

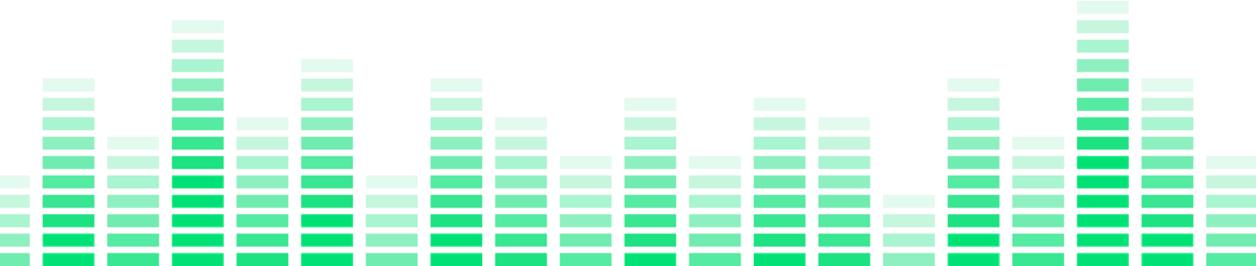
thebatterypass.eu



# **Battery Passport Content Guidance**- **Executive Summary** -

Achieving compliance with the EU Battery Regulation and increasing sustainability and circularity

Version 1.1 / December 2023



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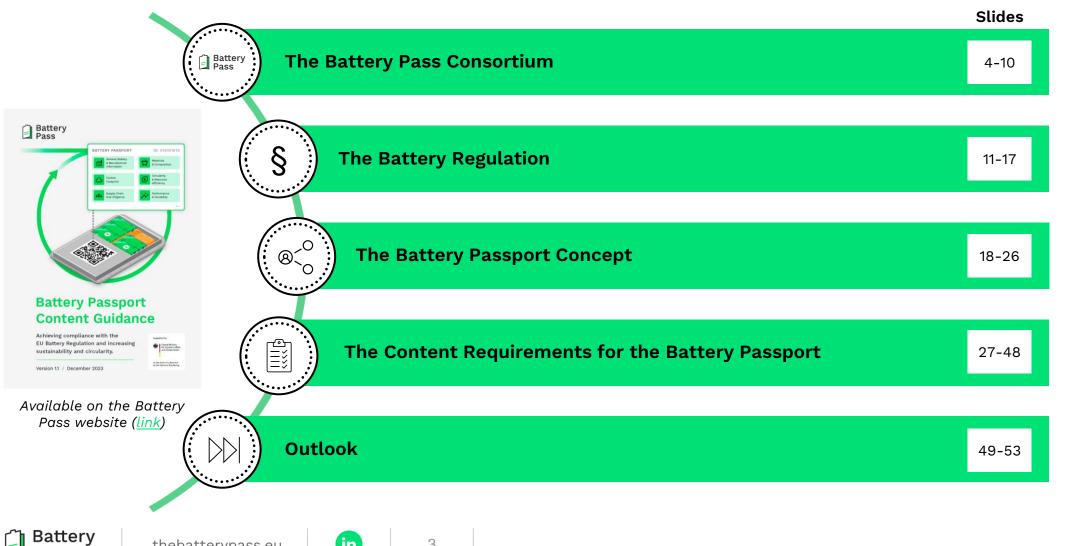
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### This Executive Summary document summarises the key insights and recommendations of the Battery Passport Content Guidance report







## **The Battery Pass Consortium**



### The "Battery Pass" is a consortium of 11 partners from industry, science, technology and beyond, co-funded by BMWK aiming to provide guidance on the EU battery passport

#### **Key facts on the Battery Pass Consortium**

- Evolved from the Circular Economy Initiative Germany (CEID)
- 11 consortium partners from industry, science, technology and beyond
- · Co-funded by the German Federal Ministry for Economic Affairs and Climate Action (BMWK) with EUR 8.2 mn
- Aiming to advance the implementation of and provide guidance on the EU Battery Passport
- Five work packages including:
  - Project coordination and stakeholder engagement
  - Guidance on content requirements
  - Guidance on technical battery passport system
  - Development of a physical and software demonstrator
  - Value assessment of individual use cases and overall
- 3-year timeframe from April 2022 to April 2025



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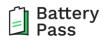
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Kick-off event of the Battery Pass Consortium in Berlin in April 2022







### The "Battery Pass" develops a perspective on battery passport content and technical requirements, builds a demonstrator, and assesses the value of the passport

Work packa	ages		Sub-topics	_
WP1	Project Coordination and Stakeholder Engagement		<ul> <li>a) Consortium coordination</li> <li>b) Content governance for quality and coherence</li> <li>c) EU alignment and global compatibility</li> <li>d) External communication for results dissemination</li> <li>e) Scaling up and making results permanent</li> </ul>	
WP2	Content Guidance	*;= ;;=	<ul> <li>a) Carbon footprint</li> <li>b) Supply chain due diligence</li> <li>c) Circularity and resource efficiency</li> <li>d) Performance and durability</li> <li>e) Responsibility and liability</li> <li>f) Auditability</li> </ul>	Focus of this document
WP3	Technical System		<ul> <li>a) Reference models for data collection along battery life cycle</li> <li>b) Contextualization regarding EU and global data spaces</li> <li>c) Process and access logics based on the reference models</li> </ul>	_
WP4	Demonstrator	○→ <b>◇</b> □←Ŏ	<ul><li>a) Data infrastructure</li><li>b) Data storage &amp; process execution</li><li>c) Integration with Catena-X/ EES/ Gaia-X</li><li>d) Demonstration</li></ul>	-
WP5	Value assessment		<ul><li>a) Benefit modelling of individual use cases</li><li>b) Benefit modelling of the battery passport overall</li></ul>	_
Battery Pass	thebatterypass.eu	in	6	



### The "Battery Pass" draws upon a network of associated and supporting partners and guidance of its Advisory Council

The Battery Pass partner network

**Associated Partners** 



































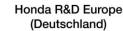










































LiBCycle

















#### **Advisory** Council





















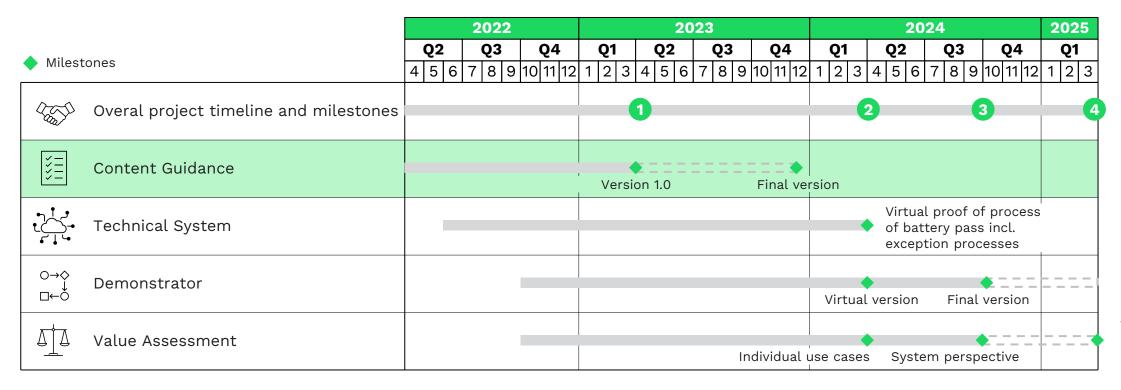








### The "Battery Pass" project runs over 3 years with the Battery Passport Content Guidance representing the first project milestone



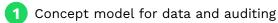
Value model discussed in community

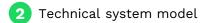
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Use case model and follow-up for implementation









### The "Battery Pass" published six documents in the context of the Content Guidance that help organisations understand passport related content requirements

**BATTERY PASSPORT** CONTENT **GUIDANCE** 



Comprehensive report PDF report (200 pages)



Slide deck



Data attribute longlist Excel file



**Position Paper to EC** PDF report

All documents

available on the

**Battery Pass** website

**CARBON FOOTPRINT DOCUMENTS** 

Battery



**Carbon Footprint Rules** PDF report



**Carbon Footprint EOL Analysis** 

PDF report





## The Content Guidance documents are directed at several stakeholder groups aiming to advance the implementation of the EU battery passport

