GLOBAL MOBILE ASSOCIATION

SUPPORTING THE SECONDARY MOBILE ECOSYSTEM

GLOBAL MOBILE ASSOCIATION EXECUTIVE WHITE PAPER SERIES

The Digital Product Passport

What the U.S. Secondary Mobile Ecosystem Needs to Know

Operational Readiness, Market Access, Data Rights, and the Future of Used Mobile Devices

6 of 8	2029	$150B+
Core DPP technical standards published by July 2026	Indicative EU evaluation target for ICT products	Projected global refurbished-phone and repair market by 2027

August 2026 Edition
Prepared by GMA Research and Insights

ABOUT THIS PUBLICATION

About the Global Mobile Association

The Global Mobile Association exists to serve the global used mobile ecosystem by bringing members together year-round through education, resources, leadership development, advocacy, business support, and meaningful industry connection.

Purpose of This White Paper

Europe is turning the Digital Product Passport from a policy concept into operating infrastructure. This paper explains what is already established, what remains undecided for smartphones and other ICT products, and what U.S. companies participating in the secondary mobile ecosystem should understand before product-specific requirements are adopted.

Accuracy and Scope

Important distinction
There is no current EU Digital Product Passport mandate specifically requiring smartphones to carry a DPP. ICT products are listed in the European Commission's first ESPR Working Plan with an indicative 2029 evaluation timeline. The Commission still must evaluate the product category, determine appropriate requirements, decide whether a DPP is the right information tool, adopt product-specific rules, and provide a transition period before any obligation becomes effective. [3, 5]

What This Paper Does Not Do

- It does not predict the final smartphone DPP data set.
- It does not assume that every future DPP will operate at individual-device level.
- It does not treat the GSMA as the regulator or owner of the EU DPP framework.
- It does not provide legal, customs, privacy, cybersecurity, tax, or environmental compliance advice.

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EXECUTIVE SUMMARY

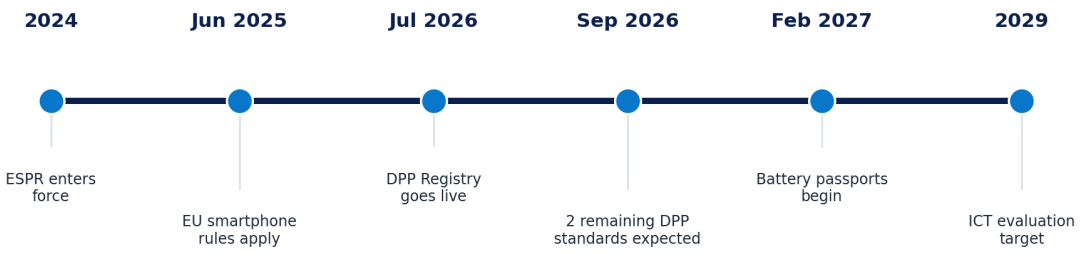
Europe Is Building Product Information Infrastructure That Could Reshape Secondary Mobile

The European Union has moved the Digital Product Passport from legislation into implementation. The European Commission launched the DPP Registry and testing environment on July 20, 2026. Six of eight harmonized technical standards have already been published, covering unique identifiers, data carriers, data exchange protocols, storage, APIs, and system interoperability. The remaining standards covering access rights, security, confidentiality, authentication, reliability, and data integrity are expected to follow. [4, 6]

The system will first become mandatory on February 18, 2027 for specified large battery categories, including electric-vehicle, light-means-of-transport, and industrial batteries above the applicable threshold. Smartphone batteries are portable batteries and are not included in that initial battery-passport mandate. [7, 8]

ICT products appear in the Commission's first ESPR Working Plan with an indicative 2029 evaluation target. That date is not a smartphone compliance deadline. Product-specific requirements must still be evaluated and adopted, and the Commission states that economic operators will receive a transition period of at least 18 months after adoption of an ESPR delegated act. [3, 5]

Europe's Digital Product Passport Implementation Path



Indicative where noted; ICT evaluation does not equal a smartphone compliance deadline.

Sources: European Commission DPP implementation pages, ESPR Working Plan, and Batteries Regulation. Timeline is indicative where noted.

Five conclusions for U.S. industry leaders

- For companies selling covered products into Europe, DPP obligations can matter even when the product is manufactured outside the EU.
- The most consequential issue for the secondary market may be data access and update rights: who can see, add, correct, and rely on lifecycle information.
- A DPP could improve repair, refurbishment, resale, customs, and end-of-life decisions if relevant data is interoperable and available to legitimate secondary-market actors.
- The same system could create cost, complexity, and market-access risk if future requirements are overly burdensome, proprietary, or difficult for smaller operators to implement.
- U.S. companies should strengthen device identity, lifecycle data, integration, and governance now while participating in future consultations before smartphone-specific requirements are settled.

1 | FOUNDATION

What the Digital Product Passport Is - and Is Not

The European Commission describes a DPP as a digital identity card or digital container for products, components, and materials. It is intended to make relevant product information easier to access throughout a product's lifecycle, support circularity, improve transparency, and strengthen legal compliance. [2, 5]

What it is

- A structured digital record connected to a persistent unique product identifier.
- A framework that can provide different information to different users based on defined access rights.
- A mechanism that can support consumers, businesses, repairers, refurbishers, recyclers, customs, and market-surveillance authorities.
- A product-by-product regulatory framework: the exact data and operating rules are set through future delegated acts or separate product-specific legislation.

