

RECHARGE recommendations on the Digital Battery Passport as part of the Batteries Regulation

April 2026

The Digital Battery Passport (DBP) represents a key instrument to transparently showcase harmonised sustainability data collected across the entire battery value chain. As the first Digital Product Passport to be implemented in Europe, the battery industry welcomes the DBP as an important step towards digitalising value chain information and supporting the transition to a circular economy by improving the traceability of materials, facilitating collection and recycling, and encouraging more circular product design. However, to ensure successful implementation, significant clarification is required on several aspects detailed in the [Batteries Regulation \(EU\) 2023/1542](#), particularly regarding implementation timelines; dynamic data¹ requirements; third party authentication and access management as well as the availability of supporting technical standards. **Providing this clarity will be essential to ensure effective implementation while maintaining Europe's leadership in digital product transparency and avoiding delays that could weaken its global competitiveness.**

Below, RECHARGE outlines the current implementation challenges and provides recommendations.

1 Effective implementation: Phased approach with 18 month lead time

Before the battery passport implementation, major structural challenges remain, in particular regarding the inclusion of dynamic in Annex XIII, as well as confidential static data, in light of the significant delays in standardisation of essential digital, security and interoperability requirements.

The technical capabilities required to collect, transmit, and maintain dynamic data are not yet widely deployed, particularly for LMT batteries. Their implementation would generate disproportionate costs, operational risks, and cybersecurity exposure without delivering commensurate regulatory value. A phased implementation approach is therefore necessary to allow the market to adapt processes and infrastructure in line with the final CEN-CENELEC JTC 24 standards.

While the industry supports the provision of relevant publicly accessible static information in Part 1 of Annex XIII, the mandatory reporting of real-time or frequently changing parameters, such as state of charge, voltage ranges, temperature conditions, or negative events, remains incompatible with current technological capabilities, regulatory timelines and standardisation maturity.

In particular, the requirement to provide dynamic data raises four major challenges:

¹Dynamic data is understood here as the data listed under Annex XIII, 4(b) 'information on the state of health of the battery pursuant to Article 14' & 4(d) 'information and data resulting from its use, including the number of charging and discharging cycles and negative events, such as accidents, as well as periodically recorded information on the operating environmental conditions, including temperature, and on the state of charge' of [Regulation \(EU\) 2023/1542](#)

- **Lack of harmonised standards:** No agreed methodologies exist today to measure, verify, or exchange most dynamic parameters. Ongoing work such as in CEN/TC 301/WG 18 and CLC/TC21X/WG 5 remains far from finalisation, with critical standards not expected before or even shortly after February 2027².
- **Disproportionate administrative and financial burden:** Establishing systems capable of continuous or frequent in-use data collection and offboarding would impose high costs on manufacturers without generating meaningful added value for recyclers, end-users or authorities. This is exacerbated by the lack of coherence with the timeline of Euro7 on-board monitoring (OBM) requirements.
- **Security and confidentiality concerns:** Dynamic data reporting would require disclosing highly sensitive technical data to third parties, creating irreversible exposure and competitive risks, which are exacerbated by the absence of clear rules on confidentiality, access rights, and data security in the exchange network. Although this is addressed in the Batteries Regulation where ‘persons with a legitimate interest’ would be entitled to have access to certain information in the battery passport such as sensitive commercial information’, the recent Commission Working Document³ attempts to address this, however further clarity is required.
- **Dynamic data reporting is impossible for legacy spare parts:** Both existing vehicles and their electronic architectures cannot be retrofitted to comply with new passport-related dynamic data obligations when batteries are replaced late in a vehicle’s life cycle.

