

Template for comments and secretariat observations

Date: 2025-08-19	Document: prEN 18216	Project: prEN 18216
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MB/NC ¹	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment ²	Comments	Proposed change	Observations of the secretariat
ASRO/RO	0	5		ge	Encourage JSON as the preferred Data format considering its greater flexibility and ease of exchange, JSON is more largely used in IT and capabilities and efficiency are better.	The data format listed below shall be used as preferred format. JSON (JavaScript Object Notation): It is a human and machine readable data-interchange format used to transmit data between a server and a client. Besides the abovementioned, the message format may be used	

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ASRO/RO	0	4.5.2.3		ed	The standard should clarify that the economic operator should provide retailers and online marketplaces with access to the DPP via a direct web link, ensuring consumer access with minimal administrative friction. This will facilitate the implementation of the economic operators' obligation to provide access to the UPI in a practical way, as the web link can be easily accessible from both a computer and mobile phone. This is also in line with ESPR Article 10, which requires the economic operator to provide a digital copy or a webpage link free of charge promptly and in any event within five working days of receiving a request to do so.	Digital access: The economic operator shall give retailers and online market places the link, to its unique product identifier to enable consumer access to the DPP of this product"	
	0	6		ed	Any choice to require a Unique Facility Identifier (UFI) and Unique Operator Identifier (UOI) should be left to the product-specific ESPR delegated acts and be based on thorough impact assessments. While the ESPR gives the possibility to the European Commission to define such UFI and UOI to trace actors and manufacturing facilities, this is not a mandatory requirement and is not mentioned as an essential requirement for the DPP in ESPR Article 10. As mentioned in ESPR Recital 36, this should be considered only where appropriate. Implementing UFI and UOI would bring considerable costs and operational complexities for economic operators, linked in particular to packaging design changes (forcing companies to design different packaging for the same product manufactured in different locations, which would not only increase costs but also reduce efficiency gains due to economies of scale) and capital investments in expensive online printing technologies.	Add below the title: ID schemes for economic operators and facilities are not mandatory according to the ESPR, but should only be set where appropriate and where required by delegated acts setting ecodesign requirements.	
ASRO/RO	0	Annex A		ed	The standard should refrain from referencing any default mode of identification, in line with the ESPR approach (see Article 9(2) and Recital 33) of leaving the definition of the DPP granularity to	Deletion of: 'In scenarios not explicitly covered above, but where item-level identification emerges as beneficial during the product lifecycle, economic	

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					the delegated acts, based on an impact assessment. Moreover, Recital 33 of the ESPR specifically refers to impact assessments that shall analyze the costs and benefits of setting information requirements through a digital product passport at the model, batch of item level and that the choice of the level of granularity shall “avoid costs for companies and for the public that are disproportionate to the wider benefits”. It further acknowledges that a cost-benefit assessment depends on “for example, the complexity of the value chain, the size, nature or impacts of the products considered.” This is particularly important in light of the European Commission’s agenda for simplification, burden reduction, and competitiveness of the EU.	operators are encouraged to default to this mode of identification’	
ASRO/RO	0	Annex A		ed	The standard should refrain from referencing any default mode of identification, in line with the ESPR approach (see Article 9(2) and Recital 33) of leaving the definition of the DPP granularity to the delegated acts, based on an impact assessment. Moreover, Recital 33 of the ESPR specifically refers to impact assessments that shall analyse the costs and benefits of setting information requirements through a digital product passport at the model, batch of item level and that the choice of the level of granularity shall “avoid costs for companies and for the public that are disproportionate to the wider benefits”. It further acknowledges that a cost-benefit assessment depends on “for example, the complexity of the value chain, the size, nature or impacts of the products considered.” This is particularly important in light of the European Commission’s agenda for simplification, burden reduction, and competitiveness of the EU.	Identification at the item level may be considered, based on the impact assessments carried out when preparing the delegated acts setting ecodesign requirements, for products that meet any of the following criteria:	
ASRO/RO	0	4.5.2.3		ed	Standards should set the compatibility level of the UPI in a way that facilitates the implementation of the DPP and clarifies that there should not be compatibility with every single device that may	Add “broadly available”: Compatibility: The unique product identifier shall be compatible with broadly available external components, such as	

