# Toys

## The DPP Project Playbook

**Toy-Model Safety Evidence and Digital Passport Operations**

**From governance and data collection to production activation, rollout, regulatory follow-up and additional business value**

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> Practical implementation guidance. This book is not a legal opinion or compliance certification. Check the specific product scope and current legislation before relying on it.

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## How to use this book

A Digital Product Passport (DPP) programme is not a website project. It is a controlled operating process that starts with product classification and evidence, crosses procurement, engineering, quality, IT and factory operations, and continues after products leave the factory. Publishing a QR destination is often

the simplest step; keeping every identity connected to correct, approved and accessible information is harder.

This handbook is designed for a manufacturer, importer, brand or supply-chain business preparing a practical project. Use it alongside the GoodsTag industry readiness assessment and checklist. Its implementation recommendations are illustrative engineering and management practices. They are **not** assertions that every practice or data field is currently required by EU law.

**Three ways to use the book.** If you completed an assessment, start with your lowest-scoring dimensions and map each gap to the evidence and stage gates in the book. If you opened the guide directly from the GoodsTag resources library, complete the scoping worksheet first and follow the generic implementation plan. If you have several product categories, keep separate applicability matrices and production flows even if you use one platform and governance team.

**What success looks like.** A responsible product owner can identify a marketed product, find the correct evidence and approvals, prove the product-carrier association, show who can access which data, repeat this reliably at industrial scale, and demonstrate a documented way to react when law, products or suppliers change.

# 1. Executive playbook

Regulation (EU) 2025/2509 establishes a DPP for toy models and generally applies from 1 August 2030. A digital passport will help present compliance information, but it cannot substitute for safety design, testing, technical documentation, age warnings or series-production controls. Treat the DPP as the published, governed output of a safety system.

**A practical situation.** A toy importer markets 500 models made at six overseas factories. It introduces model-level digital records, supplier test-evidence SLAs and a packing-line label verification procedure before scaling into registry and customs workflows.

**Management decision:** Fund the minimum legally applicable baseline, a representative end-to-end pilot, and a maintained process. Hold optional commercial features in a separately prioritised backlog. A readiness score is useful to sequence tasks; it is not a legal compliance determination.

## The five decisions to secure first

1. **Scope:** which exact products, roles and dates are covered?
2. **Identity:** what does one digital record represent — a model, batch or physical item?
3. **Evidence:** what data is required, where it comes from, and who approves it?
4. **Industrial execution:** how is the right QR or other permitted carrier associated with the correct product before release?
5. **Continuity:** who owns updates, security, hosting, legal monitoring and supplier responses after go-live?

# 2. Product scope and regulatory status

**Regulatory snapshot — 5 November 2026.** Toy Safety Regulation (EU) 2025/2509, particularly Articles 18–20 and Annex VI, with application from 1 August 2030. Existing toy safety requirements continue during transition. The passport relates to a specific toy model and is linked to a data carrier.

**Applicability triage.** Group toys by model and variants, including age groups, materials, electrical features, intended play and private-label roles. Build a model-level product ID system with clear relationships to colorway/SKU and manufacturing batches; avoid treating a packaging barcode alone as proof of conformity.

### Classification worksheet

| Decision | Ask | Record |
|---|---|---|
| Product class | What exactly is placed on the EU market? | Catalogue / technical definition |
| Market role | Who is manufacturer, importer or distributor? | Entity and obligations |
| Data level | Model, batch or item? | Enacted legal basis or “open” |
| Carrier | Product, label, packaging, accompanying document? | Legal basis + proposed design |
| Release date | Which published application date? | Source + regulatory sign-off |
| Extra products | Do adjacent categories have different obligations? | Separate compliance track |

The scope register should record product exclusions and borderline cases as carefully as included products. Review the matrix on each new product launch or relevant regulatory update. Never derive a mandatory date solely from an EU working-plan year.

## 3. Make DPP delivery a governed business programme

**Start with accountable ownership.** Appoint one executive sponsor (budget, cross-functional decisions), one DPP programme owner (scope and milestones), a regulatory product owner (legal interpretation), a product-data owner (fields and evidence), an IT architect (interfaces and security) and an operations owner (factory or labelling procedures). For outsourced production, name a corresponding partner owner. A governance meeting without named decision rights is not governance.

Use a single decision log. When stakeholders disagree about identifier granularity, whether a field is public, or when to print a label, write down the options, evidence, approver, date and re-review trigger. The legal decision must be approved by competent counsel or compliance leadership; a software vendor should implement it, not silently decide it.

