The DPP Data Map for Textiles

What Official EU Sources Tell Us Today About the Data Inside the Future Digital Product Passport

GO TRACE

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Why This Document

"What data will I need to put inside the Digital Product Passport?" This is the most asked question in the fashion and textile industry today. And yet, no one can give you the final answer - because the Textile Delegated Act, which will define the exact mandatory data fields, has not been adopted yet.

But that does not mean we are in the dark. The European Commission has published several official documents that together form a remarkably clear picture of where this is heading. In addition, the March 2026 Ecodesign Forum Expert Group meeting provided concrete updates on timelines and infrastructure. The problem is that these documents are long, technical, and scattered across different EU institutions.

This document brings them together in one place. It is built exclusively on four official EU Commission sources - no speculation, no expert opinion, no vendor marketing. Just the official signals, organised for clarity.

> *We know the structure of what the EU will require Delegated Acts to define. We know the textile-specific requirements the Commission's scientists have proposed. And we know the methodology they will use to finalise them. What we do not yet have is the adopted Delegated Act itself.*

How to Read This Document

We use a three-layer system to clearly indicate the level of certainty of each piece of information:

- **Adopted Law** - From the ESPR Regulation (EU) 2024/1781. Confirmed and legally binding for all product DPPs.
- **Proposed for Textiles** - From the JRC Preparatory Study (3rd Milestone, December 2025). Highly likely, but not yet adopted.
- **Methodology** - From the JRC DPP Methodology Report (March 2026). The process the Commission will use to finalise the Delegated Act.

Layer 1: The ESPR Regulation - What Is Already Law

The Ecodesign for Sustainable Products Regulation (EU) 2024/1781 was adopted on 18 July 2024. It is the legal foundation for all Digital Product Passports. Annex III and Article 7 define the master list of data categories that Delegated Acts can draw from.

These requirements apply to **all** product DPPs - not just textiles. The Textile Delegated Act will select which of these apply specifically to fashion and textiles, and how.

Theme 1: Product & Operator Identification (Annex III)

Every product and actor in the supply chain must be uniquely and unambiguously identified.

- Unique Product Identifier (UPI) - at model, batch, or item level
- Unique Operator Identifier (UOI) - for manufacturers, importers
- Unique Facility Identifier (UFI) - for manufacturing sites
- Global Trade & Customs Codes - GTIN, TARIC codes
- Identifiers for conformity assessment bodies

Theme 2: Compliance & Safety (Annex III + Article 7(5))

Official proof that the product meets EU legal and safety standards.

- EU Declaration of Conformity and certificates
- User manuals and safety information
- Substances of Concern - name, location in product, and concentration (especially substances on the REACH Candidate List of SVHCs)

Theme 3: Circularity & Lifecycle Information (Article 7)

The data that powers the circular economy.

- Product performance information - durability, recycled content %, water efficiency
- Information for consumers - how to use, repair, return, and recycle
- Information for treatment facilities - disassembly instructions, material identification, recycling processes

Theme 4: Technical & Voluntary Information (Annex III)

- DPP Service Provider reference - the third party storing the DPP backup
- Voluntary labels - e.g. EU Ecolabel

> ***What the Delegated Act must specify:*** *which data from the ESPR master list applies; the data carrier to use (e.g. QR code); whether the DPP is at model, batch, or item level; who can access which data; who can create and update the data; how long the passport must remain available.*

Source: Regulation (EU) 2024/1781 - ESPR, Annex III and Article 7.

Layer 2: The JRC Preparatory Study - What Is Proposed for Textiles

In December 2025, the European Commission's Joint Research Centre (JRC) published the 3rd Milestone of its preparatory study for the Textile Delegated Act. This is not law - but it is the official technical foundation that the Commission will use to draft the Delegated Act.

The study proposes four requirements (DO1-DO4) plus a separate requirement on Substances of Concern. Each would translate into specific data fields in the DPP.

