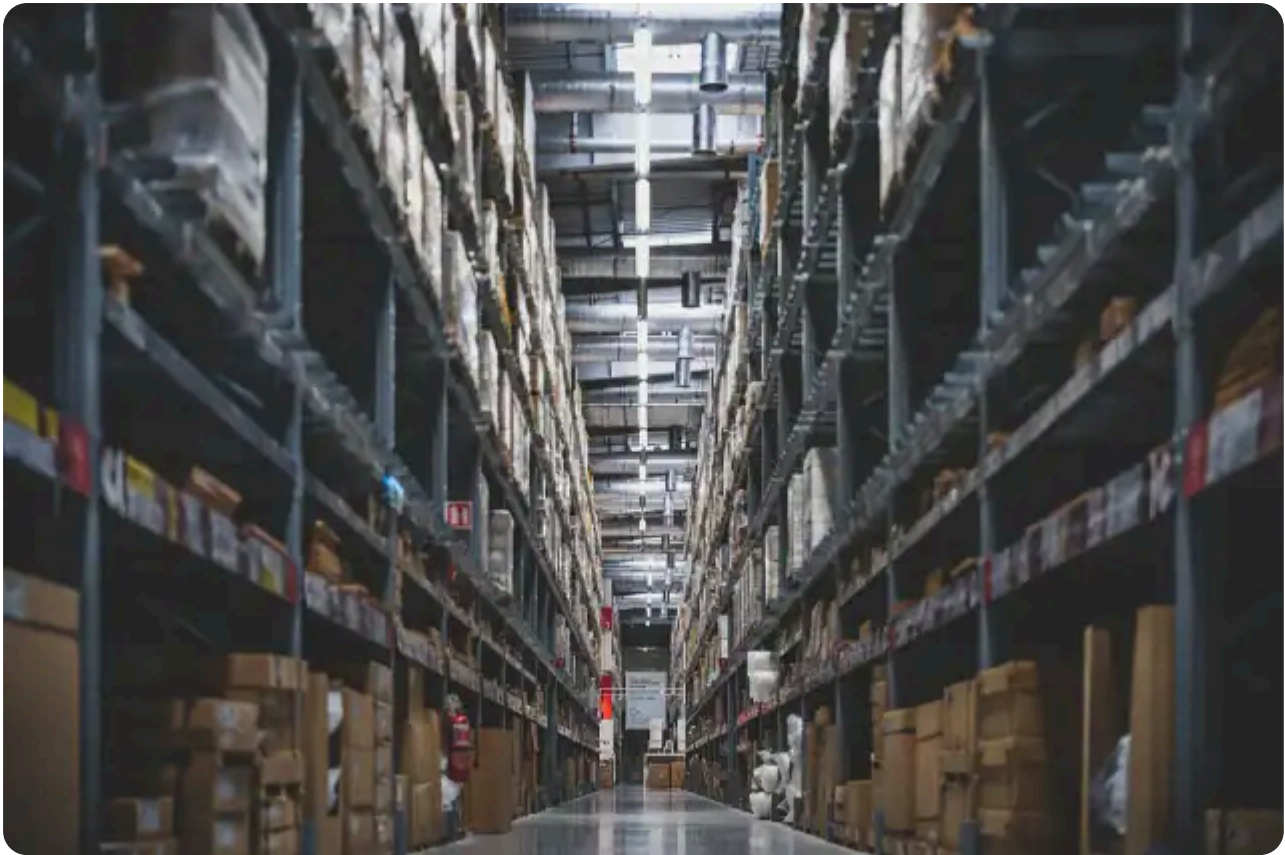
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A digital product passport is a data record linked to a product by a QR code or tag, required under EU law product group by product group. The battery passport comes first, from 18 February 2027. Iron and steel and then textiles are next on the Commission's indicative plan, but no product-specific rule was in force on 17 October 2026, so the data work starts before the law does.

