EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

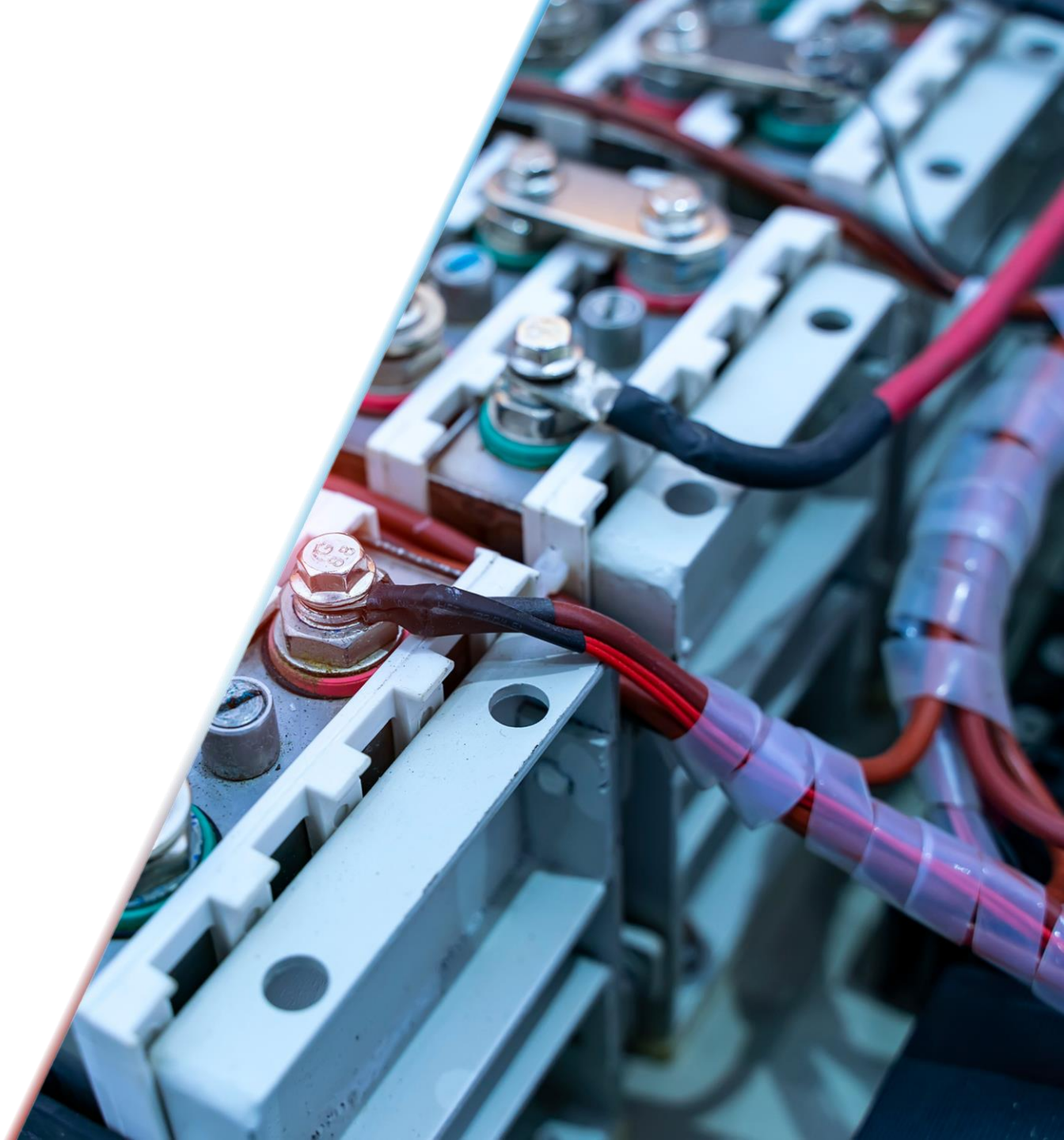
energy storage europe

WEBINAR

Industry Guidance on Battery Passport Data Fields

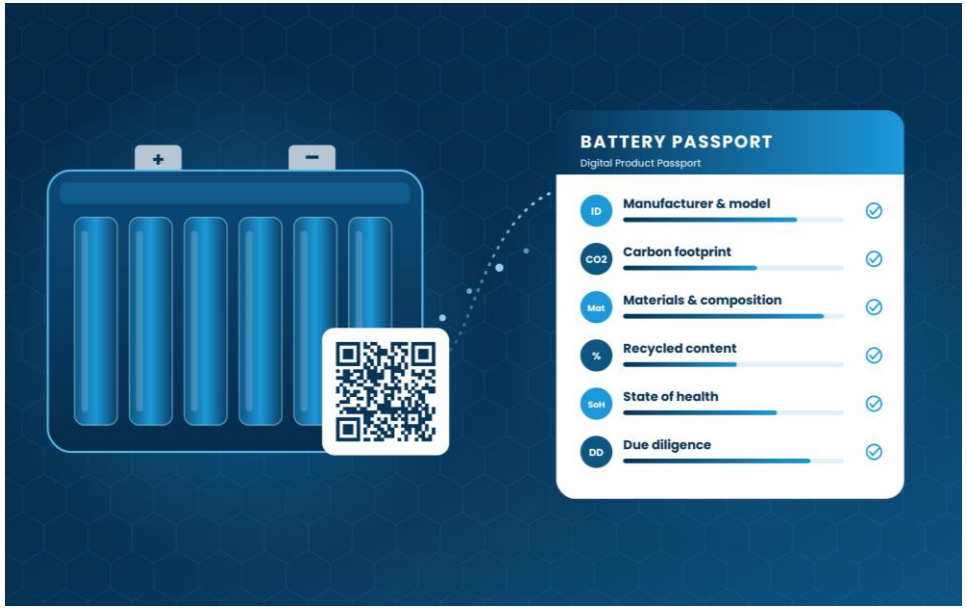
A common framework for transparent, safe and sustainable battery value chains

27 November 2027 | 10:00-11:00 AM CET | Online



Welcome to the webinar

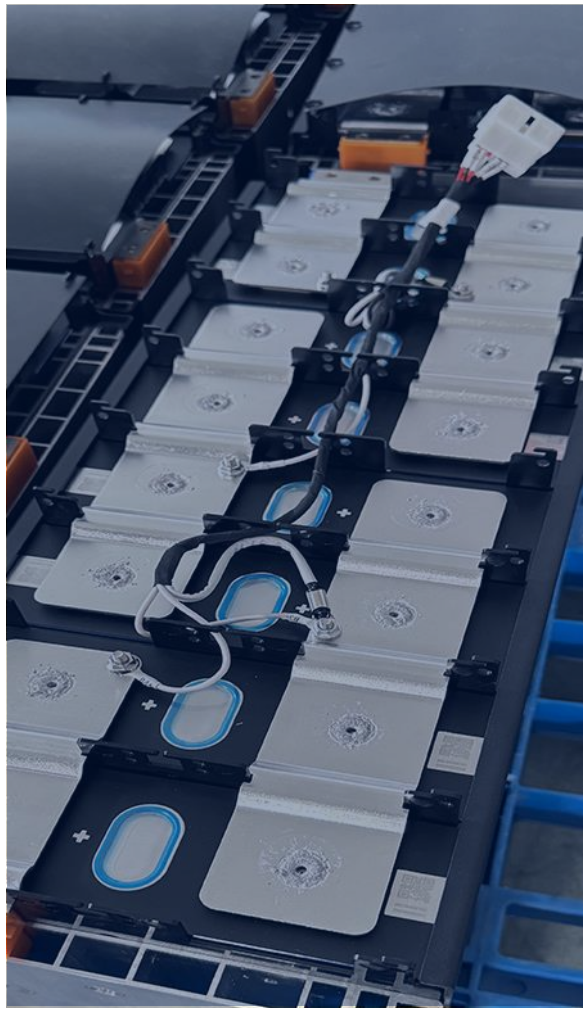
- **Aim:** present the Industry Guidance on battery passport data fields, its rationale and the key implementation challenges ahead of 18 February 2027.
- **Questions:** please add your questions to the Q&A Section.
- **Housekeeping:** Microphones and cameras are switched off for participants.
- The webinar is being recorded (recording will be published on the websites of EUROBAT and Energy Storage Europe) and the slides will be shared with registered participants.



