

Förstudie för uppbyggnad av regional kunskapsnod för Digitala Produktpass

Executive Summary

The European Union is accelerating its transition toward a circular and resource-efficient economy, and the upcoming Ecodesign for Sustainable Products Regulation (ESPR) is a cornerstone of this effort. A key element of ESPR is the introduction of Digital Product Passports (DPP), which will define how product-related information is made accessible and exchanged across the value chain. The goal is to enable greater transparency and circularity and strengthen sustainability reporting.

This pre-study was conducted against that backdrop, with a specific focus on small and medium-sized enterprises (SMEs) in Region Halland. The study sets out to understand where these companies currently stand in relation to ESPR and DPP, what obstacles they face, what capabilities they lack, and how regional actors can most effectively support them in preparing for the coming regulatory shift.

The study revealed that awareness of ESPR and DPP among SMEs is generally low, and digital maturity varies widely. While most companies have initiated some form of digitalisation, product-related data is typically fragmented, manually managed, and poorly integrated across systems and organisational functions. Spreadsheets and email remain dominant tools for managing critical product information, and traceability is often limited to batch level or specific internal processes. Only a minority of interviewed companies have automated data flows or integrated systems capable of supporting the level of transparency and interoperability that future regulation will require.

A recurring theme across interviews is uncertainty. Companies struggle to interpret evolving EU requirements and to assess which investments are future-proof. The introduction of the Omnibus packages, with their proposed adjustments to timelines and thresholds in related legislation such as CSRD and CSDDD, has reinforced this uncertainty rather than reduced it. For SMEs, this uncertainty increases the risk that necessary preparatory steps are deferred while companies wait for clearer regulatory direction. Importantly, at the time of writing, nothing in the Omnibus proposals indicates a delay or weakening of DPP requirements under ESPR. If anything, they signal that digital product information is becoming a central infrastructure for multiple regulatory domains, not a standalone compliance exercise.

Companies that have progressed further in their preparations tend to frame DPP not as a compliance burden, but as an extension of existing customer demands, international market

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expectations, or strategic sustainability ambitions. In these cases, higher maturity is driven by concrete external incentives: customer requirements, early exposure to regulated product categories, or a clear business case linked to transparency and differentiation.

Across the interviewed companies, five critical competence areas emerged as decisive for readiness. These include the ability to understand and manage product, material, and supplier data; access to suitable digital infrastructure and data governance structures; organisational and regulatory competence to embed data work strategically; mechanisms to ensure data quality and verification; and the capacity to communicate and share product information within value chains and broader ecosystems. Gaps in any one of these areas significantly limit a company's ability to respond effectively to upcoming requirements.

The implications are clear. Treating DPP as a narrow technical implementation or a late-stage compliance project is likely to be both costly and ineffective for SMEs. Instead, companies need support that builds foundational capability to generate, manage, and use reliable product-related sustainability data over time. This capability is not only essential for ESPR compliance, but increasingly for participation in European and global value chains shaped by transparency, due diligence, and digital reporting requirements.

Against this backdrop, the study concludes that there is strong potential for a coordinated regional support function in Halland. However, its focus should not be limited to "Digital Product Passports" as a standalone concept. Rather, it should address the broader challenge of enabling SMEs to provide and use trustworthy sustainability data linked to products, in a way that supports compliance, innovation, and competitiveness simultaneously.

The proposed way forward is the development of a collaborative regional "hub", built through a dedicated implementation project, that brings together existing business support actors, academic expertise, and national initiatives. The hub should act as a practical entry point for SMEs, offering guidance that is independent, up-to-date, and tailored to different maturity levels. Its role would be to connect the existing initiatives, translate complex regulatory developments into actionable knowledge, and reduce fragmentation in the support landscape.

We identified four possible core functions. First, continuous regulatory monitoring and interpretation is needed to help SMEs navigate a rapidly evolving policy environment and understand what changes are relevant to them, and when. Second, targeted support for digital and data maturity must address gaps in infrastructure, governance, and data quality, using concrete examples and stepwise approaches rather than abstract frameworks. Third, competence building and peer learning should be prioritised, enabling companies to learn from each other, access expertise, and build confidence through shared experience. Finally, opportunities for pilots and test environments are essential, allowing SMEs to experiment with data collection and sharing in low-risk settings before scaling solutions across their operations.