Recommendations

1. Displaying dynamic data should only be legally mandated once standards, interfaces, and responsibilities are firmly established. The inclusion of dynamic data in the passport is currently technically unfeasible, legally uncertain, and disproportionate.
2. Data points that require identification of third parties (Points 2, 3 and 4 of Annex XIII) should be applicable only once the framework and the technologies are put in place by the EU. This includes that the harmonised standards from the DPP Standardisation Request are officially published and other related requirements e.g. for the EU Registry as well as the EU Business Wallets to identify third parties are clear, available and in use. Naturally, the industry needs an appropriate timeframe of 18 months to implement once the relevant standards, tools and requirements are set in place.
3. To ensure effective implementation, a phased approach for battery passport data should be introduced, with entry into force starting no earlier than 18 months after the publication of final guidelines and supporting standards adopted through non-legislative acts under the Batteries Regulation. This lead time is necessary to allow companies to ensure the availability of the required data and to build, test, and validate compliant systems before market application.

²Progress is being made – such as the forthcoming publication of **EN 18060** in the Official Journal and the Commission’s support for **EN 18363**—these initiatives mainly address EV battery performance and data structures. Publication of **JTC 24** results are also expected soon.

³Working Document - *Commission Implementing Regulation (EU) of XXX laying down rules for the application of Regulation (EU) 2023/1542 of the European Parliament and of the Council specifying access to certain parts of the battery passport*

4. Align Annex XIII 4b of the Batteries Regulation with Euro7/VII OBM application timelines.

2 Governance and Management of authentication and authorisation of third parties by the Commission

Clarity is required regarding who will manage the authentication and authorisation of third parties with access rights to non-public data of the passport⁴. Currently, economic actors are left alone in the task of authenticating and authorising third parties who may legally have the right to access non-public data of the passport. A clear governance model is essential to ensure harmonisation, interoperability, and legal certainty.

Recommendations:

5. The Commission ensure that the central registry and also the envisaged public web portal does not give economic actors access to the data of other economic actors under all circumstances. This is particularly important as the battery passports are issued individually and not per battery model. The risk of scraping any register or portal for confidential data from competitors should be taken into account and avoided.
6. It is paramount for the EU Commission to ensure that future means of digital identification – such as the proposed EU Business Wallets – do not only serve as a means to identify the actor but also to assign roles to said actor based on verified and ensured qualification and justification. Otherwise, the task of authentication and authorization will again be left to the economic actors providing the battery passport.
7. The Commission should also be responsible for administering the central authentication and authorisation system, including management of user roles and permissions and ensuring uniform security standards.
8. Therefore, a clear liability framework must be established. The Commission should define who is liable for commercial or reputational damage in case of misuse of access rights, data breaches, or the propagation of misleading information through the DBP network.
9. A formal, transparent legal process must be defined to resolve disputes regarding claims of "legitimate interest" to access non-public data. Economic operators cannot be expected to act as arbiters in such disagreements.
10. The data governance framework does not impose a disproportionate administrative burden on recyclers regarding 'legacy' batteries where historical data might be incomplete.

3 Data ownership and use

Clear allocation of responsibility for the digital battery passport is required for a successful implementation. The entity who has access to the Battery Management System (BMS) and the dynamic data should manage the passport and ensure data accuracy.

⁴Although the Commission has indicated that an EU Register is to be managed by the Commission this has not been publicly confirmed. This Register will be a non-public register of all unique identified. Battery passport issuers will be required to register and provide these unique identifiers—initially, in February 2027, using eSeals or eSignatures, and in the long term via EU Business Wallets. Where possible, the Commission will structurally validate the passports and unique identifiers.

Recommendations:

11. In alignment with the GDPR and the Data Act, regulatory guidance must clearly define responsibilities for data governance within the digital battery passport.
12. Whilst CEN CENELEC JTC24 will provide the technical framework supporting data reliability and verification mechanisms, RECHARGE emphasises that certain battery data will already be subject to third-party verification requirements under the Battery Regulation (such as the Carbon Footprint Declaration and Due Diligence requirements). Additional third-party verification of passport data would create disproportionate administrative burden. Each actor contributing information to the Digital Battery Passport is accountable for the data it provides. Instead, economic operators responsible for placing the battery on to the EU market should remain responsible for the accuracy of their data which could be supported by differentiated trust levels, similar to approaches explored in initiatives such as Catena-X.
13. The standardisation work must explicitly address interoperability protocols for data exchange between different DBP system providers (e.g., Catena-X, Global Battery Alliance) to prevent a fragmented landscape of incompatible data silos.
14. The Commission should clarify how the economic actor is informed on the status change of the battery and when the original battery passport ceases to exist i.e. the battery status is changed to “waste” by an authorized third party.
15. The Commission should also clarify how the economic actor who has issued the original passport is informed about a battery having reached “waste” status if the original battery has meanwhile undergone an action of “repurposing”, “re-use” or “remanufacturing” and thereby rendered the original battery passport void as a new battery passport was issued by the responsible economic actor having undertaken any of the aforementioned actions.