**Suggested working rhythm:** a weekly 30-minute delivery review; a biweekly supplier-data and exception review; a monthly steering meeting for budget and risk decisions; a quarterly legal and business-value review after go-live. Set escalation thresholds (e.g. failed factory reconciliation or critical evidence missing) in advance, rather than improvising under launch pressure.

### Minimum RACI

| Workstream | Accountable | Responsible contributors | Evidence of completion |
|---|---|---|---|
| Regulatory scope | Regulatory leader | Product, legal, sales | Signed applicability matrix |
| Dataset and provenance | Product-data owner | R&D, procurement, quality | Versioned data dictionary |
| Identifiers and carriers | Operations owner | Master data, packaging, IT | Approved ID and label specification |
| System integration | IT owner | ERP/MES/PLM partners | Test and exception report |
| Supplier onboarding | Procurement leader | Regulatory, suppliers | Supplier evidence tracker |
| Release and audit | Quality leader | Regulatory, production | Signed go-live gate |

| Workstream | Accountable | Responsible contributors | Evidence of completion |
|---|---|---|---|
| Regulation monitoring | Regulatory leader | Legal, product owner | Change register and impact decisions |

### Programme charter — fill this before choosing a platform

- **Products and markets:** [which product families, EU operators, countries and release dates]
- **Mandatory baseline:** [which enacted provisions apply now and from what dates]
- **Preparedness backlog:** [anticipated sector rules and optional business-value extensions]
- **Delivery boundary:** [one pilot site/line, one product family, integrations and suppliers]
- **Success condition:** [measurable product-data, carrier, activation and availability gates]
- **Budget envelope and owner:** [approved figure, contingency, who can change it]
- **Excluded scope:** [what this pilot deliberately will not deliver]
- **Decision to proceed:** [names, date, open conditions]

The charter should explicitly state how to handle ambiguous categories, outsourced operations, new product introductions and markets outside the EU. Otherwise the scope expands until the pilot becomes untestable.

## 4. Build the evidence and supplier-data foundation

### Begin with a data dictionary, not a collection campaign

Take a representative product and list the actual information objects that engineering, procurement, quality, production and customers already use. Label every data item **binding requirement**, **conditional requirement**, **future candidate** or **optional business enhancement**. Ask the regulatory owner to validate the labels; they are not interchangeable.

**Sector evidence priorities for a first pilot:**

| Data/evidence object | Proposed system or owner | Validation to plan |
|---|---|---|
| Toy model and product identifier | ERP / PLM / MES / QMS / supplier | Correct model, batch or item applicability |
| Manufacturer, importer and responsible-operator details | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Safety assessment and technical documentation | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Chemical composition/restriction evidence | ERP / PLM / MES / QMS / supplier | Correct model, batch or item applicability |
| Conformity evidence and CE information | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Warnings, age limits and safe-use instructions | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Test reports and applicable standards | ERP / PLM / MES / QMS / supplier | Correct model, batch or item applicability |

| Data/evidence object | Proposed system or owner | Validation to plan |
|---|---|---|
| Production batch/lot association | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Packaging variants and language requirements | Regulatory / engineering / procurement | Approved source, unit, version and access class |
| Safety incident, recall and revision controls | ERP / PLM / MES / QMS / supplier | Correct model, batch or item applicability |

### Supplier onboarding playbook

Gather verifiable test and material declarations from moulders, paints, textiles, electronic modules, batteries and assembly vendors. A supplier certificate must be evaluated against the exact toy model, intended age range and supplied material, not simply filed and forgotten.

Send suppliers a controlled template, an example filled record and a two-way clarification channel. Request documents with a version, product scope, test method and responsible issuer. Set an SLA and fallback for smaller suppliers. Record “not available” and “not applicable” separately; neither should silently become zero. After approval, changes to materials, sites, process or methodology should trigger a refresh of affected records.

### Evidence maturity ladder

| Maturity | What it means | Next action |
|---|---|---|
| 0 — unknown | No owner and no source | Identify product family and owner |
| 1 — manual | Data held in email/PDF/spreadsheet | Version and link to product identity |
| 2 — controlled | Named owner, checks, approval | Standardise taxonomy and updates |
| 3 — integrated | Repeatable imports and validation | Monitor exceptions and supplier SLA |
| 4 — industrialised | Controlled, observable, versioned production | Scale, test recovery and optimise |

## 5. Evidence, approval and publication quality

A record can be complete but wrong. Distinguish **existence**, **validity**, **recency**, **applicability** and **provenance** for every critical field. A declaration dated yesterday is not suitable when it refers to a different formulation, production plant or model. Attach the field to the specific product entity to which the source applies: model, formula revision, material, batch, serial number or facility.

