

# Survey on the Delegated Act on potential requirements for Digital Product Passport service providers

Fields marked with \* are mandatory.

## Introduction

---

### Objectives

Capgemini together with Ecorys have been tasked by the European Commission – DG Internal Market, Industry, Entrepreneurship and SMEs (DG GROW) to conduct a background study providing input for the **Impact Assessment accompanying a Delegated Act setting out requirements for Digital Product Passport (DPP) Service Providers** under Article 11 of the Ecodesign for Sustainable Products Regulation (ESPR).

The main purpose of the study is to explore and measure the **likely costs and impacts of possible requirements on DPP service providers**, and on a possible mandate for a certification scheme to verify compliance with such requirements, by way of this delegated act. This information will help the Commission to decide on what requirements to include and on the possible introduction of a certification scheme.

The **Digital Product Passport** is a key innovation, first introduced into EU law by the ESPR, which aims at **providing easy-to-access digital information on products** to consumers, authorities and all economic actors along the value chain of a good, from raw materials to recycling or disposal - relevant to their specific needs and according to their access rights. The DPP is connected to the product through a unique product identifier, and can be accessed via a data carrier on the product (such as a QR code).

The planned Deleted Act will establish **requirements** for economic operators who store and make available DPPs for their own products or on behalf of others, and those who store backup copies.

The **specific objectives** of setting up requirements for such DPP service providers are to:

- **Safeguard data integrity:** establishing clear requirements that ensures the accuracy, completeness, back-up, continuous accessibility and up to-datedness of DPP data, which is critical for informed decision-making by businesses, consumers, and authorities;

- **Protect data security and privacy:** possibly by mandating adherence to specific standards, the ESPR seeks to prevent unauthorised access, use, or disclosure of sensitive product information;
- **Promote fair competition:** preventing DPP service providers from using data for purposes beyond their mandate (like selling or re-using it for their own gain), prevention of vendor lock-ins ensure fairness in the market.

The objective of this survey is to gather feedback from key stakeholder groups relevant to the study.

We would highly appreciate your active support and participation in this survey.

If you have any questions, please do not hesitate to contact **mate.vincze@capgemini.com**, **andrei.**

**ciocan@capgemini.com**, **clara.cotroneo@capgemini.com** and **simone.a.botticini@capgemini.com**.

## **About this survey**

This questionnaire is designed for companies (including SMEs) who are or will be involved in the DPP system as a responsible economic operator required to produce a DPP for its products, and for service providers hosting DPPs on behalf of others, as well as business organisations representing such companies.

Your insights will be essential for understanding the practical implications, market acceptability, and associated costs and benefits of the proposed requirements for operators who will host and make DPPs available to users.

The questionnaire is structured in the following sections:

- Section 0 – General information
- Section 1 – Needs and problems
- Section 2 – Policy options
- Section 3 – Personal information (optional)

**Please note that, due to the routing logic applied to make the questions as tailored as possible to the type of respondent, not all questions are immediately visible. The respondents are kindly asked to first answer all questions in Section 0 in order to access the questions in the subsequent sections.**

**Completing this questionnaire should take approximately 60 minutes.**

The findings will directly inform the Impact Assessment for the Delegated Act on DPP service providers.

**Note: the questions in this survey, including possible requirements for DPP service providers have been compiled - based on various sources - by the consultants and should not be seen as early indications of the Commission's future decisions regarding the content of the Delegated Act.**

## **Instructions**

You can save your answers as a draft on the server and continue later if you wish to, by using the same URL. You can also answer the form offline before submitting it to the server when completed. If you do not know the answer to a question, please feel free to skip it.

**If you are an association,** we kindly ask you to share the survey with your members using the following **public link** to allow for submission of individual contributions.

<https://ec.europa.eu/eusurvey/runner/DPPSP-self-hosters-business-associations>

The consultation will run for 4 weeks, from **16 July 2025 to 13 August 2025**, with a possible extension of 2 additional weeks.

We highly appreciate the time you have taken to provide your responses and thank you in advance for your contribution.

Please find attached the **privacy statement** and the **accreditation letter from DG GROW**.

