PrimaFelicitas

PRIMAFELICITAS EXCLUSIVE • 2026 EDITION

Digital Battery Passport Compliance Checklist

EU Battery Regulation (EU) 2023/1542 — Annex XIII

February 2027 Deadline Approaching — Non-compliance: up to €10,000/ton

HOW TO USE THIS CHECKLIST

Work through each section with your compliance team. Tick items you have in place. Gaps = immediate action items. Score yourself using the Risk Meter on page 4, then book a free 30-min consult with PrimaFelicitas before Q2 rush.

6
Mandatory Data Categories

80%
of Manufacturers Miss Unique IDs

2027
Full DBP Rollout Deadline

BATTERY ID & IDENTIFICATION BASICS

- ☐ Unique battery identifier assigned (QR/RFID/barcode)
  Annex XIII §1 — mandatory for all EV/LMT/industrial >2 kWh
- ☐ Manufacturer name, trade name & registered address documented
  Including importer/distributor details where applicable
- ☐ Battery model, category confirmed (EV / LMT / Industrial >2kWh)
  Category determines full Annex XIII scope
- ☐ Production date & facility location recorded
  GPS-level plant ID required by Feb 2027
- ☐ Battery chemistry type specified
  e.g. NMC, LFP, NCA, LTO — impacts safety & recycling routes
- ☐ Gross weight & dimensions logged
  Required for transport classification & second-life assessment
- ☐ Serial number unique to cell batch confirmed
  Traceability from raw material to end-of-life

MATERIALS & RESPONSIBLE SOURCING

- ☐ Critical raw materials list complete (Li, Co, Ni, Mn, graphite)
  Annex XIII §3 — weight % per material required
- ☐ Recycled content % declared for cobalt, lithium, nickel, lead
  Targets: Co 16%, Li 6%, Ni 6% by 2031
- ☐ Hazardous substances inventory completed
  SVHC list cross-checked against REACH Annex XVII
- ☐ Supplier due diligence records in place
  Conflict-mineral sourcing policy documented
- ☐ Carbon footprint per kWh calculated (cradle-to-gate)
  CO2e/kWh — mandatory declaration from Aug 2024
- ☐ Supply chain audit trail stored & accessible digitally
  Minimum 13-year retention requirement

PERFORMANCE & TECHNICAL METRICS

- ☐ Rated capacity (Ah) & energy (kWh) declared at standard conditions
  IEC 62660-1 test conditions documented
- ☐ Nominal voltage & voltage range (min/max) specified
- ☐ Original cycle life rating (# of cycles to 80% capacity) confirmed
  Key for second-life value assessment
- ☐ Degradation curve / C-rate performance data available
  Enables SoH prediction & residual value calculation

- [ ] State of Health (SoH) monitoring protocol defined
  For industrial & EV >2kWh — real-time or periodic
- [ ] Power capability (W) at defined temperature ranges documented
- [ ] Internal resistance measurement method & baseline recorded
  Deviations trigger SoH alerts

SUSTAINABILITY & ESG DATA

- [ ] Full lifecycle carbon footprint calculated (cradle-to-grave)
  Scope 1, 2 & 3 emissions mapped
- [ ] Renewable energy % used in manufacturing declared
  Enables green financing & ESG reporting
- [ ] Repairability & replaceability score documented
  Annex XIII §6 — mandatory for industrial batteries
- [ ] Water use intensity in production recorded
  kL/kWh benchmark against sector average
- [ ] Social sustainability data captured (labor standards)
  OECD Due Diligence Guidance alignment
- [ ] ESG score/rating from accredited body obtained
  Supports EU Taxonomy eligibility claims

SAFETY, HANDLING & END-OF-LIFE

- [ ] Transport & handling safety instructions included in DBP
  UN 38.3, ADR/IMDG classifications recorded
- [ ] Step-by-step disassembly instructions for recyclers provided
  Annex XIII §7 — legally required
- [ ] Hazardous material identification for recycling facilities
  Material fractions labelled for automated sorting
- [ ] Pre-treatment & recycling efficiency targets declared
  Annex VI recovery targets: Li 80%, Co/Ni/Cu 95%
- [ ] Second-life suitability assessment completed
  SoH >80%? Flag as eligible for stationary storage
- [ ] Take-back & EPR scheme registration confirmed
  WEEE / Battery Directive EPR compliance
- [ ] Emergency response instructions (fire/chemical spill) included
  SDS linked in DBP digital record

