

Battery passport checklist for LMT batteries

Duties, required data, deadlines and sources for batteries in e-bikes, e-scooters and e-mopeds 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 LMT batteries.

This checklist sums up what the EU Batteries Regulation (EU) 2023/1542 asks of you when you place batteries for light means of transport on the EU market: e-bikes, e-scooters, e-mopeds and similar vehicles. It lists the duties, the data points the Commission guidance of July 2026 classifies as mandatory for LMT 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. LMT batteries carry two particularities: they report the full set of state-of-health values, and they must remain replaceable by independent professionals.

The numbers in brackets are the data points of the Commission guidance, the articles those of the regulation.

Does the passport duty apply to your battery?

Tick what holds for your battery. The first two statements together mean the passport duty of [Regulation \(EU\) 2023/1542](#) applies to you; the third adds the vehicle maker's duties. The articles in brackets point to the regulation.

- ☐ The battery is sealed, weighs 25 kg or less, provides the traction power of a wheeled vehicle that runs on an electric motor alone or on motor and human power together, including type-approved category L vehicles, and is not an EV battery (Art. 3).
- ☐ 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.

- ☐ You place vehicles with such batteries on the market: then the duties on removability and spare parts apply to you as well (Art. 11(5) to (8)).

Your duties

Everything [Regulation \(EU\) 2023/1542](#) asks of whoever places an LMT 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 and the capacity, the separate collection symbol and, where applicable, the Cd or Pb symbol (Art. 13(1), (2), (4) and (5)).
- ☐ Keep state-of-health and expected-lifetime data accessible in the battery management system (Art. 14).
- ☐ Keep the battery and its cells removable and replaceable by independent professionals, offer spare batteries for five years after the last vehicle and never block the replacement by software (Art. 11(5) to (8)).
- ☐ 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 August 2028; the performance class and the maximum threshold follow (Art. 7).

- ☐ Document the recovered shares of cobalt, lithium, nickel and lead, for LMT batteries from 18 August 2033; the minimum shares apply from 18 August 2036 (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 54 of the 71 data points as mandatory for LMT batteries, more than for any other category, because the state of health is reported in full. 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)
- ☐ Expected lifetime in cycles and the reference test for it
Data points 31 and 32, Annex XIII point 1(j)
- ☐ Temperature range the battery withstands when not in use
Data point 34, Annex XIII point 1(l)
- ☐ Round-trip energy efficiency, initial and at 50 % of cycle life
Data points 36 and 37, Annex XIII point 1(n)
- ☐ Internal cell and pack resistance
Data point 38, Annex XIII point 1(o)
- ☐ C-rate of the cycle-life test
Data point 39, Annex XIII point 1(p)
- ☐ 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)

- ☐ Rated capacity as a living value

Data point 51, Annex XIII point 4(a)

- ☐ Capacity fade in per cent

Data point 52, Annex XIII point 4(a)

- ☐ Power in watts and power fade in per cent

Data points 53 and 54, Annex XIII point 4(a)

- ☐ Internal resistance and its increase

Data points 55 and 56, 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

Data point 62, Annex XIII point 4(b)

- ☐ Remaining power capability

Data point 63, Annex XIII point 4(b)

- ☐ Remaining round-trip efficiency

Data point 64, Annex XIII point 4(b)

- ☐ Evolution of self-discharging rates

Data point 65, Annex XIII point 4(b)

- ☐ Ohmic resistance

Data point 66, Annex XIII point 4(b)

- ☐ 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 (1)

- ☐ Period of the commercial warranty for the calendar life

Data point 35, Annex XIII point 1(m)

- ☐ Cd or Pb symbol

Data point 41, Annex XIII point 1(q)

- ☐ Energy round-trip efficiency and its fade

Data points 57 and 58, Annex XIII point 4(a)

- ☐ Charging and discharging cycles, negative events, operating conditions and state of charge

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
Data point 61, Annex XIII point 4(b)

Deadlines

The dates that matter for an LMT 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 2024

State-of-health data in the battery management system

Since this day the battery management system must give access to the data on state of health and expected lifetime (Art. 14). Check that yours exposes them; for LMT batteries they become mandatory passport values.

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 and capacity Every battery carries a label with the general information of Annex VI, and LMT batteries state their capacity on it (Art. 13(1) and (2)). Shifts if the implementing act on the format arrives later.
18 FEBRUARY 2027	Battery passport, QR code and removability From this day every LMT battery placed on the market needs the passport (Art. 77) and the QR code that leads to it (Art. 13(6)), and vehicles must let a professional remove and replace the battery and its cells (Art. 11). There is no transition period.
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 2033	Document recycled content Documentation of the recovered shares of cobalt, lithium, nickel and lead per model, year and plant (Art. 8(1)), five years later than for EV batteries. Your cell suppliers hold these numbers.
18 AUGUST 2036	Minimum recycled shares The active materials must contain at least 26 % recovered cobalt, 85 % lead, 12 % lithium and 15 % nickel (Art. 8(3)).
AFTER THE ACT	Carbon footprint in three stages The carbon-footprint declaration is due eighteen months after the delegated act on the method (nominally 18 August 2028), the performance class nominally from 18 February 2030 and the maximum threshold nominally from 18 August 2031. The acts are still pending, so none of these clocks has started (Art. 7).

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. 11 on removability, 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.
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 data you already hold to the first published passport.

1. **Data audit:** go through the required data above and note per field which system holds it today. Pay particular attention to the state-of-health values: they have to travel from the battery management system into the passport.
2. **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.
3. **Check replaceability:** clarify with engineering whether battery and cells can be removed by a professional and whether any software stands in the way of a replacement.
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. A field that is mandatory only for LMT batteries is never forced onto another category there.
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 9 September 2026. The current version of this checklist:

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