[Privacy Statement DG GROW.pdf](#)

[Accreditation Letter DG GROW.pdf](#)

## Section 0: Introductory questions

---

\* 0.1 Are you responding to this survey as an individual business or on behalf of an organisation representing businesses' interests? Please select the applicable category:

- ☐ Individual business
- ☒ An association/organisation representing businesses

\* 0.2 Please select the country in which your organisation is established from the list:

- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czech Republic
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Iceland
- ☐ Ireland
- ☐ Italy

- ☐ Latvia
- ☐ Liechtenstein
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Norway
- ☐ Poland
- ☒ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden
- ☐ Other

\* 0.3 What is the geographic scope of your organisation's operations?

- ☐ Local or regional
- ☒ National
- ☐ European
- ☐ Global

\* 0.4 Approximately how many businesses do you represent (directly or via member organisations)?

80

\* 0.5 Does your organisation represent rather large businesses or SMEs?

- ☐ Only large enterprises
- ☐ Rather large enterprises
- ☒ Large enterprises and SMEs equally
- ☐ Rather SMEs
- ☐ Only SMEs

\* 0.6 You have the option to respond to the survey from two possible perspectives: on behalf of companies that will host a DPP or a backup, or on behalf of companies that will use a third-party service provider to host their DPPs. Please indicate which perspective you choose:

- ☐ Perspective of companies that will host/self-host a DPP or a backup
- ☒ Perspective of companies that will use a third-party service provider to host their DPPs

\* 0.7 For which of the following product groups are the companies represented by your organisation the responsible economic operators (traders that place the product on the EU internal market) required to make a DPP available? Please select all that apply

*(Note: the product groups below were either chosen as first priorities for the introduction of Digital Product Passports under ESPR or have product regulations that also foresee product passports)*

### ESPR Sectors

- ☐ Textiles
- ☐ Apparel
- ☐ Furniture
- ☐ Mattresses
- ☐ Tyres
- ☐ Iron and steel
- ☐ Aluminium
- ☒ None of the above

### \* Non-ESPR Sectors

- ☒ Construction products
- ☒ Batteries for electric vehicles, bikes or scooters, and industrial batteries
- ☐ Toys
- ☒ Electronic products
- ☒ Machinery
- ☐ Other

\* 0.8 On a scale from 1 (not familiar at all) to 4 (very familiar) how familiar are you with Digital Product Passports introduced under the Ecodesign for Sustainable Products Regulation (as well as the Batteries Regulation)?

- ☐ Not familiar at all (1)
- ☐ Rather unfamiliar (2)
- ☐ Rather familiar (3)
- ☒ Very familiar (4)

\* 0.9 Are the companies represented by your organisation preparing to compile and make available - as responsible Economic Operators - DPPs for their products?

- ☐ Yes
- ☒ Not yet, but planning to
- ☐ No

\* 0.9.1 Can you elaborate on what preparations the companies you represent are undertaking or planning (e.g. preparing guidance to members, training personnel etc)?

We believe that the companies ANIMEE represent are, at the very least, starting to train their people. ANIMEE is transmitting the relevant information (we will also send our members info about this survey) and will start having webinars about DPP later this year.

\* 0.10 Are there any other initiatives (public or private) similar to the DPP that your organisation is active in (e.g., EPREL for energy-related products, digital food labelling, digital passports for proving the authenticity of apparel etc.)?.

☒ Yes

☐ No

\* 0.10.1 If yes, please indicate which:

EPREL and CBAM

## Section 1: Needs and problems

---

1.1 How important are the following needs connected to the regulation of DPP service providers for companies your organisation represents?

**Regulation scope and definitions**

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Clear legal definitions (including range of DPP service providers and activities covered by the Delegated Act)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clear description of the legal obligations for independent third-party DPP service providers and other DPP hosters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clarification of the nature and scope of backup services to be provided by DPP service provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Data sharing and data-based services

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Allowing DPP integration with existing company IT systems (ERP, supply chain management, sustainability reporting, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Clear rules on mandatory business-to-business data sharing (restrictions, safeguards)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allowing the utilisation of data generated during hosting the DPP for other purposes (e.g. feedback information to responsible economic operator, internal statistical purposes)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Possibility to offer, or allow other providers to offer, add-on data services (e.g. around product lifecycle events such as repair)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Technical specifications / Performance requirements

