

Battery passport checklist for industrial batteries above 2 kWh

Duties, required data, deadlines and sources for industrial batteries above 2 kWh from 18 February 2027 - to tick off.

What this checklist covers

Nature of this checklist. This list follows the regulation text: the data points are law, not a forecast.

This checklist is part of our [reference on the digital product passport for batteries](#), which covers the timeline, the roles, the required data and the official documents for the whole industry; this page narrows it down to industrial batteries above 2 kWh.

This checklist sums up what the EU Batteries Regulation (EU) 2023/1542 asks of you when you place industrial batteries above 2 kWh on the EU market: the duties, the data points the Commission guidance of July 2026 classifies for industrial batteries, the deadlines as a timeline, and the official documents, linked under sources at the end; the whole list is also there to download as a PDF below. For industrial batteries the list is shorter than for EV and LMT batteries, but it carries more entries marked "where applicable". Classifying each model is therefore your first task.

The numbers in brackets are the data points of the Commission guidance, the articles those of the regulation. Stationary energy storage systems have a checklist of their own with the additional safety and state-of-health duties.

Does the passport duty apply to your battery?

Tick what holds for your battery. The first three statements together mean the passport duty of [Regulation \(EU\) 2023/1542](#) applies to you; the fourth changes the carbon-footprint and recycled-content dates. The articles in brackets point to the regulation.

- ☐ The battery is specifically designed for industrial uses, or is intended for them after repurposing, or is any other battery above 5 kg that is neither an EV, LMT nor SLI battery (Art. 3).
- ☐ Its capacity exceeds 2 kWh; below that there is no passport, but labelling and a QR code.

- ☐ You place the battery on the EU market or put it into service from 18 February 2027 – as manufacturer, as importer or as the business that remanufactures or repurposes it.
- ☐ The battery has exclusively external storage, such as a flow battery: then later dates apply for the carbon footprint and the recycled-content duties do not apply (Art. 7, Art. 8).

Your duties

Everything [Regulation \(EU\) 2023/1542](#) asks of whoever places an industrial battery on the market, in the order you will meet it. Tick off what is already in place; every item names its article, and the deadlines below say when it applies.

- ☐ Create the battery passport before placing on the market and keep its information accurate, complete and up to date (Art. 77(1) and (4)).
- ☐ Assign a unique identifier under the ISO/IEC 15459 series through which the QR code reaches the passport (Art. 77(3)).
- ☐ Print or engrave the QR code visibly, legibly and indelibly; where that is not possible, put it on the packaging and the accompanying documents (Art. 13(6) and (7)).
- ☐ Separate the access tiers: public, legitimate interest, authorities and notified bodies, individual-battery data (Art. 77(2), Art. 78).
- ☐ Provide the passport data on open standards, machine-readable and without vendor lock-in (Art. 77(5)).
- ☐ Keep the passport available until the battery is recycled (Art. 77(8)).
- ☐ Register the passport in the EU DPP register yourself before the battery is placed on the market: only the operator placing it on the market may do so, not a service provider (Art. 77(10)); the register has been operational since 20 July 2026.
- ☐ Attach the label with the general information, the separate collection symbol and, where applicable, the Cd or Pb symbol (Art. 13(1), (4) and (5)).
- ☐ Decide per model which performance and durability values apply: cycle life, round-trip efficiency and C-rate apply only to batteries whose lifetime can be expressed in cycles (Annex XIII point 1).
- ☐ Carry out the conformity assessment, issue the EU declaration of conformity, affix the CE marking (Art. 17 to 20).
- ☐ Prepare the carbon-footprint declaration per model and plant: due eighteen months after the delegated act on the method, nominally from 18 February 2026; the performance class and the maximum threshold follow (Art. 7).
- ☐ Document the recovered shares of cobalt, lithium, nickel and lead per model, year and plant, from 18 August 2028 or 24 months after the act on the method; not with exclusively external storage (Art.

8).