4 Practical Challenges in Data Verification and providing commercially sensitive data

While the obligation for economic operators to ensure data accuracy is a cornerstone of the Digital Battery Passport, the Regulation currently lacks a practical methodology for achieving this across complex, multi-tiered global supply chains. This omission places a significant and potentially unmanageable burden on economic operators who must collect and verify sensitive information from a vast network of upstream suppliers. Many of these suppliers operate outside EU jurisdiction and are under no legal obligation to provide the required data, creating a critical impasse for compliance.

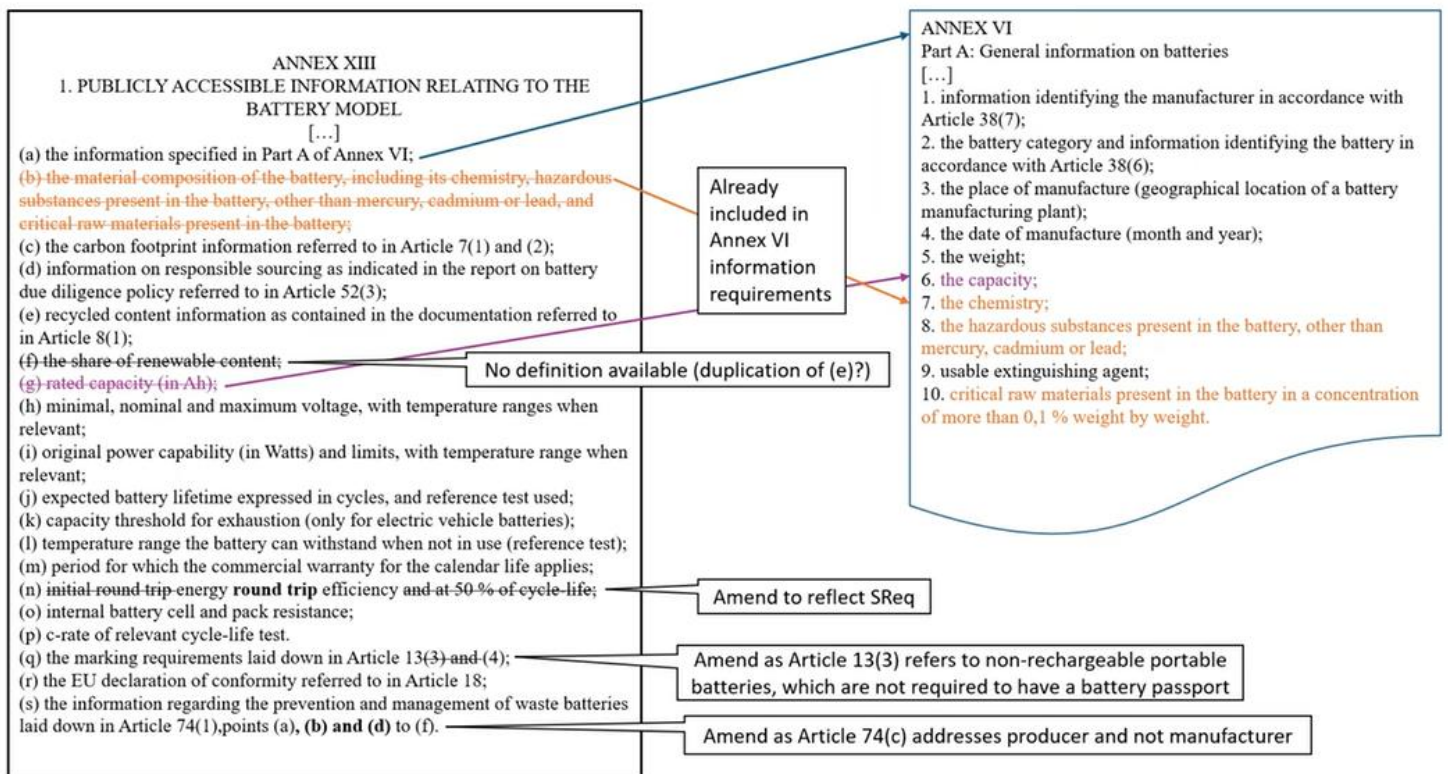
Recommendations:

