

The Digital Product Passport already pays for itself

Why fashion brands should not wait until 2029 to capture and publish product passports, and what that means in euros.

- **Subject:** the economics and marketing value of Digital Product Passports before the EU obligation takes effect
- **Written for:** management, marketing, product management, purchasing, sustainability and IT in clothing and textile companies
- **Contains:** a model calculation with disclosed assumptions, a data map, a phase model, a 90-day plan
- **As at:** September 2026
- **Excel calculator:** available, so you can enter your own data and produce your own figures
- **Note:** an illustrative calculation for orientation. Not legal, tax or investment advice.

Figure	Value
Physical labelling per item today	0.50 €
Physical labelling per item with a passport	0.20 €
Saving per year	110'790 €

A model calculation for a brand selling 250'000 items a year. Every assumption is disclosed in chapter 3 and in the appendix, and can be replaced with your own figures.

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Why you should not wait

I have been building companies for more than fifty-seven years, part of that time in the textile and fashion trade. As a textile engineer, long ago though that was, and with a good deal of other entrepreneurial experience, I know where good money goes on specifying materials and agreeing care labelling. So I write this paper as a passionate entrepreneur, and as someone who knows what a satin tape with a four-layer care label does to a costing.

The situation is well known. In its DG GROW presentation of 27 May 2026, the European Commission announced the delegated act for textiles for the third or fourth quarter of 2027, and mandatory application of the product passport for 2029. I know the usual responses from many conversations: wait, watch, put it back on the agenda in two years.

I consider that a mistake, and not a small one.

The benefit and the economics of the product passport do not hang on the obligation. They hang on the fact that you hold product data which you print expensively onto textile today, translate at great effort, scrap in leftover stock, and which nobody reads because the type is too small. Those costs fall due every day you wait. And that says nothing yet about the marketing side.

What I want to show you in this paper

First: the data is already there. Material composition, yarn counts, fabric types, care instructions, place of manufacture, size, colour, styling recommendations all sit in your PIM, in the ERP, in the tech packs, in the certificate folders. In my experience, around three quarters of a genuinely useful fashion passport can already be filled from data you hold. You do not have to invent anything. You have to bring it together in one place.

Second: this costs you real money today. In the model calculation in chapter 3 I arrive at 0.50 € per garment for labels, hang tags, inserts and the work of attaching them. Of that, 0.30 € is realistically saveable, which at 250'000 items a year is 75'000 €, every year. Add translation costs, the scrapping of leftover label stock, relabelling and a very cautious reduction in returns, and 110'790 € a year is on the page. That is 0.44 € per item sold. It is a model calculation. You hold the real figures, and they will look much like these.

Third, and this matters most to me: the QR code on the garment is the only channel that truly reaches every one of your customers. Not only the newsletter subscribers. Not only the online buyers. Also the woman who bought your dress in a multi-brand store in Antwerp and of whom you know nothing to this day. In my example that is 150'000 items a year disappearing into the market without a trace. At larger brands it is millions.

Fourth: uploading to the EU registry will be a formality when the time comes. The registry has been operating since 20 July 2026, and it stores identifiers and metadata; the passports themselves it does not store, which is often misunderstood. The actual data stays with the economic operator or their service provider. Transpareo fully meets the harmonised standards cited in the Official Journal on 15 July 2026 by Implementing Decision (EU) 2026/1736. When the obligation takes effect, this is a matter of minutes for you. Transpareo handles it automatically on your behalf.

The calculation on one page

The model company: a clothing brand, 250'000 items sold a year, around 1'200 article-colour combinations, distribution across nine EU language areas, 40 per cent direct online sales. Every assumption is disclosed and can be replaced with your own figures.

Benefit	Effect p.a.	Type
Labels, hang tags, inserts, making-up	75'000 €	cost saving
Translation, relabelling, scrapping, service	24'790 €	cost saving
Returns, counting one percentage point only	11'000 €	cost saving
Subtotal cost saving	110'790 €	0.44 € per item
Year 1 outlay (platform, data capture, QR integration)	-25'000 to -40'000 €	investment
Net effect in the first year	+71'000 to +86'000 €	
Cross-selling contribution via the passport	26'325 €	additional margin
7'500 leads, 4'500 of them previously anonymous in-store customers	45'000 €	media equivalent

The derivation is in chapters 3 and 4. Media equivalent means the spend you would have needed to buy the same number of qualified leads through paid channels. It is not a cash inflow, and it is therefore reported separately.

What convinced me most

Honestly, not the saving on labels. That is welcome, but it only funds the exercise. Something else convinced me.

Products are the heart of every company. Yet in almost every house I know, the data about those very products sits scattered: part in the ERP, part in spreadsheets held by individual employees, part in PDFs

from suppliers, part in the heads of two people who will retire at some point. The passport obligation forces you to bring it together. This is the occasion many companies have waited years for without ever getting it.

And once that data sits structured in one place, something opens up that was simply not possible before: you can play it back at any time, in whole or in part, to train your own AI models, for agentic applications, for purchasing and production planning, for research and development. All without publishing a single passport. More on that in section 5.3.

My advice, in one sentence: start with the data you have anyway and can reach without asking anyone. Publish your first passports with it. Build the data up from collection to collection. By the time the obligation arrives you will be two to three years ahead, and the changeover will have paid for itself several times over.