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					exist (e.g., niche scanners or obsolete gadget), but that the compatibility should be with broadly available external components to ensure practical uptake.	professional scanning devices, smartphones and similar digital consumer devices.	
		page13/45 4.5.2.3			This amendment clarifies how economic operators must provide access to the DPP to retailers and online marketplaces: - It replaces the word "copy" - which could be prone to misinterpretation - with access. - It clarified that access should be provided through a link. The link is the most practical way to provide access to the DPP, as it can be easily accessible from both a computer and a mobile phone. This is in accordance with Article 10 of the ESPR, according to which: 3. The economic operator: (b) provides free of charge the digital copy mentioned in letter (a) or a link to a web page promptly and, in any case, within five working days of receiving a request in this regard	2) Digital ~~access-copy~~ : The economic operator shall give retailers and online market places access, ~~via a the link, to the its unique product identifier that they need to lead to enable consumers access to the DPP of a given this product"~~	
		Page 13/45. 4.5.2.3			This amendment aims to narrow the concept of compatibility to a reasonable level to ensure fulfillment of the compatibility requirement. By inserting the words " widely available ", the standard would clarify that there should not be compatibility with every device that may exist (for example, niche scanners or obsolete gadgets) and that compatibility should be with widely available external components. It should be noted that, in the same spirit, 4.6.3 of the draft standard mentions " <i>latest generation smartphones</i> " and " <i>major operating systems and browsers</i> ".	3) Compatibility: The unique product identifier shall be compatible with broadly available external components, such as professional scanning devices, smartphones and similar digital consumer devices	

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		page17/45 6.			It is important to clarify that identification systems for economic operators and economic facilities are not mandatory in accordance with ESPR (pending the Commission's delegated acts): ***In addition, *where appropriate, the digital product passport should be associated with a unique operator identifier and a unique facility identifier that would enable the traceability of the actors and production facilities linked to that product" (recital 36) Identification systems for economic operators and facilities are not mentioned as essential requirements for digital product passports [Article 10 paragraph (1)], but Annex III	6. ID schemes for economic operators and facilities. * (add note below to title) ID schemes for economic operators and facilities are not mandatory according to the ESPR, but should only be set where appropriate and where required by delegated acts seFng ecodesign requirements.	

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		Pag 22/45. Anexa A			The legal text of the Ecodesign for Sustainable Products Regulation (ESPR) does not refer to any default mode of identification. Article 9 paragraph (2) clearly defers any decision regarding the level of granularity to future delegated acts establishing ecodesign requirements. Recital 33 of the ESPR reiterates that "impact assessments carried out in preparation of delegated acts establishing ecodesign requirements should analyse the costs and benefits of establishing information requirements through digital product passports at model, batch or item level". When such a decision is taken, recital 33 also emphasises that the choice of granularity level must "avoid costs for businesses and for the public that are disproportionate to the wider benefits" and that such a cost-benefit assessment depends on "for example, the complexity of the value chain, the size, nature or impact of the products concerned". As background information, identifying a product at item level (default item-level IDs) involves significant costs: High economic costs for companies to manage UPIs at batch or item level due to the need to invest in online label printing capacity at all production facilities. Environmental costs due to the need to store large amounts of data. Limited benefits, as products belonging to the same model have similar environmental characteristics, making it redundant to move to batch/item level. Any decision to select the item level should	~~Default~~ Identification at the item level <i>may be considered, based on the impact assessments carried out when preparing the delegated acts seFng ecodesign requirements, is advisable</i> for products that meet any of the following criteria: (...) ~~'In scenarios not explicitly covered above, but where item-level identification emerges as beneficial during the product lifecycle, economic operators are encouraged to default to this mode of identification'~~	