16. Technical, environmental, and other data contained in the digital battery passport may include commercially sensitive information. Data governance rules must therefore respect competition law, trade secret protection and proportionality principles, ensuring that only necessary information is required. This needs to be clarified clearly by the Commission.

17. The Commission must define a clear methodology for managing data gaps and uncooperative suppliers, establishing what constitutes a "best effort" in data collection. This is essential to provide legal certainty for economic operators acting in good faith.
18. In this context the Commission must clarify whether data points need to be provided for unavailable information in case of confidentiality reasons and if so, what value should be published e.g., "n.a."; "not available due to confidentiality reason"; "available only to market surveillance authorities" or alternative wording.
19. The Commission must clarify the scope of liability for economic operators concerning upstream data they cannot independently verify. The integrity of the DBP hinges on preventing a "garbage in, garbage out" scenario, and liability must be proportionate to an operator's actual control over the data.

Figure 1 annotates issues with information included in Annex XIII and Annex VI

Figure 1: Issues with information included in Annex XIII and Annex VI of the Batteries Regulation



The Annex on the next page shows RECHARGE's detailed analysis of the DBP information in the Batteries Regulation.

Annex: Analysis of inconsistencies, inaccuracies, overlaps and potential inadequacies depending on battery category
within Annex XIII of Batteries Regulation 2023/1542

	Batteries Regulation Annex XIII	Available at time of placing on the market?	Similar requirement from other part of Batteries Regulation?	Comments/ Questions/ Suggestions for other parts of the Batteries Regulation	Suggestion
1. PUBLICLY ACCESSIBLE INFORMATION RELATING TO THE BATTERY MODEL	(a) the information specified in Part A of Annex VI;	Yes		Suggestions of improvements for Annex VI have been provided to the Commission during the consultation on the harmonised label	
	(b) the material composition of the battery, including its chemistry, hazardous substances present in the battery, other than mercury, cadmium or lead, and critical raw materials present in the battery;	Yes	Article 13 in conjunction with Annex VI Part A (7), (8), (10)	How is b) different from a)?	Delete as is already covered in Part 1.(a) Double requirements are of course not needed, e.g. (b) vs (a)

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	(c) the carbon footprint information referred to in Article 7(1) and (2);	Yes	Article 7		Once the disclosure of CFP through DBP begins, it should be clearly stated in the legal text that providing CFP via paper or labels is no longer required.
	(d) information on responsible sourcing as indicated in the report on battery due diligence policy referred to in Article 52(3);	yes	Article 52		Amend to simplify: (d) information on responsible sourcing as indicated in the report on battery due diligence policy referred to in Article 52(3);
	(e) recycled content information as contained in the documentation referred to in Article 8(1);	Yes	Article 8		Delegated Act should clarify that providing this information in the battery passport relieves the manufacturer of the burden to provide the values "accompanied by documentation as required by Article 8(1) (e) We recommend putting the required documents into the battery

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					passport counts as “providing documentation” far as Article 8(1) goes.
	(f) the share of renewable content;	Yes	no definition available	It is therefore, not clear how ‘renewable content’ is defined.	Delete. Please clarify what is meant by ‘renewable content’. Recital 123 expresses the desire to learn “...whether renewable material, such as material produced from lignin to substitute graphite, is used...” but the Regulation does not provide definitions which allow identifying these materials. It is assumed there can be renewable content with some of the chemistry, most obviously related to plastics in the housing of the battery with biobased plastics. There is research going on with

