Annex XIII Readiness Checklist

EU Battery Regulation 2023/1542 — Digital Product Passport data requirements, mapped to DIN DKE SPEC 99100 v1.3. Covers EV, Industrial (including SBESS) and LMT batteries placed on the EU market from 18 February 2027.

How to use this document. Each section lists the data points a Digital Product Passport must carry for a given battery category. Tick the box where the data is already sourced and held in a retrievable system. Leave blank where the data does not yet exist, is held only in an unstructured form (spreadsheets, PDFs, emails), or sits with a supplier who has not yet been asked to provide it. The pattern of gaps tells you where the work is.

Legal framing. The economic operator placing the battery on the EU market is legally responsible for the accuracy and availability of the Digital Product Passport. A DPP Service Provider (such as EU Digital Passport Processor) creates, submits, and hosts the passport on the operator's behalf — the operator stays the economic operator. This checklist is structured to help the economic operator assess readiness regardless of which DPP Service Provider they use.

Scope. This document is a readiness assessment, not a legal interpretation of the regulation. For formal legal advice, consult your regulatory counsel. Field-level mandatory / optional status per category follows the DIN DKE SPEC 99100 v1.3 longlist as of March 2026.

Document sections

1. Common data (all categories)

These data points are required for every battery placed on the EU market, regardless of category. They form the spine of the passport record.

✓	Field	Description / where sourced
	Manufacturer legal name	Legal entity responsible for placing the battery on the market.
	Manufacturer registered address	Full registered address including country.
	Manufacturer contact email	Monitored contact for regulatory correspondence.
	Manufacturer identification number	EU Economic Operators Registration and Identification (EORI) or equivalent.
	Battery category	EV, Industrial (including SBESS), or LMT. Drives mandatory field scope.
	Battery model	Manufacturer's model name or code.
	Battery serial number or identifier	Unique per-unit identifier. Encoded in the QR / GS1 Digital Link.
	Battery GTIN	Global Trade Item Number. GS1-issued. Required for the Digital Link URL.
	Date of manufacture	ISO 8601 date format. Used to anchor retention periods.
	Place of manufacture	Country, and site where final cell-to-pack or pack assembly occurred.
	Weight (kg)	Gross weight of the battery as placed on the market.
	Status in the lifecycle	Draft / Active / Submitted / Registered / Revoked. Set by DPP Service Provider.
	QR / GS1 Digital Link URL	Encoded on the physical battery. Resolves to the public passport viewer.

2. Manufacturer and declaration of conformity

Documents and references required to demonstrate conformity with the regulation at the point of placing on the market.

✓	Field	Description / where sourced
	CE marking reference	Declaration number and date. Held by the economic operator.
	EU Declaration of Conformity (DoC) document	PDF or structured record. Required to be accessible via the passport.
	Notified body identification (where applicable)	4-digit number of the notified body involved in conformity assessment.
	Conformity assessment module used	Module A, B+C, B+D, B+E, B+F, G or H per Annex VIII.
	Harmonised standards applied	List of EN / IEC standards used in conformity assessment.
	Technical documentation archive location	Where the Article 12 technical file is held. Must be retained for 10 years.
	Authorised representative (non-EU manufacturers)	Name and address of the EU-established authorised representative.
	Importer details (if different from manufacturer)	Importer legal name, address, and identification number.

3. Chemistry and cell composition

Composition data required to support recycling, second life, and due diligence. Sourced from cell suppliers and pack integrators.

✓	Field	Description / where sourced
	Cell chemistry family	Li-ion (NMC, NCA, LFP, LMFP), Na-ion, solid-state, etc.
	Cathode active material composition (%)	Per-element mass percentage for the cathode.
	Anode active material composition (%)	Graphite, silicon composite, lithium titanate, etc.
	Electrolyte composition	Solvent and salt identification. Hazard-class flags where applicable.
	Nickel content (kg)	Total nickel mass in the battery. Required for due diligence reporting.
	Cobalt content (kg)	Total cobalt mass. Required for due diligence reporting.
	Lithium content (kg)	Total lithium mass. Required for due diligence reporting.
	Natural graphite content (kg)	Total natural graphite mass. Required for due diligence reporting.
	Lead content (if present, kg)	Total lead mass. Applies to lead-acid variants.
	Substances of very high concern (SVHC)	Per REACH Article 33. List of substances present above 0.1% w/w.
	Cell manufacturer	Legal name and site of the cell manufacturer. Per cell format if multiple.
	Module / pack manufacturer	Legal name and site, if different from cell manufacturer.

4. Carbon footprint

Stage-differentiated carbon footprint expressed as kg CO_2e per kWh of rated energy. Mandatory for EV and industrial categories; voluntary disclosure for LMT until a later date specified by the Commission. Methodology follows the Product Environmental Footprint Category Rules (PEFCR) for batteries.