What it is not

- It is not one giant EU database containing every detail about every product. Detailed data is designed to remain decentralized.
- It is not inherently a blockchain requirement. The EU framework is technology-neutral and built around open, interoperable standards.
- It is not an IMEI database, a device grading standard, a resale price guide, or a warranty database.
- It does not mean all information is public. Access will be role-based, and specific rights will be established by product-specific rules.
- It is not currently a smartphone-specific mandate.

Working hypothesis For mobile, the value of the DPP will depend less on the existence of a digital record and more on whether the right lifecycle information can be accessed and updated by legitimate secondary-market participants without exposing personal or commercially sensitive data.

2 | U.S. RELEVANCE

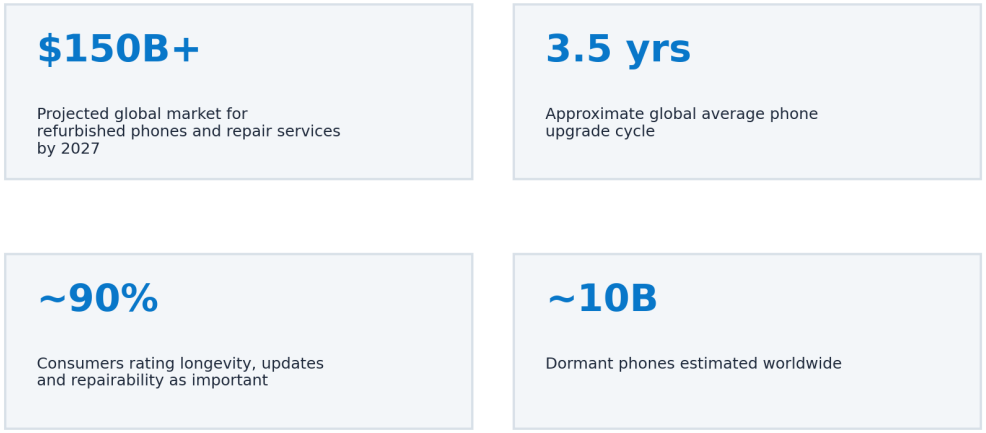
Why the U.S. Secondary Mobile Ecosystem Should Pay Attention

DPP obligations will apply to covered products placed on the EU market whether those products are manufactured in Europe or imported. The responsible economic operator must create or ensure the availability of the required passport and register it before the product is placed on the market. For imported covered products, DPP registration may also become part of customs clearance. [3, 5, 20]

The secondary mobile market is already global

Used mobile devices routinely move across borders because supply and demand are not located in the same places. A U.S. wholesaler may source devices domestically, process them in another country, sell them to a European importer, or route them to multiple markets depending on device model, compatibility, condition, support status, price, and regulatory requirements. A future smartphone DPP could therefore affect U.S. companies even when their legal responsibility is indirect.

Why Better Lifecycle Information Matters Commercially



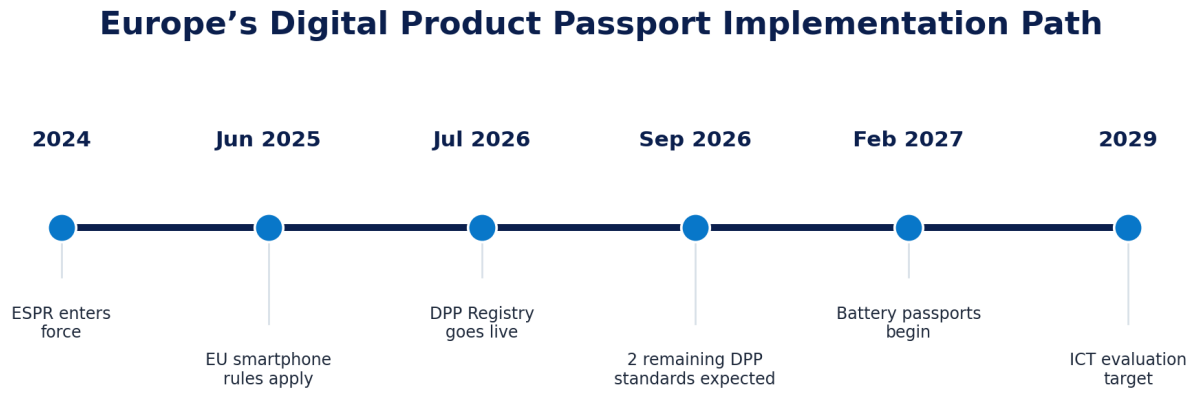
Sources: GSMA circularity research and Mobile Net Zero 2026. Figures are global and relate to the broader circular mobile market.

GSMA research shows why lifecycle information matters commercially: global upgrade cycles have slowed to about 3.5 years, nearly 90% of surveyed consumers value durability, longer software support and easy repair, approximately 10 billion phones may be sitting dormant worldwide, and the combined market for refurbished phones and repair services is projected to exceed $150 billion by 2027. [16, 17, 18]

Working hypothesis Europe can influence operating practices beyond its borders because global secondary-market companies may standardize data, documentation, and product-identification processes across markets rather than maintain completely separate systems for the EU and the rest of the world.