Stakeholder groups		Objectives		
0	Responsible economic operators	<ul> <li>One-stop-shop aggregating and interpreting all content requirements mandated by the EU Battery Regulation</li> <li>Highlighting harmonisation potential with further regulatory frameworks</li> <li>Indicating additional value-adding aspects enabling increased sustainability and circularity</li> </ul>		
- +)	Battery value chain participants	<ul> <li>Educate and guide on reporting duties of and access rights to battery passport information</li> <li>Provide additional background information, e.g., complementing definitions, links to other regulations etc.</li> </ul>		
	Other industry participants	Serve as a blueprint for other upcoming digital product passports		
×= ×= ×=	Standardisation organisations	Foundation for translating regulatory requirements into standards and unveil further standardization needs		
	European Commission	<ul> <li>Highlight ambiguities and inconsistencies in the legal text and requirements for further elaboration</li> <li>Ensure a balancing of sustainability objectives and industry feasibility</li> <li>Contribute to the public consultation phase of the upcoming delegated and implementing acts</li> </ul>		
	The Public	<ul> <li>Inform and educate the public through information on the battery passport and its contribution to increased sustainability for batteries and knowledge for informed purchase decisions</li> </ul>		
	Battery Pass work packages	<ul> <li>Leverage as foundation for the further specification of technical approaches incl. a formal reference model for data collection, an initial framework to cover technical specifications and the development of a demonstrator</li> <li>Direct requirement and input for the identification and specification of use cases / value assessment</li> </ul>		





Federal Ministry

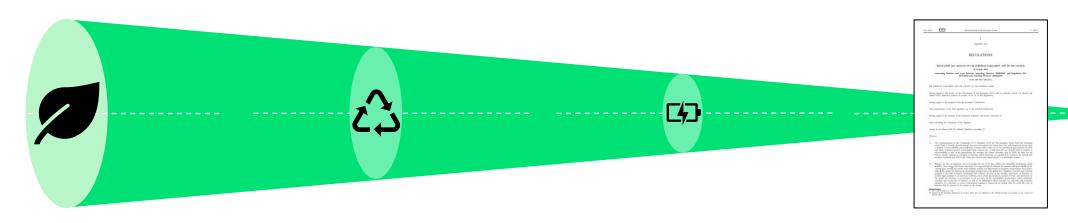
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## **The Battery Regulation**



## The Battery Regulation is part of the EU Green Deal and complements both the Circular Economy and Strategic Action Plans on Batteries



#### European Green Deal

Comprehensive package of policy initiatives launched in 2019 to:

- make EU climate-neutral by 2050
- safeguard biodiversity
- establish a circular economy
- eliminate pollution
- boost competitiveness
- · ensure a just transition

#### **Circular Economy Action Plan**

- Adopted in 2020 as one key component of the Green Deal and pre-requisite to achieve EU's 2050 climate neutrality goal
- Promotes the sustainable use of resources, especially in resourceintensive sectors
- Initiatives span along the entire lifecycle of products

#### Strategic Action Plan on Batteries

- Introduced in 2018 as part of the Clean Mobility Package and updated with the EU Green Deal
- Aims at developing a sustainable and competitive battery value chain in Europe
- Objective to ensure a reliable and sustainable supply of batteries

#### **Battery Regulation**

- Initially proposed in 2020 as part of the EU Green Deal and complementing the Strategic Action Plan for Batteries
- Entered into force in Aug 2023 replacing the EU Battery Directive
- Provides a legal framework aiming to promote sustainability, circularity, ensure safety and improve transparency

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### The Battery Regulation aims to promote sustainability, encourage circularity, ensure safety, and improve transparency



**Promoting sustainability** in the production of batteries and reducing the environmental impact throughout their lifecycle



**Encouraging circularity** by making data available to enable second life usage and to improve recycling in terms of both quality and quantity



**Ensuring safety** through the protection of human health as well as the environment



Improving transparency and consumer information on the environmental and safety performance of batteries









## The Battery Regulation is a ground-breaking reform on the EU internal market as it covers the entire life cycle and mandates the first digital product passport

Regulation categories	Exemplary requirements	Lifecycle stages	
Restriction of substances	Mercury, cadmium, lead restrictions – delegated acts potentially extending this list		
Recycled content	Min. levels of recovered cobalt (16%), lead (85%), lithium (6%), and nickel (6%), increasing over time		
Due diligence policies	Implementation of a due diligence policy, incl. traceability or chain of custody system		
Green public procurement	Criteria for sustainable procurement procedures for batterie to be established		
Labelling and marking	List of general information on battery labels determined; QR Code required		
Safety parameters	Stationary energy storage systems requiring technical documentation on safety		
Removability, replaceability	Portable batteries must be easily removable and replaceable by consumers		
Performance, durability	Minimum performance & durability requirements for batteries will be determined		
- <b>\</b> SoH, expected lifetime	Up-to-date data in the BMS to determine SoH and expected lifetime		
Carbon footprint	Carbon footprint reporting required for the first time and for each model per manufacturing plant		
Waste battery management	Collection targets as well as min. recycling efficiencies and levels of recovered Co, Cu, Pb, Li, Ni		
i Improved data availability	An electronic record of a battery (battery passport) with key static and dynamic data		





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## The Battery Regulation was generally welcomed by different stakeholders, yet the need to solve remaining challenges was addressed

Kamila Slupek Sustainability Director Eurometaux We congratulate EU legislators for reaching today's landmark agreement. The Battery Regulation's new recycling and sustainability rules are an important step to differentiating Europe's batteries market on the global stage.

"

Lauren Pagel Policy Director Earthworks The European Union is **seizing the opportunity** presented by the transition to EVs and low-carbon transportation **to break away from irresponsible mining**, which has disproportionately impacted frontline and Indigenous communities in the Global South and marginalized communities.

"

Barbara Metz Executive Director Deutsche Umwelthilfe With this **overdue agreement**, groundbreaking specifications for more sustainable batteries can finally come into force [...] 'Unfortunately, **some problems remain unresolved**. If there is a pure switch from cars with combustion engines to electric cars, the environmental impact will increase significantly due to the rise in battery production. We need a fundamental shift away from private transport to buses, trains and bikes. In addition, the Commission must now exploit the circular economy potential for recycling batteries and their raw materials as quickly as possible through supplementary legal acts.

"

"

Rene Schroeder Executive-Director EUROBAT The Commission's proposal has the **potential to be a real gamechanger** with its 360° policy approach. Sustainability and decarbonisation must go hand-in-hand with an ambitious industrial policy for batteries, as well as a comprehensive and technology-inclusive research and innovation framework.

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## The battery passport will be the first digital product passport (DPP) implemented in the EU, which are seen as a key tool to advance the European Twin Transition

#### DPPs to advance the EU Twin Transition

- The European Twin Transition is a policy framework that aims to simultaneously address two major challenges: the green transition to a sustainable and low-carbon economy and the digital transformation of society.
- Digital product passports (DPPs) are a concept that involves creating a digital record of a product's environmental and social impact throughout its lifecycle. They are seen as a key tool for advancing the European Twin Transition by promoting a more sustainable, circular and digital economy.
- The Battery Passport is the first DPP introduced in Europe and globally with further product categories to follow: textiles, construction, consumer electronics, plastics, chemicals and automotive sector.

### Battery Pass

### in

#### Overview on other global DPP initiatives

#### Canada

Involvement of Government in battery passport initiatives, considering passport for EV batteries

#### **United States**

Battery passport discussed by industry, e.g., for ensuring compliance with Inflation Reduction Act (IRA) upstream and optimizing recycling downstream

#### Others

International standardization activities regarding DPPs also taking place in other countries like e.g., Brazil, Indonesia, South Korea, Australia or Chile

#### **United Kingdom**

Product Passports proposed and advocated as a policy concept by the United Kingdom government in its waste and resource strategy

#### **European Union**

- DPPs introduced following the European Green Deal and Circular Economy Action Plan
- First DPP mandated for batteries by Battery Regulation
  - Other product categories prioritized, such as construction, textiles, plastics and chemicals.

#### China

Development of Chinese digital battery passport launched

#### Japan

Disclosure of EV battery production emissions to be mandated, for which a digital battery passport could be used

- Digital product passports mandated
- Efforts regarding digital product passports ongoing

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battery value chain

Identified digital battery passport as

solutions across stakeholders in the

opportunity to leverage experience

of deploying scalable digital

India

### Initially proposed in 2020, the EU Battery Regulation entered into force in August 2023 with the battery passport becoming mandatory from February 2027 onwards

#### Timeline of the EU Battery Regulation



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## **The Battery Passport Concept**



## The purpose of the battery passport is to provide transparency and awareness, enable the shift to a circular economy, and create a level playing field

#### **Purpose of the battery passport**



Enable the shift from linear to circular economies

- Provide the required "situational awareness" for batteries including, for example a "product-as-a-service" mode, instead of considering a product a consumable only
- · Keep products within the system to save resources and minimize the amount of actual waste
- Leverage data for optimizing circularity processes



Provide transparency to impact decisions

- Enable informed decisions based on comprehensive data being provided digitally
- Bridge information gaps in the battery value chain to maximize lifetime value
- · Leverage new insights from use and fate for design and production



Create a battery level playing field

- Build the future battery value chain on multi-stakeholder responsibilities
- Move stakeholders to compete on sustainable innovation
- Develop business models that operate on value creation, value capture, and value conservation









### The battery passport will unlock major value along the entire value chain

**Precursor and CAM producer** 

Value of the passport: Regulatory compliance and potential additional value pending conditions beyond regulatory requirements

Select examples

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Direct value add along several dimensions (environmental, social and economic)

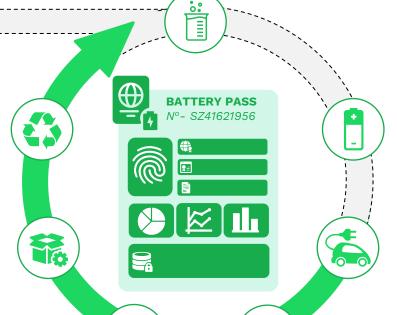
## Refiner Miner

#### Recycler: "more efficient recycling"

Availability of data on battery composition and dismantling enables more efficient recycling processes by e.g., reducing sampling efforts and optimizing the dismantling process.