- ☐ Set up supply-chain due diligence, have it verified and report on it, from 18 August 2027; applies from EUR 40 million net turnover (Art. 47 to 52).
- ☐ Keep instructions for use and safety information ready; not to be displayed in the passport at the start, until Omnibus IV is adopted (Annex XIII point 1(t)).

Required data on 18 February 2027

The [Commission guidance](#) classifies 36 of the 71 data points as mandatory for industrial batteries; much of the rest applies only where it fits the model. The data points themselves are listed in [Annex XIII of Regulation \(EU\) 2023/1542](#); under every item you find its number in the guidance and its place in the regulation.

Publicly visible (Annex XIII point 1)

- ☐ Unique identifier
Data point 1, Art. 77(3)
- ☐ Who registers or is responsible for the passport
Data point 2, Art. 77(3)
- ☐ Manufacturer: name, registered trade name or trade mark
Data point 3, Annex VI Part A (1)
- ☐ Postal address of the manufacturer with a single contact point
Data point 4, Annex VI Part A (1)
- ☐ Battery category
Data point 6, Annex VI Part A (2)
- ☐ Model and batch or serial number
Data point 7, Annex VI Part A (2)
- ☐ Place of manufacture and date of manufacture, month and year
Data points 8 and 9, Annex VI Part A (3) and (4)
- ☐ Weight, capacity and chemistry
Data points 10 to 12, Annex VI Part A (5) to (7)
- ☐ Hazardous substances other than mercury, cadmium and lead
Data point 13, Annex VI Part A (8)
- ☐ Usable extinguishing agent
Data point 14, Annex VI Part A (9)
- ☐ Critical raw materials above 0.1 % by weight
Data point 15, Annex VI Part A (10)
- ☐ Recovered shares of cobalt, lithium, nickel and lead

Data points 20 to 23, Annex XIII point 1(e)

- ☐ Share of renewable content
Data point 24, Annex XIII point 1(f)
- ☐ Minimal, nominal and maximum voltage, each with temperature range
Data points 26 to 28, Annex XIII point 1(h)
- ☐ Original power capability in watts and power limits
Data points 29 and 30, Annex XIII point 1(i)
- ☐ Temperature range the battery withstands when not in use
Data point 34, Annex XIII point 1(l)
- ☐ Internal cell and pack resistance
Data point 38, Annex XIII point 1(o)
- ☐ Separate collection symbol under Art. 13(4)
Data point 40, Annex XIII point 1(q)
- ☐ EU declaration of conformity
Data point 42, Annex XIII point 1(r)
- ☐ Information on the prevention and management of waste batteries
Data point 43, Annex XIII point 1(s)

For persons with a legitimate interest (Annex XIII point 2)

- ☐ Detailed composition including cathode, anode and electrolyte materials
Data point 45, Annex XIII point 2(a)
- ☐ Part numbers for components
Data point 46, Annex XIII point 2(b)
- ☐ Contact details of sources for spare parts
Data point 47, Annex XIII point 2(b)
- ☐ Dismantling information: exploded diagrams, disassembly sequence, fastening techniques, tools, warnings, number and layout of cells
Data point 48, Annex XIII point 2(c)
- ☐ Safety measures
Data point 49, Annex XIII point 2(d)

For authorities and notified bodies (Annex XIII point 3)

- ☐ Results of the test reports proving conformity
Data point 50, Annex XIII point 3

Individual-battery data, for authorised readers only (Annex XIII point 4)

- ☐ Status of the battery: original, repurposed, re-used, remanufactured or waste
Data point 67, Annex XIII point 4(c)