3 | TIMELINE

Europe's Implementation Timeline



Implementation milestones current as of August 23, 2026. Future dates are indicative and subject to legislative and technical progress.

What is already operational

- ESPR entered into force in July 2024 and created the legal framework for product-specific DPP requirements.
- New EU ecodesign and energy-labelling rules for smartphones and tablets began applying on June 20, 2025.
- The DPP Registry became operational on July 20, 2026, together with a testing environment and implementation guidance.
- Six harmonized DPP technical standards were published in July 2026.

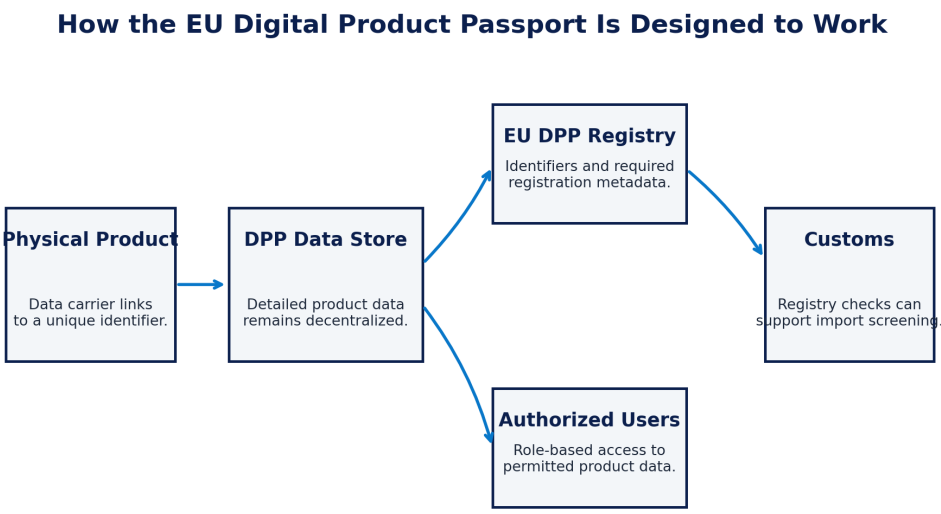
What is next

- The remaining two DPP standards are expected in September 2026.
- Battery passports become mandatory February 18, 2027 for specified EV, LMT, and industrial batteries.
- Sector-specific DPP rules are expected to expand progressively to additional product groups.
- ICT products have an indicative 2029 evaluation target under the first ESPR Working Plan.

Do not confuse evaluation with compliance
The 2029 ICT date is a policy-development milestone, not a known smartphone compliance date. The Commission must first determine whether and how DPP requirements should apply to ICT products. [3, 5]

4 | ARCHITECTURE

How the DPP Architecture Works



Simplified GMA illustration based on the EU ESPR framework and European Commission implementation guidance.

The EU framework uses a hybrid architecture. Detailed DPP data is stored by the responsible economic operator or a DPP service provider, while the EU Registry stores unique identifiers and required registration metadata. A physical data carrier links the product to the digital record. [1, 2, 4]

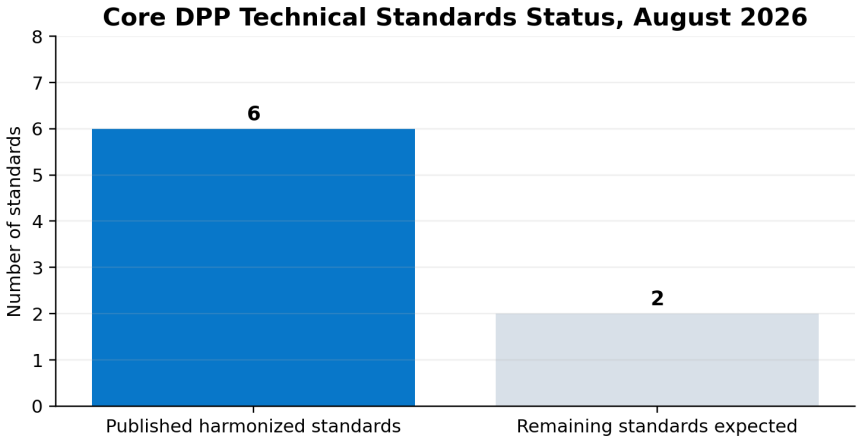
The operating sequence

- The economic operator gathers the product information required by applicable legislation.
- A DPP is created, with the detailed information stored in a decentralized location.
- The DPP is registered in the EU Registry, which generates a unique registration identifier.
- A data carrier on the product, packaging, or accompanying documentation provides a physical-to-digital link.
- Users retrieve information based on the rights assigned to their role.
- For imported covered products, customs can verify the existence and registration of the DPP.

The Registry is intended to become linked with the EU customs environment so authorities can automate parts of import verification. The Commission states that the customs interconnection must be operational within four years after the rules establishing the Registry enter into force. [5, 20]

5 | TECHNICAL STANDARDS

Standards, Interoperability, and Data Carriers



Source: Commission Implementing Decision (EU) 2026/1736 and European Commission DPP implementation update.

