

# Feedback on the EU Digital Product Passport Registry consultation

*On keeping the DPP registry as a federated trust and discovery layer rather than evolving toward centralised storage of detailed lifecycle data, and on the cross-sector interoperability that turns DPPs from a compliance burden into operational efficiency for industry.*

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The proposed registry architecture is an important step towards enabling interoperable Digital Product Passports (DPPs) across sectors. However, for scalability, industrial confidentiality and long-term lifecycle traceability, it is important that the registry remains primarily a federated trust and discovery layer rather than evolving towards centralised storage of detailed lifecycle data.

The Regulation already recognises the decentralised nature of the DPP ecosystem. This principle should be reinforced explicitly to support sector-specific implementations and future interoperability with industrial digital twin ecosystems, including machine-readable lifecycle documentation and verifiable supply-chain attestations.

The framework would benefit from explicit support for:

- decentralised identifiers (DIDs) and verifiable credentials (VCs);
- event-based lifecycle traceability across repair, refurbishment, remanufacturing and recycling activities;
- extensible sectoral semantic models and ontologies;
- persistent long-term identifiers suitable for products with multi-decade operational lifecycles.

This is particularly relevant for sectors such as aviation, construction, industrial equipment and other high-value assets where lifecycle continuity, provenance and residual value assessment are critical.

An additional consideration concerns the economic scalability and practical adoption of DPPs across industries. Today, many stakeholders perceive DPPs primarily as an additional compliance and reporting burden. However, if implemented through interoperable, machine-readable and federated architectures, DPP ecosystems also have the potential to reduce duplication of audits, reporting, certification and supply-chain verification activities across value chains.

This becomes particularly relevant where multiple sectors depend on shared upstream material and biomass streams. Future sustainability and carbon accounting frameworks are likely to rely increasingly on bottom-up traceability originating from raw materials, agricultural inputs and intermediate processing stages that feed several downstream industries simultaneously.

For this reason, the DPP framework should continue to prioritise:

- cross-sector interoperability;
- reusable trust and identity layers;
- machine-readable lifecycle data;
- and open semantic standards that avoid the creation of isolated sector-specific data silos.

Such an approach could help ensure that DPP implementation generates not only regulatory compliance benefits, but also operational and economic efficiencies for industry participants over time.

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