

EU Battery Passport Compliance Checklist

Regulation (EU) 2023/1542 — preparing for the 18 February 2027 deadline

1. Determine Your Regulatory Exposure

- Classify every battery you place on the EU market against the five categories: portable, industrial, EV, LMT, SLI.
- Identify which batteries require a passport: industrial >2 kWh, EV, and LMT.
- Map each product line to its applicable compliance deadlines.

2. Audit Your Data Against Annex XIII

- Map all 111 mandatory data points across the six categories: general/manufacturer info, carbon footprint, due diligence, material composition, performance and durability, end-of-life.
- Determine whether each data point exists, is correctly formatted, and is verifiable.

3. Engage Your Supply Chain

- Formalise data-sharing requirements for cell chemistry and raw material sourcing.
- Request component-level carbon footprint data and substance-of-concern disclosures.
- Update supplier contracts to include battery passport data obligations.

4. Select a Battery Passport Platform

- Confirm support for the Annex XIII data model.
- Confirm ISO/IEC 18004-compliant QR code generation.
- Confirm tiered access control and ERP/MES integration.
- Confirm readiness for the EU central battery passport registry.

5. Implement Carbon Footprint Processes

- Align your methodology with the Article 7(1) delegated act.
- Prepare for performance-class labelling (from August 2026).
- Prepare for maximum threshold compliance (from February 2028).

6. Establish Due Diligence Processes

- Implement an OECD-aligned due diligence system for cobalt, lithium, nickel, and natural graphite.
- Commission third-party audits of your due diligence practices.
- Prepare your first annual due diligence report (obligations apply from August 2025).

7. Run a Pilot

- Select one battery product line and create a complete battery passport.
- Populate all Annex XIII data points and generate the QR code.
- Test scanning workflows and validate access tiers before full rollout.