Six harmonized standards published in July 2026

Standard	Area
EN 18216:2026	Data exchange protocols
EN 18219:2026	Unique identifiers
EN 18220:2026	Data carriers
EN 18221:2026	Data storage, archiving, and persistence
EN 18222:2026	APIs for DPP lifecycle management and searchability
EN 18223:2026	System interoperability

Two additional standards are expected to address access-rights management, information security, data protection and business confidentiality, plus authentication, reliability and data integrity. The objective is interoperability rather than a single proprietary platform. [4, 5, 6]

Why interoperability matters to used mobile

A smartphone may pass through multiple independent companies, countries, software platforms, and ownership events. If DPP information can only be read inside one vendor ecosystem, its secondary-market value would be limited. Open standards and APIs create the possibility of using the same data across trade-in, processing, refurbishment, resale, customs, and recycling workflows.

Working hypothesis Interoperability may become a competitive requirement. Systems able to exchange standardized lifecycle data may outperform closed inventory platforms.

6 | DATA GOVERNANCE

Data, Access Rights, and Lifecycle Updates

The ESPR requires product-specific rules to define what data belongs in a DPP, whether the passport exists at model, batch, or item level, which actors can access which data, who can create or update the passport, how updates occur, and how long the passport remains available. The Regulation explicitly identifies professional repairers, independent operators, refurbishers, remanufacturers, and recyclers among the actors that may receive free and easy access based on their assigned rights. [1]

Potentially relevant mobile data categories

Category	Possible secondary-market value	Status today
Product identity	Model, variant, identifier, specifications, market compatibility	Framework supports persistent unique identifiers; mobile-specific fields not set
Durability and battery	Expected life, battery information, performance indicators	Some smartphone data already required under current ecodesign rules
Repair and parts	Disassembly, tools, spare parts, repair instructions	Current EU smartphone rules already require repair-related information
Software support	Update availability and support period	Current EU rules set minimum support obligations for covered devices
Lifecycle events	Repair, refurbishment, component changes, reuse status	Possible in DPP architecture; smartphone-specific update rights not decided
Materials and end of life	Composition, substances, disassembly and recycling information	Central DPP use case; final ICT fields not decided
Compliance	Declarations, test evidence, regulatory status	Potentially accessible to authorities and other entitled actors

The secondary-market question

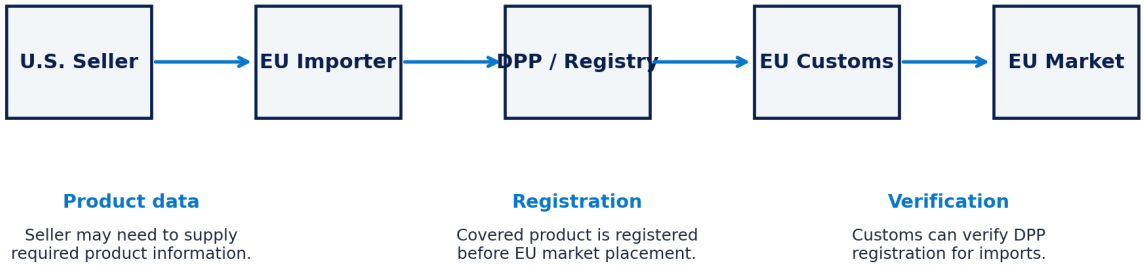
For used mobile, the most important unresolved issue is not simply what the manufacturer places in the passport on day one. It is whether legitimate downstream actors can add verified information after repair, refurbishment, component replacement, reuse, or final disposition. A passport that cannot reflect meaningful lifecycle changes risks becoming an incomplete record.

Working hypothesis Item-level lifecycle updates would create the greatest operational value for the used mobile ecosystem, but they would also create the highest data, governance, security, and cost burden. The final balance will matter significantly to smaller operators.

7 | MARKET ACCESS

Market Access, Imports, and Customs

Illustrative U.S.-to-EU Flow for a Future Covered Mobile Product



Legal responsibility depends on future product-specific rules and each company's role. GMA illustration; not legal advice.

For a product category that becomes subject to a DPP requirement, the passport must be active and registered before the product is first placed on the EU market. The Commission states that this applies to EU-manufactured and imported products. Customs authorities are expected to verify registration identifiers for covered imports and use the Registry for automated screening. [3, 5, 20]

What U.S. companies should understand

- A U.S. company may not be the legally responsible EU economic operator, but its EU customer may require product data from the U.S. supplier in order to create or maintain a compliant DPP.
- A missing or inaccurate passport could become a market-access issue once a future product-specific rule applies.
- Customs integration raises the importance of matching product identifiers, commodity codes, DPP registration, and shipment documentation.
- The treatment of imported used or refurbished smartphones will depend on the final ICT product rules and should not be assumed today.

Compliance principle
The legal obligation will be defined by future product-specific rules. U.S. companies should avoid assuming that current DPP requirements automatically apply to smartphones or that the EU importer will be able to solve missing upstream data after shipment.

8 | USED AND REFURBISHED DEVICES

What This Could Mean for Used and Refurbished Phones

The DPP framework was designed around the full product lifecycle, including repair, refurbishment, reuse, remanufacturing, and recycling. That makes secondary-market participation structurally relevant rather than incidental.

