

Battery passport checklist for stationary storage systems

Duties, safety evidence, required data and deadlines for stationary battery storage 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 stationary storage systems.

This checklist sums up what the EU Batteries Regulation (EU) 2023/1542 asks of you when you place stationary battery energy storage systems on the EU market: home storage, commercial storage and grid storage. Legally these are industrial batteries; from 2 kWh they need the battery passport. On top come two duties that apply to stationary storage alone: the safety evidence under Article 12 and the state-of-health data in the battery management system under Article 14. Below you find the duties, the required data, 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.

The numbers in brackets are the data points of the Commission guidance, the articles those of the regulation. The data points follow the column for industrial batteries.

Does the passport duty apply to your system?

Tick what holds for your system. The first three statements together mean the passport duty of [Regulation \(EU\) 2023/1542](#) applies to you; the fourth sends you to a different checklist. The articles in brackets point to the regulation.

- ☐ The system is an industrial battery with internal storage, specifically designed to store energy from and deliver it to the grid, or to store it for and deliver it to end users, wherever and by whoever it is used (Art. 3).
- ☐ The battery in the system has a capacity above 2 kWh; below that there is no passport, but safety evidence, labelling and a QR code.

- ☐ You place the system 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.
- ☐ Your battery has exclusively external storage, such as a flow battery: then it is an industrial battery but not a stationary battery energy storage system (Art. 3), so the industrial checklist applies to it, with later carbon-footprint dates and no recycled-content duty (Art. 7, Art. 8).

Your duties

Everything [Regulation \(EU\) 2023/1542](#) asks of whoever places a stationary storage system on the market, the two storage-only duties first. Tick off what is already in place; every item names its article, and the deadlines below say when it applies.

- ☐ Prove safety in normal operation: testing of the safety parameters of Annex V, assessment of further hazards, evidence of their mitigation and instructions for an incident, all in the technical documentation (Art. 12).
- ☐ Review the technical documentation when the system is remanufactured or repurposed (Art. 12(2)).
- ☐ Keep state-of-health and expected-lifetime data accessible in the battery management system (Art. 14).
- ☐ 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 (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

For industrial batteries the [Commission guidance](#) classifies 36 of the 71 data points as mandatory. Storage systems usually carry their cycle values, because their lifetime can be expressed in cycles. 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, including the safety tests under Annex V
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, for storage systems usually yes

- ☐ Expected lifetime in cycles and the reference test for it
Data points 31 and 32, Annex XIII point 1(j)
- ☐ 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)
- ☐ 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)
- ☐ Web and email address of the manufacturer, warranty period, Cd or Pb symbol
Data points 5, 35 and 41, Annex VI Part A (1) and Annex XIII point 1(m) and (q)

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 a stationary storage system, 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; systems placed on the market since then fall under its conformity rules.

18 AUGUST 2024

Safety evidence and state-of-health data

Since this day the technical documentation must prove the system's safety with the tests of Annex V and an assessment of further hazards (Art. 12), and the battery management system must give access to state of health and expected lifetime (Art. 14). Both are already due.

