Department for Business & Trade

We thank you for your time spent taking this survey.
Your response has been recorded.

Call for Evidence: Digital Product Records

This Call for Evidence aims to gather stakeholder views on Digital Product Record (DPR) policy. DPRs, such as the EU's Digital Product Passport (EU DPP), which will apply in Northern Ireland under the Windsor Framework, are being explored internationally as a means of providing product information and sustainability data across supply chains. Further information on the EU's Digital Product Passport is available here.

We are exploring whether a UK DPR policy could be used to streamline the provision of a range of product information for businesses, while enhancing transparency and traceability for consumers and Market Surveillance Authorities. This forms part of a wider aim to understand where benefits can be delivered to UK businesses and consumers through digitalisation of compliance processes.

We are inviting views on DPRs in general, the impacts of existing DPR policy (e.g. on businesses selling into the EU and in Northern Ireland), and what the UK should consider when developing domestic policy on DPRs for goods.

This survey is designed to understand this and how best to support businesses in the long term. We expect this survey to take approximately twenty minutes to complete. You may want to consult others in your organisation. If you need to pause and return to the survey, then you can use the same link to return to the same point in the survey. By completing this survey, you agree for your responses and personal information to be processed by the department according to the privacy notice. You are free to withdraw at any time. If you wish to withdraw your responses after completing the survey you can do so by emailing: DPR.engagement@businessandtrade.gov.uk

About you

*Please indicate if you are responding as an individual or on behalf of an organisation. If responding as an organisation, you will be asked to provide some further details about your organisation

- ○ I am responding as an individual
- ● I am responding on behalf of an organisation

*How many employees does your business currently have on the payroll in the UK? This includes full-time and part-time staff. Please include yourself if you are on the payroll as an employee.

- ○ 1 to 9
- ● 10 to 49
- ○ 50 to 249
- ○ 250 or more
- ○ No employees on the payroll
- ○ Do not know

*Where is your organisation primarily based?

- [x] England
- [ ] Scotland
- [ ] Wales
- [ ] Northern Ireland
- [ ] European Union
- [ ] Outside of the UK and the EU
- [ ] Do not know

*Which product category or sector(s) does your organisation primarily deal with?

- [ ] Batteries
- [ ] Textiles
- [ ] Aluminium, Steel and Iron
- [ ] Tyres
- [ ] Energy Related Products
- [ ] Furniture
- [ ] Mattresses
- [ ] Construction Material
- [ ] Toys
- [ ] Detergents and Surfactants
- [ ] Electronics and ICT
- [ ] Chemicals
- [ ] Paints and Lubricants
- [x] Other (please specify)

Cosmetics

Has your business sold physical goods to any market outside of Great Britain, including to Northern Ireland, in the last 12 months?

- ○ Yes - we have in the last 12 months
- ○ Yes - but not in the last 12 months
- ☑ No, we never have

Awareness of Emerging Digital Product Requirements

*How would you describe your awareness of emerging requirements or initiatives related to digital product records, including at the EU and international levels?

- ○ Have not heard of the requirements
- ○ Have heard of the requirements but do not know what they involve
- ○ Have some awareness (e.g. aware of the concept and that it may apply to your products)
- ☑ Have strong awareness (e.g. understand the requirements and have taken, or plan to take, action to prepare)

Please think about any regulatory developments you may have seen, read or heard recently related to digital product records. Where have you found this information?

Select all that apply:

- [ ] Online EU business guidance
- [ ] Online UK business guidance (on EU regulations)
- [ ] Government/Department for Business, Innovation, Science and Trade
- [x] EU policy-makers/officials/counterparts
- [ ] Notices and advice from colleagues
- [ ] External advice (for example from private consultants or legal experts)
- [x] Newsletters and updates from Business Representative Organisations
- [ ] Trade publications/events
- [ ] Other (please provide further detail)

What steps, if any, has your organisation taken to prepare for new or upcoming rules about digital product information or records (e.g. the EU's DPP requirements)?

