

# APPLiA position on the EU Digital Product Passport (DPP)



## A successful digital infrastructure already in place for 2 million product models

The EU Home Appliance Sector has established and operates a comprehensive digital infrastructure for product information. Our manufacturers have made substantial investments in this area, aligning with the EU's own digital ambitions.

A clear example of this is the **European Product Registry for Energy Labelling (EPREL)**. This robust and fully operational platform already manages nearly 2 million models from over 2,000 verified suppliers, showcasing our sector's existing capacity, proven efficiency, and commitment to digital data management.



## Why the Digital Product Passport (DPP) represents an undue burden

In times of significant economic challenges for the home appliance sector, the introduction of a Digital Product Passport (DPP) represents a significant additional burden that incurs substantial costs:

- **Lack of Proven Added Value:** We currently see no demonstrated need for the extensive new data requirements envisioned by the DPP, especially given the comprehensive information already effectively provided by manufacturers
- **Contradiction to EU Policy:** The introduction of a broad, mandatory DPP directly conflicts with the European Commission's own stated objectives for simplification and for safeguarding the competitiveness of European manufacturing.

## Our proposal for a pragmatic and workable DPP approach ... *if really needed*

Should the European Commission regrettably decide to proceed with a Digital Product Passport for the Home Appliance Sector, we strongly advocate for a pragmatic, **"start small" approach** that intelligently leverages existing, proven systems.

- **Leverage EPREL:** For products already subject to energy labelling, the well-established and secure EPREL database offers the optimal and most efficient solution for managing DPP-related content:
  - It builds directly on the substantial efforts and investments already made by over 2,000 suppliers, significantly reducing the administrative and financial burden of new data entry.
  - By leveraging existing IT infrastructure and a successful operational tool, it eliminates the need for redundant development and minimises new public expenditures for EU taxpayers. EPREL is a robust, operational system that has already demonstrated its effectiveness and capacity to manage large volumes of product data.
- **Data Confidentiality:** Sensitive data, particularly information intended solely for compliance authorities, must be rigorously protected and remain inaccessible to other parties.
- **Maintain Core Focus:** The DPP's scope must remain exclusively on the core data points indispensable for its purpose. It should avoid overreach and unnecessary complexity that could stifle innovation and compromise the competitiveness of the EU manufacturing industry.