Ideas for reducing the reporting burden using the dpp CIRPASS-2

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IDEAS FOR REDUCING THE REPORTING BURDEN USING THE DPP

Publication date	April 2025
Version	1.0
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Contributors	The CIRPASS-2 consortium expresses its appreciation to all of its Expert Working Group and Community of Practice experts who participated in the ideas gathering process.
Abstract	This document provides a structured summary and analysis of contributions gathered through an expert consultation process exploring the potential of Digital Product Passports (DPPs) to reduce the reporting burden for organizations.
Citation	Rukanova, B., & Chawla, K., Tan, Y.-H., Bernier, C., Dao, A. (2025). Ideas for reducing the reporting burden using the DPP. CIRPASS-2. https://doi.org/10.5281/zenodo.15082690

Document Revision History

Version	Date	Description of change	List of contributor(s)
1.0	April 16, 2025	Initial report	

CIRPASS-2 CONSORTIUM

#	Participant Organisation Name	Short Name	Country
1	Commissariat A L´Energie Atomique Et Aux Energies Alternatives	CEA	France
2	Tallinna Tehnikaülikool	TALTECH	Estonia
3	Mindworks Industries Ou	MWX	Estonia
4	DIGITALEUROPE AISBL	DIGITALEUROPE	Belgium
5	E CIRCULAR APS	E CIRCULAR APS	Denmark
6	F6s Network Ireland Limited	F6S IE	Ireland
7	Global Textile Scheme GmbH	GTS	Germany
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44	Digital Data Chain Consortium GbR	DDCC	Germany
45	ZVEI e. V.	ZVEI e.V.	Germany
46	Association of Service and Computer Dealers International	ASCDI	US
47	Open Blockchain for Asset Disposition Alliance (OBADA)	OBADA	US
48	Green Electronics Council	GEC	US
49	Textile Exchange	TextileExchange	US
50	IPoint Systems GmbH	IPoint	Germany
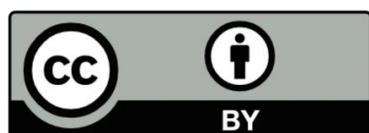
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1 OBJECTIVE OF THIS DOCUMENT

1.1 INTRODUCTION

This document provides a structured summary and analysis of contributions gathered through an expert consultation process exploring the potential of Digital Product Passports (DPPs) to reduce the reporting burden for organizations. The process was conducted within the CIRPASS-2 framework and employed a qualitative methodology, drawing on insights from the experts participating in the CIRPASS-2 Expert Working Groups (EWGs) and Community of Practice (CoP) to assess the applicability of DPPs in streamlining regulatory compliance.

The European Commission has prioritized reducing administrative burdens as part of its broader strategy to enhance Europe's economic resilience and global competitiveness. The recently proposed *Competitiveness Compact* sets a target of cutting regulatory and administrative burdens for businesses by at least 25%—and by 35% for SMEs—by 2029.[1] This commitment is complemented by initiatives such as the *Omnibus proposal*, which seeks to ease corporate sustainability reporting obligations and improve the efficiency of compliance mechanisms.

At the same time, sustainability remains a central pillar of EU policy. The *Ecodesign for Sustainable Products Regulation (ESPR)* introduces DPPs as a mandatory requirement for a wide range of products, ensuring greater supply chain transparency, traceability, and circular economy integration. DPPs are also positioned as key enablers of the EU's transition to a *Net-Zero Industry*, as outlined in the *Green Deal Industrial Plan*.

Against this backdrop, CIRPASS-2 conducted this structured consultation from December 2024 to February 2025, inviting experts from industry, policy, and technology sectors to contribute perspectives on how DPPs could serve as a mechanism for regulatory simplification.

This documents contains two parts. The first part introduces background information about developments in the area of Trade Facilitation by global organizations such as the World Customs Organization and the World Trade Organization. Because digitalization is seen as a key enabler for global trade facilitation, efforts in this direction have been going on for decades. This input is proposed both as a source of inspiration for Europe but also in order to put the DPP administrative burden reduction discussion also in the context of these developments. The second part of this document reports the results of the CIRPASS-2 consultation with stakeholders.

The methodology for collecting and processing the results from the CIRPASS-2 consultation followed a qualitative approach, gathering and analysing expert contributions to identify common themes, potential benefits, and areas requiring further development. This document summarises and presents those findings, offering an overview of the key insights generated through this process. These results are intended to inform ongoing discussions on the role of DPPs in reducing compliance complexity while ensuring alignment with EU sustainability and market integrity objectives. They also contribute to broader efforts to harmonize digital and sustainability-driven initiatives in a way that fosters both competitiveness and responsible production.

The findings presented in this document should be seen as a first attempt to identify relevant themes and topics to help better structure the understanding and provide basis for further exploration of the role DPP could play in burden reduction. In this sense this report should not be seen as an end result but as a beginning of a conversation about this important topic.

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[1] https://ec.europa.eu/commission/presscorner/api/files/document/print/en/ip_25_339/IP_25_339_EN.pdf

1.2 ACKNOWLEDGMENT

The CIRPASS-2 consortium expresses its appreciation to all experts who participated in this process, providing valuable input that helps clarify the practical applications and challenges of integrating DPPs into regulatory and business frameworks.