Run an approval workflow with clear states: *draft → supplier or owner review → validated → released → superseded/withdrawn*. The DPP should be published only from released information. Updates should never overwrite the historical basis needed to explain what was presented for a product on a given date. Define who can correct a production incident, what changes require re-approval, and which downstream viewers require notifications.

**Data acceptance tests, not just a spreadsheet review:**

1. Import data with an incorrect unit and confirm it is rejected or normalised explicitly.
2. Change a product formulation, component or relevant supplier and verify that dependent approvals are invalidated.
3. Withdraw supporting evidence and confirm affected product records enter a review queue.
4. Attempt to publish a record without a mandatory applicable field and observe a blocked release.

5. Retrieve a historical product record with its original approval timestamp and evidence.
6. Test that public, authority, supplier and repairer roles see only the information permitted for them.

A **data contract** should declare field names and types, permissible units, data owner, granularity, validation checks, allowed access class, refresh trigger and evidence location. Where legal acts leave details unsettled, classify the field as proposed rather than mandatory; change the label only after regulatory sign-off.

# 6. Design identifiers, physical carriers and production activation

## From approved information to a physical product

At artwork approval, verify that every model and its market packaging maps to the correct passport and warnings. At assembly/packing, check that the sold variant matches the approved safety file; test age-warning changes, new suppliers, accessory substitutions and rework after quality rejection.

**Minimum operational sequence:** `approve product data → reserve/derive identifier → prepare carrier artwork or print job → bind identifier to intended product identity → verify scan and physical association → publish/activate as legally appropriate → reconcile released output → monitor and update`. The precise order of registry submission, publication and physical commissioning must follow the applicable product law and factory design.

Do not define “activation” as automatically required unit-by-unit in a sector where legal passports are model-based. Where each product bears the same lawful model-level identifier, activation may mean an approved product-to-carrier release and line-level artwork/changeover verification rather than serial commissioning. Conversely, an individual battery passport needs reliable item identity and pairing. This distinction changes the cost model, IT interfaces and factory acceptance plan.

## Design for failure — six scenarios

1. **Wrong product:** operator scans a QR belonging to a different model/lot/serial. Hold and correct the unit or batch.
2. **Duplicate ID:** retry or reprint creates a second record or ambiguous pairing. Require uniqueness and idempotent processing.
3. **Supplier change:** source evidence becomes invalid while labels remain available. Invalidate affected release approvals.
4. **Network failure:** MES or publishing service temporarily unavailable. Use an approved store-and-forward and release policy.
5. **Scrap/rework:** a printed carrier is unused, destroyed or moved. Preserve traceable cancellation and authorised reprint.
6. **Later correction:** a post-market fact changes. Apply versioned publication and stakeholder notifications as appropriate.

## Commissioning sign-off

Before production release, the operations, IT, quality and regulatory owners must each sign evidence that the proposed identity, carrier location, durability, readability, system access, exception handling and output counts are acceptable for the actual product and law. Supplier print proofs and a browser-based demonstration are not adequate substitutes for line trials.

# 7. Build a dependable information and integration architecture

Design around a *digital product identity*, not a web page. The identity links the physical product or model to a current, controlled data record. The architecture should separate: (1) source systems and evidence; (2) data standardisation and validation; (3) product identity and genealogy; (4) passport generation and access control; (5) QR/data carrier production and activation; and (6) reporting, monitoring and external interfaces.

Typical sources include ERP for commercial SKUs, PLM/PIM for designs and variants, QMS/LIMS for test evidence, MES/OT for production events, procurement systems for suppliers and manual forms for smaller upstream partners. Avoid assuming that every supplier can implement an API. An authenticated upload and human approval path may be the right initial control, provided it is traceable and scalable.

**Key integration decisions.** Use stable identifiers and versions so repeated import messages do not create duplicates. Make events idempotent: retrying an activation event must not activate a second identifier. Queue and reconcile events during network outages. Maintain an exception inbox and alert ownership. Design bulk export of passport records, identifiers and evidence mappings in a documented format; this reduces operational lock-in risk. Verify retention, data sovereignty, backup, confidentiality and role-based access against applicable law and contract rather than relying on generic vendor marketing.