✓	Field	Description / where sourced
	Total carbon footprint (kg CO_2e per kWh)	Aggregate across the full lifecycle. Per rated energy.
	Stage 1 — Raw material acquisition and pre-processing	Mining, refining, processing of cathode / anode / electrolyte materials.
	Stage 2 — Main product production	Cell and pack manufacturing energy and process emissions.
	Stage 3 — Distribution	Transport from manufacturer to EU point of placing on the market.
	Stage 4 — End-of-life and recycling	Treatment emissions net of recovered material credits.
	PEF methodology version applied	Commission-adopted PEFCR version reference.
	Circular Footprint Formula (CFF) parameters	A, B, and R2 values used for end-of-life allocation.
	Third-party verification statement	Verifier name, accreditation body, date of verification.
	Carbon footprint performance class	A through E, per Commission delegated act thresholds (when published).
	Rated energy (kWh) — basis for per-kWh calculation	As measured under the applicable IEC standard.

Note: the Commission has not yet published performance class thresholds as of April 2026. Leave the performance class field blank until thresholds are adopted.

5. Recycled content and hazardous substances

Recycled content is declared per material, with pre-consumer and post-consumer split required for cobalt, lithium, and nickel. Lead remains a single field. Mandatory declaration thresholds increase over time per the regulation.

✓	Field	Description / where sourced
	Cobalt — pre-consumer recycled content (%)	Share of cobalt from manufacturing scrap or offcuts.
	Cobalt — post-consumer recycled content (%)	Share of cobalt from end-of-life batteries or products.
	Lithium — pre-consumer recycled content (%)	Share of lithium from manufacturing scrap.
	Lithium — post-consumer recycled content (%)	Share of lithium from end-of-life sources.
	Nickel — pre-consumer recycled content (%)	Share of nickel from manufacturing scrap.
	Nickel — post-consumer recycled content (%)	Share of nickel from end-of-life sources.
	Lead — recycled content (%)	Single field. Pre/post split not required.
	Method used to determine recycled content	Mass-balance, chain-of-custody, or physical segregation.
	Hazardous substances declaration	Substances listed under Annex I of the regulation, with concentrations.
	SVHC declaration (REACH Article 33)	Required where substances present above 0.1% w/w.

6. Circularity and lifecycle

Information supporting repair, repurposing, and end-of-life treatment. These fields enable the second-life operator and the recycler to act on the battery without re-discovering the design.

✓	Field	Description / where sourced
	Expected lifetime (cycles)	Manufacturer's stated expected cycle life at stated depth of discharge.
	Expected lifetime (years)	Calendar life under typical operating conditions.
	Depth of discharge used for lifetime calculation (%)	Reference DoD for the cycle-life figure.
	Operating temperature range (°C)	Min / max operating temperature envelope.
	Storage temperature range (°C)	Min / max non-operating storage envelope.
	Disassembly information	Instructions or diagrams for safe disassembly to module level.
	Repair information	Information on replaceable sub-components and tools required.
	Removal and replacement procedure	Required for LMT batteries in particular; documented procedure.
	Safety information	Thermal runaway indicators, emergency response guidance.
	End-of-life treatment recommendations	Preferred recycling route and any pre-treatment requirements.
	Parent passport ID (for second-life batteries)	Identifier of the original battery passport, if this unit is a second-life pack.

7. Performance and durability (EV & industrial)

Performance data measured under standardised test conditions. Mandatory for EV and industrial batteries; not required for LMT.

✓	Field	Description / where sourced
	Rated capacity (Ah)	At the stated reference conditions.
	Rated energy (kWh)	At the stated reference conditions.
	Nominal voltage (V)	As declared by the manufacturer.
	Rated power (W or kW)	Continuous power rating under reference conditions.
	Round-trip energy efficiency (%)	At beginning of life, under the applicable test standard.
	Round-trip energy efficiency at 50% of cycle life (%)	Measured or modelled performance mid-life.
	Internal resistance (mΩ)	At reference temperature and state of charge.
	Capacity fade (% per cycle)	Rate of capacity reduction per full equivalent cycle.
	Power fade (% per cycle)	Rate of power reduction per full equivalent cycle.
	Self-discharge rate (% per month)	At reference storage conditions.
	Temperature range for operation (°C)	Min / max temperatures within which performance is guaranteed.
	Reference test standard	IEC 61960, IEC 62660, IEC 62620, or equivalent.

8. Category-specific — EV batteries

Fields required only for electric vehicle traction batteries. State of Health monitoring becomes mandatory from 2027 onwards.

✓	Field	Description / where sourced
	Capacity threshold for exhaustion (%)	Percentage of initial rated capacity at which the battery is considered exhausted.
	Certified usable battery energy (kWh)	Useable energy certified under the applicable test standard.
	State of certified energy (%)	Current SoCE relative to the certified usable energy. Reported dynamically.
	Date put into service	Date the battery entered service. Optional for EV; mandatory for LMT.
	Commercial warranty period (months)	Manufacturer's commercial warranty duration.
	Warranty capacity threshold (%)	Capacity percentage below which the warranty covers the battery.
	BMS live data endpoint (2027 onwards)	Telemetry API for State of Health reporting. See Section 12.
	State of Health reporting frequency	Required cadence for SoH updates. To be specified by delegated act.