Company Name
Struct a/s
APCO
ASUSTek Computer Inc.
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ITRI - Industrial Technology Research Institute
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Reeco
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2   TRADE FACILITATION AT INTERNATIONAL LEVEL

Trade Facilitation has been promoted for decades by large international organizations like the World Customs Organization (WCO), World Trade Organization (WTO) and DG-TAXUD of the European Commission. Trade Facilitation is defined by the World Customs Organization as

"the avoidance of unnecessary trade restrictiveness. This can be achieved by applying modern techniques and technologies, while improving the quality of controls in an internationally harmonized manner."[2]

Trade facilitation (TF) focuses on reducing the administrative burden for companies in international cross-border trade. When the goods of a company are crossing a border they have to submit customs import or export declarations to the national customs. Typically, those documents were in paper format, and risk-assessed manually by customs officers. These paper-based procedures were complicated, labour intense, slow in processing, which led to long waiting cues at the border. These complications are often called *Administrative Burd*en or *Red Tape* for trading companies. To reduce this administrative burden for trade companies these paper-procedures were gradually replaced in the last two decades by digital documents, which are exchanged as digital files between the IT systems of the traders and customs, and risk-assessed and processed automatically. The full implementation of the TF is estimated to reduce global trade costs by an average of 14.3%, with African countries and least-developed countries (LDCs) forecast to enjoy the biggest average reduction in trade costs. Full implementation has also been found to potentially reduce the average time needed to import by 47%. Cuts in export time will be even more dramatic: estimates predict a 91% reduction of the current average.[3] An important aspect of Trade Facilitation are the so-called *Single Window*[4] and *Coordinated Border Management*.[5] The implementation of a Single Window aims to harmonize and standardize the data, and hence reduce the administrative burden for trade companies.

In addition to the above-mentioned developments, recent trade digitalisation projects also include several other initiatives. The UN/CEFACT Trust Registry Project[6] aims to foster digital trust and enhance the integrity of identity systems in global trade. Digitally signed credentials are used to replace paper-based certificates, preventing counterfeiting and enhancing supply chain transparency. A related project, VC4Trade, will be launched in collaboration with ICC to publish a suite of Verifiable Credential (VC) schema and context files for 36 documents[7] commonly used in trade. The context files will reference established vocabularies including WCO data model, UN/CEFACT BSP (Buy-Ship-Pay), and schema.org. The ACE 2.0 project by the USA Customs Boarder Protection is a revision of the trade single window platform[8]. This project is exploring the use of advanced digital technologies (linked data, Distributed Identifiers (DID) and Verifiable Credentials (VC)) to support the development of digital twins, which provide a virtual representation of what the item/good is, who is in control, and where it is geographically located roughout the supply chain.[9]

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[2]   https://www.wcoomd.org/en/topics/facilitation/overview/customs-procedures-and-facilitation.aspx#:~:text=Trade%20facilitation%2C%20in%20the%20WCO%20context%2C%20means%20the,quality%20of%20controls%20in%20an%20internationally%20harmonized%20manner.
[3]Figures from the World Trade Organization in
https://www.wto.org/english/tratop_e/tradfa_e/tradfa_introduction_e.htm
[4] https://taxation-customs.ec.europa.eu/eu-single-window-environment-customs_en
[5]   https://www.wcoomd.org/en/topics/facilitation/activities-and-programmes/coordinated-border-management.aspx
[6] https://uncefact.unece.org/display/uncefactpublic/Global+Trust+Registry
[7] https://www.digitalizetrade.org/ktdde
[8] https://www.cbp.gov/trade/innovation/testing-and-development
[9] Technical requirements can be found here: https://dhs-svip.github.io/requirements-for-decentralized-identity/OrganizationCredential/

While in this report we will mainly focus on the results from the CIRPASS 2 consultation, it is important to be aware of these international developments as they may provide for a source of inspiration when reflecting on the role of DPP in relation to administrative burden reduction in future discussions.

3   METHODOLOGY FOR THE ANALYSIS OF RESPONSES

The analysis presented in this document is based on inputs from experts from industry, policy, technology providers and academia as a response of the CIRPASS-2 request for inputs and ideas on the topic of how DPP could potentially contribute to the administrative burden reduction and serve as a mechanism for regulatory simplification. As a result of the request for inputs, 45 responses were collected[10] from representatives of 40 organizations.

Each of the responses was first analysed individually to identify topics related to the role that DPP could play with respect to burden reaction. Key arguments and topics were captured using an encoding process. The work on the coding was split in two and coding was performed by two independent coders who worked on their parts independently but met regularly to aligned on the encoding procedure and interpretation of results.

Subsequently, all the topics that emerged from the individual responses based on the initial coding were consolidated as follows. If a topic mentioned by a respondent was already very closely related to a topic mentioned by an earlier respondent, then no new topic was introduced and the topic was marked as supporting the previous topic. However, in cases where a topic was mentioned and it did not immediately relate to a topic that was identified earlier, or it was related to a topic that was mentioned earlier but contained some additional nuances or details, a new entry was created. This allowed to capture richness and variations in discussions around similar topics as well. The consolidated list of topics consists of 84 topics and is provided in Annex 1.

Next, a second level coding was conducted by the coding team to group similar topics into higher-level categories. In this process, it was possible to identify interpretation differences, to go back to the source topics and the arguments of the individual respondents and, based on the discussion, to agree on the categorization. In this process, we also identified that some of the topics relate to more than one of the higher-level categories. As a result of this process, 10 high-level categories were identified. These high-level categories were further analysed to examine also possible connections between them.

Some of the respondents also brough to the attention challenges that they see for DPP for burden reduction. These were analysed separately and included in the report.

In this document we present the results of the analysis as a result of the process described above. The topics that emerged from the coding of the individual responses can be found in Annex 1. In the results section we discuss the findings by focusing on the high-level categories that we identified and we elaborate on each of them based on the insights of the specific topics that link to each of the categories.

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[10] In some cases, when a response needed further clarification, follow-up clarification of the response was provided via e-mail as well.

4 IDEAS FOR DPP-BASED BURDEN REDUCTION: RESULTS FROM THE CONSULTATION ANALYSIS

Annex 1 provides an overview of the 84 consolidated topics that we derived from the inputs that we received discussing opportunities of DPP for burden reduction. We subsequently clustered topics that seem to address similar issues and we arrived at 10 high-level categories. These are presented in the table below.