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					balance the above costs with potential benefits. This is all the more important at a time when the European Commission has established competitiveness and reducing administrative burden as key priorities. In conclusion, the EN standard does not refer to any default mode of identification, as this contradicts the legal text of the ESPR which defers this decision to product-specific delegated acts. While for product groups that meet certain criteria the item level may be considered, the selection of the granularity level should only take place at the end of a thorough impact assessment. Therefore, EN standards should not refer to any notion of "default" identification.		
		Chapter 2 Pages 7, 8, 9			To provide economic operators with the legal certainty that they can leverage existing systems to comply with the DPP, the reference list should include all standards widely used by companies on the market. This is key to speed up the uptake of the DPP at the lowest possible costs for companies. It is essential to add the standards here referred: <u>ISO/IEC 15459-3:2015, Information technology — Automatic identification and data capture techniques— Unique identification — Part 3: Common rules.</u>	Add standards to reference list: ISO/IEC 15459-3:2015, Information technology — Automatic identification and data capture techniques— Unique identification — Part 3: Common rules ISO/IEC 18975:2024Information technology — Automatic identification and data capture techniques — Encoding and resolving identifiers over HTTP GS1 Digital Link Standard: URI Syntax, release 1.6.0	

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					This reference is missing and should be added. See its normative usage in Section 5.1.2.1 as the GS1 System is fully compliant with ISO/IEC 15459. This part of the standard must be applied universally to every Section(s) that claims ISO/IEC 15459 compliance. <i>ISO/IEC 18975:2024Information technology — Automatic identification and data capture techniques — 291 Encoding and resolving identifiers over HTTP</i> This reference is missing and should be added, given this standard is referenced by Section 5.1.2.1. For the standard, see https://ref.gs1.org/standards/digital-link/uri-syntax/ - Per Section 5.1.2.1, the reference to the <i>GS1 Digital Link Standard: URI Syntax</i> is necessary for GS1 users just as IEC 61406 is for users of ANS MH10.2 DIs <i>EPC Tag Data Standard (TDS), release 2.2</i>, https://ref.gs1.org/standards/tds/ Reference missing. The reference to the EPC Tag Data Standard (TDS) is necessary to go in line with its mentioning in the further sections (e.g., table B14).	<i>EPC Tag Data Standard (TDS), release 2.2</i> , https://ref.gs1.org/standards/tds/	
		Annex A Page 22			The legal text of the Ecodesign for Sustainable Products Regulation (ESPR) does not refer to any default mode of identification. Article 9 (2) clearly defers any decision on the level of granularity to the future delegated acts setting eco-design requirements. Recital 33 of the ESPR reiterates that “the impact assessments carried out when preparing the delegated acts setting eco-design requirements should analyse the costs and benefits of setting information requirements		

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					<i>through digital product passports at model, batch or item level". When making such a decision, Recital 33 further highlights that the choice of the level of granularity shall "avoid costs for companies and for the public that are disproportionate to the wider benefits" and that such a cost-benefits assessment depends on "for example, the complexity of the value chain, the size, nature or impacts of the products considered."</i> As a background, the identification of a product at an item level (default item-level IDs) entails significant costs: - High economic costs for companies to manage UPI at batch or item level due to the need to invest in online label printing ability at all manufacturing plants. - Environmental costs due to the need to store large quantities of data. - Limited benefits, since products belonging to the same model have similar environmental characteristics, in such a way that it is redundant to go to the batch/item level. Any decision to select the item level should balance the costs above with potential benefits. This is more important at a time where the EU Commission has set competitiveness and reduction of administrative burden as its key priorities. To sum up, EN standard shall not refer to any default mode of identification since this runs counter to the legal text of the ESPR that defers this decision to the product-specific delegated acts. While for product groups complying with certain criteria the item level may be considered, the selection of the granularity level should only come at the end of a thorough impact		

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					assessment. That is why EN standards should not refer to any notion of “default” identification.		
		4.4.2		GE	Regarding “2) Granularity consistency”: Rationale for changing the sentence: One unique identifier can serve all three levels of granularity depending on the application they interface with. For example, a product with a model, lot and serial number are encoded together. The product’s model level identifier (e.g., GS1’s GTIN) is used for online sales and fulfilment processes, the product’s model and lot number combined are used for traceability or recall, and the product’s model and serial number are used for traceability and warranty return or service records. It is up to the product manufacturer to determine what levels are required for non-regulatory purposes but the level required by the regulation must be used and remain persistent for the duration required by the regulation.	Change sentence to: “The minimum granularity level required by the regulation shall remain available once the product is placed on the market or put into service (3.15).”	
		2		GE	Draft norms prEN 18219/18220 fail to normatively reference central ISO standards. This leads to media breaks, incompatibilities, and bilateral integration efforts.	Our demand: Binding normative referencing of relevant ISO standards (e.g., ISO/IEC 15459-3, 18004, 16022).	