#### Collector: "Precise risk assessment for transport of used batteries"

Information about the history of the battery (e.g., accidents) supports the correct categorization and thereby minimizes the risk of using insufficient transport precautions.



#### Authorities: "informed policy design"

More accurate data on the battery stock in the different life cycle stages (e.g., material volumes) can provide information for fact-based policy design.

#### Cell and module producer

#### **OEM: "Supply chain transparency based on** upstream data"

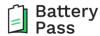
Data availability within and from the supply chain (e.g., due diligence report compliance, carbon footprint) enables a comparison of suppliers with the potential to impact choice and mgmt. of suppliers.

#### 2<sup>nd</sup> hand user: "simplified residual value assessment"

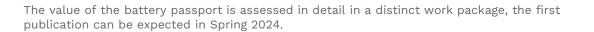
Performance and durability data (e.g., remaining capacity) enable downstream businesses and private users to better assess the residual value of the battery to decide between recycling or 2<sup>nd</sup> life and its specific 2<sup>nd</sup> life application.

#### Consumer: "informed purchasing decisions"

Access to reliable and comparable information about the battery (e.g., carbon footprint) facilitates wellinformed purchasing decisions. .





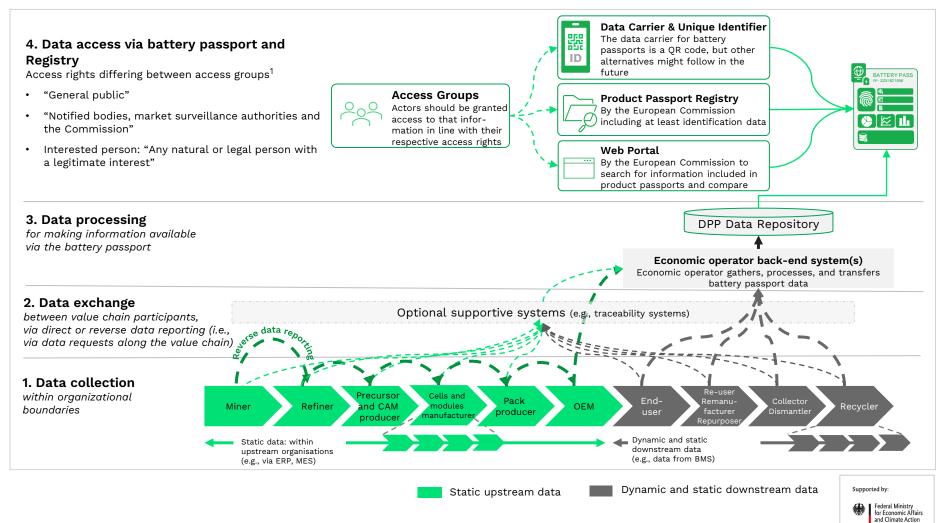


## The battery passport will be an electronic record of a battery containing a comprehensive set of information collected along the battery life cycle

#### The digital battery passport

Article 77 of the EU Battery Regulation requires an electronic record for batteries ("battery passport"), which shall contain information relating to the battery model and information specific to the individual battery.

The European Commission defines a digital product passport (DPP) as "a structured collection of product related data with predefined scope and agreed data ownership and access rights conveyed through a unique identifier"<sup>2</sup>







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### Specifications of the battery passport such as timeline, scope, responsibility, and access groups are laid out in Article 77 of the EU Battery Regulation

#### **Specifications for the battery passport**



**Timeline** 

The battery passport will be required from 18 February 2027



Scope

Batteries in light means of transport (LMT)

- Industrial batteries with a capacity greater than 2 kWh
- Electric vehicle (EV) batteries

Deep dives follow



Responsibility

The responsibility lies with the economic operator (or an authorized representative) placing the battery on the market



**Access groups** 

- The "general public"
- "Notified bodies, market surveillance authorities and the Commission"
- "Any natural or legal person with a legitimate interest in accessing and processing that information"









### EV, LMT, and industrial batteries > 2 kWh will be in scope for the battery passport

Within scope of battery passport

Battery categories <sup>1</sup>		Battery definition and use cases	Battery weight	
	Electric vehicle (EV) battery	<ul> <li>Provide electric power for the traction in hybrid or electric vehicles</li> <li>of categories L (Regulation (EU) No 168/2013), if larger than 25 kg, or</li> <li>of categories M, N or O (Regulation (EU) 2018/858)</li> </ul>	> 25 kg (category L)	
<b>્</b>	Light means of transport (LMT) battery	<ul> <li>Provide electric power for traction to wheeled vehicles that can be powered by the electric motor alone or by a combination of motor and human power including type-approved vehicles of category L (Regulation (EU) No 168/2013), e.g., e-bikes and e-scooters</li> </ul>	≤ 25 kg	
竹	Industrial battery <sup>2</sup>	<ul> <li>Designed specifically for industrial uses, or</li> <li>Intended for industrial uses after being subject to preparation for repurpose or repurposing, or</li> <li>Any other battery that weighs more than 5 kg and is not an LMT, EV or SLI battery</li> <li>Industrial uses include (Recital 15)         <ul> <li>industrial activities</li> <li>energy storage in private or domestic environments</li> <li>communication infrastructure</li> <li>generation and distribution of electric energy</li> <li>agricultural activities</li> <li>traction in other transport vehicles incl. rail, waterborne, aviation or off-road machinery</li> </ul> </li> <li>Sub-category: Stationary battery energy storage system</li> <li>Industrial battery with internal storage</li> <li>specifically designed to store and deliver electric energy from and to the grid or store and deliver electric energy to end-users, regardless of where and by whom the battery is being used</li> </ul>	> 5 kg (if no other category applies	
	SLI (starter, lighting, or ignition) battery	<ul> <li>Designed to supply electric power for starter, lighting, or ignition</li> <li>May also be used for auxiliary or backup purposes in vehicles, other means of transport or machinery</li> </ul>	-	
	Portable battery	<ul> <li>Not designed specifically for industrial uses</li> <li>Neither an electric vehicle battery, nor a light means of transport battery, nor an SLI battery</li> </ul>	≤ 5 kg	
	Portable battery of general use	<ul> <li>Rechargeable and non-rechargeable portable batteries specifically produced to be interoperable</li> <li>Common formats: 4,5 Volts (3R12), button cell, D, C, AA, AAA, AAAA, A23, 9 Volts (PP3)</li> <li>Providing traction to wheeled vehicles considered as toys (within Toy Safety Directive 2009/48/EC) (Recital 15)</li> </ul>	Supported by:	







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Only industrial batteries greater than 2 kWh are within scope of the battery passport.



## The manufacturer or importer placing the battery on the market or putting it into service is responsible for fulfilling the battery passport requirements

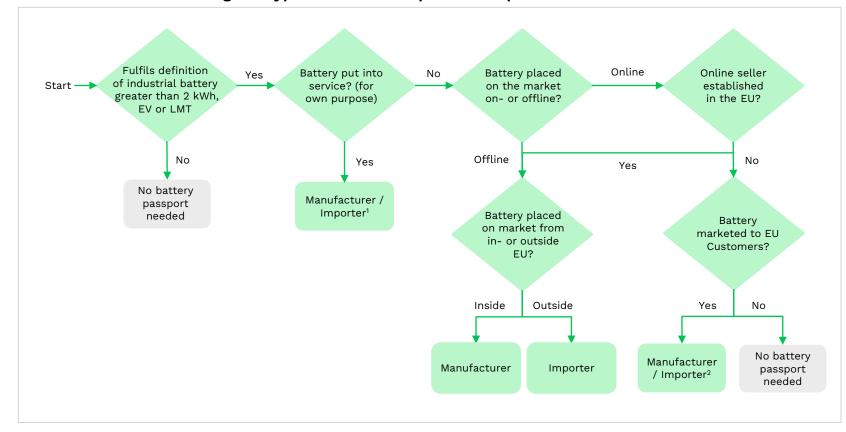
### Definition of the responsible economic operator

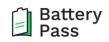
Responsibility lies with the economic operator placing a battery on the market or putting it into service.

