

DPP Readiness Checklist

Six readiness steps for exporters of batteries, textiles, metals and electronics placed on the European market, and for the European Union importers who place them, under the Ecodesign for Sustainable Products Regulation and the EU battery passport. India has no domestic Digital Product Passport law; this is export readiness.

Updated June 2026 · Regulation (EU) 2024/1781 · greensutra.in

The six readiness steps

A precise check of which product groups a business places on the EU market, and whether the dated battery track applies, is the first step of every DPP readiness review. The framework sets no general deadline; the passport becomes mandatory product group by product group through delegated acts.

01 Scope the product against the ESPR groups and the battery passport

Place each product against the priority groups named in the first ESPR Working Plan, COM(2025) 187 final, namely textiles with a focus on apparel, furniture, tyres, mattresses, iron and steel and aluminium, and against the dated EU battery passport. The Working Plan adoption years are indicative and no product-specific delegated act has been adopted as of June 2026; the battery passport applies from 18 February 2027.

[SIX PRIORITY GROUPS · BATTERY PASSPORT](#)

02 Inventory the product level data across the supply chain

Map what product level data already exists across the supply tiers against what a passport will need: material composition, recycled content, substances of concern, durability, repair and end of life information. The same inventory feeds a life cycle assessment and the carbon footprint of the product.

[DATA INVENTORY · GAP REGISTER](#)

03 **Secure the unique product, operator and facility identifiers**

Confirm whether unique product, operator and facility identifiers are in place. Under ESPR Article 12 the operator and facility identifiers must comply with the standards referenced in Annex III. Where products already carry GTINs and GS1 barcodes the identifier groundwork is partly in place; where they do not, securing the identifiers is part of the readiness work.

[ANNEX III · GTIN GROUNDWORK](#)

04 **Prepare a machine readable data carrier**

Prepare a machine readable data carrier on the product, such as a QR code or a data matrix, linked to the unique product identifier. The exact carrier and standard are set per delegated act, so none is fixed in the framework itself; the GS1 Digital Link is widely expected to be the implementation route.

[QR CODE · PER DELEGATED ACT](#)

05 **Set the data governance that keeps the record accurate**

Establish the data governance that keeps the passport accurate, complete and up to date, with the access rights set per tier. The operator placing the product on the market must also keep a back-up copy of the passport available through an independent third-party service provider so the record survives the operator ceasing activity.

[ACCURATE · TIERED ACCESS · BACK-UP](#)

06 **Track the key dates, registry and battery passport**

Sequence the work against the dated milestones: the central EU registry must be set up by 19 July 2026, the battery passport applies from 18 February 2027, and the unsold-goods destruction ban for large enterprises applies from 19 July 2026. The ESPR delegated acts carry indicative years across 2026 to 2029; each obligation starts only when its delegated act is adopted and applies.

[REGISTRY 19 JUL 2026 · BATTERY 18 FEB 2027](#)

A readiness review applies these steps to a specific product. The engagement sits at greensutra.in/services/digital-product-passport-solutions/, a structured first step is the discovery brief at greensutra.in/dpp-discovery/, and the wider EU compliance map is set out in the guides at greensutra.in/services/.

Primary sources: Regulation (EU) 2024/1781 (ESPR), Regulation (EU) 2023/1542 (EU Battery Regulation), COM(2025) 187 final (ESPR Working Plan 2025-2030), European Commission. This checklist is informational and is not legal advice.