Table 1. Overview of high-level categories that emerged from the topics

No	HIGH-LEVEL CATEGORIES
I	ONE SOURCE CONSOLIDATED DATA SET
II	AUTOMATED REPORTING/QUERYING
III	AUTOMATED INTERNAL COMPLIANCE CHECKING
IV	STREAMLINING CROSS-REGULATION AND CROSS-JURISDICTION COMPLIANCE
V	DATA ACCURACY/ UPDATES/QUALITY
VI	PROCESS OF ACHIEVING SIMPLIFICATION OF REPORTING
VII	STANDARDIZATION
VIII	MACHINE-READABLE DATA
IX	EXTENDING DPP TO INCLUDE SUB-COMPONENT TRACKING DATA
X	CROSS-ORGANIZATIONAL COORDINATION (e.g., across supply and value chains)

Elaboration on each of these high-level categories and related topics are presented in the sub-sections below. The numbering of the specific topics that are listed in a tables is corresponding to the numbering of the topics in the consolidated list that is available in Annex 1. For most of the topics, multiple respondents explicitly pointed out the importance of the topic. Topics VIII on machine-readable data, topics IX on including sub-components tracking data in DPP and topic X on cross-organizational collaboration are in a way implicit in some of the other topics as well but they were also explicitly mentioned by some of the respondents. As they address important aspects, we chose to treat them as separate themes that can inspire the further understanding and conceptualization of the role of DPP in burden reduction.

Several of the respondents also expressed concerns and were critical with respect to the role DPP in relation to burden reduction. These responses are presented in a separate sub-section 4.11. It will be important to consider also these inputs carefully, as this will allow to create a more comprehensive view of benefits, as well as potential limitations of the role DPP in this context.

4.1 ONE SOURCE CONSOLIDATED DATA SET

Several of the topics[11] mentioned by the respondents relate to how the DPP serves as a single, structured source of truth, reducing the need to search across fragmented systems to identify relevant data. This ensures consistency, minimizes duplication, and provides a foundation that both internal and external processes can build upon. What is important to notice is that the one source of truth was considered important but how this could be done could vary. Some respondents mentioned explicitly centralized

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[11] See Annex 1 for the full list of topics. The numbers that appear in the tables in which similar topics were clustered correspond to the numbers of the topics as they appear in Annex 1. We use this number for traceability purposes.

system, other were more neutral about the architectural choices allowing also possibilities for decentralized solutions (e.g. stating that data is ingested once but not further specifying how this is done).

	I. ONE SOURCE CONSOLIDATED DATA SET
1	One stop place for digital sustainability data
2	Centralized data repository and singe source of truth
10	Expanding benefits to stakeholders
15	Lifecycle and Circular Economy Data Sharing
18	enter information only once
19	DPP consolidating all necessary data for reporting
27	Facilitation of Traceability
29	Improvement of Transparency and Communication
32	Tagging data to reporting requirements and ingesting data once
39	Replace Multiple Systems: Position the DPP as a single, unified tool that replaces the fragmented systems companies currently use for regulatory, sustainability, and quality reporting.
43	Managing CE certifications via one integrated digital system, including all the way to the notified bodies, is far more efficient than paper based approaches as still standard in most EU MS
54	Reduce the digital complexity of data residing in multiple systems using aligned ontologies and upper ontologies

As can be seen from this table, a variety of the recommendations from the respondents link to the benefits offered by simply having a 'one-stop place for digital sustainability data', and a 'single source of truth' that can 'replace multiple systems' and 'reduce the digital complexity of data residing in multiple systems'. Respondents also indicate that it is beneficial to 'manage certifications from one integrated digital system' At an administrative level, it is also beneficial to 'enter information only once' or 'ingest data once'. This can further also 'facilitate traceability', 'improve transparency and communication', and 'expand benefits to stakeholders'.

4.2   AUTOMATED REPORTING/QUERYING

Once data is consolidated in one consolidated data set, it becomes far easier to automate how it's accessed and shared. DPPs can support external reporting obligations by enabling data to be queried and extracted directly in formats aligned with regulatory requirements. This reduces manual preparation, limits errors, and allows companies to respond more efficiently to evolving legal demands. If certifications are also made available via the DPP, it can reduce costly verification processes as well.

	II. AUTOMATED REPORTING/QUERYING
3	Automated reporting based on data integrated in the DPP
5	Reduced risk of errors and non-compliance (through the DPP automates data entry to EU central registry)
7	A unified platform for reporting (simplifying multi-jurisdiction reporting)
20	single extraction process (and guidance based on consensus)
33	Reports based on tagged system and central pool of data
34	Validation of commercial claims [ecolabeling] by checking compliance to traceability standards (through using certification from certification authority (CA) and transaction certificate (TC). Specialized exclusively for products that meet recognized traceability standards (GRS, ICS, GOTS)

35	Validation of commercial claims (for recycled and organic products) is granted when compiling with recognized CoC standards, certified standards backed by audits (GRS,RCS, OCS, GOTS), relying on audits of independent CAs. These standards verify environmental sustainability but also working conditions.
41	Provide Customizable Dashboards: Offer tools to visualize and analyse DPP data for internal and external reporting, making it easier for companies to fulfil diverse requirements.
47	opportunity for the first time to review both corporate and product related non-financial reporting at the same time
49	Pre-filled and reporting templates to reduce the reporting administrative burden
50	Interoperability with existing frameworks (e.g. inoperability of the data required in the platform vs. existing or upcoming regulation
55	Use the high-level concepts and aligned ontologies to define harmonized queries of the data available in the digital infrastructures
63	DPPs for public procurement and asset management

Respondents note that such 'automated reporting' can 'reduce risk of errors and non-compliance', and changes the currently complex to a 'single extraction process', where reports can even be automatically generated using 'tagged systems and a central pool of data', or with 'pre-filled reporting templates', especially if 'interoperability with existing frameworks' is ensured. It can also be used to store 'validated commercial claims' and 'provide customisable dashboards', and not just for reporting but also for validating claims in 'public procurement and asset management'.

4.3   AUTOMATED INTERNAL COMPLIANCE CHECKING

Beyond external reporting, the structured data in DPPs can also support internal compliance workflows. Automated checks can help companies validate data accuracy, flag inconsistencies, and monitor for regulatory risks in real time. This proactive approach makes it easier to catch and resolve issues early, before they escalate into costly compliance failures.

	III AUTOMATED INTERNAL COMPLIANCE CHECKING
8	Supported by advanced technologies for data verification, data integrity and real-time monitoring
16	Automated Verification and Auditing
59	Automated internal compliance checking

Respondents indicate that 'advanced technologies can be used for data verification, data integrity and real-time monitoring', enabling 'automated verification and auditing'.