**Access and integrity.** Not every stakeholder should see every field. Implement a field-level audience map, audit who changed material facts, protect credentials used to write records and ensure published data is attributable to the approved source. Plan for QR redirection and URL continuity if branding, product ownership or service provider changes. The relationship between a data carrier, unique identifier, registry entry and DPP content depends on the applicable sector rules; record those dependencies explicitly.

**Fallbacks.** If the host platform or a factory API is unavailable, the plant needs a documented stop/hold/continue policy. Do not print unregistered identifiers or release products with broken public destinations simply because the line can still run. An approved fallback can include a durable local queue and later reconciliation, but the release criteria must be validated for the legal regime and operation.

# 8. Run the programme with performance indicators

Separate **leading indicators** (predict a failure) from **release indicators** (prove a gate) and **outcome indicators** (measure lasting value). One dashboard with only “number of passports published” rewards quantity even when data and physical product pairing are unreliable.

## Core cross-industry metrics

| Measure | Definition / calculation | Example first-pilot target* |
|---|---|---|
| Scope classified | In-scope reviewed products / total candidate products | 100% before architecture freeze |
| Critical data completeness | Approved applicable critical fields / applicable critical fields | 100% for released pilot scope |
| Evidence validity | Current validated evidence objects / required evidence objects | 100% for release-blocking evidence |
| Carrier-pairing correctness | Correct scanned pairings / scanned production pairings | 100% in qualification sample |

| Measure | Definition / calculation | Example first-pilot target* |
|---|---|---|
| Activation reconciliation | Successfully reconciled activation events / required activation events | 100% prior to product release where activation is required |
| Public access uptime | Successful checks / scheduled availability checks | Service-level target set contractually |
| Exception resolution | Time between critical issue creation and closure | Define by risk severity |
| Change implementation lead time | Decision-to-production implementation elapsed time | Baseline then improve |

*The figures above are proposed project acceptance criteria, **not legal thresholds**. Confirm statistical sampling, contractual service levels and exact hard-stop rules with the quality, IT and regulatory owners. Track numerators and denominators; avoid percentages that cannot be independently reconstructed.

### Dashboard review practice

At every review, show the current value, trend, owner, source-system timestamp, open exception and next corrective action. Slice metrics by plant, supplier, product category and manufacturing line. If a category has not yet launched, display “not measured”, not a fictitious zero or green status. The first reporting period establishes a baseline; only then should management set efficiency-improvement promises.

### Additional metrics for Toys

| Sector metric | Baseline | Owner / improvement action |
|---|---|---|
| Toy models with approved safety files (%) | Measure in pilot | Assign to process owner; investigate trend and exceptions |
| Unexpired relevant test evidence (%) | Measure in pilot | Assign to process owner; investigate trend and exceptions |
| Wrong age-warning or model label incidents | Measure in pilot | Assign to process owner; investigate trend and exceptions |
| Supplier chemical evidence response time (days) | Measure in pilot | Assign to process owner; investigate trend and exceptions |
| Passport-to-model consistency (%) | Measure in pilot | Assign to process owner; investigate trend and exceptions |
| Time to identify affected lots in a recall (minutes) | Measure in pilot | Assign to process owner; investigate trend and exceptions |

## 9. Onboarding, training and change management

DPP adoption fails when the project team implements a portal but the people who create the evidence, prepare labels or approve substitutions continue working as before. Treat adoption as a controlled operational change across roles, not a one-off webinar.

**Start with process observation.** Walk one real product through specification, supplier approval, incoming inspection, production, dispatch and after-sales. Record who uses a spreadsheet, who copies

a certificate into an email, who changes QR artwork and how production reprints are approved. Design the new SOP around those real tasks before publishing training slides.

### A four-role training model

| Audience | Must be able to do | Demonstration / proof |
|---|---|---|
| Executive / programme owners | Read scores, make gate decisions, own risk | Approve a mock blocked go-live |
| Regulatory / quality / product owners | Classify, validate, approve and update records | Correct a wrong applicable field |
| Suppliers / procurement / engineering | Provide evidence with valid scope and version | Complete one full evidence submission |
| Factory, packaging, service and IT | Print, verify, activate, reconcile and recover | Pass an exception and rework simulation |

**Onboarding sequence.** Nominate one champion per site and function; provide a role-specific quick reference and sandbox; run task-based demonstrations; check knowledge with an observed exercise; allow supervised live use; and audit early records. For suppliers, support both a structured portal and a simple upload path with clear response deadlines. For internal teams, show the *reason* behind each new control: preventing mislabelled products, unapproved claims, shipment holds or untraceable changes.

