DSR PROTOCOL · CONTINUITY BRIEF

Built to outlast the product

Your Digital Product Passport must keep resolving for the product's regulated lifespan — even if your business, or ours, one day ceases to trade.

PREPARED FOR PREMIUM & LUXURY BRANDS

A Digital Product Passport is a long-term promise. Under the EU's **Ecodesign for Sustainable Products Regulation** (ESPR), the passport, its GS1 Digital Link and its QR must remain available for the **regulated lifespan of the product** — and that duty **survives insolvency, liquidation or a company ceasing activity**. So the real question is not "can you make a passport?" but "who guarantees it is still there in ten, twenty or fifty years?"

> **A passport that disappears when a supplier or a start-up folds is not compliant. DSR is engineered so your identifiers keep resolving for the full regulated lifespan — independently of any one company, including us.**

What the regulation requires

The availability period is set per product group in a **delegated act**, generally matching the product's **expected lifespan**. Where no other duration is specified, **10 years** is the regulatory default (and the EU registry's own retention). Critically, **Article 10(4)** requires an **independent third-party back-up copy** of the passport, so the data is not lost when a company exits the market. The EU maintains only a **thin registry** of identifiers and pointers — the passport content itself stays in a decentralised store you control.

PRODUCT GROUP	INDICATIVE AVAILABILITY WINDOW
Textiles	**~3–10 years**
Electronics	**~5–15 years**
Batteries (Reg. 2023/1542)	**≥ 10 years after placing on the market**
Construction products	**~30–50+ years**
Default (no duration set / EU registry)	**10 years**

Indicative only; the binding figure is set in each product group's delegated act. Ten years is the stated default where none is specified.

How DSR guarantees it

Persistent identifiers on your own domain

Every tag carries a GS1 Digital Link on **your** domain, not a vendor's. Identifiers are never reassigned, so the code on the piece resolves for its whole regulated life.

An independent, off-site back-up (Article 10(4))

A second, geographically separate copy of every passport is held in the EU and kept up to date — so the record keeps resolving even if you cease trading, or we do. This is the back-up the regulation makes mandatory.

Open-standard export — no lock-in

Each passport downloads as **GS1 Digital Link + JSON-LD**. It can be handed to any conformant resolver at any time, so you are never trapped inside one supplier — the opposite of a marketplace or a tokenised ledger.

Immutable compliance record + lawful erasure

The mandatory compliance history is preserved for the full retention window, while **personal** data is erased or pseudonymised on request. That reconciliation of ESPR permanence with GDPR erasure is exactly what an append-only blockchain cannot do.

EU registry pointer, kept current

The identifier is registered in the EU's thin index so regulators and customs can discover and verify it — while the passport content stays with you, under your control.

The continuity guarantee we put in writing

- **A longevity commitment** that matches the product's regulated window (with 10 years as the stated minimum) — something your auditors can rely on.
- **An independent, EU-resident back-up** per Article 10(4), refreshed automatically, with a documented restore and succession path.
- **Prepaid at onboarding**, so decades of availability are funded up front — the promise does not depend on you, or us, still trading tomorrow.
- **Open-standard export on demand**, so you can take your passports elsewhere at any moment. No lock-in.

The Regulatory Continuity Endowment

Continuity is **prepaid once at onboarding** and held as a **ring-fenced reserve** — not booked as ordinary revenue — so it cannot vanish if a company folds. It funds a static, read-only resolver served directly from EU-resident object storage (zero egress), sized to the regulated window. Because object storage is inexpensive and predictable, a modest one-off grant covers decades — with **no annual invoice** and no dependency on anyone still trading. Size it for your catalogue in the Continuity Endowment calculator.

Sources: Ecodesign for Sustainable Products Regulation (ESPR), Reg. (EU) 2024/1781, incl. the Article 10(4) back-up obligation; the EU Battery Regulation (2023/1542); and the GS1 Digital Link Digital Product Passport direction. This is a positioning document, not legal advice — the regulatory points should be confirmed with counsel and the exact windows read from the applicable delegated act.

Compliance case: `/why-not-blockchain` · Live demonstration: `/resolver-demo`

SCAN TO VIEW LIVE