



digital collaboration in the built environment

Response to the Digital Product Passport – Rules for Service Providers

Submitted by digiGO, Administrator of DSGO, the Digital Dataspace for the Built Environment in the Netherlands

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29 November 2024

Contact

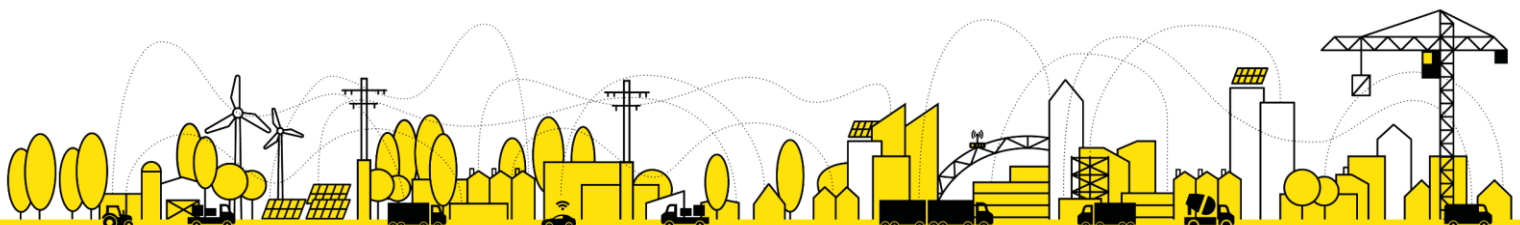
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Thank you for the opportunity to provide feedback on the call for evidence regarding the impact assessment of the Digital Product Passport (DPP) – Rules for Service Providers. As digiGO, the administrator of DSGO, the digital dataspace for the built environment in the Netherlands, we represent the outcome of extensive collaboration with all stakeholders in the built environment – from clients to contractors, service providers, and producers – ensuring broad support for the initiative. DSGO is dedicated to enabling both public and private data sharing within the built environment. In light of this, we would like to offer our perspective on the proposed regulation concerning digital product passports, with a particular focus on the rules for service providers.

Federated Data Space and Trust Framework

We strongly recommend the adoption of a federated data space for Digital Product Passports, within which DPP service providers can operate under a trust framework. In a federated data space, participating entities retain autonomy over their data while benefiting from standardized protocols for secure and reliable data sharing. It is also essential to ensure interoperability between different data spaces, allowing seamless integration and collaboration across diverse digital environments. This approach aligns with our experience with DSGO, which complies with the Digital Europe Programme and the EU Data Governance Act. DSGO offers a solution to the challenges of data sharing, digitalization, and sustainability, where collaboration is grounded in mutual trust and clear agreements.



Vergadering Digiteam 28 maart 2024

By establishing a federated framework for DPP, we create a data space that ensures data reliability while fostering innovation and competition. Service providers can participate in this system as long as they adhere to the established rules and standards. This approach prevents fragmentation and ensures a well-functioning market, where service providers compete based on quality and price, rather than exclusive data agreements.

Open and level playing field for producers

It is essential that the regulations surrounding DPP service providers do not become a barrier for producers to provide this data themselves. Independent DPP service providers are also a valuable solution to ensure the continuity and preservation of historical data. This option should be made available to all producers as an independent service, not bundled with other mandatory services.

Furthermore, we believe that producers should be empowered to generate and manage DPPs independently, without mandatory reliance on external service providers. This supports an open and level playing field, where producers have the freedom to choose and directly manage their product information. Enabling producers to independently manage their DPPs not only promotes responsibility for sustainability and circularity but also prevents over-dependence on a limited number of service providers, which could lead to monopolistic practices.

Our experience demonstrates that a framework that allows producers to operate either independently or through third parties creates the most competitive and open market conditions. This approach mirrors the principles outlined in the *Data Governance Act*, which provides space for both data intermediaries and individual actors to securely share data with clearly defined rules and responsibilities.

Security, reliability, and access

Data security and reliability are central values in DSGO, and these principles must also form the cornerstone of the DPP framework. Trust in DPPs is directly tied to the security and reliability of the data shared by producers and service providers. A transparent trust framework, with clear requirements regarding access, data storage, and data processing, is crucial to ensuring both end-user trust and broader industry acceptance.



Vergadering Digiteam 28 maart 2024

DPP not as a separate data space

A data space holds greater value when participants can exchange data across multiple use cases. For instance, producers may exchange product data with resellers, process orders, or handle other transactional data. Expanding the scope of the DPP framework to accommodate these types of data exchange will enhance its utility and foster greater collaboration.

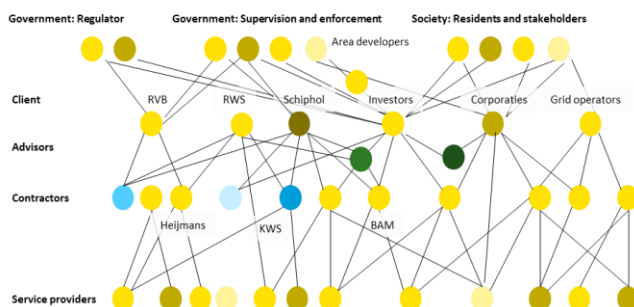
Conclusion

We support the European Commission's initiative to develop a robust and sustainable regulation for the Digital Product Passport. We recommend adopting a federated, agreement-based approach that allows both service providers and producers to participate. Such an approach will not only guarantee an innovative market but also facilitate an inclusive digital transition, in line with the objectives of Digital Europe.

We hope that our insights will be taken into consideration during the further development of this framework. We are also open to further discussions to explore these ideas and collaborate on potential solutions for a sustainable, fair, and open digital ecosystem for all stakeholders.

Without data space

In the chain many different 'languages' and point solutions in data sharing between all kinds of parties - Every time again!



With data space

Through standards and agreements system (with substantive, organizational, financial, legal and technical agreements) data exchange from the source: Sharing data in one language based on trust