Potential operational effects

Area	Potential benefit	Potential burden or uncertainty
Sourcing	More reliable product identity and support information	Upstream records may be incomplete or unavailable for legacy devices
Receiving	Faster validation of selected product attributes	Scanning and systems integration could add process steps
Diagnostics	Access to technical and repair-related information	Access rights may vary by role and product rule
Refurbishment	Better parts, disassembly, and support information	Need to determine who can write verified lifecycle changes
Wholesale resale	Stronger documentation and buyer confidence	Buyers may begin demanding DPP completeness even outside legal scope
Cross-border trade	Potentially clearer compliance and product-status evidence	Registration and customs mismatches could delay shipments
End of life	Better material and dismantling information	Downstream reporting may create additional data requirements

Legacy devices will be a major transition issue

The secondary market routinely handles devices that were manufactured years earlier and may have moved through multiple countries and owners. Future ICT rules will need to address how products without an original DPP are treated. The Commission has not yet established a smartphone-specific legacy-device approach.

Working hypothesis The transition rules for legacy inventory may matter as much as the passport itself. If older devices are treated inconsistently, the market could face parallel documentation regimes for years.

9 | SMARTPHONE RULES TODAY

Smartphone Rules Already in Force in Europe

Europe already requires more structured product and lifecycle information for smartphones and slate tablets placed on the EU market from June 20, 2025. These rules are separate from the DPP but create an important foundation for future digital product information. [9, 10]

800 cycles

Battery must retain at least 80% of initial capacity after the required test cycle

5+ years

Minimum operating-system update availability after end of model placement

7 years

Critical spare-parts availability after end of model sales

Other current requirements

- Resistance requirements for drops, scratches, dust, and water.
- Non-discriminatory access for professional repairers to software or firmware needed for replacement.
- A consumer-facing energy label that includes battery endurance, durability information, and a repairability class.
- Supplier obligations to provide product information electronically through the EU product database.
- Preparation-for-reuse requirements including secure factory reset and access to selected battery-management information.

Supplier guidance states that covered smartphones should make battery manufacturing date, first-use date, full charge/discharge cycle count, and measured state of health accessible through system settings or another location available to end users. The same guidance requires a secure factory-reset function that erases personal information. [10]

Why this matters for the DPP conversation

Europe is already generating digital and standardized information about smartphone durability, repairability, software support, battery condition, and reuse preparation. A future DPP would not start from zero; it could become an additional layer connecting existing requirements to broader lifecycle and compliance information.

10 | IMPLEMENTATION PREVIEW

The Battery Passport as an Implementation Preview

The first mandatory product-passport implementation using the common DPP framework will be the battery passport. Beginning February 18, 2027, every EV battery, LMT battery, and industrial battery above 2 kWh placed on the EU market must have a battery passport. The Commission's August 2026 guidance organizes 71 data points and identifies which are mandatory, optional, conditional, or not applicable for each battery category. [7, 8]

Smartphone batteries are not in the first mandate
The Batteries Regulation defines portable batteries separately. The February 2027 passport obligation applies to EV batteries, LMT batteries, and industrial batteries above 2 kWh, not the small portable batteries used in smartphones. [7, 8]

Why mobile businesses should study the battery implementation

- It shows how the EU will move from general DPP principles to product-specific data requirements.
- It demonstrates how information can be separated into public, restricted, and authority-only access tiers.
- It shows that individual-product status can change over time, including original, reused, repurposed, remanufactured, or waste status.
- It illustrates the need for economic operators to maintain accurate information after the product enters the market.
- It exposes the practical burden of collecting dozens of data points across multiple organizations and systems.

The Batteries Regulation requires information on areas such as identity, composition, carbon footprint, recycled content, performance, durability, dismantling, safety, state of health, and lifecycle status, with access varying by user role. [7]

Working hypothesis The battery passport will become the most useful real-world case study for secondary mobile companies because it will reveal the actual cost, data-quality problems, access-rights disputes, and system-integration requirements that arise when lifecycle passports move from policy to daily operations.

11 | INDUSTRY AND STANDARDS

GSMA, ITU, and the Wider ICT Conversation

Clarifying the roles

Who is doing what
The European Union is establishing the legal DPP framework. The GSMA is an influential mobile-industry organization contributing circularity research and policy recommendations. The ITU develops global telecommunications and ICT recommendations that can support international alignment. These roles are related but not interchangeable.

GSMA and Connect Europe have recommended that Digital Product Passports be used to improve traceability in cross-border transfers of used electrical and electronic equipment. Their 2025 Circular Economy Act position paper specifically referenced making information such as serial numbers, repair status, and compliance records available to companies and authorities through DPPs. [11]

The ITU has published Recommendation L.1070 on global digital sustainable product-passport opportunities and Recommendation L.1071, which defines an information model for sustainability and circularity information about ICT products across design, manufacturing, use, hardware changes, and final recycling as e-waste. L.1071 is intended to complement regional and global DPP initiatives. [12, 13]

Why international alignment matters

The used mobile industry depends on cross-border movement. If Europe, international standards bodies, manufacturers, carriers, marketplaces, and regulators develop incompatible product-information systems, secondary-market complexity increases. If the systems align around interoperable identifiers, data definitions, and access controls, a DPP could help reduce friction rather than add another layer of disconnected compliance.

Working hypothesis The most valuable outcome for the global used mobile ecosystem would be a passport framework that can support legitimate cross-border reuse without turning European market access into a proprietary or duplicative data exercise.