> ***Scope:*** *Textile apparel containing at least 80% textile fibres by weight. Workwear and sportswear are included if they meet this threshold.*

DO1 - Robustness Score (Durability)

Objective: Extend product lifetime by informing consumers about durability.
Type: Information requirement (disclose, no minimum threshold).
Format: Score from 0 to 10, based on three ISO tests after 5 washing cycles:

- Spirality - rotation/twist after washing (ISO 16322-3)
- Dimensional change - shrinkage after washing (ISO 3759)
- Visual inspection - colour, fabric, seams, non-textile parts (ISO 15487)

DO2 - Recyclability Score

Objective: Increase the share of textile waste going to recycling.
Type: Information requirement. Score from 0 to 10.
Key rule: Products with elastane content above 15% receive a score of 0 (non-recyclable).

DO3 - Recycled Content

Objective: Increase the use of secondary materials.
Type: Information requirement **AND** performance requirement (minimum thresholds).

> ***This is the only proposed requirement with a minimum threshold.*** *If adopted, products that do not meet the minimum recycled content percentage will not be allowed on the EU market.*

Data to collect:

- Percentage of recycled fibres by mass
- Type of waste source (post-consumer vs. post-industrial)
- Chain of custody certification

DO4 - Carbon / Environmental Footprint

Objective: Decrease the environmental impact of manufacturing.
Type: Voluntary reporting (not mandatory).
Scope: Manufacturing stage only. Raw material production excluded because LCA methodologies for different fibres are not yet comparable.

Substances of Concern

Objective: Inform about the presence of hazardous chemicals.
Type: Information requirement only (no performance requirement at this stage).
Key points: Thresholds inspired by UN GHS. Step-wise implementation. Focus on intentionally added substances that remain in the product.

Summary: What to Prepare

Requirement	Type	Mandatory?	Action
DO1: Robustness	Information	Disclose only	Arrange ISO testing
DO2: Recyclability	Information	Disclose only	Assess material mix
DO3: Recycled content	Info + Performance	Min. threshold	Secure chain of custody
DO4: Env. footprint	Information	Voluntary	Begin LCA work
Substances of Concern	Information	Disclose only	Map chemical inputs

Source: JRC Preparatory Study on Textiles, 3rd Milestone (December 2025).

Layer 3: The JRC Methodology - How the Commission Will Decide

On 19 March 2026, the JRC published a methodology report (JRC145830) that defines how DPP data requirements will be determined for each product group under the ESPR. This is the blueprint the Commission will use to write the Textile Delegated Act.

The 4-Step Process

Step A - Scope & Context: Define product scope, identify stakeholders, and map current data collection practices.

Step B - Use Cases & Data Needs: Translate policy objectives into concrete use cases, then map each use case to specific data elements.

Step C - Design & Development: Build data vocabularies, determine granularity (model, batch, or item level), and define access rights.

Step D - Validation & Consultation: Internal consistency check and public consultation before the Delegated Act is adopted.

The Prioritisation Logic

The methodology classifies each data element through a value-effort assessment:

Essential	High regulatory value, feasible to collect. Almost certainly mandatory.
Strongly recommended	Significant value but higher effort. Likely mandatory, possibly with transition periods.
Voluntary	Valuable but costly at scale. May become mandatory in future revisions.

Nine Structural Categories

The methodology identifies nine categories that DPP data requirements must address:

- Structured, machine-readable data (open standards, no vendor lock-in)
- Unique product identifiers (UPI) linked to each DPP
- Unique operator identifiers (UOI) for economic operators
- Unique facility identifiers (UFI) for manufacturing sites
- Role-based access rights (different data for consumers, authorities, recyclers)
- Data granularity decisions (model, batch, or item level - a key cost driver)

- Life cycle data governance (who creates, validates, and updates data)
- Data retention (available for the product's expected lifetime)
- Interoperability (open standards, aligned with CEN/CENELEC JTC 24)

Source: JRC145830 - Methodology for defining DPP data requirements, 19 March 2026.