As a trade association, CTPA is not directly impacted by any upcoming regulatory developments relating to digital product records. Currently within the EU, cosmetic products are not directly impacted by a DPR policy. However, it is anticipated that cosmetics will be listed as a product group within the second working plan for the Ecodesign for Sustainable Products Regulation (ESPR), which is expected for 2028. There is also consideration of the anticipated European Product Act which may see the DPP to be used as a vehicle for product compliance information as well as an enforcement tool, possibly becoming the first legislative vehicle for introducing the DPP for cosmetic products. CTPA is actively engaging with sister associations in Europe on their work on cosmetic specific digital product passports. In particular, looking at information requirements in consideration of cosmetic specific legislation requirements. CTPA has also engaged with external providers of QR code systems to learn more about the capabilities and how this can be applied to the cosmetic sector.

What forms of UK government guidance would you find most useful to help businesses comply with these types of requirements?

Select all that apply:

- [x] Signposting to relevant EU publications and guidance
- [x] UK Government guidance on how the requirements apply to UK businesses (including trade with Northern Ireland)
- [ ] Targeted webinars/Q&As, etc.
- [ ] Other (please provide further detail)

Business Impacts

In your opinion, what potential benefits for your business, sector or other affected group may come from the introduction and wider use of digital product records (e.g. within the EU and other jurisdictions, including in day-to-day operations or when trading across borders)?

Select all that apply:

- [ ] Reduced time spent gathering or checking supplier information
- [ ] Improved compliance assurance or auditability (e.g. for regulatory requirements)
- [x] More efficient cross-border compliance (e.g. reduced duplication of data submissions, smoother customs processes)
- [ ] Faster or more efficient product recalls
- [x] Improved end-of-life management (e.g. repair, reuse, recycling)
- [x] Easier provision of product information to customers
- [x] Improved supply chain transparency
- [ ] Potential cost savings over time
- [ ] No expected benefits
- [ ] Not sure

Other (please provide further detail)

As an industry where small products with limited packaging and therefore spacing is common, there would be benefits to having the ability to leverage digitalisation for the provision of information such as end-of-life management as well as help reduce packaging and

packaging waste. The rise of 'grey market' products and unauthorised channels for products exposes consumers to possibly unsafe products, and companies to reputational damage. The provision of a digital product passport could allow for the possibility to authenticate, verify and trace products by increasing visibility of the various distribution channels.

In your opinion, what drawbacks for your business, sector, or other affected group may come from the introduction and wider use of digital product records (e.g. within the EU and other jurisdictions)?

Select all that apply:

- [ ] Increased time spent gathering or verifying supplier information
- [ ] Higher compliance or reporting costs (e.g. to meet regulatory requirements)
- [x] Increased administrative burden
- [x] Challenges integrating DPR requirements into existing IT systems or processes
- [ ] Challenges aligning with border or customs processes across jurisdictions
- [x] Risks to commercially sensitive or confidential information
- [ ] Disruption to existing supply chains
- [x] Upfront investment costs (e.g. systems, training, data collection)
- [x] Uncertainty around requirements or implementation
- [ ] No expected drawbacks
- [ ] Not sure

Other (please provide further detail)

As cosmetics are not yet within scope, the uncertainty around future requirements can make it difficult for companies to plan accordingly, particularly in consideration of transition and implementation timelines. There is a risk that information requirements may duplicate

existing obligations, increasing administrative burden. However, this would be dependent on the sector specific requirements and developments around information to be included within the DPR. Cosmetic products are subject to existing notification requirements of a product and responsible person under the Cosmetic Regulation. Therefore, maintaining a secondary database may therefore create an additional administrative burden for companies. There may also be infrastructure challenges in supporting the DPP, alongside the additional administration required to maintain the registry. The DPR may contain highly confidential technical and commercially sensitive information. If the DPP is to evolve into an enforcement tool, there is the risk of possible security challenges due to the nature of the information.