12 | OPPORTUNITY

Opportunities for the Secondary Mobile Ecosystem

A well-designed mobile DPP could create meaningful commercial and operational value. These benefits are potential outcomes, not guarantees; they depend on the final ICT rules, data quality, access rights, interoperability, and adoption.

1. Better sourcing decisions

Reliable identity, support, repairability, and lifecycle information could help buyers avoid inventory that cannot be economically or legally placed in target markets.

2. Faster and more informed processing

Technicians and processors could gain more direct access to approved parts, tools, disassembly, diagnostic, battery, and support information where the future rules make it available.

3. Stronger buyer confidence

A standardized, verifiable record could reduce uncertainty about selected device attributes and documentation, particularly in cross-border B2B transactions.

4. Improved cross-border documentation

GSMA's policy work highlights the possibility of using DPPs to support serial-number, repair-status, and compliance information during cross-border transfers of used equipment.

5. More efficient end-of-life decisions

Material, safety, disassembly, and reuse information could help identify when continued use is practical and when controlled recycling is the correct destination.

6. Better market intelligence

Standardized product data could eventually improve analysis of product longevity, failure, repair, reuse, and final disposition, provided privacy and commercial confidentiality are protected.

Working hypothesis For the secondary market, the DPP could evolve from a compliance tool into operating infrastructure if it helps companies make faster, more reliable decisions about whether a device should be bought, repaired, sold, routed to another market, or responsibly retired.

13 | RISK

Risks and Unanswered Questions

The secondary mobile ecosystem should support the goals of better product information and circularity while remaining clear-eyed about implementation risk.

Issue	Why it matters	What remains open for mobile
Access rights	Downstream actors need information to repair, refurbish, resell, and recycle	Exactly which mobile data each role can see
Update rights	A passport must reflect changes after original manufacture	Who may add repair, refurbishment, or status events
Legacy devices	Used channels handle many pre-mandate devices	Whether and how older phones receive or need a DPP
Item-level identity	Phones are already serialized and traded by unit	Whether a future DPP is model-, batch-, or item-level
Data accuracy	Bad data can create false confidence	Who verifies downstream updates and corrects errors
Commercial confidentiality	Supply chains contain sensitive relationships and data	Which information is protected and from whom
Privacy and cybersecurity	Device records could be attractive targets	How access, authentication, and personal data are controlled
Cost and SME burden	Smaller companies may have less IT capacity	Implementation cost, service-provider dependency, and support
Cross-border consistency	Phones may move through multiple jurisdictions	How EU rules interact with non-EU systems and trade law

The ESPR itself directs the Commission to consider affordability, access to second-hand products, SME competitiveness, administrative burden, and avoidance of proprietary technology when setting ecodesign requirements. The Commission also requires consultation and impact assessment before product-specific requirements are adopted. [1, 5, 14]

14 | OPERATIONS

Operational Impact by Business Function

Function	Questions leaders should ask now	Potential future impact
Purchasing	Can we tie each unit to reliable identifiers and source records?	Data completeness may affect buy/no-buy decisions
Receiving	Can we scan and reconcile identifiers at scale?	DPP validation could become part of intake
Diagnostics	Where do technical and lifecycle data reside?	New data could supplement existing test results
Repair / refurbishment	How do we document component changes and repair outcomes?	Authorized lifecycle updates may become important
Inventory	Can systems retain device-level history without slowing throughput?	DPP fields may need to travel with the unit
Sales	Can we provide buyers with selected verifiable information?	Documentation may become a selling advantage or requirement
Compliance	Who owns EU product-data and customs responsibilities?	DPP registration could become a gate to market access
IT / data	Can APIs ingest and publish structured external data?	Integration may become necessary
Finance	What is the cost per unit of additional data handling?	Compliance cost can alter landed margin
Leadership	Who makes cross-functional DPP decisions?	Ownership must span legal, IT, operations, sales, and finance

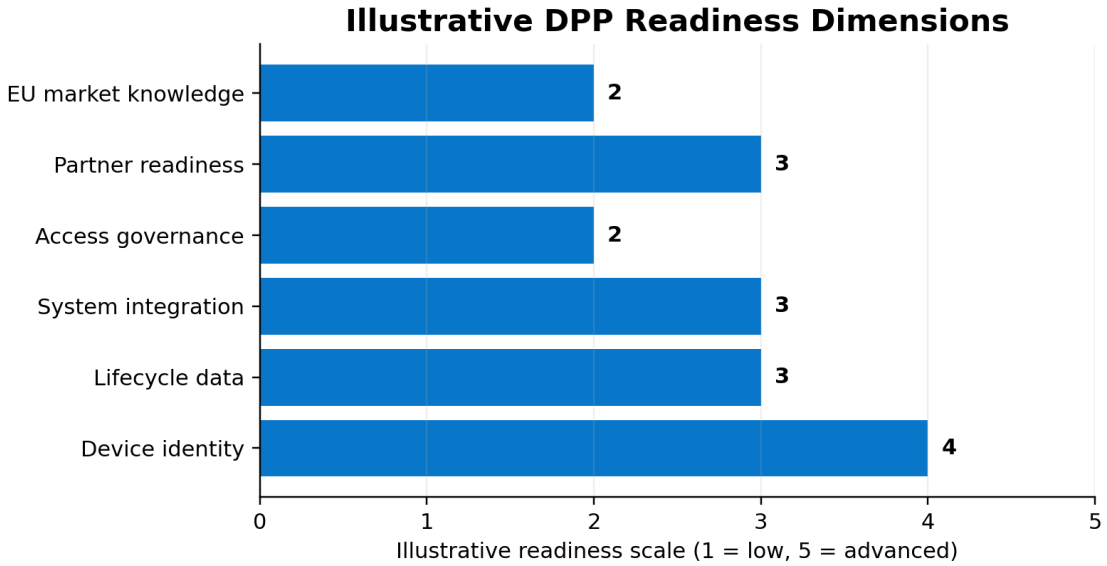
The implementation challenge is cross-functional