This could either be the:

- Manufacturer (any natural or legal person who manufactures a battery or has a battery designed or manufactured and markets that battery under its own name or trademark or puts it into service for its own purposes), or
- Importer (any natural or legal person established within the Union who places a battery on the market from a third country)

#### Decision tree determining the type of economic operator responsible









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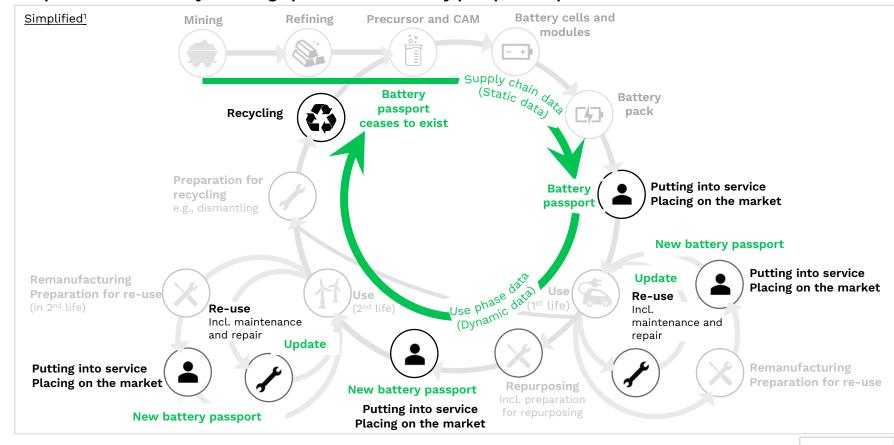
Depending on who is targeting EU consumers

### Core responsibilities for the battery passport comprise making it accessible by attributing a unique identifier as well as updating and storing the information

#### **Battery passport responsibilities**

- Attribute a unique identifier that is linked to the QR code that the battery is marked with to make the battery passport accessible
- Ensure that the information in the battery passport is accurate, complete, and upto-date
- Store the data included in the battery passport
- (...) as well as many more general and technical requirements defined in Article 77 and 78

#### Implications of battery handling operations on battery passport responsibilities









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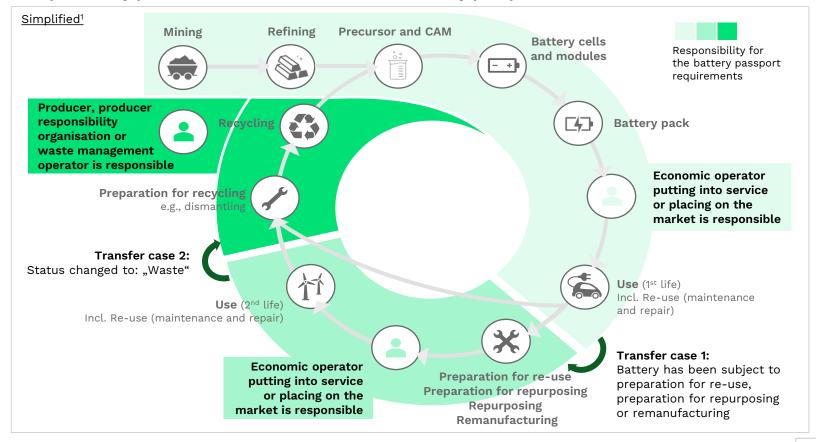
## In two specific cases, the responsibility for the battery passport needs to be transferred

#### Transfer of responsibilities

In two cases, the regulation specifically requires the responsibility for the battery passport to be transferred from one economic operator to another:

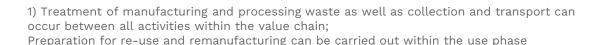
- Transfer case 1:
   Battery has been subject to preparation for re-use, preparation for repurpose, repurposing or remanufacturing and must be placed on the market anew
- Transfer case 2: Status changed to "Waste"

#### Responsibility periods and transfer cases for the battery passport













# The Content Requirements for the Battery Passport



## The mandatory scope of data attributes for the battery passport is defined by the Battery Regulation with further recommendations made by the Battery Pass

#### **Battery Pass approach**



The EU Battery Regulation defines all mandatory data attributes to be made accessible via the battery passport.



#### Further regulations serve as a source to:

- complement definitions,
- · generate additional background information, and
- harmonise reporting requirements.

Scope was limited to **EU and key Member States** regulations to align with other (upcoming) requirements in the region, e.g., the Proposal for Ecodesign for Sustainable Products Regulation (ESPR) and the German Supply Chain Act.

#### **Battery Pass objective and scope**



Guidance on how to achieve compliance with the battery passport content requirements as mandated by the EU Battery Regulation.



#### Recommendations how to:



...interpret the regulatory text



...harmonise with other regulations



...increase sustainability & circularity

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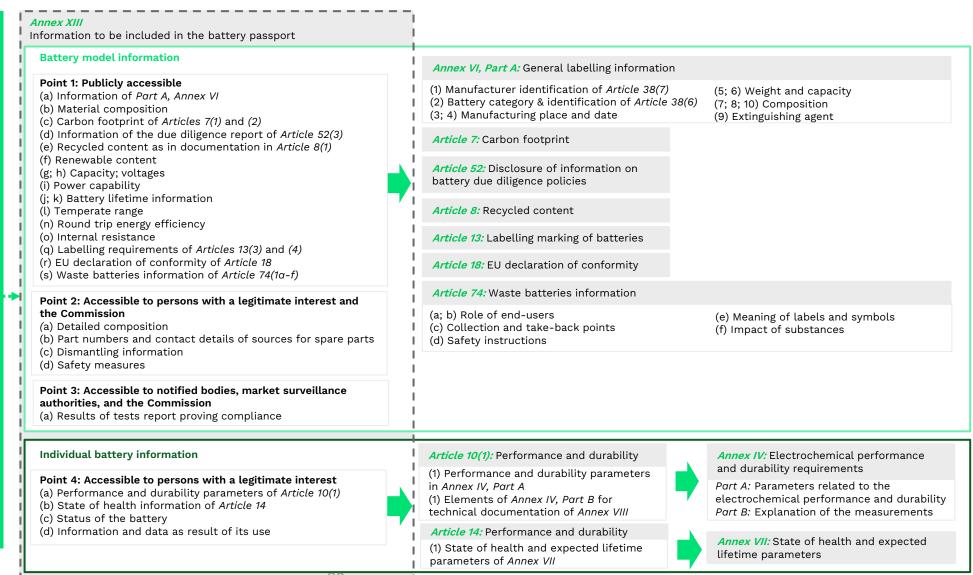
More than 100 organizations from the broader Battery Pass network participated in a consultation webinar submitting more than 250 comments on the draft report during a feedback phase lasting around two months.







## In Annex XIII, the Battery Regulation introduces the comprehensive set of mandatory data attributes for the battery passport, which are detailed out in various articles and annexes





**EU Battery** 

Regulation

Article 77

The battery

information as

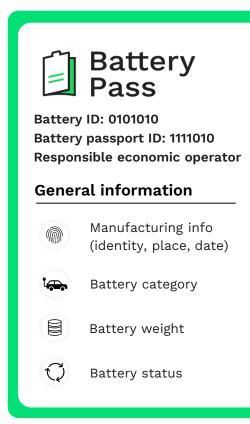
set out in Annex

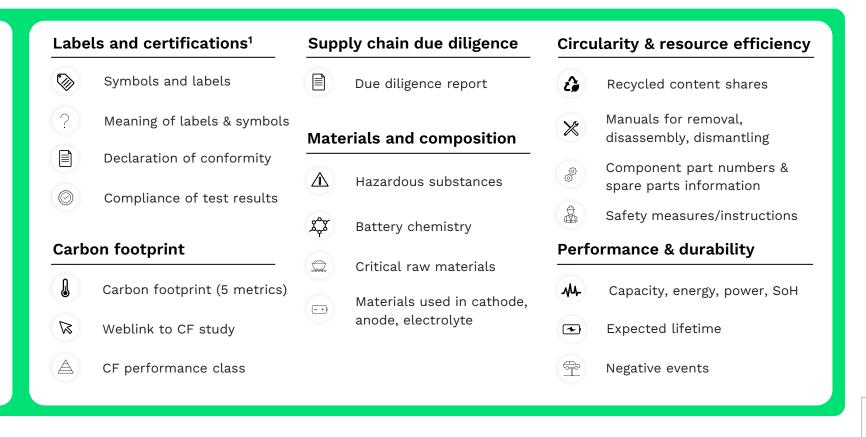
Point 2:



## The Battery Pass consortium has grouped the battery passport data attributes into seven content clusters – details on each are following on the next slides

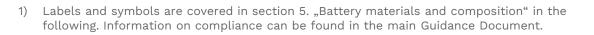
Data categories for the battery passport (select data attributes shown below)











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## General battery information is of interest for end-users as well as authorities in the context of tracing back liability and verifying compliance



#### General battery information to increase transparency and liability

- General battery information (e.g., identifying the battery (passport) or who manufactured the battery where and when) is often **difficult to obtain from the battery label**, especially for end-users.
- Furthermore, e.g., authorities struggle to accurately **trace back liability and verify compliance** since information is difficult to allocate and link to the respective battery and requirements differ between battery categories.