What impacts, if any, might your organisation face if there were separate rules regulating digital product records in Great Britain and Northern Ireland (where EU rules apply)?

Significant divergence would require companies to maintain separate datasets and compliance processes, adding to administrative burden. If this also led to different labelling requirements, this may not be commercially viable for some companies and could increase packaging waste, with associated environmental impacts.

What impacts, if any, might your organisation face if there were separate rules regulating digital product records in Great Britain and the EU?

Many of CTPA's members trade across Europe and subsequently will be preparing for the anticipated EU requirements. As a result, their IT systems and supporting infrastructure will be built around those requirements. Significant policy divergence could affect the administrative and IT systems that support data carriers. This may increase costs and administrative burden by requiring duplicated data management and processes. Divergence could also impact supply chain and distribution channels by limiting where products can be sold due to non-compliance. This would undermine the DPR’s intended benefit of improving cross-border compliance and efficiency.

Business Impacts

Which types of information in a digital record would be most valuable to you or your organisation?

Select all that apply:

- [ ] Product composition (e.g. materials, chemicals)
- [ ] Supply chain information (e.g. origin, suppliers)
- [ ] Environmental information (e.g. carbon footprint, sustainability data)
- [ ] Social and equality information (e.g. human rights, labour data)
- [ ] Repair and maintenance information
- [ ] End-of-life or recycling instructions
- [ ] Compliance or certification information
- [ ] Unique product identifiers (e.g. serial numbers, batch data)
- [x] Not sure
- [ ] Other (please provide further detail)

If a domestic Digital Product Record is introduced in Great Britain, what would you consider a priority in terms of its implementation to best support your existing supply chains and distribution networks between Great Britain, Northern Ireland, and international markets?

- [x] A system that is interoperable with that which applies in the EU and Northern Ireland including, for instance, through a single data carrier.
- [ ] A system that is tailored specifically to the Great Britain market, with potentially distinct labelling requirements to the EU and Northern Ireland.
- [ ] No preference
- [ ] Not sure (please provide further detail)
- [ ] Other (please provide further detail)

What is your view on the potential impact of digital product records on sustainability and resource efficiency? This could be for your organisation, within Great Britain, or more widely.

- ○ Strong positive impact
- ○ Some positive impact
- ○ No overall impact
- ○ Some negative impact
- ○ Strong negative impact
- ● Not sure

Please briefly explain your answer (e.g. impacts on waste, recycling, resource use, or environmental outcomes):

It could improve transparency for consumers, by providing clearer and more accessible end-of-life guidance, which can be challenging for small products such as cosmetics. Providing information digitally could reduce the need for packaging, thereby lowering material use and associated packaging waste. However, an increase in data management and an overall larger digital footprint may have subsequent environmental impacts, such as higher energy and water consumption and increased carbon emissions.

Is there anything else that Government should consider when designing digital product record rules in Great Britain?

A single data carrier for such policies is essential. Whilst DPR requirements may span multiple sectors, one common framework should be used across all sectors. However, it's important the product coverage, sector-specific datasets and granularity remain determined by the applicable sector legislation. The model and infrastructure should also take account of the need to protect commercially sensitive and confidential information. The DPR may contain highly confidential technical documentation and commercially sensitive information; this should remain strictly restricted to Authorities only upon request, in line with sector specific legislation. Moreover, the approach to the inclusion of compliance data and information should be proportionate to what is required, with access to the DPR to be role-based and proportionate. It's important to avoid the DPR becoming a mechanism for routine and large-scale access to detailed product information for remote inspections that refrains from interactions with the responsible person. Whilst the DPR can provide basic reassurance of product compliance, the verification of compliance should remain relying on direct, internal dialogue with the responsible person, safeguarding enforcement's educational and constructive role. Any policies should establish clear obligations for the Competent Authorities to protect confidential information when accessing, copying or storing documentation. The interaction with broader legislation, including environmental and packaging requirements, should also be considered. Any rules should align with those frameworks to avoid creating additional burdens for companies. As noted above, the cosmetics sector is not yet within scope of the DPP, so the requirements remain at an early stage. Therefore, sufficient transition timelines should be provided, taking EU timings into account. If timelines are too staggered, companies may face operational challenges, particularly around data management and artwork changes.