1) The situation: the obligation is expected in 2029, the benefit is immediate

The Ecodesign Regulation (EU) 2024/1781 has been in force since July 2024. 2026 was the year the infrastructure went live: eight CEN/CENELEC standards appeared in May, six of them were cited as harmonised in the Official Journal on 15 July through Implementing Decision (EU) 2026/1736, and the content of the two outstanding ones is known. The EU registry for product passports started operating on 20 July. What is still missing are the product-group delegated acts.

1.1) The timetable as the Commission itself states it

Date	Event	What it means for you
since July 2026	harmonised standards cited, EU registry operating	The technical architecture is settled. Anyone setting up now builds on firm ground.
February 2027	first obligation for certain battery groups under Regulation (EU) 2023/1542	The precedent. From here the passport is a market reality.
Q3/Q4 2027	delegated act for textiles expected (DG GROW, 27.05.2026)	Only then will you know the final list of mandatory fields. The substance is already settled.
expected 2029	mandatory application for textiles and clothing	From here the passport is a condition of market access. No passport, no sale in the EU.
today until then	two to three years	That is your head-start window. It is closing, and for everyone at once.

1.2) The data opportunity behind the obligation

I would like to put forward a thought here that is almost entirely lost in the debate.

The passport obligation is discussed as a regulatory burden. Turn it around for a moment. No company I have seen in five decades has voluntarily set up a project titled *"We are bringing all the data about our products together in one place"*. The requirements have also moved on over time. There was always something more urgent. The data stayed scattered: material details in purchasing, care instructions in quality management, certificates in the compliance folder, size charts in the tech pack, styling recommendations in marketing, supplier addresses in accounting.

Products are the heart of every company. Yet their data is the worst-organised holding most houses own, because it sits in many places. The passport is the first external occasion in a long while strong enough to change that, and one that rewards the work at the same time, because the result yields immediate commercial and marketing value.

Structured product data held centrally supports analyses and measures that were simply unthinkable before, because nobody could see the data in one view. Which yarn quality produces the fewest complaints across three seasons? Which dye house delivers the most stable colour values? Which material combination correlates with which return rate. Questions of that kind are not answered with five spreadsheets from four departments.

1.3) What waiting costs

Aspect	Starting today	Starting only in 2028/2029
Data capture	step by step in the rhythm of the collections, out of day-to-day operations	a project under deadline pressure; outside help will be scarce and expensive in 2028, because everyone starts at once
Suppliers	data delivery is negotiated into the framework contracts over several order seasons	renegotiating with every supplier at once, without time and without leverage
Label costs	fall from the next collection onwards	continue unchanged, around 225'000 € over three years in the model case
Marketing	works from the first published collection	falls away entirely until the obligation
QR integration	done as part of the label change that is due anyway, marginal cost near zero	a separate exercise, possibly relabelling stock
Competition	a head start on content, customer data and data quality	parity. An obligation everyone meets is no longer an argument

The last point matters to me. From the moment the passport is mandatory, everyone has one. It becomes a hygiene factor that everybody has. The head start exists solely in the window that is open right now.

2) What data you already have

Before you think about systems, take stock. The tables below show what clothing companies typically hold already, usually spread across PIM, ERP, tech packs, lab reports, certificate folders, supplier specifications and the webshop. Much of it already has to go onto the product in printed form.

I recommend taking these tables as a working template and noting in a third column who maintains each field. That question is harder to answer in the end than the question of where the field sits.

2.1) Product identification and basic attributes

Data field	Typical source	On the product today?
Article and style number, colour code, SKU	ERP / PIM	hang tag, label
GTIN / EAN, serial or batch number	ERP / master data	hang tag barcode
Collection, season, delivery window	collection planning	no
Product name, short description	PIM / webshop	partly
Size and sizing system (DE/FR/UK/US/IT)	ERP / size grid	size label
Colour, colour name, colour number, dye lot	ERP / supplier specification	label
Fit and cut (regular, slim, oversized)	tech pack / webshop	no
Size chart per size (chest, waist, length, sleeve)	tech pack / sample record	no
Model measurements ("the model is 1.78 m and wears size M")	shoot record	no
Product weight	shipping master data	no

2.2) Material, yarns and qualities

Data field	Typical source	On the product today?
Fibre composition in per cent per component	supplier specification / lab	mandatory label
Yarn count (Nm, Ne, dtex), twist, yarn type	tech pack / weaving mill	no
Woven or knitted structure (jersey, twill, interlock, poplin)	tech pack	no
Fabric weight in g/m ² , thread count	material data sheet	no
Finish (mercerised, sanforised, water-repellent)	supplier specification	partly hang tag
Lining, interlining, wadding, filling	bill of materials	label
Trims: buttons, zips, cords, appliqués	bill of materials	no
Recycled content, share of bio-based fibres	supplier declaration	partly hang tag
Fibre origin (cotton origin, for instance)	supply chain documentation	rarely
Dye and chemical classes, RSL conformity	test report / lab	no
Shrinkage, rub fastness, pilling grade, light fastness	test report	no

2.3) Care, wear, repair

Data field	Typical source	On the product today?
Care symbols to GINETEX / ISO 3758	care labelling	mandatory label
Plain-text care instructions, multilingual	quality management	label / insert
Detailed washing advice (detergent, load, mesh bag)	quality management	rarely
Drying, ironing and cleaning instructions	care labelling	label
Notes on colour bleeding, pilling, shrinkage behaviour	test report	partly
Wearing advice, occasion, seasonality	marketing / webshop	no
Dressing and tying instructions (wrap dress, tie, scarf)	marketing / video	no
Repair notes, patching and darning instructions	quality management	no
Spare parts: spare button, spare yarn, zip puller	bill of materials / service	enclosed