#### Battery labelling in the regulatory context

- The **Battery Directive** introduced **registration requirements,** to be adopted into national law, including some general manufacturer and battery type information.
- As continuation of the Battery Directive, the Battery Regulation requires several general information for the label of batteries as well as clear, understandable, and readable instructions.
- Beyond batteries, the **Proposal for Ecodesign for Sustainable Products Regulation** introduces mandatory digital product passport requirements, including general product and manufacturing information.

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#### General battery information in the battery passport

- For the battery passport, the Battery Regulation requires economic operators to identify the battery passport and the responsible economic operator, the battery, its manufacturing (manufacturer, place, date), the battery category, weight, and status. Except for the status, these information shall be publicly accessible.
- The usage of **unique identifiers**, as introduced by the Battery Regulation and the ESPR, is important for the battery passport, e.g., to unambiguously determine **liabilities and responsibilities for data**.







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## General battery and manufacturer information can be largely based on standardized reporting such as unique identifiers or manufacturing codes

### Battery passport reporting requirements

Battery Regulation Article 77(3); Article 38(6, 7); Annex VI, part A, reference from Annex XIII, 1(a):

- Data attributes: General information about batteries (as listed on the right side), also to be printed on the battery label
- Access: to the public

Battery Regulation Annex XIII, 4(c):

- **Data attribute:** Information on the status of the battery
- Access: to persons with a legitimate interest

#### **Battery Pass assessment and recommendation**

Data requirements per Battery Regulation	Battery Pass reporting recommendation	Reasoning / value of the data	
Battery passport identification	Unique battery passport identifier	Unambiguous identification of a	
Battery identification	Unique battery identifier	individual battery, its manufacturing, and its	
Responsible economic operator identifier	Unique operator identifier	corresponding battery passport ensuring liability, responsibility, and clear attribution of data to	
Manufacturer's identification	Unique operator identifier	the battery passport	
Manufacturing place (manufacturing facility geographical location)	Unique facility identifier		
<b>Manufacturing date</b> (month and year)	Manufacturing codes		
Battery category	Category: 'stationary battery energy storage system'', (other) 'industrial battery'', 'LMT battery'', or 'electric vehicle battery'.	Categories with differing reporting requirements: determination of the battery passport content	
Weight	Weight in kg		
Battery status ('original', 'repurposed', 'reused', 'remanufactured' or 'waste')	Status: 'original', 'repurposed', 'reused', 'remanufactured' or 'waste')	Basic battery characteristics: key information and required to calculate other data	







## The carbon footprint is a key policy measure to enable decarbonisation in the value chain through transparency



#### Accurate product carbon footprints (PCF) are crucial for decarbonisation

- While batteries play a significant role in decarbonising the energy and transport sector, they come along with considerable **embedded carbon emissions**.
- A uniform calculation methodology is needed to create transparency, enabling informed decisions based on primary data that steer operational measures for life cycle decarbonisation.
- Existing methodologies and standards leave room for interpretation and do not provide sufficient guidance for company-specific PCF reporting.

#### The carbon footprint in the regulatory context

- There are several voluntary international standards and initiatives for PCF reporting. In the EU, the carbon footprint is one environmental indicator within the Product Environmental Footprint Recommendation of the EU (PEF).
- The Battery Regulation makes the calculation and reporting of the battery carbon footprint mandatory at placement on the market in the EU. A methodology for calculation and verification of the carbon footprint will follow the Battery Regulation in form of a Delegated Act.



- The Battery Regulation requires economic operators to declare the carbon footprint for each battery model per manufacturing plant.
- The results of the carbon footprint declaration must be publicly available via **the battery passport**, as an absolute value and differentiated per life cycle stage.











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## The Battery Regulation defines specific carbon footprint reporting requirements, reflecting the implementation of the carbon footprint measures

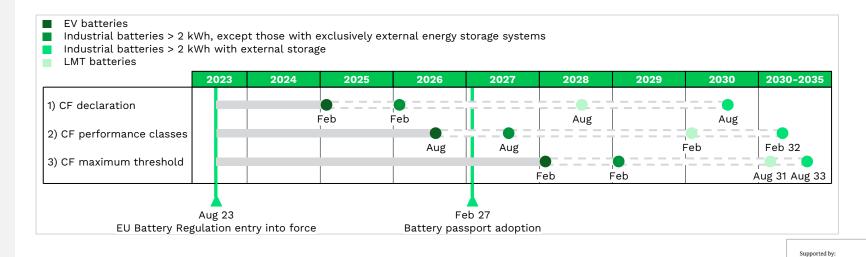
### Battery passport reporting requirements

Battery Regulation Annex XIII, part 1(c), reference to Article 7(1;2)

- Data attributes:
  - declared carbon footprint
  - share of battery carbon footprint per life cycle stage
  - carbon footprint performance class
  - web link to public carbon footprint study
  - administrative information about the manufacturer
  - information about the geographic location of the battery manufacturing facility
  - information about the battery model for which the declaration applies
- Access: to the public

#### **Carbon footprint timeline**

- The CF requirements are implemented in 3 steps (deadline varies for different battery categories):
  - Carbon footprint declaration
  - 2) Carbon footprint performance classes
  - 3) Carbon footprint maximum thresholds (not included in battery passport)
- For EV and industrial batteries w/o exclusively external storage, the CF declaration becomes mandatory before and for LMT batteries and industrial batteries with exclusively external storage after the battery passport adoption
- Only for EV batteries, the CF performance class needs to be reported before battery passport adoption









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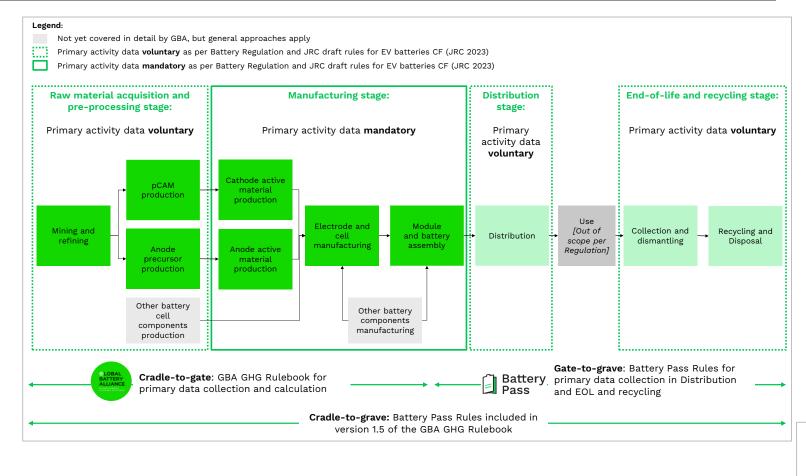
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### The Battery Pass complemented the Global Battery Alliance's GHG Rulebook recommending to calculate carbon footprints using company-specific data

#### Battery Pass carbon footprint assessment and recommendation

- Current developments indicate that primary (company- or supply chainspecific) data are only required for the "Main product production / Manufacturing" life cycle stage which sets the focus of company-specific carbon footprint data on this narrow scope while in other life cycle stages, secondary (i.e., average) data may be used.
- Provided that the final EU delegated act requirements are complied with, the Battery Pass consortium recommends calculating the battery carbon footprint based on the GBA GHG Rulebook and Battery Pass Rules to provide the data basis for measuring and optimising real-world CFs along the value chain both documents build on existing standards in compliance with the regulatory requirements and cover the battery life cycle cradle-to-grave based on guidance and prescriptions for the collection and usage of companyspecific data end-to-end.











## Battery due diligence helps to address social and environmental issues in complex battery supply chains



#### Lack of transparency and regulations to create sustainable supply chains

- Today, battery materials and components are often fraught with **unethical working conditions** (e.g., forced or child labour) and **negative environmental effects** (e.g., water usage and pollution).
- Due to a **lack of supply chain transparency**, downstream suppliers might not appropriately identify and address such risks.
- At the same time, regulatory requirements preventing social and environmental issues are falling short.

#### Due diligence in the regulatory context

- Several legislative initiatives have started to reflect social and environmental supply chain issues in European (e.g., EU Supply Chain Due Diligence Directive) and national (e.g., German Supply Chain Act) regulations.
- On a product level, the EU Battery Regulation introduces battery due diligence obligations to identify, prevent, and address risks linked to the sourcing, processing and trading of (secondary) raw materials. The requirements span the company's management system and risk management plan, e.g., including operating a chain of custody or traceability system.



