



**RIGHT TO
REPAIR**

Contribution for the Digital Product Passport Registry public consultation.

Brussels, 26-05-2026

The [Right to Repair Europe](#) coalition represents over 190 organisations from 30 European countries. It represents environmental NGOs and repair actors such as community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement, and its objective to make repair affordable, accessible and mainstream is aligned with the objectives of the European Green Deal and the Circular Economy Action Plan. Browse member organisations by country [here](#).

Introduction

While the Digital Product Passport (DPP) registry marks an important advancement for product transparency and the circular economy, several critical gaps remain that could limit its effectiveness. The following recommendations aim to address these shortcomings.

Ensuring access to the DPP throughout the product lifecycle

Article 10.3 provides for the automatic removal of entries from the register after 10 years in the absence of a specific duration provided for by Union law. And Article 4 on

the verification of economic operators suggests that the validity status of a Product Data File could be altered if the verification of the relevant economic operator has expired. These two provisions conflict with the objective of long-term availability of the Product Data File. By potentially rendering the DPP inaccessible before the product's end of life, these provisions deprive consumers of essential product data and deny repairers, refurbishers, and recycling centers the data they need to carry out their activities.

Right to Repair Europe recommends:

- *That the data retention period in the registry **be aligned with the product's expected lifespan**, rather than uniformly set at 10 years, for example at least 15 years for electronics and keep them active as soon as we have evidence that people are still using the products.*
- *That the **DPP's validity status** remains "valid" even if the operator becomes "unverified," by distinguishing between product data and registration data.*

Facilitating access for independent repairers

Article 5 provides for a verification process for "other actors in the value chain," but the verification requires a level of certification that may be disproportionate for small independent repairers and refurbishers. For producer cooperatives, trade unions, and artisan networks in key sourcing countries, this requirement may not be technically or financially feasible. Since no mutual recognition agreement has been concluded between eIDAS and a third-country system, the DPP risks becoming inaccessible to key actors.

Finally, the regulation does not specify how costs should be distributed throughout the supply chain. In the absence of a cost-sharing principle, there is a real risk that the costs associated with DPP compliance will be passed on upstream to small suppliers and producer organizations, which are least able to bear them.

Furthermore, the phrasing "shall have access to the digital product passport registry" does not specify either the data or the rights granted to actors in the value chain.

Right to Repair Europe recommends:

- *A proportionate verification procedure for SMEs, small repair shops, compatible with existing national identification systems.*
- *A specific procedure for producer cooperatives, trade unions, and artisan networks in non-European countries.*
- *An explicit ban on manufacturers conditioning access to technical data on the use of proprietary tools, closed portals, or prior commercial agreements. And that repair providers have access, without discrimination and without a prior commercial agreement with the manufacturer, to the technical data necessary for repairs.*
- *Develop a principle for sharing the costs of implementing the DPP, ensuring that most of the costs of the whole DPP fall on the one placing the product on the market.*

Ensuring accessible support for all

The help desk, as currently designed, is a Brussels-based service in English, operating according to EU working hours. For stakeholders in supplier countries, this may prove insufficient.

Right to Repair Europe recommends:

- *That the helpdesk provided for in Article 13 should not be limited to the Commission's working days in Brussels. Independent repairers often work outside these hours.*
- *The establishment of multilingual support, provided through EU delegations and trusted intermediaries as part of the helpdesk.*

Providing for data categories that sector-specific delegated acts may specify

Given that this regulation does not make data mandatory but sets the conditions for what delegated acts may technically require, Right to Repair recommends **that the**

semantic framework include, from the outset, structured categories reserved for the following data, which sector-specific delegated acts may specify, in particular:

- ***The repairability or durability index:*** with access to the detailed rating grid and not just the final score
- ***A standardized usage counter by product type:*** charge cycles, hours of use
- ***A history of repair work:*** date, nature, price, identity of the repairer.
- ***Refurbishment data:*** date, work performed, identity and country of the refurbisher
- ***The price and availability of spare parts:*** using data already collected via EPREL or national repairability indices
- ***Consumer data:*** the year the product was launched on the market, duration of legal and commercial warranties, duration of software support, manufacturer contact information.

Furthermore, Article 12 entrusts the Commission with the development and maintenance of the reference framework, without any mechanism for consulting stakeholders. In order to develop the semantic reference framework so that it meets the expectations of all stakeholders, Right to Repair Europe recommends:

- ***That the process of defining and revising data models formally involve all actors of the value chain, including independent repairers and refurbishers, consumer and environmental protection associations***

Implementing penalties for false declarations

Article 17 addresses the fraudulent use of the registry but contains no provisions regarding **false declarations of product data**.

To hold economic operators accountable for the accuracy of product data, Right to Repair Europe recommends:

- The addition of an **article on the liability of economic operators** for the accuracy of reported product data, providing for **penalties for false declarations**.

- **Reporting mechanisms** allowing repairers, refurbishers, and civil society actors to report inaccurate data.

Consumer protection and prohibition of “shadow profiling”

This regulation lists DPP service providers as part of the registry but does not establish any rules regarding the processing of access data generated when an end user views a digital passport. However, if the DPP is registered at the individual unit level, each access to a passport constitutes a traceable event that could potentially be used to reconstruct the usage history of an identified product.

To prevent data from being misused, Right to Repair Europe recommends:

- *That the implementing regulation or sector-specific delegated acts impose an explicit prohibition on DPP service providers from using consumer access logs to the DPP for commercial purposes, behavioral profiling, or resale to third parties.*
- *That the link between a product’s unique identifier and the identity of its owner cannot be reconstructed by the manufacturer via DPP access systems, in particular by requiring that consumer access to public DPP data be anonymized on the provider’s side.*
- *That the principle of data minimization expressly applies to logs generated by DPP service providers when the passport is consulted by non-professional third parties.*

Making data accessible to all relevant stakeholders

The regulation provides for access by economic operators, other actors in the value chain, competent national authorities, and customs authorities. The DPP will centralize unprecedented volumes of data on product lifespans, repair rates, and spare part prices, which could help document planned obsolescence and inform public policy. However, it does not mention any mechanism for consumer

associations, NGOs, researchers, or the general public to access aggregated data as provided for in Article 11(b) of the ESPR.

Furthermore, the draft does not explicitly mention contracting authorities among the national authorities to which Member States should grant access to the register. In the absence of an explicit reference, Member States may fail to take contracting authorities into account when managing access rights, which would prevent them from using DPP data to verify compliance with sustainability criteria in public tenders.

In order to leverage its data while protecting consumers, Right to Repair Europe recommends:

- ***Providing access to aggregated and anonymized data from the registry for recognized associations and public research institutions, as well as an open data portal allowing users to view statistics aggregated by product group.***
- ***To explicitly include contracting authorities among the national authorities to which Member States should grant access to the registry.***

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