Data field	Typical source	On the product today?
Warranty and complaint conditions	legal / terms	rarely

2.4) Origin, manufacture and supply chain

Data field	Typical source	On the product today?
Country of manufacture ("Made in ...")	proof of origin / customs	mandatory statement
Making-up facility, factory address (tier 1)	purchasing / audit reports	no
Weaving, knitting, dyeing and finishing mills (tier 2/3)	supplier mapping	no
Social and environmental audits of the factory	compliance / amfori BSCI, SA8000	no
Manufacturer identity and EU contact address (GPSR)	legal	mandatory statement
Importer and party placing on the market	customs / master data	partly
Production date and production batch	ERP / order data	rarely

2.5) Certificates, conformity, sustainability

Data field	Typical source	On the product today?
OEKO-TEX STANDARD 100, certificate number and validity	certificate folder	hang tag
GOTS, OCS, GRS, RCS with transaction certificates	certificate folder	hang tag
RWS, RDS, Leather Working Group, bluesign, C2C	certificate folder	hang tag
REACH and POP declarations of conformity	compliance	no
Safety standards (EN 14682 on cords in childrenswear, for instance)	quality management	no
Warnings (flammability, small parts, allergens)	quality management	label
CO ₂ e, water or energy figures, where measured	sustainability report / LCA	no

Data field	Typical source	On the product today?
Take-back, recycling and disposal instructions	sustainability / take-back	rarely
The brand's second-hand and resale programme	marketing	no

2.6) Commercial information, the underrated part

This category is entirely irrelevant to regulation. Commercially it is the most valuable. It already exists in full in your house, in the webshop, in the lookbook, in the marketing calendar, and it is not played out on the physical product at all today, because a hang tag has no room for it.

Information	Held as
Styling recommendations: matching tops, trousers, shoes, accessories	lookbook, styling guide, shop recommendation logic
The complete outfit from the campaign shoot	shoot record, campaign assets
Product videos, 360-degree views, detail shots	media library
Brand story, designer statement, collection theme	collection briefing, PR material
Other colours and sizes available in the same model	PIM / shop
Reorder and repurchase link, wish list	shop system
Store finder, opening hours, styling appointment	retail master data
Events: store events, sample sales, repair cafés, shows	marketing calendar
Loyalty programme, newsletter, community access	CRM
Customer reviews and user-generated content	shop / social media

If you are wondering where to begin: with this table. It is the only one for which you have to write to no supplier at all.

3) What the changeover is worth

Now to the core question: what can be saved when the classic information carriers fall away and essentially only a QR code remains on the garment? I have built the calculation deliberately conservatively and so that you can follow every step, so that you can put your own purchasing terms in. Every figure in the tables below is either a disclosed assumption or follows from the rows above it.

3.1) The model company

Parameter	Assumption
Annual sales	250'000 garments
Range	around 350 models, around 1'200 article-colour combinations
Collections	2 main collections plus 2 drops a year
Markets	DACH plus six further EU countries, nine languages on the care label
Distribution	60 % bricks and mortar (own retail and wholesale), 40 % D2C online
Online orders	around 100'000 order lines a year
Basket	65 € net, contribution margin 45 %

If your house works with six, eight or twelve drops a year, and many brands now do, then all the figures below improve considerably, because label runs are smaller, scrapping rates higher and translation cycles more frequent. The model calculation is therefore the unfavourable case. See section 3.9.

3.2) Physical labelling today

Covered here are material, print, finishing and the proportionate labour for attaching. The values reflect usual terms in the mid price segment at medium run lengths.

Item	per item	at 250'000 items
Brand and neck label, woven	0.045 €	11'250 €
Size label	0.010 €	2'500 €
Care and composition label, nine languages, multi-layer	0.065 €	16'250 €
Additional label for origin, certificates, warnings	0.020 €	5'000 €
Main hang tag, two-sided, finished	0.110 €	27'500 €
Second hang tag: sustainability and brand story	0.060 €	15'000 €
Cord, seal, security thread	0.030 €	7'500 €
Insert and booklet on care and repair	0.070 €	17'500 €
Making-up and attaching (proportionate labour)	0.090 €	22'500 €
Total today	0.500 €	125'000 €

3.3) Physical labelling with a product passport

Not everything falls away, and I do not claim it does. The woven brand label stays; it is brand-building rather than an information carrier. The size label stays, because otherwise nobody in the store can sort the rail. The care and composition label stays too, but becomes much leaner: symbols, short statements and a QR code on one layer instead of nine language versions in 4-point type on four layers.

Item	per item	at 250'000 items
Brand and neck label, woven (unchanged)	0.045 €	11'250 €
Size label (unchanged)	0.010 €	2'500 €
Reduced care label: symbols, short statements, single layer	0.035 €	8'750 €
QR code, integrated into the existing label print	0.005 €	1'250 €
One lean purchase hang tag with price and QR	0.055 €	13'750 €
Making-up, reduced	0.050 €	12'500 €
Total with a passport	0.200 €	50'000 €

3.4) Three scenarios

Scenario	What falls away	per item	p.a.
Conservative	second hang tag, booklet and additional label go; making-up falls slightly; the QR print is added	0.160 €	40'000 €
Realistic (tables 3.2 against 3.3)	additionally consolidation onto one lean hang tag and a single-layer care label	0.300 €	75'000 €
Ambitious	additionally digital textile labelling permitted: the care label goes, the hang tag becomes a pure price ticket	0.360 €	90'000 €

Conservative working: $0.060 + 0.070 + 0.020 + 0.015$ (making-up) $- 0.005$ (QR) = 0.160 €. Realistic: $0.500 - 0.200 = 0.300$ €. Ambitious: $0.300 + 0.035$ (care label) $+ 0.025$ (hang tag) = 0.360 €.