The Short Version

- A passport is not a certificate. It's a data carrier, and the duty to provide it sits with whoever places the product on the EU market.
- Batteries come first, from 18 February 2027, for EV, light means of transport and larger industrial batteries.
- For textiles and steel, each product group needs its own delegated act, and none was adopted by 17 October 2026.
- The data asked for will overlap heavily with what buyers already ask for, materials, origin, substances, recycled content and footprint.
- Indian suppliers that already hold traceable certificates and lab reports will find the passport mostly a formatting job.

Is the digital product passport a law yet? Partly. The framework is law, the first passport has a start date, and for most of what India sells to Europe the detailed rules are still being written. That's an awkward place for a buyer to plan from, but a useful one for a supplier, because the time to get your data straight is before somebody asks for it with a deadline attached.



This guide is part of our [certifications and compliance hub](#). It covers what the passport is, the dated timeline we could confirm, what an EU importer should do now and how an Indian exporter gets ready.

1. What a Digital Product Passport Is

A digital product passport (DPP) is a structured set of data about one product, held online and linked to the product by a data carrier, usually a QR code, sometimes an RFID tag. Customs, regulators, recyclers, repairers and consumers can read the parts meant for them.

It comes from two EU laws –

- **The Ecodesign for Sustainable Products Regulation (ESPR)**, Regulation (EU) 2024/1781. It's a framework. It lets the Commission set rules for each

product group through delegated acts, and each act says what the passport must contain for that group.

- **The Batteries Regulation**, Regulation (EU) 2023/1542. It sets its own battery passport directly.

The passport doesn't certify anything on its own. It carries data that has to be true, and some of it (recycled content, substances, durability) will be checked the way any product claim is. Think of it as the product's paperwork going digital and travelling with the product.

2. The Timeline We Could Confirm

Date	What happens	Status
18 Jul 2024	ESPR in force	Law
19 Jul 2026	Legal deadline for the Commission's central DPP registry, and the ban on destroying unsold clothing and footwear starts for large companies	Law, registry launch not confirmed
2026 (indicative)	Delegated act for iron and steel	Commission plan, not law
18 Feb 2027	Battery passport required for EV batteries, light means of transport batteries and industrial batteries above 2 kWh	Law
2027 (indicative)	Delegated act for textiles, focus on apparel	Commission plan, not law
About 18 months after each act	Passport becomes mandatory for that group	Depends on each act

The registry and destruction-ban dates and the indicative years come from the Commission's first working plan, COM(2025) 187, which we read through

summaries ([Renoon](#), [Intertek](#)) because EUR-Lex and the Commission page blocked our reader. Summaries we read in October 2026 agreed that no product-specific ESPR delegated act had been adopted, so no product group outside batteries carries a binding passport duty yet. Check the current list with your customs broker or on the Commission's ESPR page.

Indicative years slip. I'd plan for textiles passports to bite around 2028 at the earliest, and I wouldn't bet a production schedule on any date that isn't in an adopted act.

3. What a Passport Will Probably Hold

Each delegated act sets its own list, so this is the pattern from the ESPR's framework and the battery rules, not a final list for any product –

- A unique product identifier, and the identifier of the manufacturer and facility.
- Materials and their share, including recycled content.
- Substances of concern, which links to the [restricted substances](#) work buyers already do.
- Durability, repair and disassembly information.
- Environmental footprint where the act asks for it, see [carbon footprints](#).
- Compliance documents and certificates.
- For batteries, chemistry, capacity, carbon footprint, due diligence on raw materials and state of health.

Notice how much of that a good buyer already asks an Indian supplier for on paper today. The passport changes the format and the audit trail, not the questions.

4. What an Importer Should Check

The duty sits with the business that places the product on the EU market (the manufacturer, or the importer where the manufacturer isn't in the EU). Here's what to do now.

