



Federation of the European
Sporting Goods Industry

FESI feedback to the *have your say* consultations on the DPP Registry

May 2026

The Federation of the European Sporting Goods Industry (FESI), representing around 1,800 manufacturers and 85% of the European sporting goods market, welcomes the European Commission's draft implementing act on the Digital Product Passport (DPP) Registry.

The industry welcomes the objectives and establishment of the EU DPP Registry as an important step towards greater transparency, traceability, market surveillance and circular economy in the internal market. While the industry supports the ambition of creating a more coherent digital framework that can strengthen compliance and improve access to product information, at the same time we consider as essential that the framework remains proportionate, practical and sensitive to the realities of the various types of economic operators, value chain actors, and product categories. In consequence, we believe that further clarification is needed regarding the overall role of the DPP system as well responsibilities of entities that will technically operate and manage the registry, which authorities will be responsible for enforcement in case of non-registration or non-compliance as well as in terms of verification of the accuracy and completeness of the information submitted.

In general, FESI underlines that the DPP Registry must ensure a high level of cybersecurity, data protection and protection of commercially sensitive information throughout the entire system architecture. At the same time, the establishment and use of the registry must not create additional registration, access, maintenance or compliance costs for economic operators. The industry therefore calls for a system design that guarantees secure and reliable operation without imposing direct or indirect financial burdens on companies, in particular SMEs and businesses managing large product portfolios.

In this context, the industry wishes to share the following recommendations:

1. Reduction of unnecessary administrative burden and logging scope

FESI supports a registry design that is minimal, workable, and focused only on what is strictly necessary for registration and traceability. The requirements listed in Article 14 (2) appears extensive and risk going beyond what is needed for the registry's integrity and enforcement traceability. In consequence, we are asking for logging to be narrowed to what is strictly required for authentication, registration validation, security and defined enforcement purposes.

2. Importance of interoperability across EU legislation with a timely introduction

FESI emphasizes that interoperability and alignment across EU legislations are key to avoid fragmentation, inconsistencies, and potential divergences of technical requirements avoiding compliance processes for economic operators. This is important both for companies falling under the requirements of multiple regulatory frameworks and to support coherent implementation from Member States and enforcement by market surveillance authorities.

Additionally, early publication of technical specifications, including API access and a test environment would be supportive for economic operators and service providers to build and verify connectivity ahead of go live. Without this, integration risk is pushed onto operators at the point the registry becomes mandatory.

3. Clarification of the scope of enforcement

It would be important to ensure clear governance and responsibility boundaries across the different actors involved in the DPP ecosystem. In particular, clarity is needed on responsibilities in cases of system unavailability, delays in processing updates, or discrepancies between registry data and decentralised DPP content. Given that the registry may become a prerequisite for placing products on the market, it is essential to ensure that economic operators are not exposed to compliance risks due to issues outside their control, and that appropriate safeguards and accountability frameworks are defined. In consequence, the industry calls for clarification whether economic operators can access relevant registry logs and records for their own compliance, particularly when supplier or third-party claims are involved.

Additionally, we call for Moreover, the industry calls for a clearer, exhaustive definition of permitted enforcement and compliance use cases tied to registry access.

4. Strengthening the safeguards against registry breaches

The draft requires the Commission to maintain security controls (Art. 16) and act on inappropriate or fraudulent registry use, including massive data download (Art. 17). However, it does not set out an operator-facing recourse/accountability framework or a specific affected-operator notification process if registry data or commercially sensitive metadata is exposed through breach or unauthorised access. We are asking for clearer safeguards, incident transparency obligations and accountability mechanisms for registry failures affecting economic operators.

Conclusions

FESI and its members support the objectives of the DPP framework and recognizes the DPP registry as a critical enabling component of implementation of the ESPR. The industry therefore welcomes the Commission plan to provide clear operational guidance on when an update requires registry interaction, how timestamps are generated/used, and how version links will be managed in practice. We remain fully committed to this initiative and remain available to work with the European Commission, Member States and other stakeholders on it.

Founded in 1960 FESI - the Federation of the European Sporting Goods Industry represents the interests of approximately 1.800 sporting goods manufacturers (85% of the European market) through its National member Sporting Goods Industry Federations and its directly affiliated companies. 70-75% of FESI's membership is made up of Small and Medium Sized Enterprises. In total, the European Sporting Goods Industry employs over 700.000 EU citizens and has an annual turnover of some 81 billion euro.

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