Only where applicable

- ☐ Web and email address of the manufacturer
Data point 5, Annex VI Part A (l)
- ☐ Expected lifetime in cycles and the reference test for it, where the lifetime can be expressed in cycles
Data points 31 and 32, Annex XIII point 1(j)
- ☐ Period of the commercial warranty for the calendar life
Data point 35, Annex XIII point 1(m)
- ☐ Round-trip energy efficiency, initial and at 50 % of cycle life
Data points 36 and 37, Annex XIII point 1(n)
- ☐ C-rate of the cycle-life test
Data point 39, Annex XIII point 1(p)
- ☐ Cd or Pb symbol
Data point 41, Annex XIII point 1(q)
- ☐ Individual-battery values: rated capacity, capacity fade, power and power fade, internal resistance and its increase, round-trip efficiency and its fade
Data points 51 to 58, Annex XIII point 4(a)
- ☐ Expected lifetime in cycles and in calendar years
Data points 59 and 60, Annex XIII point 4(a)
- ☐ Remaining capacity, power capability, round-trip efficiency, self-discharge and ohmic resistance
Data points 62 to 66, Annex XIII point 4(b)
- ☐ Charging and discharging cycles, negative events, operating conditions and state of charge
Data points 68 to 71, Annex XIII point 4(d)

Not to be displayed at the start

- ☐ Material composition as a summary field
Data point 16
- ☐ Carbon-footprint declaration and label, until the implementing act sets the format
Data points 17 and 18, Annex XIII point 1(c)
- ☐ Information on responsible sourcing
Data point 19, Annex XIII point 1(d)
- ☐ Rated capacity in Ah as a static field
Data point 25, Annex XIII point 1(g)
- ☐ Capacity threshold for exhaustion, foreseen for EV batteries only
Data point 33, Annex XIII point 1(k)
- ☐ Instructions for use, until Omnibus IV is adopted
Data point 44, Annex XIII point 1(t)
- ☐ State of certified energy, SOCE, foreseen for EV batteries only

Deadlines

The dates that matter for an industrial battery, taken from the application articles of the regulation. The later ones hang on delegated acts the Commission has not adopted yet and are marked as such.

18 FEBRUARY 2024

● The regulation applies

Most provisions of the Batteries Regulation apply from this day (Art. 96). Everything below builds on it; batteries placed on the market since then fall under its conformity rules.

18 AUGUST 2025

● Separate collection symbol

Every battery carries the crossed-out bin symbol, with the Cd or Pb symbol beneath it where the limits are exceeded (Art. 13(4) and (5)). Already due; check your current label.

18 AUGUST 2026

● Label with general information

Every battery carries a label with the general information of Annex VI, from manufacturer and model to capacity and chemistry (Art. 13(1)). Shifts if the implementing act on the format arrives later.

18 FEBRUARY 2027

● Battery passport and QR code

From this day every industrial battery above 2 kWh placed on the market needs the passport (Art. 77) and the QR code that leads to it (Art. 13(6)). There is no transition period; a battery placed the day before needs none, one placed on the day does.