**Change communications.** A useful manager message is concrete: “From [date], no new product artwork is released unless the DPP destination and model/lot mapping have passed the checklist. Exceptions go to [owner] within [hours].” An abstract announcement that the company “is digitalising” creates no behavioural change.

**Measure adoption** by proportion of trained roles passing the observed test, number of supplier responses accepted without rework, share of production changes following the new SOP, and unresolved field-level evidence issues. Schedule refreshers after legal amendments, product redesigns or repeat incidents—not merely every calendar year.

### Role-specific coaching for Toys

Train product safety staff on the new passport and evidence requirements, creative teams on warning/artwork review, sourcing on supplier test documentation, logistics on model/batch identity and customer-service staff on incident escalation.

## 10. Rollout from pilot to full portfolio

Use the following as a **sequencing pattern**, not a promise that all manufacturers can complete a compliant programme within a fixed number of weeks. Multi-plant, high-volume or heavily regulated portfolios may require longer qualification, validation and procurement.

| Phase | Illustrative timebox | Output | Exit gate |
|---|---|---|---|
| 0. Frame | Weeks 1–2 | Scope, charter, owner, legal tracker | Signed applicability and budget |
| 1. Build evidence | Weeks 3–6 | Sources, supplier pilot, dictionary | Critical test records verified |

| Phase | Illustrative timebox | Output | Exit gate |
|---|---|---|---|
| 2. Integrate | Weeks 7–10 | Identity, carrier, APIs, validation | End-to-end non-production test |
| 3. Qualify | Weeks 11–14 | Factory/packaging trial, QA, training | Documented release gate passed |
| 4. Controlled launch | Weeks 15–18 | One line/product family, real exceptions | Reconciliation and availability proven |
| 5. Scale | Weeks 19+ | Additional products/sites, operating dashboards | Repeatable site rollout playbook |

**A staged release is safer than a big bang.** Choose one product family that exposes meaningful complexity but has engaged owners and accessible evidence. Run parallel operations briefly if needed, compare old and new outputs and document any planned decommissioning. Stop and fix systemic errors before moving to additional sites; do not conceal failures by excluding bad records from the dashboard.

## Factory or publication acceptance protocol

- **Identity test:** new, repeated, duplicate, missing and retired IDs behave predictably.
- **Wrong-product test:** the scanner detects the incorrect SKU/model/serial association.
- **Carrier test:** labels remain legible in intended use conditions, with valid, persistent destinations.
- **Data test:** unapproved and expired evidence cannot appear as released facts.
- **Exception test:** scrap, reprint, rework, offline production and recall scenarios are handled.
- **Access test:** public, restricted and authority views respect the approved access matrix.
- **Recovery test:** backup, restoration and export work and are auditable.
- **Operational test:** trained people can run the process without the project team present.

**Scale only when the gate is green.** Approve the next site after the first has reached sustained stability, named support owners are available, and control performance is recorded. Copy the *process template* across sites, then adapt local equipment, supplier mix, workforce and systems; do not blindly clone a factory integration.

## The top five risks to rehearse in this sector

1. **Treating the QR as a replacement for physical safety warnings.** Assign an owner; write one preventive check, one detection method, one containment action and one decision to resume normal operations. Include it in the qualification scenario register.
2. **Reusing a test report on a materially different toy.** Assign an owner; write one preventive check, one detection method, one containment action and one decision to resume normal operations. Include it in the qualification scenario register.
3. **Losing batch genealogy for affected imports.** Assign an owner; write one preventive check, one detection method, one containment action and one decision to resume normal operations. Include it in the qualification scenario register.
4. **Missing a supplier change in pigments or plasticisers.** Assign an owner; write one preventive check, one detection method, one containment action and one decision to resume normal operations. Include it in the qualification scenario register.
5. **Incorrect model/passport pairing for private-label variants.** Assign an owner; write one preventive check, one detection method, one containment action and one decision to resume normal operations. Include it in the qualification scenario register.

# 11. Follow-up and EU regulatory evolution

Regulatory monitoring must be an operating control. Once a DPP is live, a new delegated act, amended product rule, Commission guideline, standard, market-surveillance interpretation or customer procurement specification can affect the recorded data, access classes, retention, QR carrier or product scope. An unlabeled link to an EU website is not a monitoring process.