4.4   STREAMLINING CROSS-REGULATION AND CROSS-JURISDICTION COMPLIANCE

Perhaps one of the strongest recommendations from the respondents is on using the DPP system to align and streamline cross-regulation and cross-jurisdictional compliance. The table list the many topics that were mentioned by the respondents and we considered that are relevant and can be grouped under this theme.

	IV. STREAMLINING CROSS-REGULATION AND CROSS-JURISDICTION COMPLIANCE

11	Automated Linkage to Global Reporting Frameworks (e.g. Ellen MacArthur Foundation (EMF) Plastics Pact reporting criteria, Carbon Disclosure Project (CDP)- voluntary but aligned with EU's Corporate Sustainability Reporting Directive (CSRD)
12	Integrating Circularity Indicators and Metrics (integrated in DPP) to facilitate product-specific circularity evaluations- e.g. ISO 59020; Material Circularity Indicator (MCI) or Circular Transition Indicators (CTI)
13	Streamlining Cross-Regulation Reporting
14	Interoperability Across Jurisdictions
15	Lifecycle and Circular Economy Data Sharing
21	DPP ability to integrate seamlessly with both national and European control systems
31	Enhancing Compliance with Sustainable Financial Reporting Using the DPP via -Automated ESG Data Integration required by CSRD and Taxonomy Regulation -Alignment with the EU Taxonomy for --Sustainable Activities -Transparency Across Value Chains (e.g. Scope 3 emissions) -Real-Time Stakeholder Reporting -Interoperability with Global Standards (e.g. GRI, SASB, TCFD), ISO 59040
34	Validation of commercial claims [ecolabeling] by checking compliance to traceability standards (through using certification from certification authority (CA) and transaction certificate (TC). Specialized exclusively for products that meet recognized traceability standards (GRS, ICS, GOTS)
35	Validation of commercial claims (for recycled and organic products) is granted when compiling with recognized CoC standards, certified standards backed by audits (GRS,RCS, OCS, GOTS), relying on audits of independent CAs. These standards verify environmental sustainability but also working conditions.
38	Maintain the focus of DPPs on 'product traceability and circularity', ensuring they complement rather than replace existing reporting systems.
40	Integrate with ESG Reporting Standards: Connect DPP data directly to existing ESG frameworks (e.g., GRI, CDP, SASB) or replace redundant aspects, allowing companies to consolidate efforts and streamline compliance.
45	Simplified calculation of EPR based on better information
46	Possibility for calculated modulated EPR feeds based on better knowledge of recycled material in models
48	Standardisation of data-better comparability (by ISO norm 59040 Product Circularity Data Sheet
50	Interoperability with existing frameworks (e.g. inoperability of the data required in the platform vs. existing or upcoming regulation
51	The DPP could act as an interface between businesses and regulatory bodies, streamlining the process of submitting product data for compliance verification and certification.
52	Encourage eco-design and transparency (e.g. PCDS can also serve as an internal tool during the design process; PCDS/DPP data could be recognised evidence in the CSRD E5 data points
53	Common set of concepts (e.g. based on UN Recommendation 46) to reduce the legislative complexity by identifying a common set of concepts on what to monitor for these legislations. This can be then used to formulate harmonized queries to the digital infrastructures
57	Look not only at DPP (and mandatory data) and move away from silos (SCIP) and encourage larger data handling via the ecosystem and their data as a basis for other reporting demands; DPP system (knowledge graph) would be the backbone for such operations

60	Integrating REACH data
62	DPP as a single source of truth for compliance, integrating CBAM
64	Integrating EUDR data, including perhaps with Smart Contracts
65	Integrating CPR
69	Integrating energy disclosures, such as EN 16325
70	Interest to use DPP for REACH data, Carbon footprint, Recycled content and Recycling/ repair process

Many organizations face overlapping regulatory demands across different domains and geographies. DPPs, if designed appropriately, can help reduce this complexity by structuring data in ways that are interoperable across frameworks and jurisdictions. By aligning with shared concepts, standards, and metrics, the same dataset can serve multiple compliance needs—whether for sustainability disclosures, circularity targets, or extended producer responsibility—making it easier to stay compliant across the board. Identifying a common set of concepts on what to monitor based different legislations was suggested as a way to reduce the legislative complexity (e.g. building on concepts from UN Recommendation 46).

Specifically, our respondents suggest that the DPP can be used to consolidate disclosure requirements from the following mandatory regulations and non-mandatory standards:

1. Voluntary

    a. EMF Plastic Pact Reporting Criteria

    b. Carbon disclosure project

    c. Material Circularity Indicators (ISO 59020, Material Circularity Indicator (MCI) or Circular Transition Indicators (CTI))

    d. GRI, SASB, TCFD,

    e. ISO 59040 Product Circularity Data Sheet

    f. (GRS,RCS, OCS, GOTS)

    g. ISO 14083

        i. "The DPP can be designed to support the requirements of **ISO 14083** on the quantification of greenhouse gas emissions in transport."

2. Legally mandatory in the EU

    a. Corporate Sustainability Reporting Directive (CSRD) & EU Taxonomy for Sustainable Activities Regulation

        i. Linked to 1.b, 2.b

        ii. "**Example:** For CSRD, the DPP could contain data related to greenhouse gas emissions (Scope 1, 2, and 3), water consumption, waste management, human rights, and corporate governance."

        iii. "For **CSRD**, the DPP could automatically verify if ESG data is complete according to the **European Sustainability Reporting Standards (ESRS)**."

        iv. "The DPP centralizes data on environmental, social, and governance (ESG) metrics, which can be automatically integrated into sustainability reports required by the CSRD or EU Taxonomy Regulation. Example: Carbon emissions, energy efficiency, and recycling rates tracked in the DPP can directly populate required disclosures."

b. CSDDD

c. RoHS

d. Simplified calculations of EPR

    i. "Knowing exactly the number of batteries sold when, where, and whether they are still in use, simplifies calculating EPR fees significantly and makes it far more accurate."