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					renewable battery chemistry but this is a bit off in the future.
	(g) rated capacity (in Ah);	Yes	Article 10 in conjunction with Annex IV Part A (1) "rated capacity (in Ah)" and Article 13(2) in conjunction with Annex VI Part A (6) "the capacity"	Repetition of Part 1(a) or if this is meant in relation to Article 10 then the value is covered in Part 4(a) of the Battery Passport	Delete as is already covered in Part 1.(a)

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	(h) minimal, nominal and maximum voltage, with temperature ranges when relevant;	Yes		Under load, voltage varies significantly due to internal impedance of the battery (eodc-cutoff-voltage typically Ri-compensated)	Recommendation to specify "voltage" as "open-circuit voltage" ⁵
	(i) original power capability (in Watts) and limits, with temperature range when relevant;	Yes	Article 10 in conjunction with Annex IV Part A (2)	Unclear what is meant by "original power capability" (continuous?) and power limit(s) (peak?); temperature range is already covered in (h) and (l) - or is operational temperature meant?	-Clarify wording considering the definition of power in EN50762-1 for LMT batteries and original power capability in EN18060 for EV batteries. -Also note, power is covered by Article 10 in connection with Annex IV (3) ('Power' means the amount of energy that a battery is capable of providing over a given period under reference conditions') of the

⁵ Annex II of the following working document – *Commission Delegated Regulation (EU) of supplementing and amending Regulation (EU) 2023/1542 of the European Parliament and of the Council as regards minimum values for the electrochemical performance and durability of rechargeable industrial batteries, technical parameters, and standards concerning the battery passport* changes in point 2 and 4 of Annex IV of the Batteries Regulation 'at the rated voltage' to 'under specific conditions' but there are no amendments to point (h) of Annex VIII of the Batteries Regulation.

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					Batteries Regulation and is covered by Part 4a of this Annex XIII of BR.
	(j) expected battery lifetime expressed in cycles, and reference test used;	Yes	Article 10 in conjunction with Annex IV Part A (5)	Once the Battery Passport comes into effect, does the Battery Passport fulfil the requirement of Article 10 that "batteries shall be accompanied by a document containing values"?	Clarify that 1(j) is the theoretical values when placed on the market and 4(a) should reflect the actual expected numbers based on the lifecycle stage.
	(k) capacity threshold for exhaustion (only for electric vehicle batteries);				
	(l) temperature range the battery can withstand when	Yes		Unclear what is meant by reference test; up to manufacturer to determine temperature range based on own experience and	Amend: (l) temperature range the battery can withstand when not in use (reference test);

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	not in use (reference test);			testing; usually temperature range is specified by manufacturer as storage temperature range	
	(m) period for which the commercial warranty for the calendar life applies;	No		<p>Commercial warranty not available at time of placing on the market as this is related to contractual B2C date.</p> <p>A battery is a consumable, calendar life is heavily impacted by user attitude and storage conditions, thus not covered by commercial warranty.</p> <p><i>Battery warranty</i> terms vary significantly by OEM, application, and market. Warranty data is contractual, not technical; most of it is confidential. Publishing warranty duration in the Passport may mislead consumers (e.g., “warranty remaining life = battery</p>	<p>Delete</p> <p>If retained, only high-level classification (e.g., “warranty applicable according to OEM conditions”) should be used, without contract specifics.</p>

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				actual remaining life"). Warranty is a vehicle-level commitment, not a battery-level technical parameter.	
	(n) initial round trip energy efficiency and at 50 % of cycle-life;			completely new wording and unclear; not part of SReq; "energy round trip efficiency" included in Article 10 in conjunction with Annex IV Part A	Delete or replace by wording as chosen in Standardisation request (i.e. "energy round trip efficiency" which is used in EN 18060)
	(o) internal battery cell and pack resistance;	Yes	Article 10 in conjunction with Annex IV Part A (3)	value required from cell manufacturer (technical specification) and commercially sensitive;	Delete (o) as '[i]nternal resistance' is covered by Article 10 in connection with Annex IV (5) ('Internal resistance' means the opposition to the flow of current within a cell or a battery under reference conditions, that is, the sum of electronic resistance and ionic resistance to the contribution to total effective resistance including inductive/capacitive properties) of the Batteries Regulation and is