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

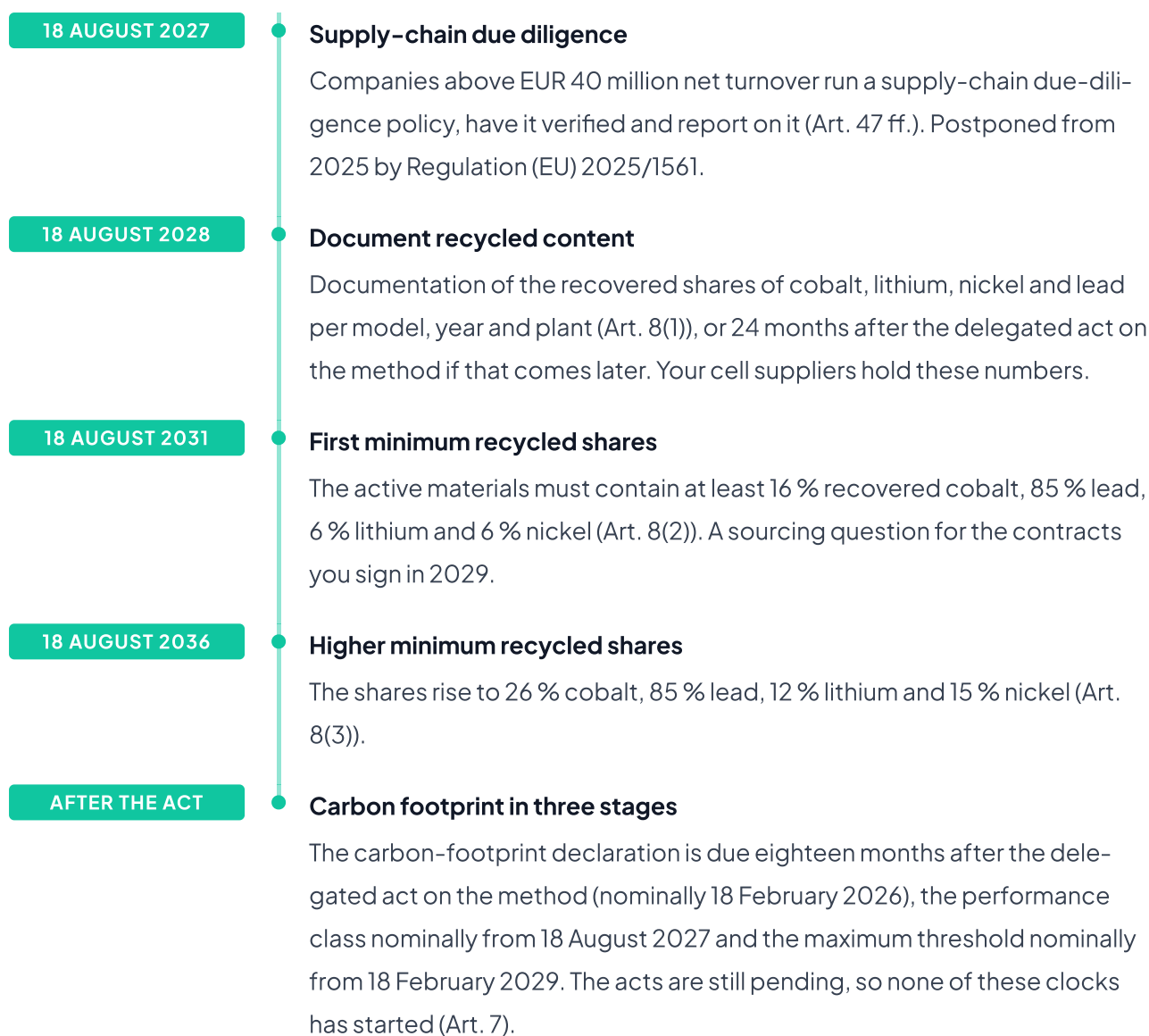
Label with general information

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 storage system 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 system placed the day before needs none, one placed on the day does.



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. 12 and Annex V on safety, Art. 14 on state-of-health data, Art. 77 and 78 and Annex XIII on the passport, Art. 13 on the QR code.

Document	What for
Commission guidance "Digital Batteries Passport - data points by category"	The classification of every data point, for storage systems the column of the industrial batteries.
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 safety evidence you already owe to the first published passport.

1. **Check the safety evidence:** does your technical documentation contain the tests under Annex V, the assessment of further hazards and the instructions for an incident? This duty has applied since 2024.
2. **Connect the state-of-health data:** clarify how state of health and expected lifetime travel from the battery management system into the passport, and how often.
3. **Data audit:** go through the required data above and note per field which system holds it today.
4. **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.
5. **Pilot with a handful of models:** [Register for free](#), pick the battery template and create a few real systems as passports. Every update of the state-of-health data becomes a new signed version.
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-stationary-storage>