One common reading of the battery passport data fields across the industry

Agenda

01	**Welcome and introduction of EUROBAT and ESE** Mariia Baryshpol (EUROBAT) & Alberto Gasparato (ESE)	10:00
02	**Regulatory background and the Industry Guidance** Alberto Gasparato & Mariia Baryshpol	10:05
03	**Short Q&A**	10:15
04	**Industry Guidance table in detail** Yuki Wang, EUROBAT Battery Passport Task Force Leader	10:20
05	**Policy issues: hazardous substances, access rights** Karsten Kurz, EUROBAT EHS Cluster Leader	10:35
06	**Q&A and closing**	10:45



Today’s speakers



Yuki Wang

Leader, EUROBAT Battery Passport Task Force

CATL



Karsten Kurz

Leader, EUROBAT EHS Cluster

EXIDE Technologies



Mariia Baryshpol

Policy Assistant

EUROBAT



Alberto Gasparato

Junior Policy Officer

Energy Storage Europe

About EUROBAT

The leading association for European automotive and industrial battery manufacturers, covering all battery technologies.

www.eurobat.org

EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

36 members



- **Three Clusters** – Environment, Health & Safety; Technology; Industry – with Task Forces on live topics.
- **Battery Passport Task Force** within the Technology Cluster, which led the work on this Guidance within EUROBAT.

About Energy Storage Europe

The Unified Voice of Energy Storage

- Energy Storage Europe, **established in 2011**, is the leading organisation **representing the full energy storage value chain.**
- **The association represents more than 70 members**, including utilities, technology suppliers, research institutes, distribution system operators and transmission system operators, and works towards a renewable-based, carbon-neutral Europe by 2050.
- Under the technology and Value Assessment Committee, the **Task Force on Sustainable Batteries** works to ensure that European legislation is fit for batteries for energy storage.

energy storage europe

www.energystorageeurope.eu

EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

energy storage europe

02

Regulatory background

Alberto Gasparato, Energy Storage Europe

The battery passport at a glance

- **Legal basis:** Regulation (EU) 2023/1542, Article 77 and Annex XIII.
- **Mandatory from 18 February 2027** for LMT batteries, industrial batteries above 2 kWh and EV batteries placed on the EU market.
- **Part of the Digital Product Passport (DPP)** under the Ecodesign Regulation: unique identifier, QR code and the DPP registry.
- **Standards:** EN 18219 and EN 18220.



One electronic record for each individual battery

Who can see which information

Public

Information accessible to everyone, for example on the battery model, its composition and carbon footprint.

Persons with a legitimate interest

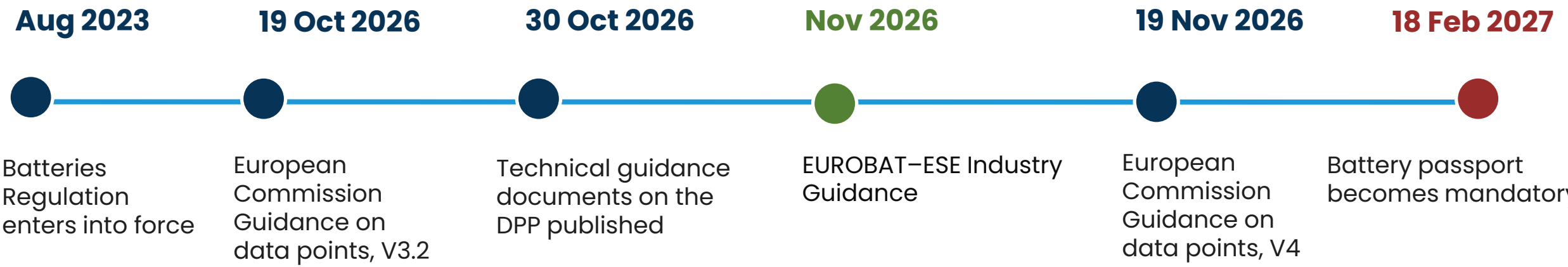
Restricted information, for example for repairers, remanufacturers, repurposers and recyclers.

Notified bodies, market surveillance authorities and the European Commission

Restricted information, such as test reports, for conformity assessment and enforcement.