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Guidelines on the frequency of backups, the amount of data to be stored, data retrieval requirements and quality standards for data storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring DPP technical flexibility for data preservation of products with long lifecycles	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allowing the use of lower level of granularity (e.g. item-level) than required in upcoming sectoral DPP regulation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring that all requirements are technology-neutral, not advantaging or disadvantaging certain technologies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring a high level of standardisation and clear data transfer protocols to ease data transfer and portability between DPP service providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Economic effects of regulation

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* Having affordable hosting services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring a level playing field among DPP service providers or other custodians of DPPs	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Avoiding the risk of market concentration among DPP service providers (e. g. from strict certification or financial requirements)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Harmonised requirements across all EU Member States (EEA members)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

1.2 Please elaborate on any additional need(s) in relation to the regulation of DPP service providers, you consider important:

Technological neutrality is needed. Requirements for DPP services must remain neutral to the technologies used to provide DPP services. There are different ways to provide DPP services (e.g. through platforms, blockchains, federated data spaces, or a mixture of these), and more may appear in the future as businesses innovate. The delegated act should not unnecessarily drive some technological options out of the market, as responsible operators must have the maximum choice of technological offers available to select the most suitable option for their situation and systems. The legal framework for the provision of DPP services must be the same across all EU Member States to ensure legal certainty and a harmonised level playing field across the single market.

1.3 What are the key decision criteria for companies that do not self-host a DPP for choosing a DPP service provider? Please rate the following criteria according to their importance.

	1 – Not important	2 – Somewhat important	3 – Important	4 - Very important	Do not know	Not applicable to our organisation
* The price of DPP hosting services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Guaranteed ease of switching to another provider (no lock-in)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provider's guarantees and credentials for information security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* High service level guaranteed by provider (service operational and accessible)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* User-friendly tools and service offered	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provider being established in Europe	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provider's long experience in business	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Provider's experience with similar customers	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Large size of provider's customer base	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Financial stability of the provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Certification attesting the provider's compliance	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## Section 2: Policy options

### E. DPP (and DPP data) portability requirements

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Not feasible	Do not know	Not applicable to our organisation
--	-------------	---------------	-----------------	----------------	--------------	-------------	------------------------------------

### J. Third-party dependency risks requirements

	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Not feasible	Do not know	Not applicable to our organisation
--	-------------	---------------	-----------------	----------------	--------------	-------------	------------------------------------

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

<b>A. Technical accessibility</b>	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
-----------------------------------	-------------	---------------	-----------------	----------------	-------------	------------------------------------

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

<b>B. Content accessibility</b>	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
---------------------------------	-------------	---------------	-----------------	----------------	-------------	------------------------------------

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

<b>C. Background information and user interaction</b>	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
---	-------------	---------------	-----------------	----------------	-------------	------------------------------------

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

<b>D. Reducing user nuisance</b>	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
----------------------------------	-------------	---------------	-----------------	----------------	-------------	------------------------------------

2.7 Please also rate the likely implementation costs of the following possible requirements for making the DPP system user-friendly.

--	--	--	--	--	--	--

<b>E. Value-added data services</b>	0 – No cost	1 – Low costs	2 – Medium cost	3 – High costs	Do not know	Not applicable to our organisation
-------------------------------------	-------------------	---------------------	-----------------------	----------------------	----------------	---------------------------------------

2.1 Please rate the importance for each potential requirement DPP service providers should ensure when hosting the DPPs of the companies you represent.

**A. Access rights management, information system security and business confidentiality requirements**

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Implementing differentiated data access mechanisms to ensure that only authorised parties can modify DPP data and that restricted data points are accessible only to approved stakeholders	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Application of upcoming identity management standards (developed by European Standardisation Organisations)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Implementing an attribute-based access control system to restricted product passport information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Recording changes in access rights without delay	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Having appropriate IT-security and cybersecurity safeguards in place to prevent unauthorised access and data breaches	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## B. Data storage, archiving and persistence requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Securely archiving historical passport data, preserving a comprehensive record of past information	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Making the DPP accessible for at least the expected lifetime of the product (or as required in product-specific delegated acts)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring that DPPs are rendered inaccessible to users when the defined retention period passes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