    ii. Knowing the amount of recycled material per battery (model) allows calculating modulated EPR fees (i.e. paying less for models with higher recycled shares, and more for those with less).

e. REACH

    i. "DPP as a digital tool could be very useful to take the place of the existing substance reporting requirements under REACH Article 33 and WFD / SCIP"

    ii. Legally, I have doubts that a more horizontal use of the DPP can be achieved under the existing ESPR. Maybe the still on-going targeted REACH Revision (Commission proposal now due by Q4 2025) instead also offers an opportunity to digitalise substance reporting, aiming to achieve a real simplification for Europe's industrial competitiveness as is intended by the new European Commission (see Commission Work Programme of 11.2.2025: REACH Revision is marked as 'Simplification initiative or initiatives with a strong simplification dimension').

    iii. "**Example:** For REACH, the DPP could contain information on the chemical substances used in products, their concentrations, and the related health and environmental risks."

    iv. "The DPP could integrate a **rules engine** to alert companies to potential future non-compliance (e.g., the addition of new banned substances in REACH Annex XIV or XVII)."

f. Carbon Border Adjustment Mechanism (CBAM)

    i. "For example, allow carbon footprint reporting under the Carbon Border Adjustment Mechanism (CBAM) to be submitted via the DPP, reducing the need for redundant reporting."

g. EU Deforestation Regulation (EUDR)

h. Construction Products Regulation

    i. "Since CPR regulations are directly linked to DOPC, aligning DPPs with CPR compliance would ensure a smoother transition into standardized digital reporting"

i. Energy disclosures EN 16325

4.5 DATA ACCURACY/ UPDATES/QUALITY

Several of the respondents considered topics such as data accuracy/ updates/ data quality as important aspects in the discussion of reducing reporting burden using DPP. The table below summarises the detailed topics that we identified from the responses and grouped under this theme.

	V. DATA ACCURACY/ UPDATES/QUALITY
4	Real-time updates ensure compliance reports reflect the latest data

8	Supported by advanced technologies for data verification, data integrity and real-time monitoring
9	Manufacturer responsibilities (about engagement of suppliers including conduct, selection, audits, data arrangements)
22	Machine learning and AI linked to DPP to enhance efficiency, validation of data, identify errors, to improve processes and circularity index
24	Continuously manufactured semi-finished products, such as steel or aluminium strips, should be provided with continuous coding over their entire length
25	Material coding, including concerns for high speed processing and readability (human/machine/OCR) and retrieval of data (REST API)
26	Allowing for additional information in DPP for semi-finished products to increase value added
36	Brands can use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data

As can be seen in the table, respondents pointed out that real-time updates are important to ensure that the compliance reports reflect the latest data. In this context also coding (coding on materials and semi-finished products) was mentioned as an important aspect and high-speed processing and readability (human/ machine/ OCR) and retrieval of the data. Allowing for additional information in DPP for semi-finished products was also considered to increase value added. It was also suggested that use can be made from advanced technologies for data verification, data integrity and real-time monitoring; and that machine learning and AI, linked to DPP, may enable to enhance efficiency, validation of data, identify errors, to improve processes and circularity index. On the organisational side, respondents considered the importance of the manufacturers' responsibilities about their engagement with suppliers, including contracts, selection, audits and data arrangements. It was also discussed that brands may use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data.

4.6   PROCESS OF ACHIEVING SIMPLIFICATION OF REPORTING

Several of the topics mentioned by the respondents relate to the process of achieving simplification of reporting. Some of these process aspects relate to the organizations themselves and what they could do internally. For example businesses could take steps to resolve legacy data management based on paper or excel to move to more innovative and automated solutions.

Better trackability and access to better information could serve for a number of purposes to explore possibilities for further steps that may lead to simplification. For example, traceability systems can be the basis for companies to simplify recall procedures. Or organizations would have the possibility to simplify the calculation of Extended Producer Responsibility (EPR) based on better information, enable modulated EPR feeds based on better knowledge of recycled materials in models. Furthermore, organizations may consider introducing medullar reporting.

Other aspects that were identified were to encourage public-private collaboration; to consider enabling intra-organisational interoperability by moving reporting burdens outside the legal department, as well as the opportunity to review both corporate and product-related non-financial reporting at the same time. Some process steps were also given for companies that have some alignment with the United Nations Transparency Protocol already but which would need to make next steps. For example additional attention may need to be paid on expanding the social auditing, collection and measurements of specific indicators and embedding in the algorithms, report standardization, inclusion of non-certified suppliers and traceability of non-certified fibres.

	VI. PROCESS OF ACHIEVING SIMPLIFICATION OF REPORTING
17	Encouraging Public-Private Collaboration
42	For businesses, Finding and resolving legacy data management, often paper- or excel based, that they are now forced to review, innovate and automate
44	more efficient recalls: Tracing product related data throughout lifetime can reduce risk costs, since accruals for recalls can be reduced
45	Simplified calculation of EPR based on better information
46	Possibility for calculated modulated EPR feeds based on better knowledge of recycled material in models
47	opportunity for the first time to review both corporate and product related non-financial reporting at the same time
58	Enabling intra-organisational interoperability by moving reporting burdens outside the legal department
61	Modular reporting
70	Interest to use DPP for REACH data, Carbon footprint, Recycled content and Recycling/ repair process
71	Support for SMEs
72	International collaboration
73	Enable dynamic updates of DPP- AI-Assisted Dynamic Updates and Report Generation
74	Establishing a Two-Way Information Exchange Mechanism (DPP as a foundation for integrated reporting and data flowing up and downstream)
75	Support for Brand Owners' EPR (Extended Producer Responsibility) Programs
76	Expanding the Economic Value of the DPP
77	Demonstration in Diverse Use Cases
78	Incorporation into Public Procurement and Asset Management
79	Use the DPP to record environmental data across a product's entire lifecycle
80	Integration with Corporate Asset Management and Certification Labels
81	Developing Public APIs with ERP Systems
82	Enhancing Digital Capabilities (by providing training programs and AI tools)
83	Equivalence with Existing Reporting Methods: Ensure that the DPP holds legal validity and can serve as an equivalent to traditional written or electronic reporting methods during its initial stages
37	For compliance with UNTP, some companies alignment with the key principles is there but next steps are needed such as expanding the social auditing, collection and measurements of specific indicators and embedding in the algorithms, report standardization, inclusion of non-certified suppliers and traceability of non-certified fibers

Some of the respondents also provided detailed steps and processes for achieving simplification in reporting from using DPP by taking a wholistic approach and considering aspects such as support for SMEs, enhancing digital capabilities, developing public APIs, enabling dynamic updated of DPPs, incorporation in public procurement and asset management, creating equivalence with existing reporting methods to mention only a few.