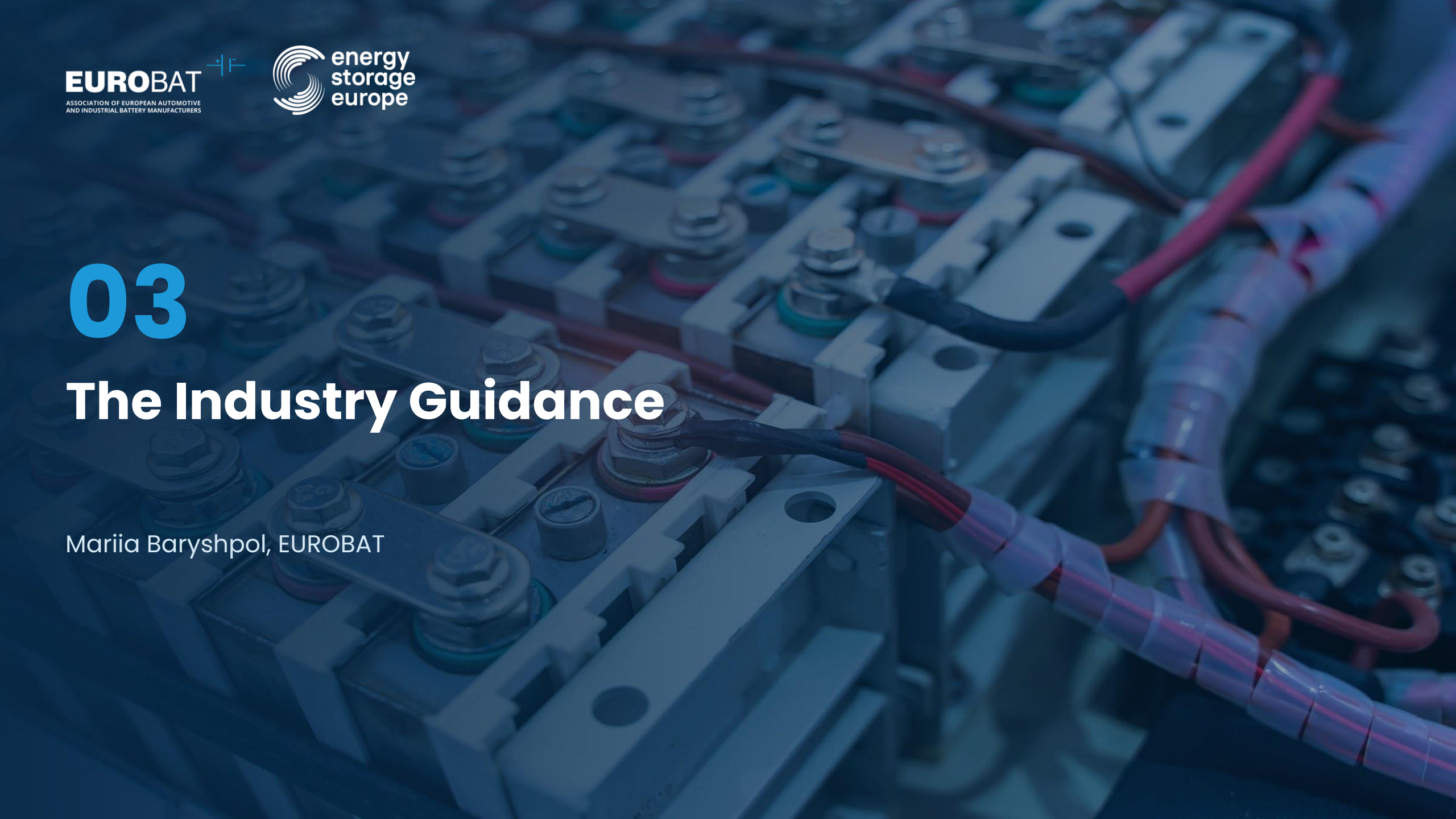
Access rights for persons with a legitimate interest will be set out in an implementing act under Article 77(9), still under discussion.

Where we stand



EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

energy storage europe



03

The Industry Guidance

Mariia Baryshpol, EUROBAT

Why an Industry Guidance?

- **Room for interpretation:** the Regulation leaves some data points open to different readings.
- **Consistency:** a common reading helps companies provide consistent and comparable data across the industry.
- **Dialogue with the European Commission:** several of our proposals are already reflected in the European Commission's latest guidance.
- **Status:** a voluntary recommendation without legal force. The Regulation and European Commission texts prevail.



Developed jointly by EUROBAT and Energy Storage Europe

Scope and approach

71

data points covered

V3.2

European Commission data points guidance (19 October 2026) used as the basis

For each data point, the Guidance gives:

Legal source

Article and Annex of the Regulation

Applicability

EV, LMT and industrial batteries

Proposed definition

How the data point should be understood

Proposed data format

How the data should be provided

EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

energy storage europe



Short Q&A

Clarification questions on the framework and the Guidance



EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

energy storage europe

04

Industry Guidance table in detail

Yuki Wang, EUROBAT Battery Passport Task Force Leader



05

Broader policy issues

Karsten Kurz, EUROBAT EHS Cluster Leader

Hazardous substances: passport and label

Today

CLP-based definition: potentially ~200 000 substances, with no concentration threshold.