### C. Data authenticity, reliability and integrity requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Ensuring that the originality and integrity of DPP data is technically verified	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirements for DPP service providers to record the identity of economic operator or authority producing or updating DPP data and perform validation activities to ensure DPP data conformity*	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Keeping logs of access history of economic operators and authorities producing or amending DPP data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring that DPP data displayed is the most up-to-date version, changes are reflected without delay	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

*\* “Data conformity” refers to checks such as ensuring that mandatory fields are completed, data formats are correct, narrative semantics are appropriate, and digital certificates are valid and not revoked.*

#### D. DPP (and DPP data) portability requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Requirements to ensure seamless transition between DPP service providers (when changing provider)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirements to ensure the deletion of customer data who changed DPP service providers (i.e. economic operator responsible for the DPP)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## E. Accessibility requirements

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Ensuring compliance with minimum network reliability requirements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirements for DPP service providers to ensure that DPP data loading speed is comparable to that of major websites (fast response times) (access response time requirements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirements to ensure that DPP data is accessible most of the time (complying with target set in Delegated Act)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Ensuring compliance with minimum incident response and recovery plans requirements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## F. Application Programming Interfaces (APIs) integration and access

	0 – Not important	1 – Somehow important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Integrating API ensuring seamless CRUD (Create, Read, Update, Delete) operations on products passports for authorised economic operators and authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Integrating API ensuring seamless queries on DPP data at scale (where relevant) by authorised add-on systems or services (e.g. by authorities)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.2. Are there any other requirements you consider crucial for DPP service providers that will host the DPPs of the companies you represent? Please specify.

Certification schemes should be based on self-assessment as a rule, but allow for third party assessment as an option. To avoid bottlenecks, delays and unnecessary costs, this assessment scheme should remain lean and rely on the self-assessment of providers and a notification to monitoring authorities, following the principles of the Data Governance Act. This should be regularly renewed to ensure that service providers continue to meet the evolving needs of the market. In the long term, the Commission should evaluate the possibility of a harmonised standard on the assessment scheme. In any case, providers must comply with existing and upcoming EU regulations in the fields of cybersecurity, data governance and platform regulation.

2.3 Please rate the importance of the following possible requirements for making the DPP system user-friendly for the companies you represent, as well as consumers and others using it.

**A. Technical accessibility**

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Making DPPs accessible on all relevant devices: desktop computers, smartphones, tablets, in-store touchscreens etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## B. Content accessibility

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Intuitive, easy-to-understand user interfaces with clear structure and visual elements, standard layouts and icons	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Automated multilingual support so that consumers can access DPPs in their preferred language	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* High-contrast modes for visually impaired users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

### C. Background information and user interaction

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Providing basic information on the DPP system, the completeness and reliability of DPP data in clear language, and a FAQ	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Allowing consumers to provide feedback (indicating technical problems, DPP content errors, asking questions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Providing link to relevant authority's webpage for consumer complaints	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**D. Reducing user nuisance**

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Avoiding too burdensome anti-bot authentication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

## E. Value-added data services

	0 – Not important	1 – Somewhat important	2 – Important	3 – Very important	Do not know	Not applicable to our organisation
* Offering consumers various add-on data services (product comparisons, identification of suitable replacement components, mapping repairers, price estimations for resale, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Allowing third-party mobile apps or web portals to re-use DPP data (with consideration of applicable legal restrictions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* Enabling smart home devices to access DPP data of other products in the household	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

#### 2.4 Are there other requirements for DPP service providers to ensure that DPP is user friendly?

#### \* 2.5 Are you in favour of asking DPP service providers for a certification that could give assurance about their compliance with the requirements, even if it increases hosting fees? What methods of certification, if any, do you think would be necessary?