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ASRO/RO		5.7.3		ed	If the ease of recognition of the data carrier bearing the Digital Product Passport (DPP) is deemed necessary in instances of multiple data carriers on a single product, it is imperative to acknowledge that the specific choice of symbology, such as '6452' or '6452-1', can significantly impact the readability and print quality of said data carrier. Furthermore, the chosen symbology must not pose a risk of disruption to the operations of various stakeholders, and the precise indication of the data carrier bearing the DPP should remain unrestrictive to avoid market segmentation for products sold concurrently in the EU and other geographical areas.	A 2D data carrier linking to a DPP may feature an optional graphical marking to distinguish it from other data carriers marked on the same product. When such a graphical marking is employed, it could use [15][16], using symbol 6452 or 6452-1, unless these symbols alter the inherent marking characteristics of the data carrier itself.	
		5.1.		ed	To be fully aligned with the ESPR text, the standards should clearly specify that the choice of data carrier location should be specified in the applicable delegated act, and not through a generic document. See Article 10 paragraph (1) letter (b) of the ESPR: <i>(b) the data carrier is physically present on the product, on its packaging or on the documentation accompanying the product, as specified in the applicable delegated act adopted under Article 4</i>	<i>5 Requirements</i> <i>5.1 General</i> <i>A product item shall have at least one data carrier either on the product itself, on the packaging or on documentation according to the applicable delegated acts</i> ~~this document.~~	
		5.4.1		ed	In accordance with the ESPR text (recital 37), the standards should clarify that delegated acts may provide for the provision of data carriers on packaging or in documentation, based on an impact assessment that takes into account the nature, size or use of the product in question. We recommend removing the term "preferred" to avoid implying a hierarchy that may not be feasible for all product	<i>5.4.1.General</i> <i>There shall be at least one data carrier containing the product identifier of the DPP provided either on the product (preferred), embedded in the product (preferred), on the packaging or in the documentation.</i> Based on impact assessment considering the nature, size, or use of the product concerned, the applicable delegated acts can set that the data carrier should be provided on the packaging or in the documentation.	

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					types. Economic operators should retain the flexibility to determine the most suitable placement based on the product's size, shape, packaging material and available space		
		5.4.2. 5.4.6.		ed	It is important to highlight that product marking may not be suitable for small products or for products used under specific conditions. For products used in constant contact with water, soap or formulations (for example, toothpaste), this frequent exposure can affect the visibility of the product label. In particular, very small and detailed elements, such as QR codes, may become illegible due to moisture or residue, making scanning and accessing information more difficult. Any choice regarding data carrier placement should be left to the discretion of delegated acts establishing ecodesign requirements, based on an impact assessment	5.4.2 (...) <i>The advantage of product marking is that the identifier stays in principle with the product throughout its complete lifetime. The disadvantage is that product marking is not appropriate for small products or may be challenging due to the use conditions of a product.</i> 5.4.c (...) <i>The main interest in permanently attaching data carrier to the product is to ensure DPP will provide at any time of its life cycle relevant information related to the product (consumer, authorities, recyclers) to increase circular economy. The main limit is that this technique is not appropriate for small products or may be challenging due to use conditions of a product.</i>	
		Annex A. Data carrier selection criteria – Mandatory criteria.		ed	"The notion of "tracking of individual items" should be removed, because: - This contradicts Article 9 paragraph (3) letter (c) of the ESPR - namely the reference for this requirement. Article 9 paragraph (3) letter (c) does not refer to tracking an individual item, but to the need for the DPP to "improve the traceability of products along the value chain". - Article 9 paragraph (2) letter (d) of the ESPR clearly defers any decision on the level of granularity to future	Improve traceability: Enables the traceability of ~~tracing individual items~~ products along the value chain (and entire supply chain)	

