

# Digital Product Passport (DPP) Compliance GAP Report

**Prepared for:** Hans Wurst, Hans Wurst Test Ltd  
**Industry:** Textiles & Apparel

**Date of Assessment:** 17/12/2025

**Current Readiness Score:** 69%

## I. Executive Summary

This report evaluates the current readiness of **Hans Wurst Test Ltd** against the mandatory European Union Digital Product Passport (DPP) requirements established under the **Ecodesign for Sustainable Products Regulation (ESPR)**. With a target implementation timeline of **Q2 2026**, your organization is strategically ahead of the **2027 mandatory textile deadline**.

While your current readiness score is a strong **69%**, significant technical and regulatory gaps remain—specifically regarding global identification standards and long-term data persistence—that must be addressed to secure your access to primary markets in **Germany, Poland, and Spain**.

## II. Technical Gap Analysis

The table below details the current status of key compliance requirements and the identified gaps.

Compliance Requirement	Current Status (Hans Wurst Test Ltd)	Regulatory Requirement (EU ESPR)	GAP Status
Unique Identification	Internal SKU System Only	Mandatory adherence to <b>ISO/IEC 15459:2015</b> .	<b>CRITICAL</b>
Data Longevity	Standard Cloud System	Data must persist for product life + 10 years.	<b>MAJOR</b>
Material Transparency	51-80% Data Available	100% composition & "Substances of Concern".	<b>MODERATE</b>

Compliance Requirement	Current Status (Hans Wurst Test Ltd)	Regulatory Requirement (EU ESPR)	GAP Status
Environmental Metrics	Partial Carbon Footprint	Mandatory Global Warming Potential (\$GWP\$).	<b>MODERATE</b>
3rd-Party Hosting	Not established	Mandatory independent hosting for insolvency.	<b>MAJOR</b>

## 2.1. Identification & Interoperability

Your current reliance on internal SKUs is sufficient for internal logistics but fails the EU requirement for a **Unique Product Identifier (UPI)**. To comply, your 190,000 SKUs must be mapped to a serialization logic that follows **ISO 15459**. This ensures that the QR codes you intend to print on labels are machine-readable and verifiable by EU customs and market surveillance authorities.

## 2.2. Environmental Performance Data

You have indicated that carbon footprint data is only calculated for "some" products. Under the ESPR, \$GWP\$ is a mandatory metric for all textile products. Additionally, your material data availability (51-80%) must reach 100% to meet circularity requirements, specifically regarding recyclability and disassembly instructions.

## III. Strategic Recommendations

Based on your production volume of **5,000,000 units** and your total SKU count of **190,000**, the **DPP-Link PRO Plan** is recommended to manage the high level of automation and data complexity required.

### 3.1. Implementation Roadmap (High Priority - Q2 2026)

- Data Mapping (Month 1):** Transitioning your internal SKUs into a compliant UPI structure using our custom AWS Lambda microservices to enforce GS1/ISO serialization.
- Infrastructure Migration (Month 2):** Moving your existing cloud data into our secure, AWS-backed core to guarantee the mandatory **10-year persistence** and independent hosting required for EU compliance.
- QR Integration (Month 3):** Since you confirmed QR printing onto labels is possible, we will provide the unique URL/UPI strings for your existing printing workflows to avoid manufacturing disruptions.

## IV. Proposed Compliance Investment

The following table outlines the investment required for the recommended **DPP-Link PRO Plan**.

Tier	One-Time Setup Fee	Monthly Subscription	Included Services
<b>PRO Plan</b>	<b>£3,999 (Fixed)</b>	<b>£319/mo</b>	Data automation, GenAI assistance, and deep mapping for 190,000 SKUs.

**Total Year 1 Investment:** £7,827 (Excluding over-usage fees of £0.60 per DPP after included units).

## V. Next Steps

To meet your **Q2 2026** launch target, we recommend finalizing the **Statement of Work (SOW)** by January 2026. This will allow for the recovery of specialized labor required for your complex data mapping and ensure your primary market access in the EU remains uninterrupted.

Please review the attached SOW document, [D File](#), to start the process. We can schedule a kickoff meeting to discuss the next steps here: [Calendar event](#).

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