- ☐ No certification
- ☐ Self-certification
- ☒ Hybrid: self-certification and third-party certification
- ☐ Certification by a third party
- ☐ Do not know

#### 2.6 Would you rather agree or disagree with geographic restrictions for DPP service providers?

	1 – Fully disagree	2 – Rather disagree	3 – Neither	4 – Rather agree	5 – Fully agree	Do not know
* Requiring all DPP service providers to be established in the European Economic Area (EEA)*	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring DPP service providers (also) hosting backups to be established in the EEA	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring all DPPs to be stored on servers within the territory of the EEA	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requiring backup copies to be stored on servers within the territory of the EEA	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* No geographic restrictions on DPP service providers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

\* Apart from the EU member states, Norway, Iceland, Liechtenstein are also members of the European Economic Area, having access to the Internal Market and are bound by its rules

#### \* 2.7 What are the main reasons for your choices above? Please briefly describe:

In the electric and electronic sector, represented by ANIMEE, many components are imported from countries outside the EEA and it would be a plus if our members could use the same DPP service providers as their suppliers. Also, ANIMEE does not oppose free trade. It does oppose the lack of market surveillance to ensure that all market suppliers comply with the EEA's rules.

2.8 What would be the consequences of a possible requirement for DPP service providers to be established on the territory of the European Economic Area (EEA)?

Please indicate to what degree you agree with the following:

	1 – Fully disagree	2 – Rather disagree	3 – Neutral	4 – Rather agree	5 – Fully agree	Do not know
* The personal data of customers would be better protected (access credentials and logged access events)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The sensitive commercial data of customers derived from access patterns (e.g. number of consumers accessing or repairing a specific product) would be better protected	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Disputes between DPP service providers and their customers (e.g. handling of access credentials, unavailability of service) would be resolved more easily	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The range of apps or web portals creating new information from DPP data (e.g. product comparisons, personalised recommendations) would be reduced	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Some products produced outside the EU would not be available anymore	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The overall costs of the DPP system would increase, indirectly raising product prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.9 What would be the consequences of a restriction on DPP service providers to store DPP data on servers within the territory of the European Economic Area (EEA)?

Please indicate to what you degree agree with the following:

	1 – Fully disagree	2 – Rather disagree	3 – Neither	4 – Rather agree	5 – Fully agree	Do not know
* The personal data of customers would be better protected (access credentials and logged access events)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

* The sensitive commercial data of customers derived from access patterns (e.g. number of consumers accessing or repairing a specific product) would be better protected	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Disputes between DPP service providers and their customers (e.g. handling of access credentials, unavailability of service) would be resolved more easily	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The range of apps or web portals creating new information from DPP data (e.g. product comparisons, personalised recommendations) would be reduced	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Some products produced outside the EU would not be available anymore	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* The overall costs of the DPP system would increase, indirectly raising product prices	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.10 Would there be any other important consequences? Please briefly describe:

2.11 DPP service providers might be asked to demonstrate their financial viability. Overall, considering costs and advantages, would you rather agree or disagree with the following possible requirements for DPP service providers?

	1 – Fully disagree	2 – Rather disagree	3 – Neither	4 – Rather agree	5 – Fully agree	Do not know
* Business continuity requirements, such as a mandatory business continuity plan and/or exit strategy that ensure the transfer of DPPs and redirection of queries to another provider	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Mandatory insurance for DPP service providers to ensure continuity of service in case of financial challenges, by reimbursing transfer to another provider for instance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

* Requirements to disclose ownership and capital structure information, and meet certain minimum criteria, to be eligible to provide DPP services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Requirement to contribute to a reserve fund (a fixed % of annual turnover for instance) to ensure continuity of service, by funding transfer to another provider for instance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

\* 2.12 What are the main reasons for your choices above? Please briefly describe:

First, ANIMEE emphasizes that options 2 and 4 in the previous table should not be cumulative. They may even be optional for each of the DPP service providers. Now, to answer the specific question: choosing a DPP service provider will be important and will consume some time and resources. Companies will need some immediate security in case the chosen company has to or decides to stop providing the service. Regarding the requirements to disclose ownership... they are important, preventing issues related to commercial espionage.

## Section 3: Personal information (optional)

You can submit your responses anonymously. If you would like to hear about the results of the survey, or if we can contact you for further information, please share your contact details with us below.

3.1 Your organisation's name:

ANIMEE - Associação Portuguesa das Empresas do Sector Eléctrico e Electrónico

3.2 Your email address:

martaepifanio@animee.pt

3.3 Can we contact you

- ☒ Yes  
☐ No

## Contact

[Contact Form](#)

