Making the DPP a success: Recommendations for action
Introduction

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Recommendations for policymakers and business

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Recommendations for Policy

Prioritise the principles of DPPs (transparency, sustainability, and circularity)
- Reporting based on DPP data
- Energy/resource efficient infrastructure (data carriers EOL)
- Real-life applications and innovation (product, circular business model)
- KPIs for the circular economy

Generate a level playing field
- Incentives for DPP-based circular practices (SMEs)
- Fines for misuse
- Standardise terminology (traceability)
- Policy coherence (duplication of efforts)

Ensure knowledge building
- Information campaigns and guidelines with best practices
- Training and educational programmes (workforce, university, SMEs)
- Regional DPP support centres (implementation)
Recommendations for Policy/Business

**Fund the future**
- Research and pilot projects
- Open-source solutions and new technologies (AI, IoT, blockchain)
- Green public procurement (demand of active DPPs)

**Ensure stakeholder alignment and participation**
- Gradual roll-outs and timeline clarity
- Implementation assessment and feedback
- Ecosystem collaboration and sectoral alliances
- International initiatives

**Business and IT: Opportunities**
- Interoperable solutions (single framework)
- Sustainability and circular strategy
- Customer and user engagement
- Supply and value chain management (ecosystem leadership)
DPP-as a Service for SMEs

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Steps for successful DPP implementation

Collaboration & Alignment

- Alignment between EU Member States to ensure all DPP implementation support mechanisms provide unified information
- Clarity on DPP related legislation
- Facilitating collaboration between all economic operators to establish operational and interoperable DPP ecosystems

Awareness & Knowledge Building

- Creating widespread awareness about upcoming policies and benefits of DPP implementation
- DPP Helpdesk per member state
- Creating training and sharing successful implementation models
Steps for successful DPP implementation

- Implementing test cases and DPP pilots showcasing economic and sustainability benefits of DPP
- Supporting facilitation of DPP-as-a-Service offering
- Funding to support DPP implementations

- Establishing common understanding and standards for i.e. data requirements or privacy
- Stimulating the adoption of standards and integration of DPP solutions by service providers offering i.e. Product Lifecycle Management (PLM) or Enterprise Resource Planning (ERP) systems
Legal Framework and Challenges of a Product Information System

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Legal Framework of a Product Information System for a DPP

- (Proposal) Ecodesign for Sustainable Products Regulation (ESPR)
- Packaging Directive
- CLP Regulation
- RoHS Regulation
- REACH Regulation
- Textile Labelling Regulation
- WEEE Directive
- and more...

- General Data Protection Regulation (GDPR)
- eprivacy Directive / Regulation (Proposal)
- Free flow of non-personal data Regulation
- Artificial Intelligence Act (Proposal)
- Data Act

Product Information 4.0
## Legal Challenges: Two Examples

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<tr>
<th>RFID and data protection</th>
<th>Product information and trade secrets</th>
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| ● GDPR may apply to RFIDs if a natural person can be identified (e.g., tracked) through the tag.  
   ○ Example: Unique ID stored in the RFID tag | ● Some stakeholders (e.g., recyclers) can profit from more information which is currently not mandated by law. |
| ● Consequence: If identification/tracking of an individual is potentially possible (even if not intended), GDPR applies. | ● Argument of protecting trade secrets has to be assessed product by product.  
   ○ Stakeholders in the electronics sector stated higher needs for trade secret protection than those in the textile sector. |
Thank you!