#### Due diligence in the battery passport

- For the battery passport, the Battery Regulation requires economic operators to make the information indicated in the report on the due diligence policies ("due diligence report") available to the public.
- Besides this due diligence report, no additional supply chain due diligence information is mandatory for the battery passport. Also, a harmonization with due diligence requirements of other regulations is not addressed in the Battery Regulation.









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## Information of the due diligence report is the only mandatory battery passport data point for responsible supply chains

## Battery passport reporting requirements

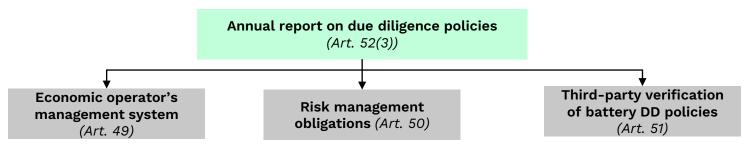
Battery Regulation Annex XIII, 1(d), reference to Article 52(3)

- Data attribute: information indicated in the report on battery due diligence policy ("due diligence report")
- Access: to the public
- Action need: economic operator placing the battery on the market to make the information of the annual due diligence report (valid when placing the battery on the market) available via a PDF (link to company website)

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#### The due diligence report

The due diligence report, made available via the battery passport, shall provide documentation on three main elements (based on the 5-step OECD framework):



#### **Battery Pass recommendations**

- 1. Harmonise the report with the due diligence requirements of other regulations (e.g., expand beyond the materials stated in the Battery Regulation, explore synergies of required guidelines/ standards, cover all risk categories)
- 2. Ensure additions of the Battery Regulation are covered (report to also include elaboration on access to information, public participation in decision-making, and access to justice in environmental matters)
- **3.** Investigate making defined key information of the report (currently displayed as part of the PDF) available as individual data points. Definition of machine readable in the context of the report needed.









## Beyond the due diligence report, the Battery Pass consortium recommends exploring voluntary battery passport additions

#### **Beyond requirements**

- The due diligence report is the only mandatory battery passport supply chain due diligence information
- The Battery Pass consortium recommends exploring additional voluntary supply chain due diligence information. This way, transparency, attention and pressure for responsible supply chain practices can be increased.
- In this context, it is therefore recommended to investigate how to make 3<sup>rd</sup> party assurances, and in the future potentially also supply chain indices and provenance information available via the battery passport

#### Battery Pass recommendation: voluntary due diligence additions

The Battery Pass consortium explored potential meaningful additions to the battery passport. While a value for the addition exists, open questions remain to be discussed.

#### 3<sup>rd</sup> party supply chain assurances (e.g., certifications)

- Can enable companies to engage with others on sustainable practices and enhance risk identification
- For the battery passport, they could allow for differentiation and making sustainability-related claims
- Assurances (and their key information) made available via the battery passport should be recognized under the Battery Regulation, be credible, and of high quality

#### Supply chain indices (Global Battery Alliance)

- Subsequently to the risk-based due diligence approach of regulations, the focus should shift to accelerating positive impacts through supply chain practices of companies
- The GBA develops ESGE+ indices, allowing to score and benchmark sustainability performance
- A developed reporting framework could be made available via the battery passport

#### Provenance (material source location)

- Transparency on provenance is increasing with attention to conflict-affected and high-risk-areas, allowing to better monitor practices, identify risks, and implement corrective measures
- In case of a regulatory obligation to unveil the provenance, it could be made available via the battery passport, ideally linked to additional information such as 3<sup>rd</sup> party assurances









## Battery material and composition information is key for logistics, dismantling, and recycling companies as well as consumers



#### Material information for safe handling and informed decisions

- With the emergence of various battery chemistries (e.g., Li-ion, Lead-acid, solid-state batteries), it has become increasingly challenging for actors to effectively manage the variety of batteries.
- Several value chain participants such as logistics, sorting, dismantling and recycling companies find it increasingly difficult to e.g., assess safe transport requirements, define a battery's value, choose appropriate handling routes, and accurately calculate recycling efficiencies etc.
- In addition, also the **end-consumer** lacks transparency for informed purchasing decisions.

#### Materials and composition in the regulatory context

- Today, the European chemicals legislation is one of the strictest globally and relevant for battery labelling, (hazardous) substance classification and authorization (e.g., CLP, REACH, SCIP).
- The previous **Battery Directive** required chemical and separate collection symbols on the label of batteries. The new **Battery Regulation** extends these labelling requirements.
- Beyond regulation, e.g., the automotive industry material data system IMDS and the Global Automotive Declarable **Substance List** process information on a substance level.

#### Materials and composition in the battery passport

- For the battery passport, the Battery Regulation requires economic operators to specify the general and detailed composition, hazardous substances and their impact, as well as key symbols and their meaning.
- The information shall be accessible to the **public** only materials on cell level have restricted access.
- The Battery Pass suggests aligning the battery passport reporting on materials and composition to already established formats (e.g., standardised identifiers such as CAS numbers).











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# Information on battery chemistry and critical raw materials shall be made available to the public, the detailed composition also to persons with a legitimate interest and the Commission

## Battery passport reporting requirements

Battery Regulation Annex VI, part A (7; 10)

- Data attributes:
  - Battery chemistry
  - Critical raw materials present in the battery in a concentration of more than 0.1% weight by weight
- Access: to the public

Battery Regulation Annex XIII, 2(a)

- **Data attribute:** Materials used in the cathode, anode, and electrolyte
- Access: to persons with a legitimate interest and the Commission

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#### **Battery Pass assessment and recommendation**

Requirements per Battery Regulation	Battery Pass reporting recommendation	Indication for, e.g., logistic companies and consumers on key battery differences, such as safety, lifespan, performance, recycling, and reuse  Awareness and monitoring of critical raw materials		
Battery chemistry	Specify chemistry as composition in general terms: cathode and anode active material and electrolyte			
Critical raw materials	List all critical raw materials above 0.1% weight by weight			
Detailed composition, incl. materials used in cathode, anode, and electrolyte	Materials above 0.1% weight by weight in anode, cathode, and electrolyte	Enable second life operators such as sorters, dismantlers, and recyclers to assess the value of a		
	<ul><li>Name materials (public standards)</li><li>Related identifiers (CAS numbers)</li><li>Mass fraction in percent</li></ul>	battery, decide on the handling route, ease recycling processes, and allow a fraud-free and accurate calculation of recycling efficiencies and recycled content		







## Information on hazardous substances and their potential impact ensures safe and efficient second-life and end-of-life operations

## Battery passport reporting requirements

Battery Regulation Annex VI, part A (8):

- **Data attribute**: Hazardous substances [...] other than mercury, cadmium or lead
- Access: to the public

Battery Regulation Annex VI, part B; Article 13(4):

- Data attribute: Separate collection symbol
- Access: to the public

Battery Regulation Article  $13(5)^{1}$ ; Article 74(e; f):

- Data attributes:
  - Symbol for cadmium if +0.002% cadmium
  - Symbol for lead if +0.004% lead
  - Impact of substances, in particular hazardous substances [...] on the environment and on human health, or safety of persons, including the impact due to inappropriate discarding of waste batteries, such as littering or discarding as unsorted municipal waste
  - Meaning of the labels and symbols marked on batteries [...] or printed on their packaging or in the document accompanying batteries
- Access: to the public

#### Requirements per Battery Pass reporting Battery Regulation recommendation

**Battery Pass assessment and recommendation** 

#### Reasoning/value of the data

Fulfill health and safety

improved 2<sup>nd</sup> life and

end-of-life operations such as recycling and

Ensure safe and

dismantling.

end-users

Provide key safety

information also to

Ensure batteries are sent to

separate collection facilities

obligations

## Hazardous substances other than mercury, cadmium or lead

by weightSubstance name (e.g., IUPAC or chemical name)

suggested above 0.1% weight

Hazardous substances,

- Hazard classes/categoriesRelated identifiers (CAS number)
- Location of the substance
- Concentration range in %

#### Impact of substances on environment, human health, safety, persons

**Impact of substances** (aligned with CLP hazard classes) via common hazard statements

Symbol for cadmium (Cd) if +0.002%

Symbol for cadmium (Cd)<sup>1</sup>

Symbol or lead (Pb) if +0.004% Symbol for lead (Pb)<sup>1</sup>

Symbol for separate collection

Separate collection symbol

for recovery and recycling

Meaning of labels and symbols

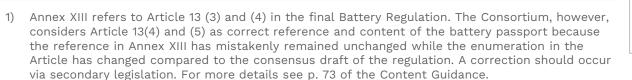
Explanation of meaning of all battery's symbols and labels

Ensure

comprehensibility











## Circularity strategies enable secure and sustainable access to critical battery raw materials in light of demand and supply discrepancies

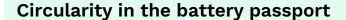


#### Circular economy strategies to meet increasing battery (material) demand

- Circular economy strategies enable secure and sustainable access to critical battery raw materials by reduction and optimization of material demand, expanding material lifetime/use, and high-quality recycling.
- Today, however, batteries are rarely designed keeping repairability or replaceability in mind.
- In 2020, only 47% of all portable batteries and accumulators sold in the EU were collected for recycling.