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					delegated acts establishing eco-design requirements. Therefore, tracking of individual items is not a requirement for the DPP, but only a possibility in case future delegated acts establish DPP at item level. Therefore, we suggest aligning the wording with the ESPR legal text.		
		Chapter 2 Pages 7 and 8		ed	There are significant gaps in the Normative References section: the section as it exists omits almost all references except for RFID, vocabulary, and direct part marking standards. It is essential to have an exhaustive reference of standards to provide economic operators using them with legal certainty they can leverage them for DPP. This will speed up uptake of DPP at lower possible costs. The list misses important standards like DataMatrix, QR Code, NFC, 61406-1 and -2, barcode print quality standards, GS1 Digital Link URI and EPC Taga Data Standard. Here is a (possibly incomplete) list of missing normative references. The standards may be referenced multiple times but for the purpose of this comment, we list the first occurrence. The additions were listed alphabetically not by their chronological use. The summary below starts with the Section # then uses shorthand titles for the standard to ease review: - 5.2.2: 15459-2, 18975, 61406-1, 61406-2, 15424, 15418, GS1 Digital Link Standard: URI Syntax - 5.6.2: 15415, 29158 - 5.6.3: 15426 - 6.2.2: 16022 (Data Matrix) - 6.2.3: 18004 (QR Code) - 6.2.4.1 15459-3, -4, -6 - 6.2.4.2: 8859	<u>Identification related</u> • <i>EN IEC 61406-1:2022, Identification Link - Part 1: General requirements</i> • <i>EN IEC 61406-2:2024, Identification link - Part 2: Types/models, lots/batches, items and characteristics</i> • <i>ISO/IEC 646:1991, Information technology — ISO 7-bit coded character set for information interchange</i> • <i>ISO/IEC 8859-1:1998, Information technology — 8-bit single-byte coded graphic character sets — Part 1: Latin alphabet No. 1</i> • <i>ISO/IEC 15418:2016, Information technology — Automatic identification and data capture techniques — GS1 Application Identifiers and ASC MH10 Data Identifiers and maintenance</i> • <i>ISO/IEC 15459-3:2015, Information technology — Automatic identification and data capture techniques — Unique identification — Part 3: Common Rules</i> • <i>ISO/IEC 15459-4:2014, Information technology — Automatic identification and data capture techniques — Unique identification — Part 4: Individual products and product packages</i> • <i>ISO/IEC 15459-6:2014, Information technology — Automatic identification and</i>	

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					- 6.3.3.2: 18092, 21481 (NFC) 6.3.4.3 EPC Tag Data Standard, V2.2	<i>data capture techniques — Unique identification — Part 6: Groupings</i> <i>ISO/IEC 18975:2024, Information technology — Automatic identification and data capture techniques — Encoding and resolving identifiers over HTTP</i> <i>GS1 Digital Link Standard: URI Syntax, V1.6.0 2D Barcode Symbols related</i> <i>ISO/IEC 15415:2024, Automatic identification and data capture techniques — Bar code symbol print quality test specification — Two-dimensional symbols</i> <i>ISO/IEC 15424:2025, Information technology — Automatic identification and data capture techniques — Data carrier identifiers (including symbology identifiers)</i> <i>ISO/IEC 15426-2:2023, Information technology — Automatic identification and data capture techniques — Bar code verifier conformance specification — Part 2: Two-dimensional symbols</i> <i>ISO/IEC 16022:2024, Information technology — Automatic identification and data capture techniques — Data Matrix bar code symbology specification</i> <i>ISO/IEC 18004:2024, Information technology — Automatic identification and data capture techniques — QR code bar code symbology specification</i> <i>ISO/IEC 29158:2020, Information technology — Automatic identification and data capture techniques — Direct Part Mark (DPM) Quality Guideline</i> <u>RFID related</u> <i>GS1 EPC Tag Data Standard, V2.2</i> <i>ISO/IEC 15961-1:2021, Information technology — Data protocol for radio</i>	