1. **Find out if you sell batteries in scope.** E-bike, e-scooter and larger industrial batteries need a passport from 18 February 2027. Batteries built into goods you import count too. Talk to your battery supplier this quarter, not next year.
2. **For everything else, map your data gaps.** Take one SKU and try to fill the list in section 3 from what your supplier holds. The empty boxes are your work list.
3. **Ask for facility-level traceability.** Passports name the facility. A trader who won't say which factory made the goods is normal business, but you'll need that name for the passport, so agree how it's shared under confidentiality.
4. **Watch for the delegated act for your group.** When it's adopted, you usually get about 18 months. That's shorter than it sounds when your data sits three tiers deep in a supply chain.
5. **Pick a passport service provider later, not now.** Until your group's act and the EU's technical standards settle, any platform is a guess. The data matters more than the software.



Red flags – a supplier or a vendor selling a "DPP certificate". There isn't such a thing. There's data, and there will be rules about how it's published.

5. How an Indian Exporter Gets Ready

Most Indian exporters won't publish the passport themselves, the EU importer will. Your job is to supply data the importer can stand behind. These steps take the textiles and engineering cases as the model.

Step 1 – Assign product and facility identifiers. Give every SKU a stable ID and record which unit made it. If you subcontract job work, record that unit too. One to two weeks to set up, then it's routine.

Step 2 – Build a bill of materials with origins. For a tee – fibre, yarn spinner, knitter, dyer, trims, packaging, with each one's location. For steel parts – grade, mill, heat number. Two to four weeks the first time.

Step 3 – Link certificates and tests to each SKU. Scope and transaction certificates for organic or recycled content, lab reports for restricted substances, mill test certificates for metals. Store them by SKU and lot, not in a general folder. Our [textile certifications](#) guide covers which documents prove what.

Step 4 – Measure what you'll be asked for. Recycled content share, product weight, and a carbon footprint if the act or buyer wants one. This is where factories without fuel and power logs struggle.

Step 5 – For batteries, work with your cell supplier now. Most Indian battery pack assemblers import cells. Your passport data depends on the cell maker's carbon footprint and raw material due diligence. Ask for it in writing, early.

Step 6 – Share it in a format the buyer can load. A spreadsheet per SKU with stable field names works today. When the EU technical standards are final, buyers will ask for a specific format, and clean data converts easily.

Step 7 – Keep it current. A change of yarn supplier or a new dye house changes the passport. Update on change, not once a year.

Setting this up across several suppliers and tiers is the kind of work that eats a buyer's quarter. [SourcingSync](#) can collect and check supplier data for you.

6. A Worked Example

This example is an illustration built from the rules above, not a real firm.

A Dutch retailer imports e-bike battery packs assembled in Pune with imported cells, and cotton tees from Tiruppur.

The battery packs are in scope from 18 February 2027. The retailer, as importer, needs a passport per battery. The Pune assembler asks its cell

maker for chemistry, carbon footprint and raw material due diligence data, adds its own pack data and a unique ID per pack, and the retailer's chosen platform publishes it behind a QR code on the pack.

The tees aren't in scope yet. The retailer runs the section 3 list against one style and finds two gaps, no named dye house and no recycled content figure for the trims. The Tiruppur knitter fills both in a month. When the textiles act lands, the retailer is formatting, not chasing. More on the tees in our [cotton T-shirts guide](#).

FAQ

Is the digital product passport mandatory now? 

Only where a rule has been adopted for a product group. Batteries start on 18 February 2027. For textiles, steel and others, check whether the delegated act has been adopted.

Who is responsible for the passport, the Indian factory or the EU importer? 

Is a DPP a certificate? 

Does the UK have a digital product passport? 

What should an Indian supplier do first? 

Next Steps

- Check whether any battery you sell is in scope from 18 February 2027.
- Run the data list in section 3 against one SKU this month.

- Read restricted substances and carbon footprints for two of the biggest data blocks.
- See eco-labels and green claims for how claims in the passport must be backed.