For everything that follows I apply the realistic scenario throughout: 0.30 € per item, 75'000 € a year.

3.5) What will happen to textile labelling

Care is warranted here, so let me be plain. As matters stand, the Textile Labelling Regulation (EU) No 1007/2011 still requires the fibre composition to be given physically on or in the product. The manufac-

turer details required by the General Product Safety Regulation and safety-relevant warnings cannot currently be replaced by digital means either.

That is precisely why the realistic scenario is calculated the way it is: it substitutes only voluntary information carriers, that is hang tags, inserts, additional labels and multilingualism beyond the mandatory minimum. It works within today's legal framework, without a single rule having to change.

My view on the direction of travel is nonetheless clear: the information required by the Textile Labelling Regulation will very probably have to be captured and shown in the fashion and textile passport anyway. When the same information is required digitally, additional physical labelling is hard to justify on the merits, because it costs label, material, labour and resources without producing any gain in information. A revision of the Textile Labelling Regulation is under discussion in connection with the passport. It has not been decided, which is why the ambitious scenario in section 3.4 is expressly marked as a future option and appears nowhere in the overall calculation.

Anyone already carrying the data in full in the passport has nothing to do when such a change comes, other than order a smaller label. Anyone who is not carrying it starts from the beginning again.

3.6) Indirect process and knock-on costs

The unit price of the label is only the visible part. The process costs around it are higher than the material itself in many houses, and they appear in no single cost centre. That, incidentally, is why this saving is regularly underestimated in controlling.

Cost block	today p.a.	reduction	saving
Translation, proofreading and layout of label texts (9 languages, 4 collection waves)	14'000 €	70 %	9'800 €
Reprints and relabelling after text errors or range changes (3'500 items x 0.90 €)	3'150 €	80 %	2'520 €
Scrapping leftover label and hang tag stock at collection changes (8 % of the label budget)	10'000 €	60 %	6'000 €
Storage, picking and handling of label variants	6'000 €	50 %	3'000 €
Packaging and paper licence fees (EPR, around 4 g of board per item)	400 €	80 %	320 €
Customer service enquiries about care, size and material (3'000 tickets x 3.50 €)	10'500 €	30 %	3'150 €
Total	44'050 €		24'790 €

The point I consider most important: changeability. A printed label is final. If a care instruction is corrected afterwards, if a certificate expires, if a styling recommendation becomes pointless because the partner article has sold out, print cannot be rescued. A passport can be updated centrally at any time, for all the goods in the market, including items sold two years ago. That difference is qualitative, and therefore hard to write into the table above. Anyone who has ever organised a recall over a wrong care symbol knows what I mean.

3.7) Returns, the single biggest lever

Returns are the dominant cost block in online fashion. A considerable share of them comes down to differences in fit and expectation, and to uncertainty about material and care. That is exactly where the passport works: complete size charts per size, material behaviour, shrinkage values, wearing properties, model measurements, videos. Before the purchase, by scanning in the store, and after it, at home.

Parameter	Value	Effect
Online orders p.a.	100'000	
Return rate today	42 %	42'000 returns
Full cost per return (freight, inspection, refurbishment, loss of value)	11.00 €	462'000 €
Reduction of 1.0 percentage point	-1'000 returns	11'000 €
Reduction of 2.0 percentage points	-2'000 returns	22'000 €
Reduction of 3.0 percentage points	-3'000 returns	33'000 €

In the overall calculation I deliberately apply a single percentage point. Even that very cautious assumption brings 11'000 € a year. Every further percentage point brings the same sum again. This is by far the lever with the greatest upside, and it should be measured deliberately during the pilot. More on that in section 5.4.

3.8) The overall calculation, platform costs included

Item	p.a.	per item
Labels and making-up (realistic scenario)	75'000 €	0.300 €
Indirect process, translation and service costs	24'790 €	0.099 €
Reduction in returns (1 percentage point, conservative)	11'000 €	0.044 €
Gross saving	110'790 €	0.443 €
Year 1 outlay: platform, data capture, QR integration, internal time	-25'000 to -40'000 €	

Item	p.a.	per item
Net effect year 1	+71'000 to +86'000 €	
Outlay from year 2: platform and ongoing maintenance	-18'000 to -25'000 €	
Net effect from year 2	+86'000 to +93'000 €	

On platform costs, transparently. Transpareo is priced by the number of published product passports, can be cancelled monthly, and the data can be exported in full at any time. So there is no lock-in to us, which I consider a matter of course that is sadly not one in this market.

Tariff	Product passports	CHF / month	EUR / month
Small, for pilot and entry	up to 100	139	approx. 153
Medium	up to 1'000	559	approx. 629
Large, the model case at 1'200 SKUs	up to 10'000	1'399	approx. 1'539
Unlimited	unlimited	3'499	approx. 3'849

Prices as at August 2026, with the current beta discount, including AI translation into 40 languages, your own domain, branding, GS1 Digital Link, lead generation, analytics, the REST API, and import and export. Current terms and running offers are on transpareo.com.