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						<i>frequency identification (RFID) for item management — Part 1: Application interface</i> • <i>ISO/IEC 15961-2:2019, Information technology — Data protocol for radio frequency identification (RFID) for item management — Part 2: Registration of RFID data constructs</i> • <i>ISO/IEC 15961-3:2019, Information technology — Data protocol for radio frequency identification (RFID) for item management — Part 3: RFID data constructs</i> • <i>ISO/IEC 18046-1:2011, Information technology — Radio frequency identification device performance test methods — Part 1: Test methods for system performance</i> • <i>ISO/IEC 18046-2:2020, Information technology — Radio frequency identification device performance test methods — Part 2: Test methods for interrogator performance</i> • <i>ISO/IEC 18046-3:2020, Information technology — Radio frequency identification device performance test methods — Part 3: Test methods for tag performance</i> <u>NFC related</u> • <i>ISO/IEC 18092:2023, Telecommunications and information exchange between systems — Near Field Communication Interface and Protocol 1 (NFCIP-1)</i> • <i>ISO/IEC 21481:2021, Information technology — Telecommunications and information exchange between systems — Near field communication interface and protocol 2 (NFCIP-2)</i> <u>Vocabulary related</u> <i>ISO/IEC 19762:2025, Information technology — Automatic identification and data capture (AIDC) techniques — Vocabulary”</i>	

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		Section 5.1 Page 10		ed	To be fully aligned with the ESPR text, standards should make clear that the selection of the location of the data carrier should be specified in the applicable delegated act, and not through a generic document. See Article 10 (1) b of the ESPR: <i>(b)the data carrier shall be physically present on the product, its packaging or on documentation accompanying the product, as specified in the applicable delegated act adopted pursuant to Article 4;</i>	<i>5 Requirements</i> <i>5.1 General</i> <i>A product item shall have at least one data carrier either on the product itself, on the packaging or on documentation according to the applicable delegated acts ~~this document~~.</i>	
		Section 5.4.1 Page 11		ed	Standards should not identify a preferred location of the data carrier, but should leave such a choice to the product-specific delegated act. In line with the ESPR text (Recital 37), delegated acts can provide for data carriers to be provided on the packaging or in the documentation, based on an impact assessment considering the nature, size, or use of the product concerned. Product marking may not be appropriate for small products or for products used under specific conditions. In the case of products used in constant contact with water, soap or formulations (e.g. toothpaste), this frequent exposure can impair the visibility of the product labeling. In particular, very small and detailed elements, such as QR codes, may become unreadable due to moisture or residue, making scanning and accessing the information more difficult.	<i>5.4.1.</i> <i>General</i> <i>There shall be at least one data carrier containing the product identifier of the DPP provided either on the product ~~(preferred)~~, embedded in the product ~~(preferred)~~, on the packaging or in the documentation, in line with the applicable delegated act preceded by an impact assessment considering the nature, size, or use of the product concerned.</i>	
		Section 5.4.2 Page 12		ed	It is important to highlight that product marking may not be appropriate for small products or for products used under specific conditions. In the case of products used in constant contact with water, soap or formulations (e.g. toothpaste), this frequent exposure can impair the visibility of the product labeling. In particular, very small and detailed elements,	<i>5.4.2 (...)The advantage of product marking is that the identifier stays in principle with the product throughout its complete lifetime. The disadvantage is that product marking is not appropriate for small products or may be challenging due to the use conditions of a product.</i>	