9. Category-specific — Industrial (including SBESS)

Fields required only for industrial batteries, including stationary battery energy storage systems (SBESS). SBESS has no kWh threshold under the 2023/1542 scope — all industrial SBESS applications fall under the regulation.

✓	Field	Description / where sourced
	Application type	Grid-scale SBESS, behind-the-meter, backup power, forklift, data centre UPS, etc.
	Installation address (where known)	For fixed installations. May be blank at time of placing on market.
	Grid connection voltage (kV, where applicable)	For SBESS grid-connected systems.
	Power conversion system reference	Inverter / PCS manufacturer and model, if integrated with the battery.
	Response time for grid services (ms, where applicable)	For frequency response or ancillary service capable systems.
	Round-trip efficiency at system level (%)	Including PCS losses, for integrated SBESS units.
	State of Health reporting (2027 onwards)	Required under the same delegated act as EV. See Section 12.

10. Category-specific — LMT (Light Means of Transport)

Fields required only for LMT batteries — e-bikes, e-scooters, e-mopeds, light electric vehicles. There is no 2 kWh threshold: all LMT batteries placed on the EU market from 18 February 2027 are in scope.

✓	Field	Description / where sourced
	Date put into service	Mandatory for LMT. Anchors warranty and recall windows.
	Energy throughput (kWh, cumulative)	Cumulative energy delivered over the life of the battery.
	Capacity throughput (Ah, cumulative)	Cumulative charge throughput over the life of the battery.
	Removability from host device	Whether the battery can be removed by the end user or a professional.
	Compatibility identifier	Reference to the host device classes the battery is designed for.
	Charging specification	Voltage, current, protocol, and connector type.

Note: LMT batteries do not require the full performance and durability suite from Section 7. They do require the common data, manufacturer, chemistry, recycled content, and circularity sections.

11. Supply chain due diligence

Required for economic operators with an annual net turnover of EUR 40 million or more, for batteries containing cobalt, lithium, natural graphite, or nickel. Below-threshold operators are exempt but may choose to publish voluntarily.

✓	Field	Description / where sourced
	Due diligence policy statement	Public statement referencing OECD Due Diligence Guidance alignment.
	Supply chain risk identification report	Identifies risks per Annex X of the regulation.
	Risk mitigation plan	Actions taken or planned to mitigate identified risks.
	Third-party audit statement	Audit by accredited verifier. Frequency per the regulation.
	Grievance mechanism reference	Accessible mechanism for reporting concerns.
	Upstream supplier list (where disclosure is required)	Smelter / refiner level disclosure for cobalt, lithium, graphite, nickel.
	Chain of custody documentation	Evidence supporting the recycled content figures in Section 5.

12. Ongoing obligations (2027 onwards)

Data obligations that continue after the battery is placed on the market. These are the lifecycle obligations that distinguish a Digital Product Passport from a static conformity declaration.

✓	Field	Description / where sourced
	State of Health updates (EV and industrial)	Periodic SoH telemetry. Mandatory from 2027 under delegated act.
	State of Charge updates	Where applicable. Supports second-life and recycler decision-making.
	Change of ownership events	Transfer of economic operator responsibility. Passport record updated.
	Second-life repurposing event	Creation of a child passport referencing the parent passport ID.
	Recycler access provision	Recycler read access to composition and disassembly data.
	End-of-life declaration	Final lifecycle status. Closes the passport record.
	Incident or recall notifications	Safety incidents linked to the battery are recorded against the passport.
	Data retention commitment (10 years minimum)	Passport record retained for the statutory lifetime of the battery.

Using this checklist to plan

The pattern of unticked boxes is the plan. In our experience working with battery manufacturers preparing for the February 2027 deadline, the gaps cluster in predictable places:

Chemistry and composition — data exists at cell manufacturer level but has not been packaged for pack-level disclosure. Usually resolved by a structured data request to the cell supplier.

Carbon footprint — rarely exists in PEF-compliant form at first assessment. Requires a dedicated PEF study, typically 8–12 weeks with an accredited verifier.

Recycled content pre/post split — most operators hold total recycled content at best, not the split. Requires supplier-level chain of custody evidence.

State of Health telemetry — the BMS produces the data but it is rarely surfaced to an external API. Requires firmware and cloud integration work.

Due diligence documentation — where required, typically the largest single block of work. Plan 6–9 months including verification.

Next steps

If you want help building the passport submission and hosting flow on top of this readiness assessment, EU Digital Passport Processor is a DPP Service Provider under ESPR Article 2(32). We create, submit, and host passports on the economic operator's behalf, integrating with the EU EES registry once the API opens in mid-2026.

Visit **eudigitalpassportprocessor.com** to join the June 2026 demo wave, or email **partners@eudigitalpassportprocessor.com** for a structured readiness conversation.