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					covered by Part 4a of this Annex XIII as well.
	(p) c-rate of relevant cycle-life test.	Yes	Article 10 in conjunction with Annex IV Part A	This is part of SReq covering Article 10 in conjunction with Annex IV Part A and therefore covered in Part 4(a).	Delete
	(q) the marking requirements laid down in Article 13(3) and (4);	Yes	Article 13(3) and (4)	Article 13(3) pertains to non-rechargeable portable batteries only, which do not have a battery passport requirement	Amend: (q) the marking requirements laid down in Article 13(3) and (4);
	(r) the EU declaration of conformity referred to in Article 18;	Yes			

	Batteries Regulation Annex XIII	Available at time of placing on the market?	Similar requirement from other part of Batteries Regulation?	Comments/ Questions/ Suggestions for other parts of the Batteries Regulation	Suggestion
	(s) the information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f).	Partially	Article 74(1) points (a) to (f)	Article 74 addresses producer, not the manufacturer; manufacturer does not know where the product will be made available, therefore point Article 74 (1) (c) will be difficult as collection depends on Member State.	Amend: (s) the information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a), (b) and (d) to (f).
2. INFORMATION RELATING TO THE BATTERY MODEL ACCESSIBLE ONLY TO PERSONS WITH A LEGITIMATE INTEREST AND THE COMMISSION	(a) detailed composition, including materials used in the cathode, anode and electrolyte;	IP	Article 13 in conjunction with Annex VI Part A (7)	What is the difference to Article 13 in conjunction with Annex VI Part A (7) and the added benefit? Depending on interpretation, this information may be commercially sensitive and difficult to obtain from cell manufacturers and component suppliers.	The Commission should invite stakeholders to develop harmonised reporting templates for detailed battery composition, including materials used in the cathode, anode and electrolyte This process would help define the appropriate level of data granularity while ensuring the protection of commercially sensitive information. Such alignment could be achieved through dedicated stakeholder workshops, similar to the process used to establish reporting templates under the

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					<p><u>Delegated Act establishing the methodology for calculation and verification of rates for recycling efficiency and recovery of materials from waste batteries, and the format for the documentation.</u></p>
	(b) part numbers for components and contact details of sources for replacement spares;	Yes		May be commercially sensitive information if not clarified that battery pack spares are meant	<p>Amend: (b) part numbers for components and contact details of sources for replacement spares;</p> <p>Please revise it to 'part number of battery' for Tier 1 part numbers only. Disclosing the source of parts could make it possible to manufacture the same battery. It should be a spare battery, not a spare part.</p>

	Batteries Regulation Annex XIII	Available at time of placing on the market?	Similar requirement from other part of Batteries Regulation?	Comments/ Questions/ Suggestions for other parts of the Batteries Regulation	Suggestion
	(c) dismantling information, including at least: <ul style="list-style-type: none"> — exploded diagrams of the battery system/pack showing the location of battery cells, — disassembly sequences, — type and number of fastening techniques to be unlocked, — tools required for disassembly, — warnings if risk of damaging parts exist, — amount of cells used and layout; 	Yes, but IP		May be IP relevant	Access to dismantling information is important for recyclers, as it is crucial for the safe and efficient opening of battery packs. It is therefore recommended that these plans remain accessible to authorised recyclers

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	(d) safety measures.	Yes	<p>different or same as information listed in Article 74(1) point (d) or Article 77 "safety measures to be taken during the dismantling" e.g. Safety information like "avoid short circuits when dismantling the battery", "discharge cells before ..."?</p> <p>Extremely critical as liability relevant.</p>		<p>For clarity please clarify Article 74(1) point (d). It is understood that Article 74 (1) point (d) is a safety instruction sheet for handling waste batteries, and so it is understood this is separate from the safety instruction sheet intended for disassembly work during reuse operations. Therefore, it is suggested for the Commission to provide specific examples or indicate the intended purpose of using 'safety measures'.</p>

