

FEAD recommendations for the Digital Product Passport

FEAD, the European Waste Management Association, welcomes the European Commission's proposal for the Digital Product Passport (DPP) under the Ecodesign for Sustainable Products Regulation. As representatives of the waste management private sector, we recognise the DPP as a key tool to promote transparency across product value chains, support sustainability objectives and enable the transition to a circular economy.

However, FEAD notes that significant challenges remain with regard to the **practical implementation and usefulness of the DPP for the waste management sector**. While its ambition to provide granular data is commendable, lessons from existing tools such as the SCIP database show that complexity and limited usability can hinder its effectiveness for recyclers. Ensuring that the DPP provides **actionable, accessible and standardised information** is crucial to maximising its benefits while minimising the administrative burden.

Given the wide scope of the DPP, covering more and more product categories, FEAD has proposed a **list of guiding principles** to ensure that the DPP can be used effectively and smoothly by the waste management sector, to optimise its implementation and leverage its potential to advance Europe's circular economy goals:

- **Usability at scale:** The DPP should be designed to provide relevant, practical and standardised information that can be applied effectively on an industrial scale by waste management operators.
- **Data Accessibility:** Waste management operators must have seamless access to all necessary data to facilitate their operations, such as collection, sorting, dismantling, and recovery processes. This includes critical details like the concentration of chemicals and materials that are subject to regulatory quotas. The SCIP database, focused on SVHC and contaminants, could be integrated into the DPP to enhance information consistency and utility.
- **Liability Protection:** Access to data from the DPP should not impose additional legal responsibilities on waste management operators, such as responsibility for the presence of SVHCs - access to the information does not mean that the substance can be treated effectively.
- **Interoperability:** The DPP should seamlessly align with existing practices and workflows at waste management sites to avoid operational disruptions.
- **Remote Readability:** The DPP should be accessible remotely, even for damaged, crushed, or compacted products, to minimize the need for scanning individual items manually.
- **Technological Feasibility:** While RFID technology appears promising, its limitations need to be addressed, such as metal interference for RFID, which can become unreadable when exposed to excessive metal environments (e.g. for batteries), or durability issues, as some RFID tags may not withstand processes such as washing (e.g. for textiles).
- **Durability and Traceability:** The DPP must be durable and have a unique identifier to ensure effective tracking of items, especially in applications that involve product reuse. To ensure accurate recycling, all components listed in the DPP must remain intact when the product reaches recycling facilities. Missing components could lead to inefficient recycling methods or mismanagement based on incomplete DPP data.

FEAD is committed to working collaboratively with the European Commission and stakeholders to ensure the DPP meets its objectives and supports the operational needs of the waste management sector.

FEAD Secretariat

info@fead.be

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 19 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year.