For getting started that means the pilot with twenty to thirty models costs you 139 to 199 CHF a month. Against every other line in this paper that is a rounding difference, so there is simply no financial argument for not beginning at once. Only with the rollout across the whole range does the tariff scale up. In the model case with around 1'200 article-colour combinations that is the Large tariff at around 18'500 € a year, and it is contained in the outlay ranges above. Measured against 110'790 € of saving, that is about 17 per cent.

3.9) If you run more than two collections a year

Many brands now renew and extend their offer permanently. For the calculation that is a multiplier, and it works in both directions of the argument.

Cost block	2 collections plus 2 drops	8 to 12 drops a year
Label runs	medium runs, good volume pricing	smaller runs, worse volume pricing, the unit price rises
Translation and layout	4 cycles a year	8 to 12 cycles, the 14'000 € easily double

Cost block	2 collections plus 2 drops	8 to 12 drops a year
Scrapping leftover stock	8 % of the label budget	12 to 18 % in experience, because changes are more frequent
Minimum order quantities	rarely binding	regularly binding, causing systematic over-ordering
Time to market	plannable	label lead time becomes the bottleneck for the drop

The last point is often overlooked and is in truth the sharpest: when a drop has to wait for delivery of the care label, that costs selling days. A passport is updated in minutes. I recommend that every house with a high drop frequency repeat the model calculation with its own figures. The result is generally a good deal better than the one shown here.

4) What the passport does for marketing

The cost saving funds the exercise. The real strategic value lies elsewhere: the passport turns a mandatory label into a permanent, brand-owned channel on the product.

4.1) The only contact point with full reach

Every other channel reaches a segment. The newsletter reaches subscribers. Social media reaches followers and paid reach. The shop reaches online buyers. The QR code hangs on every single item sold.

Attribute	Classic channels	Passport on the product
Reach	a segment of buyers	every item sold
In-store customers	generally anonymous	addressable for the first time
Media cost	ongoing, per contact	none, the carrier is the product
Contact duration	the campaign period	the whole life of the garment, often years
Trigger	the brand	the customer, with attention to match
Second owner	unreachable	becomes a new contact on resale

The second row is the one I discuss most often with fashion entrepreneurs. In the model case, 60 per cent of the goods cross the counter in store. That is 150'000 items a year going to people you know nothing about and will never be in contact with again. The passport breaks through that without a till system integration, without a loyalty card, and without the retail partner having to do anything.

4.2) Combinations and cross-selling

The pointer to garments that go together is expected service information in the passport. Someone scanning the code on the skirt they have just bought is in exactly the situation where a recommendation for the matching blouse helps rather than intrudes. That is the difference from any retargeting ad served three days later.

- The complete look from the campaign shoot, directly orderable
- Matching accessories: belt, scarf, bag, shoes
- Other colours and sizes in the same model
- Repurchase of the same article, a badly underrated revenue driver for favourite pieces
- Seasonal extension: the matching knitted coat in autumn for the summer dress
- Care products: wool detergent, fabric shaver, waterproofing spray, spare buttons

Cross-selling, the working	Assumption	Result
QR codes in the market p.a.	250'000	
Scan rate with a visible promise of benefit	12 %	30'000 scans
Conversion on a styling recommendation	3 %	900 orders
Basket value	65 €	58'500 € revenue
Contribution margin	45 %	26'325 € contribution

Scan rates for consumer goods typically run between 5 and 15 per cent. They rise considerably when the label states a concrete benefit: *"care tips, matching styles and your extended warranty"* instead of a bare code. That sentence costs nothing and is the single most effective measure I know.

4.3) Events, community, brand experience

The passport is editorially free and can be updated at any time without the QR code changing. That turns every garment in the market into a distribution channel for current occasions, even years after the sale.

- Invitations to store events, sample sales, collection premieres, trunk shows
- Appointment booking for personal styling advice at the nearest store
- Repair cafés and repair services, strong evidence of sustainability with high repeat-contact value
- Regional targeting: only customers near a store see its dates
- Early access windows and community formats for registered wearers

4.4) The lead generator

With the Transpareo lead generator you build any number of questionnaires yourself, without an agency, and link them to the passport. One technical detail decides the effect: the questionnaire opens automatically after the QR code is scanned. The customer has nothing to look for and nothing to click. Anyone who has tried to move people to a form via one extra click knows what that difference does to the participation rate.

The mechanism itself is old and it works: the customer gets a concrete benefit and gives information and a consent in return.

Benefit for the customer	What the questionnaire asks	Value to you
Extended warranty on product registration	date of purchase, place of purchase, contact details	first contact and sell-through transparency in wholesale
Personal styling guide for the item bought	style preferences, occasions, sizes	segmentation for campaigns and range planning
A benefit or gift on the next purchase	email, newsletter consent	an opted-in lead with no media cost
Early access to the new collection	favourite categories, price sensitivity	demand signals ahead of the order
Entry to a prize draw or community event	region, store preference	location-based activation
Fit feedback with a size recommendation for next time	body measurements, verdict on fit	a direct basis for reducing returns
Free repair check	length of use, points of wear	quality data from the field for product development

The last row closes a loop that is almost never closed in fashion. Feedback on fit and durability normally reaches product development only through return reasons and complaints, which is to say distorted, negatively selected and late. Through the passport it comes from satisfied wearers after months of real use. As a textile engineer I would have wished for this source of data.

Lead generation, the working	Assumption	Result
Scans p.a. (12 % of 250'000)	30'000	
Participation in the automatically opened questionnaire	25 %	7'500 leads
Of those from bricks and mortar, previously anonymous	60 %	4'500 new contacts
Benchmark lead cost in fashion	6 € per lead	45'000 € media equivalent

The media equivalent is not a cash inflow and is therefore reported separately in the overall calculation. Qualitatively the difference is greater still than the amount: a passport lead comes from a verified buyer with a known product relationship.