No single department can operationalize a future smartphone DPP. Product identity, legal obligations, IT architecture, physical processing, data security, customs, customer documentation, and cost management intersect. Companies that wait until a compliance date is known may discover that the largest work is not legal interpretation but cleaning and connecting internal data.

Working hypothesis The companies best positioned for future DPP requirements will be those that already manage device identity and lifecycle information as shared enterprise data rather than information trapped inside separate purchasing, warehouse, diagnostic, repair, and sales systems.

15 | TECHNOLOGY READINESS

Technology and Data Readiness



GMA analytical example only; organizations should score themselves using the readiness questions in this paper.

Six readiness dimensions

- Device identity: ability to connect physical units, internal inventory records, and persistent external identifiers.
- Lifecycle data: consistent capture of source, status, processing, repair, support, disposition, and other relevant events.
- System integration: API capability and structured data exchange between internal and external systems.
- Access governance: control over who can read, add, correct, or export specific information.
- Partner readiness: suppliers, processors, service providers, and customers able to exchange trustworthy data.
- EU market knowledge: clear ownership of product, customs, privacy, cybersecurity, and regulatory interpretation.

Do not overbuild prematurely

There is no reason for a U.S. secondary mobile company to build a complete smartphone DPP platform today because the final product-specific requirements do not exist. The better approach is to strengthen foundational data capabilities that create value regardless of the final rule: accurate identifiers, reliable lifecycle records, API readiness, data governance, traceability, and partner documentation.

No-regret investment
Better device identity, structured lifecycle data, secure access controls, API capability, and documented chain of custody improve operations today even if the eventual smartphone DPP differs from current expectations.

16 | U.S. SCENARIOS

Three U.S. Business Scenarios

Scenario A: U.S. wholesaler sells directly into the EU

This company has the most obvious exposure. When a future smartphone DPP requirement applies, the responsible economic operator in Europe will need compliant data and registration before placing the product on the EU market. The U.S. seller may need to provide device information in a structured format and may face commercial rejection if required information is missing.

Scenario B: U.S. processor sells to a global intermediary

The company may have no direct legal obligation in Europe, yet the intermediary may impose upstream data requirements because some inventory is ultimately routed into the EU. This can create de facto global standards before the legal requirement reaches every market.

Scenario C: U.S. company sells only outside Europe

Direct regulatory exposure may be low, but the business could still be affected if manufacturers, software providers, marketplaces, carriers, or large buyers adopt DPP-compatible data globally. The company may also benefit from better product information even if no EU compliance obligation applies to its sales.

A fourth scenario: imported used inventory from outside Europe into the EU

This is especially important for the secondary market and remains unresolved at the smartphone-specific level. Future rules will need to clarify how pre-existing, previously used, and legacy products are treated when first introduced into the EU market after a DPP requirement begins. Companies should not assume the answer until the delegated act is published.

Working hypothesis Commercial requirements may spread faster than legal requirements. Large buyers and platforms may begin requesting DPP-compatible information from suppliers across the world in order to simplify their own compliance and risk management.

17 | GMA ANALYSIS

GMA Working Hypotheses

Working hypothesis The DPP will increasingly function as market-access infrastructure, not simply sustainability disclosure. Registration, identifiers, customs verification, and product data will connect compliance directly to commercial flow.

Working hypothesis The most important secondary-market issue will be whether legitimate downstream operators receive fair access to relevant information and the ability to contribute verified lifecycle updates.

Working hypothesis A mobile DPP can reduce friction only if it is interoperable across borders, manufacturers, software platforms, and lifecycle stages. A fragmented or proprietary implementation would add cost without delivering the full circularity benefit.

Working hypothesis Legacy inventory is likely to be one of the hardest implementation questions because the used mobile market depends on devices manufactured and sold years before any future passport requirement begins.

Working hypothesis The battery passport will reveal practical lessons that should shape any future ICT passport: data burden, access control, update governance, service-provider economics, system integration, and error correction.

Working hypothesis The U.S. used mobile ecosystem has more influence before ICT requirements are finalized than after compliance architecture is locked. Early, constructive participation is therefore more valuable than reactive opposition later.