4.7   STANDARDIZATION

Several of the topics that were identified in the consultation related to the potential of DPP for reporting burden reduction were grouped under standardization. The table below captures the topics that were identifies in the responses of the contributors in the consultation.

	VII. STANDARDIZATION
23	Reduction of burden by standardizing document requirements from various supplied industries (aviation, automotive, construction) and corresponding industry standards
28	Standardization of Data
30	Standardized Templates for Reporting:
37	For compliance with UNTP, some companies alignment with the key principles is there but next steps are needed such as expanding the social auditing, collection and measurements of specific indicators and embedding in the algorithms, report standardization, inclusion of non-certified suppliers and traceability of non-certified fibers
48	Standardisation of data-better comparability (by ISO norm 59040 Product Circularity Data Sheet
56	Security and Sustainability Rating System for UIDs and Data Carriers
67	align with existing standards already is use
84	Adopt standards like the PACT Carbon Footprint Framework
36	Brands can use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data

The suggestions included reduction of burden by standardizing document requirements from various supplied industries (aviation, automotive,   construction) and corresponding industry standards; standardization of data, and standardized reporting templates. Also standardization of data for better comparability (by using norms such as ISO 59040). Other specific standards were also suggested such as United Nations Transparency Protocol (UN TP), Product Circularity Data Sheet, as well as to align with standards that are already in use. Another suggestion was to use Security and Sustainability Rating System for UIDs and Data Carriers. It was also mentioned that brands can use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data.

4.8   MACHINE-READABLE DATA

Machine readable data was also elaborated as a potential for using DPP for burden reduction. Attention was paid on the need to support high-speed processing for which material coding will be important; on the use of aligned an upper-level ontologies for reducing the digital complexity across multiple systems and supply chains, and replacing static documents with machine-readable data.

	VIII. MACHINE-READABLE DATA
25	Material coding, including concerns for high speed processing and readability (human/machine/OCR) and retrieval of data (REST API)
54	Reduce the digital complexity of data residing in multiple systems using aligned ontologies and upper ontologies
66	Replacing static documents with machine-readable data

4.9 EXTENDING DPP TO INCLUDE SUB-COMPONENT TRACKING DATA

We identified a number of responses that we grouped in the category of DPP to include sub-component tracking. Interesting suggestions were made about extending the DPP to allow for additional information of raw materials and semi-finished products to increase ethe value added.

	IX. EXTENDING DPP TO INCLUDE SUB-COMPONENT TRACKING DATA
26	Allowing for additional information in DPP for semi-finished products to increase value added
68	Extending DPPs also to raw materials and semi-finished products

While this topic was not mentioned by many respondents explicitly we considered this point as important and deserving separate attention as it may also link to future discussions about complex products and inter-linked passports.

4.10 CROSS-ORGANIZATIONAL COORDINATION (E.G., ACROSS SUPPLY AND VALUE CHAINS)

An interesting aspect that was also suggested in the consultation was the role of DPP and burden reduction in the context of cross-organizational coordination across supply and value chains. We chose to dedicate a separate theme on this issue, as it brings the attention of the role DPP could play and benefits it can bring with respect to cross-value chain coordination and related coordination costs and this can open new avenues of exploring the potential of DPP.

	X. CROSS-ORGANISATIONAL COORDINATION (e.g., across supply and value chains)
6	Improved coordination

4.11 CHALLENGES WITH DPPS AND BURDEN REDUCTION

While the experts were asked about the opportunities that DPP could bring for burden reduction and we discussed these inputs in the previous sections, some respondents were critical about what can be achieved in the area and brough to the attention a number of challenges that they foresee. These critical aspects also need to be very carefully considered in order to arrive at a thorough understanding of opportunities and challenges.

Concerns were raised that efforts to develop a single tool for all the data would be too expensive, that it is difficult to connect data for different reporting services, as some data like Human Resource data is not directly linked to the product. And that due to issues with reliability and granularity of data it would be difficult to avoid company-level calculations. Other concerns were raised that while there are possibilities for the DPP to reduce the reporting burden, DPP must not become a reporting burden itself. Concerns were raised that from many companies and market parties DPP is seen as the next level supply chain transparency reporting tool but that this is not the goal of DPP and that more attention needs to be paid as DPP to enable business models and to reach circularity goals and increase profitability. Also while a lot of discussions are about data that needs to be included for all companies, and discussions around long lists, that it is not the amount of data, but rather having the data that is really needed what matters most. Suggestions of how to ensure that DPP does not become the next reporting tool but really helps to achieve impact in circularity were also provided. These suggestions include: (1) limiting mandatory data, (2) letting companies define what they need to enable circular business models, (3) Evaluate use cases for mandatory DPP data, (4) creating awareness that DPP is not foremost a reporting tool.