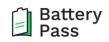
#### **Battery circularity in the regulatory context**

- Circular (battery) design, only scarcely addressed in the Battery Regulation, is taken up by the ESPR, introducing circular design parameters.
- To improve recycling, the Battery Regulation introduces collection and recycling rates for all batteries. For increased recovery of raw materials, recycled content shares, recycling efficiencies, and material recovery rates are defined.
- Via **end-of-life instructions**, the Battery Regulation aims at better informing the end-user on the separate disposal and collection of waste batteries.



For the battery passport, the Battery Regulation requires different circularity and resource efficiency information:

- 1) Battery removability and replaceability: Dismantling information, information on spare parts and suppliers, safety measures
- 2) Recycled content share for cobalt, lead, lithium, nickel
- 3) Renewable content share
- **4) Waste management:** Information on separate disposal of waste batteries, on take-back and collection points











## 3

## Removability and replaceability: battery removal and disassembly information should be complemented by additional design information and be provided as manuals

## Battery passport reporting requirements

Battery Regulation Annex XIII, 2(b-d):

- Data attributes:
  - Dismantling information
  - Part numbers for components and sources for replacement spares
  - Safety measures
- Access: to persons with a legitimate interest and the Commission

Battery Regulation Annex VI, part A (9):

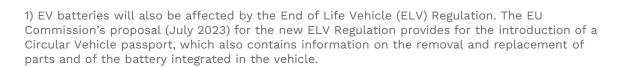
- Data attribute: Usable extinguishing agent
- Access: to the public

#### **Battery Pass assessment and recommendation**

- The Battery Pass consortium suggests providing the dismantling information required by the EU Battery Regulation as part of two manuals:
  - Manual for the removal of the battery from the appliance<sup>1)</sup>
  - Manual for disassembly of the battery pack
- Besides the dismantling information required by the Battery Regulation, the Battery Pass consortium advises to integrate the below information in the 'Manual for disassembly of the battery pack'
  - type of construction of battery pack, modules, and cells
  - format and dimensions of battery cells, modules and pack
  - orientation of the battery cells
  - replaceability of modules and cells
  - characteristics of of joints, screws, and fasteners
  - fillings, if used
  - casing
- It is suggested to provide the two manuals, the part numbers and suppliers for components and the safety measures (instructions) as URL linking to pdf
- Furthermore, it is recommended that the **information on the usable extinguishing agent** refers to **classes of extinguishers** (A, B, C, D, K)











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### Recycled content: calculating the shares for cobalt, lithium, nickel, and lead is required, distinguishing between pre- and post-consumer waste recommended

#### **Battery passport reporting** requirements

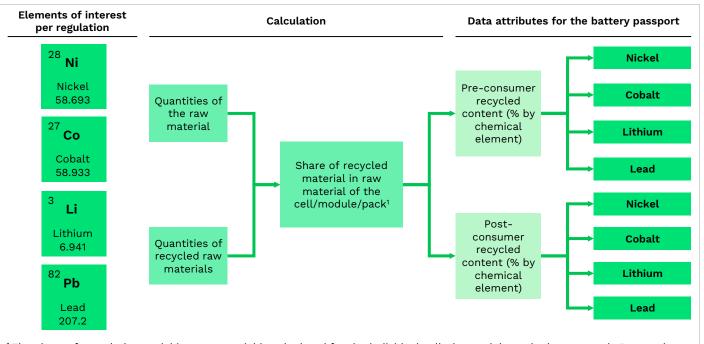
Battery Regulation Annex XIII, 1(e; f), Article 8, Recital 33

#### Data attributes:

- Recycled content for each battery model per year and per manufacturing plant: share of cobalt, lithium, and nickel recovered from battery manufacturing waste or postconsumer waste present in active materials, and the share of lead recovered from waste present in the battery
- Renewable content share
- Access: to the public

#### **Battery Pass assessment and recommendation**

The Battery pass consortium suggests to calculate and declare the recycled content shares from pre-consumer waste and post-consumer waste of cobalt, lithium, nickel and lead, separately. This results in 8 data attributes to be reported for the passport.



<sup>&</sup>lt;sup>1</sup>The share of recycled material in raw material is calculated for the individual cell, the module or the battery pack. Pre- and post-consumer recycled content refers to the average content on the battery pack level.







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## Informing end-users on the appropriate and available waste management of used batteries is key to enable recycling

#### **Battery passport reporting** requirements

Battery Regulation Article 74 (1a-c):

- Data attributes:
  - Information on the role of end-users in contributing to waste prevention
  - Information on the role of end-users in contributing to the separate collection of waste batteries
  - Information on the separate collection, take-back and collection points, preparation for re-use, preparation for repurposing and treatment available for waste batteries

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Access: to the public

#### **Battery Pass assessment and recommendation**

- The respective information mentioned in Article 74 (1a-c) should be provided in the battery passport as URL linking to pdf.
- Waste batteries shall be discarded in designated separate collection points (Article 74 (1c)).
- Producers/producer responsibility organizations shall install take-back and collection points as well as provide end-users with corresponding information.
- Good practices and recommendations concerning the use of batteries aiming at extending their use-phase should be developed and be provided to end-users.

#### Excursus: Value of recycling traceability information for a circular economy

The Battery Regulation emphasizes the need for high collection and recycling of waste batteries, though end-of-life information is currently not required in the battery passport. Tracing recycling information connected to the original battery ID could be valuable in terms of sustainability and reduce the need for primary materials. However, this goal requires careful consideration of how material flows can be traced, especially when a battery has been dismantled into components. This touches on the scope and system boundaries of the battery passport as defined in the Battery Regulation.







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## Performance and durability information of batteries facilitates a comparison of batteries at purchase and the determination of the value for a second life



#### Battery performance and durability information is only scarcely shared so far

- Today, little information on the performance and durability of batteries is shared between the actors of the value chain. Equally, very few standards for the evaluation of performance and durability batteries exist.
- Therefore, at purchase, the comparability of batteries is limited. At the same time, the determination of the residual value of a battery and its usability in a second-life is hampered.

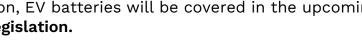
#### Performance & durability in the regulatory context

- Per Battery Regulation, several data attributes must be reported in a document accompanying the battery and the Battery Management System (BMS), if in place.
- Batteries will have to follow minimum requirements on performance and durability, as to be specified by Delegated Acts of the Battery Regulation.
- In addition, EV batteries will be covered in the upcoming Euro 7 legislation.

#### Performance & durability in the battery passport

Battery passport requirements originate from Articles 77 and Annex XIII referring to Articles 10 and 14 as well as Annexes IV, and VII.

- 1) Relevant parameters listed in Annex XIII(1) and (4)
- 2) The values referred to in Article 10(1) for LMT batteries, rechargeable industrial batteries with a capacity greater than 2 kWh, and EV batteries when the battery is placed on the market and when it is subject to changes in its status
- 3) Information pursuant to Article 14 for stationary battery energy storage systems, LMT batteries and EV batteries that use a BMS











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### Around 40 performance and durability data attributes are required for the battery passport, while detailed descriptions are falling short in the Battery Regulation

#### **Battery passport reporting** requirements

Battery Regulation Annex XIII referring to Articles 10 and 14 and their corresponding Annexes IV and VII

#### Data attributes:

- ~40 separate data attributes Several mandatory data attributes are specific to battery categories (i.e. not mandatory for entire battery passport scope)
- Distinction into static (pre-use) and dynamic (in-use) data;
- Performance and durability includes most dynamic data attributes of the battery passport

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 Access: varies between data attributes1

#### **Battery Pass assessment and recommendation**

- The different data attributes were bundled into content clusters.
- These consist of several static and dynamic data attributes (for an overview see details on next slide).
- Most data attributes lack a detailed description, complicating their understanding.
- In addition, only few standards for evaluation conditions exist, that are needed to enable the comparison among different batteries.
- The implementability of data attributes for different battery categories and designs (High-T, redox-flow) is a major issue for further considerations.