18 | READINESS

DPP Readiness Framework for Secondary Mobile Companies

Level	Characteristics	Leadership priority
1 - Awareness	DPP treated as a future policy topic; no owner; limited EU monitoring	Assign ownership and identify EU exposure
2 - Mapping	Company knows where identifiers and lifecycle data reside; major gaps documented	Map data, systems, partners, and legal roles
3 - Foundation	Device-level records are reliable; APIs and governance improving	Standardize identity and lifecycle data
4 - Integration	Systems can exchange structured data with partners; controls and audit trails exist	Pilot external data exchange and role-based access
5 - Readiness	Company can adapt rapidly to product-specific requirements without redesigning core operations	Monitor final rules and configure compliance layer

Readiness questions

- Can every device be tied to a stable identifier across purchasing, receiving, processing, inventory, and sale?
- Can the company distinguish manufacturer data, observed diagnostic data, repair events, customer data, and compliance data?
- Can systems export and import structured data through APIs?
- Can the company control access to data by role and maintain an audit trail?
- Can suppliers and customers provide reliable data without manual re-entry?
- Does leadership know who will own a future EU DPP implementation?
- Can finance quantify implementation cost per unit and potential impact on margin?
- Can the company prove where a device has been and what changes were made to it without exposing personal data?

Readiness objective

The goal is not to predict the final rule. It is to build an operating foundation that can absorb future product information requirements with the least disruption and cost.

19 | GMA ROLE

How GMA Can Support the Conversation

The DPP is the kind of emerging issue where the used mobile ecosystem benefits from having a dedicated association. GMA can help translate developments into practical business implications and create a forum where the companies actually buying, processing, refurbishing, selling, and moving used devices can be heard.

Potential areas for GMA consideration

- Monitor public EU, GSMA, ITU, and standards developments and explain material changes to the used mobile ecosystem.
- Use member discussions to identify operational concerns such as access rights, legacy devices, cross-border data, cost, and SME impact.
- Provide educational briefings that separate confirmed requirements from speculation.
- Where appropriate and formally approved, contribute secondary-market perspectives to public consultations or industry discussions.
- Encourage interoperability, reasonable access, privacy, security, and recognition of legitimate reuse as principles for future mobile requirements.
- Help members understand readiness without implying that GMA itself is a DPP certification, standards, legal, or technology provider.

Governance note
These are potential roles for GMA to consider as the association grows. Any formal advocacy position, program, working group, partnership, or recurring deliverable would require appropriate GMA approval, resources, and subject-matter support.

A constructive position

The secondary mobile ecosystem does not need to oppose the Digital Product Passport. Better product information can support reuse, repair, refurbishment, responsible trade, and recycling. The objective should be to ensure that the implementation recognizes the realities of secondary commerce and does not unintentionally create barriers that shorten device life or exclude legitimate operators.

ACTION FRAMEWORK

Recommended Actions for U.S. Secondary Mobile Leaders

Now - build awareness without overreacting

- Confirm whether the company sells directly or indirectly into the EU and identify the responsible business owners for those relationships.
- Assign one executive owner to monitor DPP and EU ICT policy developments.
- Educate leadership that 2029 is an indicative ICT evaluation target, not a known smartphone deadline.
- Review the battery-passport rollout as the first real implementation case.

Next 90 days - strengthen the data foundation

- Map device identifiers across purchasing, receiving, diagnostics, repair, inventory, sales, returns, and disposition.
- Identify lifecycle information the company already collects and where it is incomplete, inconsistent, or trapped in separate systems.
- Assess API capability, data governance, access control, audit trails, and partner data exchange.
- Document which suppliers and customers may need to exchange structured product data if future EU requirements apply.

Over the next 12 months - prepare for participation

- Track EU ICT preparatory work, impact assessments, and stakeholder consultations.
- Develop a list of secondary-market issues the company would want represented: legacy inventory, access rights, update rights, SME burden, cross-border trade, privacy, and interoperability.
- Avoid major technology purchases marketed as smartphone DPP compliance until the actual product-specific requirements are known.
- Use existing operational improvements - better identity, lifecycle data, chain of custody, and system integration - as no-regret readiness investments.

UNDERSTAND THE CHANGE | PREPARE THE FOUNDATION | HELP SHAPE THE OUTCOME

METHODOLOGY

Research Methodology and Limitations

This paper synthesizes official European Union legislation and implementation guidance, European Commission and Joint Research Centre publications, GSMA research and policy positions, and International Telecommunication Union recommendations available through August 23, 2026. GMA prioritized primary and authoritative sources and separated current legal requirements from proposed, indicative, or analytical conclusions.

Primary source categories

- Regulation (EU) 2024/1781 establishing the ESPR and Digital Product Passport framework.
- European Commission DPP implementation pages, Registry information, FAQs, economic-operator guidance, repairer/recycler guidance, and public-authority guidance.
- Commission Implementing Decision (EU) 2026/1736 on six harmonized DPP standards.
- Regulation (EU) 2023/1542 and August 2026 Commission guidance on the battery passport.
- European Commission smartphone and tablet ecodesign and energy-labelling requirements.
- Joint Research Centre methodology for defining DPP data requirements.
- GSMA circularity research and GSMA/Connect Europe policy recommendations.
- ITU-T Recommendations L.1070 and L.1071 on digital product-passport opportunities and ICT sustainability information.

Limitations

- No final smartphone-specific DPP delegated act exists as of this publication date.
- The ICT 2029 timeline is indicative and may change.
- The final mobile data fields, granularity, access rights, update rights, legacy-product treatment, and compliance date are unknown.
- EU implementation continues to evolve; readers should confirm the latest requirements before making legal or technology decisions.
- GMA working hypotheses and scenario analysis are clearly identified and should not be interpreted as legal requirements or official EU positions.

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Prepare Early. Participate Constructively.

The secondary mobile ecosystem should help shape the product-information systems that may influence its future.

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