4.5) Brand and counterfeit protection

This subject is discussed surprisingly little in connection with the passport, although it is probably the single strongest benefit for premium and luxury brands, and it is available immediately.

A passport that points through a unique identifier at a versioned, cryptographically signed data record maintained by the brand is proof of provenance. The buyer can check in the browser whether the item is genuine, where it comes from and when it was placed on the market. A counterfeiter can copy the QR code, but cannot produce a valid entry in your data holdings and cannot produce a valid signature.

Used for:

- Proof of provenance for high-value garments, bags, watches and luxury goods
- A means of checking for customs and market surveillance without asking the manufacturer
- Confidence on the second-hand market, where authenticity is the central obstacle to purchase
- Serial numbers per individual item rather than per article, where that is worthwhile
- Where it is organisationally possible, the responsible management of the sales shop can, with a permission in the Application Manager, enter the buyer's name and further details of the purchase and preserve them in the passport

I fully expect NFC and RFID methods to establish themselves here over the coming years, using the same identifier that sits in the QR code. A chip in the hem carrying the same identifier is considerably harder to fake than a printed square. NFT-based proof of ownership will use this identifier as its anchor too. What matters is this: anyone building a clean, unique identifier per product today, with a Digital Product Passport, is already prepared for all of these methods.

4.6) Second-hand market and value retention

The second-hand market for fashion is growing faster than the primary market. The passport works there in three ways:

- **Value retention.** A garment with an unbroken, digitally held history of material, origin and care achieves higher resale prices than one with an illegible label. That feeds through to willingness to pay when new.
- **Authenticity.** See section 4.5 on counterfeit protection. On the second-hand market this is the decisive argument for purchase.
- **A new contact with no acquisition cost.** The second owner scans and arrives at you. A second-hand purchase you earn nothing from turns into a lead and potentially a new customer.

4.7) Multilingualism and accessibility

A care label with nine languages in 4-point type on four layers of satin tape is effectively unreadable for a considerable part of the population. It affects every customer over sixty, everyone with impaired sight and everyone who can no longer make out the label after the third wash.

A passport is optimised for the screen, can be read aloud by a screen reader, enlarged at will and shown at high contrast. That pays directly into the requirements of the European Accessibility Act.

On the language question, surface area stops mattering. Transpareo translates all database information into every European language at no additional cost, as well as into Bengali, Chinese, Hindi, Indonesian, Japanese, Korean and Vietnamese, 40 languages in all, among them all 24 official EU languages. In the Application Manager every user chooses their own working language. On the passport page the browser's language appears automatically, with nothing for the customer to set.

For you that means two things. An additional market costs not one more millimetre of label width and no translation invoice. And the languages in the supply chain are covered too: the sewing factory in Bangladesh, the supplier in Vietnam and the partner in China read your specifications in their own language. In practice that is worth at least as much as the customer side.

5) What your organisation gains

The benefit hardest to put a number on, and the most important in the long run, lies in the organisation itself. A product passport is a data product, and that presupposes clear responsibilities, consolidated sources and suppliers who are part of the process. None of that can be produced at short notice. Data quality cannot be bought, it has to be earned.

5.1) Starting simply, with what is within reach

The most common reason passport projects never start is the idea that everything has to be in place first. That is wrong and paralysing. Start with the data that exists and is accessible without having to ask anyone, in case of doubt with section 2.6, for which you have to write to nobody. Publish with it. And build the holding up afterwards from collection to collection.

For the customer, a passport with care instructions, material details, a size chart and styling recommendations is already valuable today. They do not expect complete tier-3 supply chain data, and it will not be the first thing they look at in 2029 either.

Phase	Period	Content	Result
1 Get going	month 1–2 or sooner	Establish the cost base. Choose a pilot range of 20 to 30 models. Capture only data available internally: marketing, material, care and size data. Small tariff, 139 to 199 CHF a month.	first complete records without a single supplier contact
2 Publish	month 3–5 or earlier	Design the layout and the promise of benefit. Integrate the QR into the label print. Set up the first questionnaire. Go live.	passports in the market, first scans, first leads, first measurements
3 Scale	month 6–12 or earlier	Roll out across the whole collection. Put the Excel and ERP connections into production. Reduce the label. Establish the metrics.	full cost saving in effect, reliable conversion data
4 Deepen	year 2 to 2028	Add tier 2/3 supplier data. Build out the environmental, repair and recycling fields. Write data delivery into framework contracts. Establish data quality routines.	broad readiness long before the obligation
5 Register	from 2029	Map onto the final data model of the delegated act, register in the EU registry.	compliance with no project and no deadline pressure

Note that phases 1 and 2 together take five months at most and require nothing you do not hold yourself. That is the point at which most reservations evaporate.

5.2) Data import and integration, and why direction matters

Transpareo reads any number of Excel files; the importer adapts to your files and not the other way round. A separate PIM is not required, though one can be connected. Beyond that, any number of internal and external databases can be connected, ERP systems included.

One architectural decision governs the connection, which I consider security-relevant and worth examining closely, at every provider you assess:

The data flow is inbound only. The source side authenticates against the Transpareo vendor API and submits a data package. Transpareo never reaches into manufacturer systems and needs no credentials for your ERP. That means there is no route from our platform into your systems. No inbound access, no stored credentials, no open connection that could be compromised. Building push rather than pull rules out a whole class of attack routes from the outset.