European Commission position (October 2026)

Passport disclosure required from 18 February 2027 under the current definition; the 18-month period of Article 13 does not apply.

Environmental Omnibus

Competing definitions on the table. Industry calls for the REACH Candidate List of SVHCs (253 entries).

Consequences

Inconsistent hazardous substance information. At least two reviews per year & high risk of scrapping labels

Persons with a legitimate interest

Only what is necessary

No cell composition data for repairers, remanufacturers and repurposers; no proprietary know-how.

Clear roles

Define the “purchaser of the battery”; no independent access for training centres.

Third parties

Limit access to the battery owner to avoid de facto public disclosure of operational data.

Verification

A European Commission web portal to register and verify roles, with a clear access-rights matrix.

Download and publication

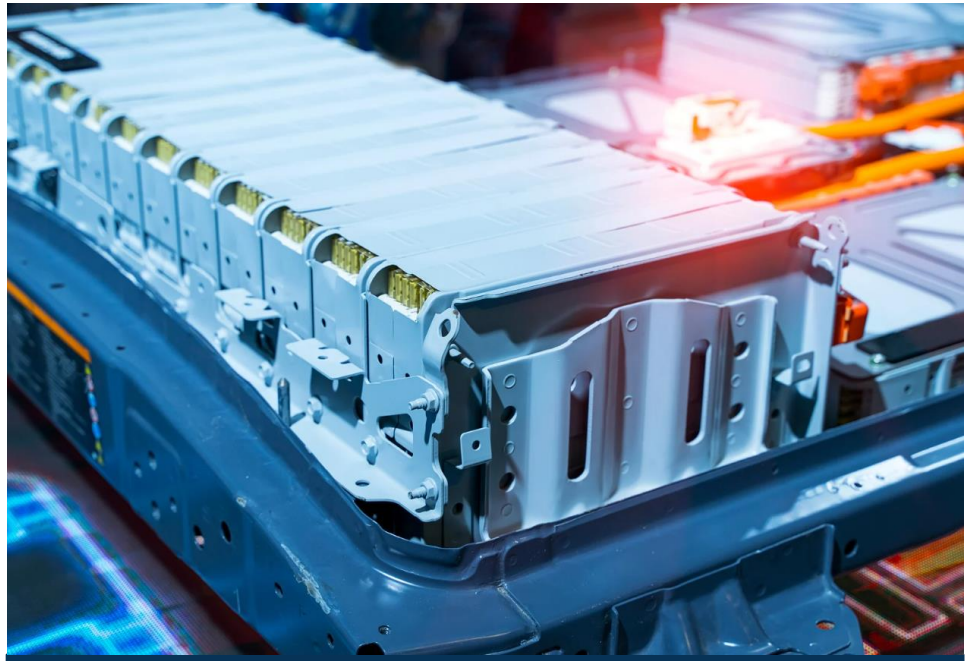
Remove download rights and the possibility to authorise publication of data.

Transition period

At least 6–12 months after the implementing act is published.

A pragmatic transition period

- **Several key elements are not yet final:** the access-rights implementing act and the technical specifications for the registry.
- **Our message:** we support the objectives of the battery passport. Workable rules and legal certainty are needed.



Support for the passport's objectives – with workable rules and legal certainty



EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

energy storage europe

Q&A

Questions and answers

Please add your questions to the Q&A Section

Key messages

A common reading

The Industry Guidance proposes a definition and data format for each of the 71 data points, building on European Commission's V3.2 table.

Get ready now

The battery passport becomes mandatory on 18 February 2027. Companies should start preparing their data and systems now.

Workable rules

Industry supports the passport's objectives, but key pieces are still pending: access rights, hazardous substances and the registry.

Thank you

The Industry Guidance is available on both associations' websites.

EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

www.eurobat.org

eurobat@eurobat.org

energy storage europe

www.energystorageeurope.eu

info@energystorageeurope.eu

Avenue Adolphe Lacomblé 59/8, 1030 Brussels, Belgium

This guidance is provided for information purposes only and does not constitute legal advice. It does not replace the requirements of Regulation (EU) 2023/1542 or its implementing and delegated acts.