	Challenges
C1	The effort to develop a single tool to record all the data would be too expensive (due to variation of products, customers, production plants, suppliers, access to ingredients data).
C2	Difficult to integrate data in a common server (CSRD and EUDR some info not linked to product (HR data)
C3	Difficulty on avoiding company level calculation due to reliability and granularity issue of the data sets (e.g. CO_2 primary data)
C4	While there are for sure a few possibilities for the DPP to reduce the reporting burden from existing policies and standards, DPP must not become a reporting burden itself
C5	In discussions with the market and companies there is currently a strong focus and impression of the DPP as the next "supply chain transparency reporting tool. But the goal and success of DPP is to enable circular business models to reach climate goals and increase profitability.
C6	Many people focus on what data should everyone report in DPP and long lists. But discussion should be more focussed on what we really need for the R strategies.
C7	Many companies just ask for "DPP reporting compliance". This would generate billions of DPPs ending up "in the drawer" and creating additional energy waste.
C8	Instead of making the DPP even more complex and confusing for companies now by moving existing reporting policies into the DPP and thus overloading it, let's first make sure the DPP itself is limited to the minimum of data reporting and fully focused on impact for the circular economy.
C9	Proposal to refocus DPP from more reporting to real impacts through (1) limiting mandatory data, (2) letting companies defined what they need to enable circular business models, (3) Evaluate use cases for mandatory DPP data, (4) creating awareness that DPP is not foremost a reporting tool
C10	Avoiding duplication of reporting
C11	Avoid creating a new software or platform
C12	Limitations of non-standardized fibres and lack of traceability systems for materials not covered by standards

Attention was brough also to issues such as the need to avoid duplication in reporting, as well as to avoid the creation of new software or platform. Also the limitations were discussed related to non-standardized fibres and lack of traceability systems for materials not covered by standards and that these limitations need to be taken into account.

5   CONCLUSIONS AND FUTURE WORK

While DPPs were initially introduced with the intention to improve circularity and sustainability of products, over the last few years DPP has gained attention as a tool that may have the potential to unlock much more. With the dynamic policy landscape and stronger priority on EU resilience and competitiveness, next to a strong green agenda, the question on the role of DPP in administrative burden reduction was only a logical one.

This CIRPASS-2 consultation was a first step in collecting and structuring ideas on how DPP may help in burden reduction. We received many interesting inputs from a variety of organizations, which we reviewed and tried to structure along topics and themes as presented in this report. These topics and themes can serve as a basis for further discussion and elaboration. In order to place this discussion in the broader Trade facilitation discussion, we also included in this report background information and references on trade facilitation efforts at international level, as taking these efforts and interacting with these international

organizations in discussions on the role of DPP and facilitation in the future may open new doors for international cooperation.

This study is limited in a number of ways. First, it included a limited number of respondents that are in the direct reach of the CIRPASS-2 network. The study may be extended to include feedback from a wider stakeholder group. Second, we received very rich inputs from the stakeholders. The results presented in this document can be seen as a quick scan analysis to identify emerging topics and themes. But there is much more richness in the respondents' comments which can be further revisited for additional insights on specific topics. Finally, while in this document we presented the trade facilitation developments and the results of the consultation, for the moment these are more for information rather than connected. Further research can focus on examining possible closer links between the international trade facilitation developments, the findings from the consultation, and what opportunities this opens for broader consultation and engagement on the topic of DPP and facilitation in an international context.

6   ANNEX 1 CONSOLIDATED LIST OF TOPICS

The consolidated list of topics identified from the inputs form the respondents is presented below. This list of topics includes ideas for reducing reporting burden using DPP, as well as challenges that may be faced for using DPP with respect to reporting burden reduction.

No	Topic
	Ideas for reducing the reporting burden using DPP
1	One stop place for digital sustainability data
2	Centralized data repository and singe source of truth
3	Automated reporting based on data integrated in the DPP
4	Real-time updates ensure compliance reports reflect the latest data
5	Reduced risk of errors and non-compliance (through the DPP automates data entry to EU central registry)
6	Improved coordination
7	A unified platform for reporting (simplifying multi-jurisdiction reporting)
8	Supported by advanced technologies for data verification, data integrity and real-time monitoring
9	Manufacturer responsibilities (about engagement of suppliers including conduct, selection, audits, data arrangements)
10	Expanding benefits to stakeholders
11	Automated Linkage to Global Reporting Frameworks (e.g. Ellen MacArthur Foundation (EMF) Plastics Pact reporting criteria, Carbon Disclosure Project (CDP)- voluntary but aligned with EU's Corporate Sustainability Reporting Directive (CSRD)
12	Integrating Circularity Indicators and Metrics (integrated in DPP) to facilitate product-specific circularity evaluations- e.g. ISO 59020; Material Circularity Indicator (MCI) or Circular Transition Indicators (CTI)
13	Streamlining Cross-Regulation Reporting
14	Interoperability Across Jurisdictions
15	Lifecycle and Circular Economy Data Sharing

16	Automated Verification and Auditing
17	Encouraging Public-Private Collaboration
18	Enter information only once
19	DPP consolidating all necessary data for reporting
20	single extraction process (and guidance based on consensus)
21	DPP ability to integrate seamlessly with both national and European control systems
22	Machine learning and AI linked to DPP to enhance efficiency, validation of data, identify errors, to improve processes and circularity index
23	Reduction of burden by standardizing document requirements from various supplied industries (aviation, automotive, construction) and corresponding industry standards
24	Continuously manufactured semi-finished products, such as steel or aluminium strips, should be provided with continuous coding over their entire length
25	Material coding, including concerns for high speed processing and readability (human/machine/OCR) and retrieval of data (REST API)
26	Allowing for additional information in DPP for semi-finished products to increase value added
27	Facilitation of Traceability
28	Standardization of Data
29	Improvement of Transparency and Communication
30	Standardized Templates for Reporting:
31	Enhancing Compliance with Sustainable Financial Reporting Using the DPP via -Automated ESG Data Integration required by CSRD and Taxonomy Regulation -Alignment with the EU Taxonomy for --Sustainable Activities -Transparency Across Value Chains (e.g. Scope 3 emissions) -Real-Time Stakeholder Reporting -Interoperability with Global Standards (e.g. GRI, SASB, TCFD), ISO 59040
32	Tagging data to reporting requirements and ingesting data once
33	Reports based on tagged system and central pool of data
34	Validation of commercial claims [ecolabeling] by checking compliance to traceability standards (through using certification from certification authority (CA) and transaction certificate (TC). Specialized exclusively for products that meet recognized traceability standards (GRS, ICS, GOTS)
35	Validation of commercial claims (for recycled and organic products) is granted when compiling with recognized CoC standards, certified standards backed by audits (GRS,RCS, OCS, GOTS), relying on audits of independent CAs. These standards verify environmental sustainability but also working conditions.
36	Brands can use verified data to demonstrate compliance with regulations but must account for the limitations associated with non-certified data
37	For compliance with UNTP, some companies alignment with the key principles is there but next steps are needed such as expanding the social auditing, collection and measurements of specific indicators and embedding in the algorithms, report standardization, inclusion of non-certified suppliers and traceability of non-certified fibers
38	Maintain the focus of DPPs on 'product traceability and circularity', ensuring they complement rather than replace existing reporting systems.

