

EU Digital Product Passport — Readiness Checklist for Underwear

What to collect now so your 2028+ obligations are already covered

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Why this matters now. The EU's Ecodesign for Sustainable Products Regulation (ESPR) introduces the Digital Product Passport. The textile delegated act covering apparel — with underwear explicitly in scope — is expected around 2027, with compliance landing in the 2028–2029 window. The data a DPP needs is *produced during sourcing*, not afterwards: if it is not captured order by order from today, it will have to be reconstructed later at far higher cost.

1. Timeline to plan against

When	What happens	What you should have ready
Now – 2027	ESPR framework in force; textile delegated act in preparation; PPWR packaging rules phasing in	Data collection discipline per order; packaging compliance
~2027 (expected)	Textile delegated act adopted; product-specific requirements and data fields finalised	Supplier data templates agreed; roles assigned (who is the economic operator?)
2028 – 2029 (expected)	DPP becomes applicable to textiles placed on the EU market	Working passport per SKU; carrier/QR strategy; data hosting plan

Dates are the currently expected roadmap and may shift; check the Commission's ESPR working plan before committing systems.

2. Data to capture per order, starting now

✓	Data item	Source	Notes
☐	Style / SKU identifier and GTIN	Your PIM	One passport per product model, not per unit
☐	Fibre composition with percentages	Lab test report	Must match the label and the test — the classic audit failure point
☐	Fabric weight, construction, finish	Mill spec sheet	Also drives care and durability claims
☐	Material origin (country) and supplier chain tier	Mill / spinner declarations	Even approximate is better than nothing; refine annually
☐	Recycled content and certification (if claimed)	GRS or equivalent certificate	Only claim what is certified for the exact material

☐	Substance compliance (REACH, restricted substances)	OEKO-TEX Standard 100 / lab test	Keep the certificate for the fabric actually used, not a substitute
☐	Durability evidence (colourfastness, pilling, shrinkage, wash cycles)	Lab test report	Underwear is washed frequently — this is the most testable claim
☐	Care instructions	Your care label	Should be consistent with the durability test result
☐	Repairability / spare parts / disassembly notes	Design & factory	Minimal for underwear; relevant for sleepwear with trims
☐	End-of-life and disposal guidance	You / take-back scheme	Increasingly part of retail scorecards already
☐	Packaging composition and recyclability	Packaging supplier	PPWR obligations apply earlier than the DPP
☐	Production site: legal name, address, audit status	Audit report	Site-specific; keep the audit ID with the order file

3. Packaging: the earlier deadline (PPWR)

- Record the material, weight and recyclability class of every packaging component (polybag, carton, sticker, hangtag).
- Reduce empty space and avoid unnecessary multi-material laminates — recyclability requirements tighten first.
- Keep per-SKU packaging weight data; it is the figure most often requested by retail compliance teams.

4. Roles and responsibilities

Question	Why it decides your workload
Who is the economic operator placing the product on the EU market?	That entity carries the DPP obligation — usually the importer or the brand, not the supplier
Where will passport data be hosted?	Decide between your PIM/PLM, a DPP service provider, or GS1-based infrastructure before the fields are fixed
How will the carrier be attached?	QR on care label, hangtag or packaging — each has different durability and cost implications
Who signs off data accuracy?	Data quality is the liability; assign one owner per field group

What we can do for you. For every Unitex order we can supply the sourcing-side data set — composition and construction, fabric mill and country of origin, OEKO-TEX certificate reference for the fabric used, audit status of the production site, test reports, packaging weights, and the production timeline. Ask for the DPP data pack at order confirmation and it travels with your order file.