18 AUGUST 2027

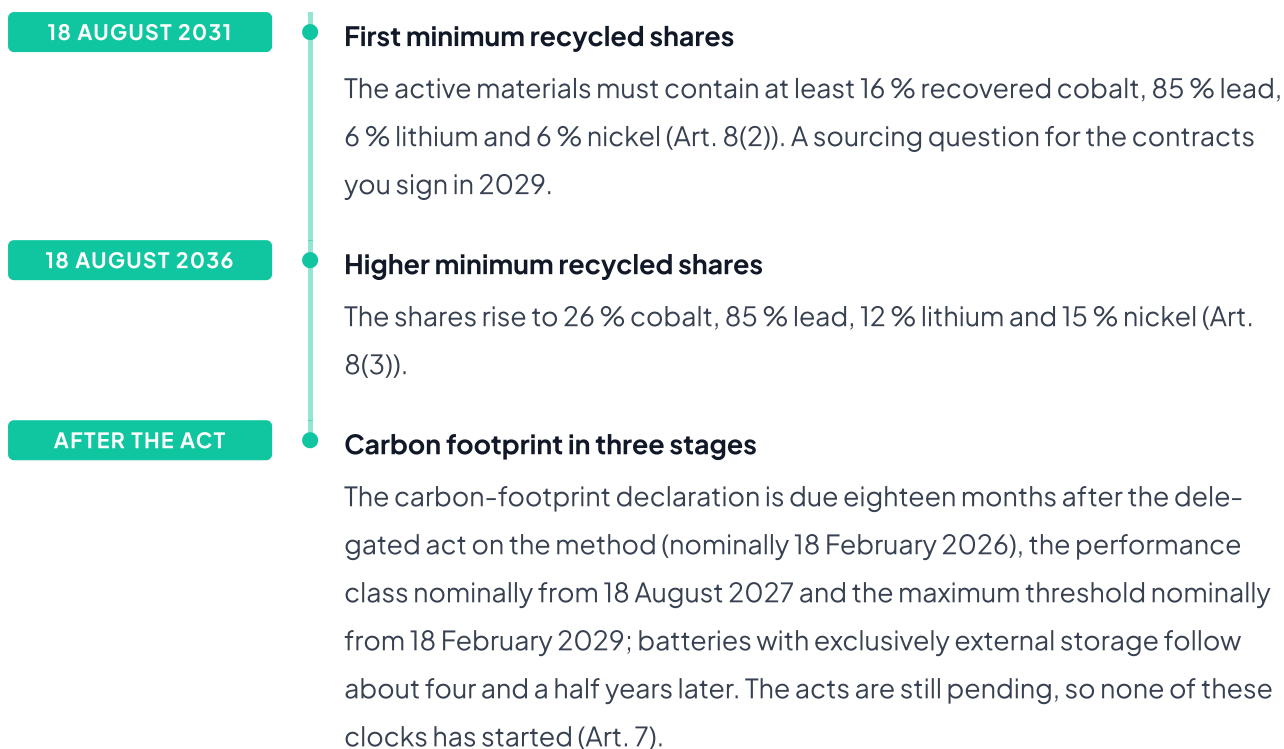
● Supply-chain due diligence

Companies above EUR 40 million net turnover run a supply-chain due-diligence policy, have it verified and report on it (Art. 47 ff.). Postponed from 2025 by Regulation (EU) 2025/1561.

18 AUGUST 2028

● Document recycled content

Documentation of the recovered shares of cobalt, lithium, nickel and lead per model, year and plant (Art. 8(1)), or 24 months after the delegated act on the method if that comes later. Not for batteries with exclusively external storage. Your cell suppliers hold these numbers.



Sources

The documents this checklist is drawn from, and what each one is good for.

Document	What for
Regulation (EU) 2023/1542	The regulation itself: Art. 77 and 78 and Annex XIII on the passport, Art. 13 on the QR code, Art. 7 on the carbon footprint, Art. 8 on recycled content.
Commission guidance "Digital Batteries Passport - data points by category"	The classification of every data point per battery category, for industrial batteries with its many "where applicable".
Regulation (EU) 2025/1561	The postponement of the due-diligence duties to 18 August 2027.

How to prepare

Six steps in the order they pay off, from the classification of your models to the first published passport.

1. **Classify per model:** decide for every model which of the "where applicable" data points apply, and record the reasoning. Market surveillance will ask for it.
2. **Data audit:** go through the required data above and note per field which system holds it today.
3. **Bind suppliers by contract:** recovered shares, cell chemistry and test results sit with the cell manufacturers. Put defined data fields and deadlines into the purchasing contracts.
4. **Set the access tiers:** decide per field who may see it, and who in your company maintains and releases it.
5. **Pilot with a handful of models:** [Register for free](#), pick the battery template and create a few real models as passports. Fields that do not apply to a model stay empty without blocking the passport.
6. **Prepare register and carbon footprint:** keep the fields for the registration ID and the carbon-footprint declaration ready, but build no calculation before the act.

As of 8 September 2026. The current version of this checklist:

<https://transpareo.com/en/industries/batteries/checklist-industrial-batteries>