

Public Review: New UN Economic Committee for Europe White Paper on Digital Product Passports & Critical Raw Materials for Batteries: Legal Conflicts and Principles for Cross-Border Cooperation

Legal fragmentation slows down the scaling up of the Critical Raw Materials-battery value chains to meet the demands of the green transition. Digital Product Passports (DPPs) should serve as an effective digital traceability tool for business compliance, rather than creating a green barrier.

UNECE and UN/CEFACT are proud to release our **White Paper for public review**, offering a deep dive into:

1. Legal conflicts across the Critical Raw Materials-battery international and cross-sector value chains (jurisdiction, applicable law, and enforcement)
2. Traceability across critical raw materials like cobalt, copper, lithium & nickel
3. Gaps in international cooperation, especially between the EU, China, the U.S., and Australia
4. Practical principles to bridge legal divides and support SMEs and the Global South

The paper proposes **five key principles** for improving legal interoperability:

1. Leverage existing legal and trade frameworks
2. Respect mandatory laws and public policy exceptions
3. Maintain certainty and predictability
4. Ensure inclusivity for SMEs and developing countries

5. Achieve mutual recognition across jurisdictions

The white paper is subject to a 14-day public review until Monday, 30 June 2025. Please use the Public Comment Log provided to facilitate the preparation of a Disposition Log by the Project Team. **Download the full paper and provide your comments here:**

<https://uncefact.unece.org/pages/viewpage.action?pageId=24933171>

For the works leading to this white paper, see [here](#) and [here](#).