**Establish a regulatory change register** with the following fields: source URL, publication date, legal instrument, proposed/adopted/status, products affected, effective date, expected impact, owner, legal opinion if needed, required product-data change, software change, factory/SOP change, supplier notice, verification evidence and completion date. Assign a regulatory lead who decides whether a notice is informational or triggers a controlled change request.

Review official EU sources at least monthly, and immediately after a relevant adoption or application notice. Re-check regulations before each new market/product launch, then run a quarterly compliance architecture meeting that includes legal, operations and IT. Track delegated acts separately from public consultation documents and industry association forecasts. A consultation is not an enacted obligation; a delegated act's adoption year is not necessarily its application year.

**Change-control protocol:** detect → triage for product categories → legal interpretation → impact map → budget/priority decision → dataset/version change → technical regression and factory testing → training → controlled release → evidence of completion. Assign a regulatory-version tag to every published passport data profile so a future auditor can reconstruct which rules were applied at launch.

**Continuous operations** must also cover expiring supplier documents, product redesign, factory changes, access security, service uptime, URL persistence, incident handling, backup restore tests and data export. Define a clear owner and service commitment for each. A production-level failure is a business continuity issue, not simply a missing marketing web page.

### Specific change watch for Toys

Monitor the implementing rules for toy DPP data, identifiers, carrier and registry operation, harmonised test standards, customs integration and the 2030 application preparations.

# 12. Create value beyond minimum compliance

Use the DPP foundation as a governed product information layer, not a dumping ground for every data set the company owns. Start with a clear legal baseline and add optional customer or operational services in separately governed modules. The same QR or identifier can route users to differentiated content when lawful and appropriate, but mandatory information must remain accessible under the applicable rules.

**Prioritise expansion with a benefit case.** Estimate the current cost of retrieving compliance evidence, resolving warranty claims, answering customer product questionnaires, replacing paper manuals, handling returns, administering supplier changes or providing recycling instructions. Select one extension with a measurable baseline and a named commercial or operational owner. Do not assume scans equal incremental revenue.

**Data-use safeguards.** Keep commercial analytics separate from regulatory duties. Be transparent about consumer data collection, obtain valid legal bases for marketing communications and ensure access is not conditional on providing personal data where mandatory information must be free. Avoid unsupported sustainability claims; evidence should be tied to the exact model/batch/item and methodology.

### Extension project scorecard

| Candidate initiative | Benefit hypothesis | Test before scaling |
|---|---|---|
| Digital manuals and service | Less support effort / faster self-service | Compare qualified support requests |
| Supplier evidence exchange | Fewer chasing emails and errors | Track turnaround and first-pass acceptance |
| Product authenticity | Fewer disputed products | Measure verified authentication cases |
| Circular after-sales | More repair/reuse and traceable handoffs | Track completed service transactions |
| Customer product data API | Faster procurement/specification and retailer data exchange | Time saved by target customers |

Expand only after the regulated passport backbone is stable. A poorly controlled extended portal creates fresh cybersecurity, privacy and claims risk on top of the compliance project.

### The strongest adjacent-value opportunities for Toys

1. **Multilingual play and safety instructions.** Build a small measured pilot only after the mandatory baseline and data entitlements are stable; define the responsible business function and how impact will be measured.
2. **Targeted recall communication.** Build a small measured pilot only after the mandatory baseline and data entitlements are stable; define the responsible business function and how impact will be measured.
3. **Product authenticity and counterfeit checks.** Build a small measured pilot only after the mandatory baseline and data entitlements are stable; define the responsible business function and how impact will be measured.
4. **Age-appropriate accessory and spare-part support.** Build a small measured pilot only after the mandatory baseline and data entitlements are stable; define the responsible business function and how impact will be measured.
5. **More efficient distributor and customs document exchange.** Build a small measured pilot only after the mandatory baseline and data entitlements are stable; define the responsible business function and how impact will be measured.

**Portfolio expansion decision rule:** An extension is worth funding when it reuses verified product identity, has a direct measurable outcome, does not degrade mandatory access, and has a sustainable owner and cost model. An attractive scan experience without an operational benefit is not a business case.