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3. INFORMATION ACCESSIBLE ONLY TO NOTIFIED BODIES, MARKET SURVEILLANCE AUTHORITIES AND THE COMMISSION	results of test reports proving compliance with the requirements laid down in this Regulation or any delegated or implementing act adopted pursuant to this Regulation.	Yes			
4. INFORMATION AND DATA RELATING TO AN INDIVIDUAL BATTERY ACCESSIBLE ONLY TO PERSONS WITH A LEGITIMATE INTEREST	(a) the values for performance and durability parameters referred to in Article 10(1), when the battery is placed on the market and when it is subject to changes in its status;	Yes	Article 10(1) in conjunction with Annex IV Part A (1)-(5)		We suggest the Commission to publish non legislative acts such as a Delegated Act which should clarify that providing this information in the battery passport relieves the manufacturer of the burden to provide the values "accompanied by a document" as required by Article 10(1) could potentially be moved to public part of the battery pass, then many of the Part 1 recommendations to delete would be covered

	Batteries Regulation Annex XIII	Available at time of placing on the market?	Similar requirement from other part of Batteries Regulation?	Comments/ Questions/ Suggestions for other parts of the Batteries Regulation	Suggestion
	(b) information on the state of health of the battery pursuant to Article 14;	Yes	Article 14 in conjunction with Annex VII	<p>need to adjust Annex VII for LMT batteries: Delete "evolution of self-discharging rate" in Annex VII; reasoning: value arbitrarily determined by manufacturer, of no value to the state of health and has been removed from SReq for LMT accordingly.</p> <p>The inclusion of state of health (SOCE – Annex XIII 4(b)) in the battery passport would be successful as long as the application timing is aligned with the implementation of the SOCE measurement and reporting requirements of Regulations 2024/1257 (Euro 7), 2025/1707 (On-Board Monitoring for Euro 7) and upcoming equivalent legislation for heavy-duty vehicles and with relevant standards for other battery applications such as</p>	

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				<p>EN50762-2 for LMT batteries. This alignment will ensure consistency across EU legislation and avoid premature obligations.</p> <p>Currently there is no standard definition of SOH (capacity fade vs power fade vs internal resistance) yet. SOC/SOH algorithms are proprietary OEM intellectual property. Values differ between OEM, pack integrator, and diagnostic tools.</p>	

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	(d) information and data resulting from its use, including the number of charging and discharging cycles and negative events, such as accidents, as well as periodically recorded information on the operating environmental conditions, including temperature, and on the state of charge.	No	definition of "negative events, such as accidents" is considered to be the same as "harmful events" in Annex VII Part B (4).	<p>State of charge does not make sense. SoC is highly volatile and user can see it directly on product/ vehicle – there is no need for this information in the Battery Passport.</p> <p>Most batteries cannot record "accidents". Safety is critical and legally sensitive. This information should remain within OEM servicing channels.</p> <p>"periodically recorded information on operating environmental conditions...." sounds like operating data storage, which would be draining the battery and therefore may render the battery useless faster due to the battery passport – that cannot be the intention.</p>	<p>Amend:</p> <p>(d) information and data resulting from its use, including the number of charging and discharging cycles and harmful/negative events defined by the battery manufacturer such as accidents, as well as periodically recorded information on the operating environmental conditions, including temperature, and on the state of charge.</p>

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				<p>What is the common understanding of ‘periodically recorded information’, for example for industrial batteries, periodically recording could be understood as the change of status of the batteries which is stated in Annex IX.</p> <p>In a vehicle, the data points are changing continuously during vehicle use such as set of change, temperature – therefore it is important to have clarity on what this term means.</p>	



ABOUT RECHARGE

RECHARGE is the European industry association for advanced rechargeable and lithium batteries. Founded in 1998, it is our mission to promote advanced rechargeable batteries as a key technology that will contribute to a more empowered, sustainable and circular economy. RECHARGE's unique membership covers all aspects of the advanced rechargeable battery value chain in Europe: from suppliers of primary and secondary raw materials, to battery, equipment and original equipment manufacturers (OEMs), to logistic partners and battery recyclers. www.rechargebatteries.org

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