DIGITAL INFRASTRUCTURE & ACCESS

- ☐ DBP hosted on EU-accessible digital platform (EU node)
  Data sovereignty & GDPR compliance mandatory
- ☐ QR/RFID link from physical battery to live DBP confirmed
  Machine-readable access verified
- ☐ Role-based access controls implemented (public/authority/industry)
  Annex XIII tiered access model
- ☐ API integration with supply chain partners tested
- ☐ Data update & version-control workflow documented
  Immutable audit log required

DBP COMPLIANCE CHECKLIST 2027 Timeline • Risk Meter • ROI Snapshot

YOUR 2027 COMPLIANCE ROADMAP

Q1 2026	Q3 2026	Feb 2027
Gap Analysis & Audit	Pilot DBP Implementation	FULL ROLLOUT or €10K/ton fines

■ *Audit slots filling fast — claim yours before Q2 rush*

QUICK RISK ASSESSMENT — Score Yourself in 2 Minutes

Answer Yes / No. Count your YES answers. Find your risk band below.

Q1. Do you have a unique digital identifier on every battery leaving your facility?	■ YES	■ No
Q2. Is your cobalt/lithium sourcing documented with supplier due diligence?	■ YES	■ No
Q3. Have you calculated the carbon footprint (CO2e/kWh) for your battery range?	■ YES	■ No
Q4. Do you track State of Health (SoH) data for EV or industrial batteries?	■ YES	■ No
Q5. Have you defined a disassembly guide for your recycling partners?	■ YES	■ No
Q6. Is your DBP hosted on an EU-accessible, GDPR-compliant platform?	■ YES	■ No
Q7. Do you have recycled content % data for Co, Li, Ni, and Pb?	■ YES	■ No
Q8. Have you completed an EPR / take-back scheme registration?	■ YES	■ No
Q9. Does your team have a documented 2027 rollout plan?	■ YES	■ No
Q10. Have you run a gap analysis against Annex XIII in the last 6 months?	■ YES	■ No

8-10 YES	Low Risk — verify documentation quality; book a final audit.
5-7 YES	Medium Risk — critical gaps exist; start Q1 sprint immediately
0-4 YES	**HIGH RISK — regulatory exposure; contact PrimaFelicitas TODAY**

ROI SNAPSHOT — What Does Compliance Pay Back?

Waste Reduction	Cut 20% material waste through precise traceability	~€500K/year
Second-Life Revenue	Unlock battery repurposing streams via SoH data	+15–25% margin
Fine Avoidance	Avoid €10,000/ton non-compliance penalties	Priceless
Green Financing	Cut 20% material waste through precise traceability	0.3–0.8% rate saving

Your Score Shows Gaps. Don't Face 2027 Alone.

Book your FREE 30-minute DBP Gap Audit with a PrimaFelicitas compliance specialist

Limited slots available before Q2 2026 — manufacturers booking now for Feb 2027 readiness

BOOK MY FREE 30-MIN CONSULT

YOUR 3-STEP ACTION PLAN

1

STEP 1 — Gap Analysis (This Week)

Share this checklist with your R&D;, Procurement & Legal teams. Identify unchecked items. Assign owners and deadlines. This is your compliance gap register.

2

STEP 2 — Pilot DBP (Q3 2026)

Select 1 battery SKU for a DBP pilot. Work with your IT team to connect production data to a compliant digital platform. Test QR access with a recycling partner.

3

STEP 3 — Full Rollout (by Feb 2027)

Scale DBP across your full product range. Complete regulatory submission. PrimaFelicitas can manage your entire implementation — from data architecture to submission.

Regulatory References: EU Battery Regulation (EU) 2023/1542 | Annex XIII | Regulation (EU) 2024/1257 (DBP Delegated Acts) | REACH Regulation (EC) 1907/2006. This checklist is for informational purposes only and does not constitute legal advice. Consult your legal and compliance team for jurisdiction-specific obligations.