## 13. Working templates — copy these into your project workspace

### Template A — applicability decision sheet

| Field | Fill in for your company |
|---|---|
| Product/category / product family | [name and defining technical criteria] |

| Field | Fill in for your company |
|---|---|
| EU economic operator / markets | [manufacturer/importer/distributor, countries] |
| Current binding rule | [instrument and relevant articles] |
| Future/indicative rule | [draft/working plan; clearly labelled] |
| Required granularity | [model / batch / item / to be determined] |
| Carrier/registry/legal start | [what applies; evidence link] |
| Review/approval | [legal approver, date, next review trigger] |

## Template B — product data dictionary

For each field document: `field_id | display_name | product_type | granularity | datatype/unit | mandatory_now? | future_candidate? | source_system | supplier_owner | validation_rule | evidence_id | approved_by | valid_from | valid_until | access_class | change_trigger`.

Example: `mass_kg | Net mass | Product model | model | decimal kg | check law | optional | PLM | engineering | >= 0 and unit normalised | TEST-22 | quality | [date] | [date] | defined audience | model revision`.

## Template C — supplier evidence request

> Subject: Product evidence for [product family] — [deadline] We are establishing a structured product-information process for [market/product]. Please provide the attached field template and supporting evidence for the specified models/material lots, including the document version, relevant plant or model, test method where relevant, validity date and technical contact. Please identify missing or confidential fields explicitly rather than substituting estimates. We will validate the submission with you and communicate any change requests before approval.

## Template D — project risk and exception log

| ID / risk | Likelihood / impact | Owner | Preventive control | Contingency / due date |
|---|---|---|---|---|
| R-01 Mis-scoped product | [L/M/H] | [Regulatory] | Signed scope matrix | Hold launch and review rule |
| R-02 Missing critical evidence | [L/M/H] | [Procurement] | Supplier SLA and validation | Escalate / alternate evidence |
| R-03 Wrong label/ product pairing | [L/M/H] | [Production] | Scanner and changeover gate | Quarantine/rework shipment |
| R-04 Data access breach | [L/M/H] | [Security] | Field-level access policy | Revoke key, investigate, notify if required |
| R-05 Regulatory rule changes | [L/M/H] | [Regulatory] | Monthly change watch | Impact assessment and requalification |

## Template E — factory release test record

Record: `test ID | product/model | line | printer | scanner | source record version | identifier | expected response | observed response | evidence screenshot/log | tester | QA approval | issue |`

`retest date`. Include wrong-SKU, duplicate, off-network, rework, reprint, scrap, public URL, restricted access and export/restore tests.

### Template F — monthly programme scorecard

Record each KPI with `period | product/site | numerator | denominator | current value | prior value | target | trend | accountable owner | exception tickets | next corrective action`. Keep a commentary column to explain why measured scope changed.

### Template G — legal change register

`Source URL | Instrument | Status (proposal/adopted/applicable) | Publication date | Application date | Product family | Relevant articles | Gap vs current data model | IT/line impact | Owner | Decision date | Test evidence | Closure`.

### Template H — training and adoption log

`Role | Required SOP | Training version | Learner/group | Date | Practical demonstration | Pass/fail | Remediation | Supervisor sign-off | Refresh trigger`.

### Template I — 1-page business case

`Problem measured | Current annual effort/cost | Proposed controlled workflow | One-time project cost | Ongoing cost | Regulatory dependency | Avoided risk | Measurable upside | Owner | Pilot measurement date | Decision gate`.

### Template J — handover-to-operations checklist

- [ ] Legal scope and ownership confirmed; open interpretations recorded.
- [ ] Data contract, owners, evidence and access classes versioned.
- [ ] Supplier process, escalation and maintenance SLA operating.
- [ ] Identity, carrier and physical association tests signed off.
- [ ] Monitoring, uptime, export, backups, incident runbook and responsibilities proven.
- [ ] Factory/packaging SOPs trained and practical competency checked.
- [ ] Rollout metrics, exception thresholds and monthly review agreed.
- [ ] Regulatory monitoring cadence active and next legal review scheduled.

## 14. Your first 30 days — an executable start

**Days 1–5:** nominate the programme owner and regulatory lead; classify the top revenue/product categories; separate enacted duties from future candidates; gather three representative real products and their data/evidence packages.

**Days 6–10:** draw the actual product-data flow, identify hidden spreadsheets and document sources, map identifiers used by ERP and factory, and select a pilot plant or outsourced packer. Request representative evidence from two suppliers, including one likely to struggle.

**Days 11–20:** define the minimum data dictionary, audience/access map, identity scheme, approval chain and printing/activation design. Resolve the biggest risk about product granularity, line integration or missing evidence before buying equipment or redesigning packaging.