When you compare providers, that is one of the first questions I would ask. We have put together a deliberately vendor-neutral basis for it; see section 6.4.

5.3) The data holding as an asset in its own right

Now to the point that interests me most personally and that barely features in the debate.

When your product data sits structured in one place, it belongs to you, and it can be played back at any time, in whole or in part: into your data warehouse, into your analysis tools, into your own systems. At Transpareo through export in CSV, XLSX, JSON-LD and SQL, or through the REST API. And that holds whether or not you publish a single passport. Immediately and repeatedly.

That opens up applications and considerable value that have nothing to do with compliance:

- **AI training on your own data.** A language model that knows all your materials, your quality designations, your fit logic and your supplier structure is something entirely different from a general model. The basis for it is a clean, consistent product data holding, which is exactly what building the passport produces anyway.
- **Agentic applications.** Assistant systems that evaluate collection data, propose material alternatives, check specifications or answer customer enquiries all require structured product data. Without it, every agent idea stays a presentation slide.
- **Purchasing and production planning.** Material requirements across models, colours and sizes, bundling yarn qualities across collections, supplier concentration per material group: all analyses that fail on scattered data and become trivial on consolidated data.
- **Research and development.** Which construction, which fabric weight and which finish lead to which complaint and return behaviour across several seasons? That correlation can only be calculated when material, sales and feedback data sit in the same place.

Let me say this plainly as an entrepreneur: even if the EU scrapped the passport tomorrow, the work on this data holding would have been right and valuable in the long run. The passport is the application. The data is the asset.

5.4) Metrics to measure from day one

Metric	Measure	Purpose
Scan rate	scans per 100 items sold	optimise the promise of benefit on the label
Dwell time and page depth	seconds, clicks	prioritise content, cut ballast
Lead conversion	leads per 100 scans	test the benefit offered
Cross-selling conversion	orders per 100 scans	improve the combination logic
Return rate, scanners against non-scanners	difference in percentage points	the most convincing figure for management
Service enquiries about care and size	tickets per month	evidence of relief for customer service

Metric	Measure	Purpose
Label cost per item	euro per item	make the saving visible in controlling

Please set up the fifth row before going live. The comparison between scanners and non-scanners cannot be reconstructed retrospectively, and it is exactly the figure you will be asked for in the second year. Scan statistics in Transpareo are collected on the server, with no cookies and no trackers. You get the count, the trend over time and the region, without creating a consent problem.

6) From the passport into the EU registry: a formality

The most common objection to starting early is that the final EU data model is not settled, so today's work might be wasted. I understand the objection, but it rests on a misunderstanding of how the registry works.

6.1) What the registry actually does

The EU registry for product passports has been operating since 20 July 2026; Implementing Regulation (EU) 2026/1778 governs access control, user verification, registration and storage requirements. The registry holds unique identifiers and metadata; a data store for the passports themselves it is not. The actual product data stays decentralised with the economic operator or their service provider.

In practice that means what matters is that your passports carry a standards-compliant, resolvable identifier and are recorded in the registry before the product is placed on the EU market. Maintaining the data stays where it is.

Transpareo fully meets the harmonised standards cited in the Official Journal on 15 July 2026 by Implementing Decision (EU) 2026/1736; the two outstanding ones are implemented as well. Transpareo works with GS1 Digital Link and standards-compliant GTIN resolution and is designed for registration in the EU registry. Every version of a passport carries two independent signatures, one from the issuer and one from Transpareo; you can hold the issuer key yourself through your own signing endpoint.

Capture once. Publish today. Register later.

1. **Capture:** move existing product data into the database, structured and field-based. Field-based is the decisive part: running text cannot be mapped, clean fields can.
2. **Publish:** the passport goes live at once. QR on the product, benefit from day one.
3. **Build out:** further fields arrive from collection to collection, at the pace of day-to-day business.
4. **Register:** when the obligation takes effect, the existing record is mapped onto the final model and recorded by Transpareo in the EU registry. No fresh start, no project, no deadline panic.

6.2) The four objections I hear most often

Objection	My answer
"The data model for textiles is not settled yet."	The technical structure is not settled, the substance very much is. Material, origin, care, repair, certificates and recyclability will be in it, and there is no serious doubt about that. Structures can be mapped by machine, provided the content is captured cleanly and field by field. That capture is the real work, and it falls due either way.
"Then we will be doing the work twice."	You maintain the record once, in the database. It is published as a passport at once and registered in addition later. Capture once, output many times.
"We are waiting for the standard."	Six of the eight standards have been cited as harmonised since July 2026, and the registry is running. The standard people were waiting for is largely here. The other two are known and already implemented by Transpareo. And whoever waits on is also waiting on the cost savings, the leads and the learning curve.
"We do not have all the data."	Nobody has. A passport starts with what exists and grows. That will always be so, including after the registry entry. See section 5.1.

6.3) Risks, stated openly

Risk	Assessment	Handling
The final data model differs	medium	Capture field-based rather than as running text. Mapping is possible by machine; recapturing content would not be.
Low scan rates at the start	medium	Formulate the promise of benefit on the label, test and iterate in the pilot before scaling.
Mandatory physical labelling remains	high	Already priced in. The realistic scenario substitutes only voluntary carriers.
Suppliers do not deliver data	medium	Start with internally available data. Write data delivery into framework contracts step by step, while there is still room to negotiate.
Lock-in to one provider	low	Monthly cancellation, full export in four formats, stable passport addresses, an open source renderer. Check this at every provider you consider; our provider checklist sets out the questions worth asking.
Data protection in lead generation	low	Clean opt-in, purpose limitation and a deletion concept from the outset.

