

90-day Digital Product Passport action checklist

What to do in the next 90 days

ESPR is in force. The EU DPP registry opened on 20 July 2026. Empowering Consumers applies from 27 September 2026. The textile field list is still to come. This checklist is the work that pays off either way. Updated August 2026.

Days 1–30 · Know your exposure

☐ **Confirm scope, market by market.**

List which entity places goods on the EU market and which on the UK market, per channel: own site, wholesale, marketplaces, EU fulfilment.

☐ **Pick one range as the pilot.**

Choose 10–20 styles that represent your main fibres and factories, not your easiest ones.

☐ **Name one owner.**

One accountable person across product, sourcing, legal and IT, with authority to settle speed vs accuracy.

☐ **Inventory the claims you already make.**

Every recycled, organic, biodegradable, carbon or “conscious” claim on swing tickets, PDPs and paid media.

☐ **Map your packaging.**

Polybag, carton, hangtag, tissue, mailer: format, material, weight and market. This drives UK Plastic Packaging Tax and EPR fees.

Days 31–60 · Collect the evidence

☐ **Map every core field to a holder.**

Identity, composition, origin, supplier, care and repair, end of life. For each field name the system, supplier or certificate that holds it.

☐ **Go to Tier 2.**

Request composition and processing records from mills and dyehouses, not just from your Tier 1 CMT factory.

☐ **Collect and date the certificates.**

GOTS, GRS, RCS, OEKO-TEX, LWG: scope certificates plus transaction certificates, with expiry dates recorded.

☐ **Substantiate or withdraw each claim.**

If the file behind a claim does not exist, change the wording before 27 September 2026 rather than after.

☐ **Put GS1 identifiers on new styles.**

Cheap in the tech pack now, expensive to retrofit across a season.

☐ **Record your Plastic Packaging Tax position.**

Tonnage, recycled content above or below 30%, and the evidence that proves it.

Days 61–90 · Make it repeatable

☐ **Build one evidence file per style.**

One place, one structure, versioned. Not an inbox and not five spreadsheets.

☐ **Write the supplier data clause.**

Add data and evidence obligations into new orders and onboarding, with a response window.

☐ **Test one vendor properly.**

Ask for a live UNTP-conformant passport, a GS1 Digital Link resolution and a signed credential. All three, or treat the roadmap as marketing.

☐ **Dry-run a surveillance request.**

Give yourself 48 hours to produce composition, origin and claim evidence for one style. Whatever you cannot find is your programme.

☐ **Set the review rhythm.**

Quarterly: certificate expiries, new styles, changed suppliers, changed claims.