**Days 21–30:** perform a tabletop process simulation using a real SKU/model. Validate a digital destination, test a wrong-product/label incident, draft the rollout scorecard, build the legal change register and submit a signed pilot go/no-go plan.

**Decision after day 30:** do not ask only “Can we generate a DPP?” Ask “Can we repeatedly deliver the *correct approved product information to the correct physical product*, prove it, and operate the process as law and products change?”

# Sector-specific readiness actions from the GoodsTag questionnaire

These six practical checks are aligned with the vertical readiness questionnaire and should be completed with records from an actual product—not answered merely “yes” in a meeting.

## Check 1 — Sector control

**Diagnostic question:** Are toy models, product identifiers, images, commodity codes and responsible operators documented?

**Action:** Create model-level IDs and records for manufacturer/importer details, product image and customs codes.

**Accountable function:** Product / Regulatory
**Evidence to retain:** Complete model master dataset.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

## Check 2 — Sector control

**Diagnostic question:** Are safety assessments, standards, testing and notified-body evidence where relevant under change control?

**Action:** Link the technical documentation, safety assessment and conformity evidence to each toy model.

**Accountable function:** Regulatory / QA
**Evidence to retain:** Toy safety technical-file index.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

## Check 3 — Sector control

**Diagnostic question:** Can you demonstrate chemical safety, including relevant restrictions and allergenic fragrance disclosures?

**Action:** Collect validated material, test and fragrance evidence with thresholds and applicable restrictions.

**Accountable function:** Quality / Laboratory
**Evidence to retain:** Chemical safety and allergen evidence pack.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

### Check 4 — Sector control

**Diagnostic question:** Can CE, age/safety warnings and instructions be kept aligned across all intended EU languages and channels?

**Action:** Audit physical/digital information, CE marking, warnings and translations by toy model.

**Accountable function:** Packaging / Regulatory
**Evidence to retain:** Multilingual label and warning review.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

### Check 5 — Sector control

**Diagnostic question:** Have you prepared the DPP registration identifiers and procedures needed for EU customs verification?

**Action:** Prototype identifier/registry data submission and importer/customs handover for a representative model.

**Accountable function:** IT / Trade Compliance
**Evidence to retain:** Registry/customs process design.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

### Check 6 — Sector control

**Diagnostic question:** Can you support the required complaint/safety communication and ten-year DPP continuity obligations?

**Action:** Define consumer complaint/Safety Gate references, backup continuity and long-term record availability.

**Accountable function:** Quality / IT
**Evidence to retain:** Complaint and continuity operating plan.

**Acceptance:** the named owner has demonstrated the control with a representative live model, lot or physical item; exceptions and a retest date are recorded.

## 15. References and document maintenance

**Information date: 5 November 2026.** Official legislation takes precedence over this practical guide. Verify current consolidated texts, product-family exclusions, applicable dates and any newly enacted measures before taking binding regulatory decisions. Maintain a named internal regulatory owner and record subsequent updates.

### Primary sources

- **Commission DPP overview:** https://single-market-economy.ec.europa.eu/single-market/digital-product-passport_en
- **Commission DPP FAQs:** https://single-market-economy.ec.europa.eu/single-market/digital-product-passport/explore-our-faqs_en
- **ESPR Regulation (EU) 2024/1781:** https://eur-lex.europa.eu/eli/reg/2024/1781/oj/eng
- **ESPR Working Plan 2025–2030:** https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025DC0187

- **DPP Registry announcement:** https://single-market-economy.ec.europa.eu/news/digital-product-passport-registry-now-live-2026-07-20_en
- **Toy Safety Regulation (EU) 2025/2509:** https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202502509
- **Commission toy safety page:** https://single-market-economy.ec.europa.eu/sectors/toys/toy-safety_en

## Version history

| Version | Date | Change / owner |
|---|---|---|
| 1.0 | 5 Nov 2026 | Initial customer-facing edition; legal information subject to subsequent updates |
| 1.x | As required | Record regulatory and operational changes and affected chapters |

## Next step

Use the Toys Readiness Assessment to prioritise work, or adopt the generic Toys checklist to organise owners, evidence and progress. For complex multi-site or mixed-category portfolios, schedule a design review covering identity, data interfaces, line commissioning and ongoing governance.

**GoodsTag** · https://www.goodstag.com/ · A practical implementation guide, not a legal compliance certification.