6.4) On choosing a provider

I write this paper as the founder of Transpareo, and you should read it accordingly. Which makes the following all the more important to me.

We have published a deliberately vendor-neutral [provider checklist](#) with thirty criteria that genuinely count for a sovereign platform decision: standards conformity, support for GS1 Digital Link, the signing and archiving concept, data sovereignty and exportability, the pricing model and how it scales with the number of SKUs, and the ability to leave. Work through that list before you decide, including and especially if you end up deciding against us. A platform that fails such a review is one you should not take; that goes for us as much as for anyone else.

In addition you will find ongoing specialist articles on the ESPR, standardisation and implementation practice under [Insights & Perspectives](#), and an assessment of the regulation itself in our [ESPR guide](#). The Transpareo Time Machine renderer is open source under GPL v3, so every passport can be verified in the browser independently of us.

7) The first 90 days

To close, a plan you can begin on Monday. It works without a consulting mandate, without a tender and without a budget request.

Period	Task	Result
week 1–2	Establish actual costs: gather label invoices, hang tag orders, translation costs and scrapping lists from the past twelve months	your own figures in place of my model assumptions from chapter 3
week 2–4	Draw a data map: which field sits in which system, who maintains it, how current it is. Use the tables in chapter 2 as a template	clarity about data maturity and about the real gaps
week 3–4	Choose the pilot range: 20 to 30 models with high visibility and good storytelling potential. Free trial, then the Small tariff	a manageable, meaningful pilot
week 4–6	Set up the account, define the field structure, load the pilot data by Excel import	first complete records
week 6–8	Design the layout and the content, add styling recommendations, write the promise of benefit for the label	a passport ready to publish
week 7–9	Agree the QR integration with the label supplier and put it into the next label change that is due anyway	marginal introduction cost near zero

Period	Task	Result
week 8–10	Set up the first questionnaire in the lead generator. Recommended: extended warranty on product registration	lead mechanics live, the questionnaire opens automatically after the scan
week 10–12	Go live with the pilot range, set up the metrics, start measuring, the returns comparison above all	first real scan and conversion data
week 12	Evaluate, update the business case with actual figures, decide on the rollout	a sound basis for the decision

7.1) Three things I want to leave you with

- **Put the benefit on the label.** A bare QR code is barely scanned. *"Digital Product Passport: care tips, matching styles, your extended warranty and much more"* multiplies the scan rate. That sentence costs nothing and decides the entire marketing half of the calculation.
- **Tie the changeover to your next label change.** Anyone who puts the QR integration into a change that is due anyway has practically no changeover cost. Anyone who turns it into a special exercise pays twice.
- **Measure the effect on returns from the beginning.** The comparison of return rates between scanners and non-scanners is the most convincing figure you can put forward in the second year, and the lever with the greatest upside. It cannot be reconstructed retrospectively.

And if you do only one thing after this paper: ask in your house for the label supplier's last invoice and divide the amount by the number of items. That single figure is the beginning of every serious discussion about the passport. At most of the brands I speak to, it is higher than the management had assumed.

Appendix: all assumptions at a glance

Every figure in this paper is either one of the assumptions below or follows arithmetically from them. I have deliberately avoided setting any value anywhere that could not be traced, and where in doubt I have taken the more cautious option.

Assumption	Value	Character
Annual sales	250'000 items	model setting
Article-colour combinations (= number of passports)	1'200	model setting

Assumption	Value	Character
Physical labelling today	0.500 € per item	usual industry terms
Physical labelling with a passport	0.200 € per item	model calculation
Saving applied (realistic scenario)	0.300 € per item	difference between the two
Online orders	100'000 p.a.	corresponds to a 40 % D2C share
Online return rate	42 %	typical for the industry
Full cost per return	11.00 €	typical for the industry
Reduction in returns applied	1.0 percentage point	deliberately conservative
QR scan rate	12 %	average with a clear promise of benefit
Participation rate in the questionnaire	25 % of scans	experience with a benefit offer
Cross-selling conversion per scan	3 %	conservative
Basket value and contribution margin	65 € and 45 %	model setting
Benchmark lead cost (CPL)	6.00 €	fashion range 4 to 12 €
Platform cost at rollout (Large tariff)	approx. 18'500 € p.a.	list price August 2026
Total year 1 introduction outlay	25'000 to 40'000 €	range estimate
Ongoing outlay from year 2	18'000 to 25'000 €	range estimate

All values are illustrative and do not replace a calculation specific to your company. The calculation is built so that you can put your own actual values in place of the assumptions. Statements about how far labelling may permissibly be reduced are not legal advice and must be assessed case by case.

The Excel calculator for this paper, in which you replace every assumption with your own figure, is on [our page about the product passport for textiles](#).

About the author

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If you have changes, additions or other comments on individual lines of the calculation, I would be glad to hear from you. I find these subjects enormously important and am very happy to make time for them.

About Transpareo

Swiss-based Transpareo AG, headquartered in Tech Cluster Zug, provides a self-service portal for creating, managing and publishing Digital Product Passports in 40 languages, for companies of every industry and size. The Transpareo Time Machine front end is open source.

The portal already meets the requirements the EU Ecodesign Regulation places on Digital Product Passports in full, along with the harmonised standards cited on 15 July 2026 by Implementing Decision (EU) 2026/1736. Data can be captured and Digital Product Passports used today.

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