Business Costs

Do you expect your business or sector to face additional costs as a result of upcoming EU DPP compliance changes?

- ◯ Yes – one-off or transition costs
- ◯ Yes – ongoing costs
- ◯ Yes – both one-off and ongoing costs
- ◯ No
- ◯ Not sure

Approximately how much of your total expected costs will be related to product labelling (e.g. updating labels, adding QR codes, printing, or packaging changes)?

Please provide an estimate per year, in pound (£) terms or as a rough percentage.

Data and Supply Chain Capability

Does your business currently collect or create the product and supply chain information that may be relevant for a digital product record (such as those envisaged under EU DPP rules)?

- ◯ We already collect or create most of this information
- ◯ We collect or create some of this information
- ◯ We do not currently collect or create this information
- ◯ This is not our responsibility
- ◯ We do not know what information may be required
- ◯ Not sure

Do any of your products rely on components or materials from the following markets?

Select all that apply:

- ☐ Northern Ireland
- ☐ European Union
- ☐ Other international markets
- ☐ None of the above
- ☐ Not sure

Do you expect your business will be able to obtain all the required product and supply chain information?

- ◯ Yes, all of it
- ◯ Yes, most of it
- ◯ No, some information will be difficult to obtain
- ◯ No, significant gaps are expected
- ◯ Not sure

If your business does not currently hold some of this information (or if you are unsure), what additional costs, effort or challenges would be involved in obtaining or creating it?

Consumer Impacts

In your view, how will EU DPP requirements impact consumers within Great Britain or Northern Ireland?

Consumers would benefit only where manufacturers voluntarily maintain digital information across both markets. However, consumers in Great Britain are still likely to encounter the DPP, as many companies use the same product artworks across the UK and EU. The DPP could increase product transparency for consumers, helping to build trust in both products and companies. It may also help address issues linked to counterfeit and grey market products, reducing the risk of consumers being exposed to unsafe products There is a risk of misalignment regarding the applicability of information to the UK market, such as recycling, end-of-life information, or material sourcing.

What, if any, consumer safeguards or protections should be considered if digital product records were made mandatory in Great Britain?

It is generally recognised that the UK is digitally literate, however it should be considered that there may still be limiting factor of technology access for consumers. Where necessary, a non-digital form of communication may need to be made available, to help achieve consistent information provision to consumers. If considering the associated security challenges of this channel of information, it may be prudent to explore appropriate security and anti-tampering measures. This may include secondary authentication of companies/economic operators as well as the ability to identify altered or counterfeit information.

Other Information

Do you have any other evidence to contribute? For example, are there any other opportunities or challenges the UK Government should consider in relation to digital product records that have not already been covered?

A reasonable implementation roadmap should be established, to avoid excessive infrastructure burdens or overly granular data requirements for industry. There may also be benefit from the publishing of specific guidelines on the DPR obligations for different actors, including what information must be submitted and accessed. This would help ensure responsibilities are proportionate to the role while protecting commercially sensitive and confidential information. In exploring DPR policies, there should also be the opportunity to leverage the use of Digital labelling when rolled across sectors, to allow for the reduction of the duplication of physical and digital information, whilst retaining established essential physical information, where justified. Whilst alignment with the EU is imperative, there should be consideration of further international developments. As mentioned in the consultation, there have been standardisation efforts related to digital product records, and the UK should be seeking to align to international best practice leaving enough room to future-proof the implemented model.

If you are happy to be contacted for further discussion please provide your email address below

Please continue to the next page to submit your answers.