#### Performance & durability content clusters

#### Performance

- Capacity, Energy, SoC, Voltage
- Power capability
- Round trip efficiency, self discharge
- Internal resistance

#### **Durability**

- Expected lifetime
- Temperature conditions
- Negative events











Capacity,

Power Capability

Energy, SoH, voltage

Energy round trip efficiency,

Internal Resistance

Self-discharge

Expected

**Temperature** 

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conditions

Negative

events

Lifetime

### In addition to the mandatory scope per Battery Regulation, the Battery Pass consortium suggests few additional performance & durability data attributes

#### **Battery Pass assessment and recommendation**

- Data attributes are distinguished by:
- Static or dynamic behaviour and update requirement
- Battery categories (see legend)
- Access groups (see legend)
- Most static data attributes are specified for all battery categories and public, while several dynamic data attributes are specific for a battery category and available only to interested persons
- Next to the mandatory scope of data attributes per Regulation, the Battery Pass consortium suggests few additional voluntary data attributes

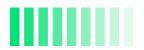
#### Legend Update requirements<sup>1</sup> Access groups a) From Art. 10; to be made available upon Public placement on market and status change Interested persons (Re-use/repurposing...) b) Dynamic reporting depending on definition of 'up-to-date' in Art 77/Annex XIII or Art. 14 **Battery categories** All batteries below EV batteries (if BMS is used<sup>1</sup>) \$\delta\_0 \text{LMT batteries (if BMS is used}\text{1})} ☆ Industrial batteries incl stationary energy storage systems<sup>2</sup> > 2 kWh ★ Stationary battery energy storage systems > 2 kWh

	Perf	Performance					
	<b>\$</b>	Rated capacity (in Ah) Certified usable battery energy (voluntary) Minimal, nominal and maximum voltage, with temperature ranges when relevant	<b>†</b>		State of certified energy (SOCE) <sup>b</sup> State of charge (SoC) <sup>b</sup>		
		Original power capability (in Watts)  Maximum permitted battery power  Ratio between nominal battery power and battery energy (voluntary)	namic Data	☆食	Power fade <sup>a</sup> Remaining power capability <sup>b</sup>		
Data		Initial round trip energy efficiency (Initial) round trip efficiency at 50% of cycle life Initial self-discharging rate Internal battery resistance (cell & pack)		sio 食 sio 食 CD	Where applicable, energy round trip efficiency fade <sup>a</sup> Current self-discharging rate <sup>b</sup> Evolution of self-discharging rate <sup>b</sup> Current internal resistance (pack, voluntary: cell/module) <sup>a</sup> Internal resistance increase (pack; voluntary: cell/module) <sup>a</sup>		
Static	Dur	Durability					
		Expected battery lifetime expressed in cycles, and reference test used, (except for non-cycle applications?), and in calendar years  C-rate of relevant cycle-life test  Period for which the commercial warranty for the calendar life applies  Capacity threshold for exhaustion  SOCE threshold for exhaustion (voluntary)  Where appropriate, the date of putting into service	Dyr	<b>念</b> 食	Current number of (full) charging and discharging cycles <sup>b</sup> Capacity throughput <sup>b</sup> Energy throughput <sup>b</sup>		
		Temperature range idle state (lower boundary) Temperature range idle state (upper boundary)			Time spent charging during extreme temperatures <sup>b</sup> Time spent in extreme temperatures <sup>b</sup>		
					Number of deep discharge events <sup>b</sup> (voluntary for EV, industrial) Number of overcharge events (voluntary) <sup>b</sup> Accidents <sup>b</sup>		





<sup>2)</sup> Category listed as part of entire battery passport scope. No data attribute applies solely to this battery category



**Outlook** 

## Based on the elaborated content requirement perspectives, the "Battery Pass" will continue bringing in its expertise both ex- and internally

1. Integration in other Battery Pass results

Integration of content-related insights into a technical battery passport system guidance, a demonstrator and value assessment of the passport – all to be released in Q1 2024

Knowledge sharing with other organisations

Support and collaborate with other organisations and initiatives to build on Battery Pass results for complementing purposes (e.g., cross-sector requirements, standardisation efforts)

Deep dives follow

**Involvement in secondary legislation process** 

Exploration and assessment of possibilities for Battery Pass to get involved in the secondary legislation process (Delegated and Implementing Acts) contributing expertise









## Results of the Content Guidance have been building the foundation for further Battery Pass publications which will soon be released



#### **Technical Guidance**

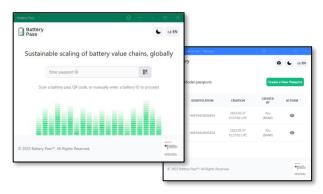
- Objective: provide an overview on how the technical battery passport system could look like and which required technical standards it must support
- Scope: Technical Standard Stack incl. mapping of existing standards as well as key challenges and recommendations



To be released Q1 2024

#### **Demonstrator**

- Objective: provide a platform which integrates results on battery passport data and system and verifies technological feasibility of the passport
- Scope: software prototype (TRL 5) covering exemplary real-world data

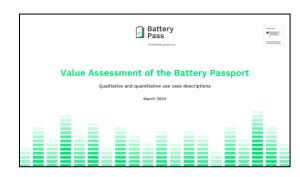


Draft demonstrator to be released 01 2024



#### Value Assessment

- Objective: Provide an analytical study to motivate stakeholders to use the battery passport proactively and leverage its full potential.
- Scope: benefit modelling of individual use cases as well as the battery passport overall (incl. a qualitativeconceptual evaluation and exemplary quantification)



First results to be released 01 2024

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by the German Bundestag









## "Battery Pass" will continue to support and collaborate with other major initiatives active in the digital product passport space



- European Commission "Digital-2021-Trust-01-DIGIPASS" winner
- Kicked off in October 2022 lasting 18 months (March 2024)
- Funding volume: EUR 2 mn
- Partners: 31 organisations
- Objective: build a common understanding of a cross-sectoral DPP
- Focus: Batteries, Textiles, Electronics



- Leading global voluntary passport initiative
- · Objective: enabling transparency and accountability for risks and ESG impacts in EV battery value chains by creating a digital twin of the battery and aggregating data in a battery passport
- 3 early-stage proof of concepts were launched at WEF 2023
- · Release of first set of ESG metrics (GHG Rulebook, Child Labour and Human Rights Indices) with additional metrics to follow



- Developing a comprehensive data ecosystem with standardized global data exchange for data-driven value chain in the automotive industry
- Based on GAIA-X data space technology to support data sovereignty with distributed data management and sophisticated identity and access management
- · Focusing on several use cases including decarbonization and ESG reporting, circularity & battery passport and others









And many more...



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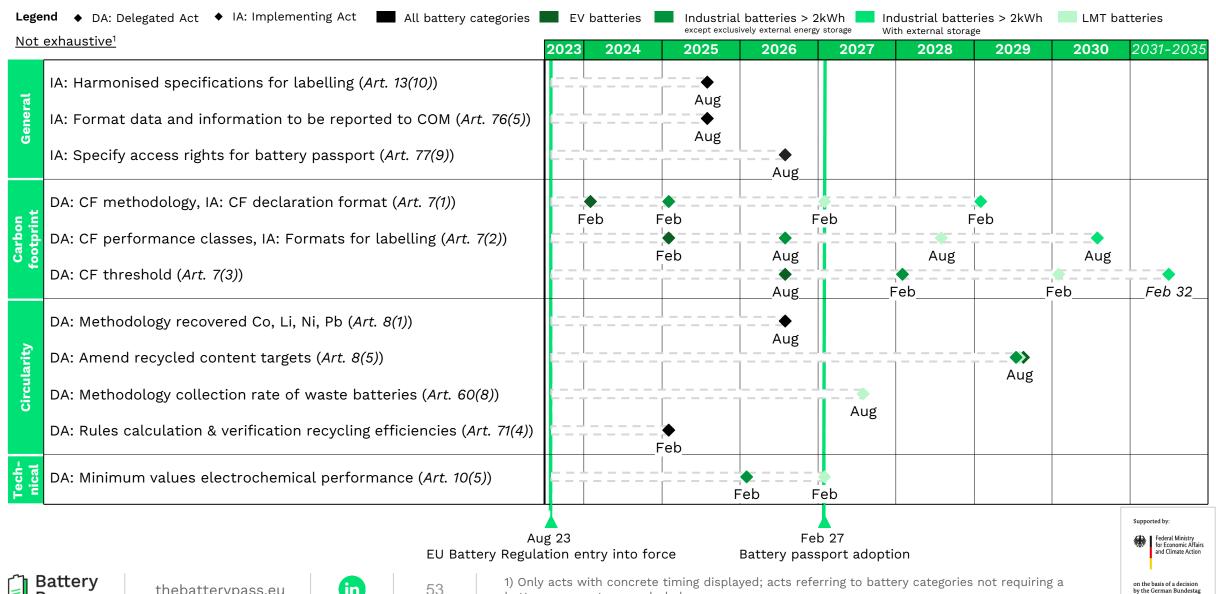








### Secondary legislation on the battery passport will run over a decade









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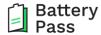
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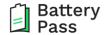
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## Thank you

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