What Is Coming Next

On 19 March 2026, the European Commission held an Ecodesign Forum Expert Group meeting bringing together policymakers, JRC researchers, and industry representatives. The official slide deck provides concrete updates on DPP infrastructure, implementation timelines, and standardisation progress.

The DPP Registry Is on Track for July 2026

According to the Commission's presentation, the DPP Registry Implementing Act is following a concrete timeline: a first draft was prepared in February-March 2026, followed by a public consultation in March and an interservice consultation in April-May. Comitology meetings are scheduled for May and June 2026, with formal adoption planned for June 2026.

The DPP registry itself is expected to launch in July 2026. Certain types of large batteries are expected to become the first product category for which the DPP becomes mandatory, beginning in February 2027.

Six of Eight DPP Standards Approved

Six harmonised standards - covering unique identifiers, interoperability, data carriers, APIs, data exchange protocols, and data storage - received a positive vote on 2 April 2026, as confirmed by the European Commission in a Parliamentary answer on 4 May 2026. Two remaining standards on authentication and access rights will follow later in Q2 2026.

Textile-Specific DPP Work Is Actively Progressing

During the meeting, Maria Gonzalez Torres from JRC-Sevilla (Unit B.5) presented a session on textile DPP updates. While the detailed textile presentation was not included in the publicly circulated slide deck, the session confirms that textile-specific DPP work is actively progressing within the Commission.

Expected Timeline

When	What	Status
July 2024	ESPR entered into force	**Done**
April 2025	ESPR Working Plan confirmed textiles as priority	**Done**
Dec 2025	JRC 3rd Milestone published	**Done**
March 2026	JRC Methodology + Textile DPP session at Ecodesign Forum	**Done**
April 2026	6 CEN/CENELEC standards received positive vote (2 April)	**Done**
June 2026	Adoption of DPP Registry Implementing Act	**In progress**
July 2026	Launch of EU DPP Registry	**In progress**
Feb 2027	DPP mandatory for large batteries (first product category)	**Pending**
2027	Indicative adoption of Textile Delegated Act	**Pending**

Sources: Ecodesign Forum Expert Group Meeting, European Commission, 19 March 2026; ESPR Working Plan (April 2025).

Where Do You Stand?

Based on the official sources mapped in this document, here are five questions to assess your organisation's readiness today:

1. Can you uniquely identify every product, manufacturing site, and key supplier in your chain with a persistent, machine-readable identifier?
2. Do you have access to the ISO test data (spirality, shrinkage, visual inspection) needed to calculate a durability score for your products?
3. Can you document the percentage of recycled content in your products by mass, with chain of custody certification?
4. Do you know which Substances of Concern are present in your products, including their name, location, and concentration?
5. Do you have a system in place that can provide different levels of data access to consumers, authorities, and recyclers?

Go Deeper

This document maps the landscape. The GO TRACE DPP Masterclass teaches you how to navigate it.

From legal foundations and data architecture to supplier management, technology selection, and implementation planning - the Masterclass is the most comprehensive, vendor-neutral DPP training for fashion and textiles.

gotrace.fashion

Official Sources Referenced

1. Regulation (EU) 2024/1781 - ESPR. Adopted 18 July 2024.

2. JRC Preparatory Study on Textiles, 3rd Milestone (December 2025).

3. JRC145830 - DPP Data Methodology. Published 19 March 2026.

4. Ecodesign Forum Expert Group Meeting, European Commission, 19 March 2026.

5. ESPR Working Plan - COM/2025/187 final, adopted 16 April 2025.

6. Parliamentary answer EN E-000888/2026, Executive Vice-President Séjourné, 4 May 2026.

Disclaimer: This document is provided for informational purposes only. It does not constitute legal advice. The final mandatory data requirements for the textile DPP will be defined in the Textile Delegated Act, which has not yet been adopted. GO TRACE remains vendor-neutral and does not endorse any specific technology provider or solution.

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