39	Replace Multiple Systems: Position the DPP as a single, unified tool that replaces the fragmented systems companies currently use for regulatory, sustainability, and quality reporting.
40	Integrate with ESG Reporting Standards: Connect DPP data directly to existing ESG frameworks (e.g., GRI, CDP, SASB) or replace redundant aspects, allowing companies to consolidate efforts and streamline compliance.
41	Provide Customizable Dashboards: Offer tools to visualize and analyse DPP data for internal and external reporting, making it easier for companies to fulfil diverse requirements.
42	For businesses, Finding and resolving legacy data management, often paper- or excel based, that they are now forced to review, innovate and automate
43	Managing CE certifications via one integrated digital system, including all the way to the notified bodies, is far more efficient than paper based approaches as still standard in most EU MS
44	More efficient recalls: Tracing product related data throughout lifetime can reduce risk costs, since accruals for recalls can be reduced
45	Simplified calculation of EPR based on better information
46	Possibility for calculated modulated EPR feeds based on better knowledge of recycled material in models
47	Opportunity for the first time to review both corporate and product related non-financial reporting at the same time
48	Standardisation of data-better comparability (by ISO norm 59040 Product Circularity Data Sheet
49	Pre-filled and reporting templates to reduce the reporting administrative burden
50	Interoperability with existing frameworks (e.g. interoperability of the data required in the platform vs. existing or upcoming regulation
51	The DPP could act as an interface between businesses and regulatory bodies, streamlining the process of submitting product data for compliance verification and certification.
52	Encourage eco-design and transparency (e.g. PCDS can also serve as an internal tool during the design process; PCDS/DPP data could be recognised evidence in the CSRD E5 data points
53	Common set of concepts (e.g. based on UN Recommendation 46) to reduce the legislative complexity by identifying a common set of concepts on what to monitor for these legislations. This can be then used to formulate harmonized queries to the digital infrastructures
54	Reduce the digital complexity of data residing in multiple systems using aligned ontologies and upper ontologies
55	Use the high-level concepts and aligned ontologies to define harmonized queries of the data available in the digital infrastructures
56	Security and Sustainability Rating System for UIDs and Data Carriers
57	Look not only at DPP (and mandatory data) and move away from silos (SCIP) and encourage larger data handling via the ecosystem and their data as a basis for other reporting demands; DPP system (knowledge graph) would be the backbone for such operations

	58	Enabling intra-organisational interoperability by moving reporting burdens outside the legal department
	59	Automated internal compliance checking
	60	Integrating REACH data
	61	Modular reporting
	62	DPP as a single source of truth for compliance, integrating CBAM
	63	DPPs for public procurement and asset management
	64	Integrating EUDR data, including perhaps with Smart Contracts
	65	Integrating CPR
	66	Replacing static documents with machine-readable data
	67	Align with existing standards already is use
	68	Extending DPPs also to raw materials and semi-finished products
	69	Integrating energy disclosures, such as EN 16325
	70	Interest to use DPP for REACH data, Carbon footprint, Recycled content and Recycling/ repair process
	71	Support for SMEs
	72	International collaboration
	73	Enable dynamic updates of DPP- AI-Assisted Dynamic Updates and Report Generation
	74	Establishing a Two-Way Information Exchange Mechanism (DPP as a foundation for integrated reporting and data flowing up and downstream)
	75	Support for Brand Owners' IPR (Extended Producer Responsibility) Programs
	76	Expanding the Economic Value of the DPP
	77	Demonstration in Diverse Use Cases
	78	Incorporation into Public Procurement and Asset Management
	79	Use the DPP to record environmental data across a product's entire lifecycle
	80	Integration with Corporate Asset Management and Certification Labels
	81	Developing Public APIs with ERP Systems
	82	Enhancing Digital Capabilities (by providing training programs and AI tools)
	83	Equivalence with Existing Reporting Methods: Ensure that the DPP holds legal validity and can serve as an equivalent to traditional written or electronic reporting methods during its initial stages
	84	Adopt standards like the PACT Carbon Footprint Framework
		Challenges for reducing reporting burden with DPP
C1		The effort to develop a single tool to record all the data would be too expensive (due to variation of products, customers, production plants, suppliers, access to ingredients data).
C2		Difficult to integrate data in a common server (CSRD and EUDR some info not linked to product (HR data)
C3		Difficulty on avoiding company level calculation due to reliability and granularity issue of the data sets (e.g. CO2 primary data)
C4		While there are for sure a few possibilities for the DPP to reduce the reporting burden from existing policies and standards, DPP must not become a reporting burden itself

C5	In discussions with the market and companies there is currently a strong focus and impression of the DPP as the next "supply chain transparency reporting tool. But the goal and success of DPP is to enable circular business models to reach climate goals and increase profitability.
C6	Many people focus on what data should everyone report in DPP and long lists. But discussion should be more focused on what we really need for the R strategies.
C7	Many companies just ask for "DPP reporting compliance". This would generate billions of DPPs ending up "in the drawer" and creating additional energy waste.
C8	Instead of making the DPP even more complex and confusing for companies now by moving existing reporting policies into the DPP and thus overloading it, let's first make sure the DPP itself is limited to the minimum of data reporting and fully focused on impact for the circular economy.
C9	Proposal to refocus DPP from more reporting to real impacts through (1) limiting mandatory data, (2) letting companies defined what they need to enable circular business models, (3) Evaluate use cases for mandatory DPP data, (4) creating awareness that DPP is not foremost a reporting tool
C10	Avoiding duplication of reporting
C11	Avoid creating a new software or platform
C12	Limitations of non-standardized fibres and lack of traceability systems for materials not covered by standards