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					such as QR codes, may become unreadable due to moisture or residue, making scanning and accessing the information more difficult. Any choice on the location of the data carrier should be left to the delegated acts setting ecodesign requirements, based on an impact assessment.	<i>5.4.6 (...)The main interest in permanently attaching data carrier to the product is to ensure DPP will provide at any time of its life cycle relevant information related to the product (consumer, authorities, recyclers) to increase circular economy. The main limit is that this technique is not appropriate for small products or may be challenging due to use conditions of a product.</i>	
		Annex A Page 21		ed	The notion of “tracing of individual items” should be removed since: - It is in contradiction with Article 9 (3) (c) of ESPR – i.e. the reference for this requirement. Article 9 (3) c does not refer to tracing of individual item, but to the need for DPP to “ <i>improve the traceability of products along the value chain</i> ”. - Article 9 (2) (d) of the ESPR clearly defers any decision on the level of granularity to the future delegated acts setting ecodesign requirements. Tracing of individual items is, therefore, not a requirement for DPP, but only a possibility in case future delegated acts set DPP at item level. That is why we suggest aligning wording with the legal text of the ESPR.	<i>Improve traceability: Enables the traceability of ~~tracing individual items~~ products along the value chain (and entire supply chain)</i>	
		2		GE	Draft norms prEN 18219/18220 fail to normatively reference central ISO standards. This leads to media breaks, incompatibilities, and bilateral integration efforts.	Our demand: Binding normative referencing of relevant ISO standards (e.g., ISO/IEC 15459-3, 18004, 16022).	
		4.3.2		GE	Two requirements are missing referring to ISO/IEC 15459-3 and ISO/IEC 15459-4.	Add the following two requirements: “3) For identifiers conforming to ISO/IEC 15459-3 Unique Identification - Common Rules, see Sections 6 Identity for rules on syntax, structure, length of identity, and character set. 4) For identifiers conforming to ISO/IEC 15459-4: The identity for individual products and	

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						product packages shall not contain more than 50 characters."	
		5.7.3		GE	The graphical symbol marking is specified for use on equipment and it may be perfectly appropriate there. It is however wholly inappropriate for use on retail consumer products where it mimics the convention used for "peel-off coupons" or information leaflets, Any standardisation by retail of a mark that is used to influence consumer behavior would come only after a very significant research effort with consumer focus groups.	Adjust sentence to: "When an optional graphical marking is used for equipment, it should comply with [15][16], symbol 6452 or 6452-1."	
				GE	DPP standards assume 2D barcodes in retail without mandatory implementation or technical assurance. This poses risks for scanner compatibility, POS integration, as well as overall compatibility, overburdening IT infrastructure, and thus significantly increasing additional costs.	Our demand: Essential close linkage with 2D-migration according to GS1 guidelines.	

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ASRO/RO	0	4.3		ed	ESPR Article 11 empowers the European Commission to adopt delegated acts to set out the requirements for DPP service providers to become such providers and, where appropriate, the certification scheme to verify compliance with such requirements. In the absence of such a delegated act, standards should not cover provisions on back-up service providers, as these would risk becoming obsolete depending on the final delegated acts.	Removing all references to back-up service providers	
		Sections 4.3 and 4.4. Page 5		ed	According to Article 11 of the ESPR, the EU Commission “<i>the Commission is empowered to adopt delegated acts in accordance with Article 72 to supplement this Article by setting out the requirements that digital product passport service providers are to comply with in order to become such providers, and, where appropriate, a certification scheme to verify compliance with such requirements, and by setting out the requirements that those service providers are to comply with when providing digital product passport services (...)</i>”. In absence of such a delegated act, we recommend the standards do <u>not</u> cover provisions on back-up service providers. The risk is that standard provisions may become obsolete depending on the final delegated acts.	Removing all references to back-up service providers	

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ASRO/RO	0	Introduction		ed		Authentication method of API should be introduced or refer to another document.	

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		Section 4.1.3 Page 10/22.			This note clarifies that Economic Operator ID and Facility ID are not mandatory features of DPP: - <i>Recital 36 states that “In addition, <u>where appropriate</u>, the digital product passport should be linked to a unique operator identifier and a unique facility identifier which would allow the actors and manufacturing facilities related to that product to be traced”</i> ID schemes for economic operators and facilities are not mentioned in the essential requirements for Digital Product Passports (Art. 10 (1))	<i>Economic Operator ID and Facility ID (* add note below)</i> <i>*ID schemes for economic operators and facilities is not mandatory according to the ESPR, but should only be set where appropriate and required by delegated acts setting ecodesign requirements.</i>	

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