EMPOWER GREEN

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Getting battery storage ready for the EU battery passport

From 18 February 2027, every industrial battery above 2 kWh sold in the EU needs a digital battery passport. For a maker of storage racks, packs or containers, much of the data sits with the cell supplier, often in another country. This paper explains what the EU Battery Regulation asks for and when, what the passport contains, and what to build in the next two quarters.

Version 2.0 · General information, not legal, tax or investment advice

In brief

Who it is for
Founders, technical leads and compliance leads at battery storage makers and integrators selling racks, packs or containers into the EU, wherever the factory is; and European buyers vetting a new supplier.

What's in it

1. **The basics**
   What the regulation covers, The timeline
2. **The passport**
   What the passport contains, Where the data comes from
3. **What buyers also ask for**
   Safety tests and CE marking, Producer registration, Forced labour and resilience rules
4. **The plan**
   What to build in the next two quarters

What it covers

- Every battery sold in the EU, wherever it is made.
- Industrial batteries above 2 kWh need a digital passport from 18 February 2027.

What is still moving

- The EU carbon-footprint method is not adopted, so that clock has not started.
- Due diligence starts on 18 August 2027 for companies above €40m turnover.

Where the data comes from

- Most passport data sits with your cell supplier.
- Your purchase contracts must oblige suppliers to provide it.

What buyers also ask for

- Safety tests, CE marking and producer registration.
- Evidence for the forced-labour ban and the Net-Zero Industry Act.

The EU Battery Regulation covers every battery sold in the EU

- **What it is.** Regulation (EU) 2023/1542 replaced the 2006 Batteries Directive. It follows a battery through its whole life, from design and materials to collection and recycling.
- **Where it applies.** To any battery placed on the EU market, wherever it was made.
- **Which batteries.** For stationary storage, industrial batteries above 2 kWh. That is every rack, pack and container you ship.
- **Who is responsible.** The manufacturer and, for batteries made outside the EU, also the importer and distributors.

What to do

Check which category each of your products falls into, and agree with your importer who will handle each duty.

2 kWh

Capacity above which an industrial battery needs a passport
Regulation (EU) 2023/1542

18 Feb 2027

The battery passport becomes mandatory
Regulation (EU) 2023/1542

Four obligations start at different times, and the passport comes first

Obligation	Applies from	What it means
Battery passport	18 Feb 2027	A digital record for each battery, reached by QR code. The date is fixed in law.
Supply-chain due diligence	18 Aug 2027	A checked policy on cobalt, graphite, lithium and nickel, for companies above €40m turnover.
Carbon-footprint declaration	18 months after the EU method	The Commission's method was not adopted as at late September 2026, so the clock has not started.
Recycled content	Aug 2028 at the earliest	Declare recycled cobalt, lithium, nickel and lead. Minimum shares from August 2031.

What changed in 2026

1. The EU battery passport registry opened on 20 July 2026.
2. Commission guidance says the carbon-footprint, due-diligence and recycled-content fields are not yet required.
3. Draft rules on who may see restricted passport data came out on 19 October, for comment until 16 November.

None of this moves the passport date. Position as at 6 November 2026.

The passport is a data record in three layers

- **Public layer.** Who made the battery, the model, where and when it was made, chemistry, capacity and voltage. Later also carbon footprint, recycled content and due diligence.
- **Restricted layer.** State of health and usage data, open to those with a legitimate interest, such as repairers and second-life operators.
- **Authority layer.** Compliance documents, for regulators only.
- **How it works.** The data stays in your own or a provider's system, reached through a QR code. The EU registry holds identifiers, not the data.
- **At launch.** Commission guidance marks the carbon-footprint, due-diligence and recycled-content fields as not yet required in February 2027.

What to do

Map every data point to a system in your plant or to a supplier, and choose who will host your passports.

Most passport data comes from your cell supplier

- **Upstream data.** Carbon footprint, raw materials, recycled content and due diligence all depend on the cell, and behind it on the cathode and anode supply chains.
- **Bought-in cells.** Most storage makers outside China buy their cells. If you do, you are still responsible for the passport of your system.
- **Your contracts.** Every cell contract should oblige the supplier to deliver this data for each lot, in a format that matches the passport, and to promise in writing that it is correct.
- **The risk.** Without those terms, the regulatory risk sits with you at the EU border.

What to do

Add a data schedule to every new cell, battery-management and enclosure contract, and make delivery a condition of payment.

Buyers will check safety tests and CE marking alongside the passport

- **CE marking.** Batteries get their CE mark by meeting the regulation's safety, performance and labelling rules. Stationary systems have their own safety requirements.
- **Safety standards.** IEC 62619 for industrial lithium cells and batteries, IEC 62933-5-2 for storage system safety, and UN 38.3 for transport.
- **Fire testing.** Buyers and insurers increasingly ask for UL 9540A fire test data, even for European projects.
- **The whole system.** The EU's low-voltage and electromagnetic compatibility (EMC) rules apply to the inverter, the controls and the complete container.

What to do

Test the product you will actually ship, not the pilot, and plan UL 9540A testing early.

What buyers also ask for

In each EU country, someone must register as the producer

- **Who the producer is.** Whoever first makes the battery available in that country. That is usually the EU importer or distributor.
- **What the producer does.** Registers in that country, reports what it sells and pays for collection and recycling. These duties have applied since 18 August 2025.
- **Selling direct from outside the EU?** Then you are the producer, and you must appoint an authorised representative in each country, because national registers only deal with a company based there.
- **Electrical equipment.** The equipment around the batteries falls under the EU rules on waste electrical and electronic equipment (WEEE), which work in a similar way.

What to do

Agree in each supply contract who is the producer. If it is you, appoint a representative in your first EU markets before the first shipment.

What buyers also ask for

Two more EU rules call for the same supply-chain evidence

- **Forced labour.** From 14 December 2027, products made with forced labour are banned from the EU market. It is a ban on the product, not a reporting duty.
- **Where attention falls.** Solar and battery supply chains, including polysilicon and cells, have long been a focus of forced-labour concerns.
- **Net-Zero Industry Act.** Since 30 December 2025, member states must judge at least 30% of auctioned renewable volume, or 6 GW a year, on factors other than price, including resilience.
- **Resilience.** The test applies when one country outside the EU supplies more than half of EU demand for a technology. Today that is often China, so a supplier elsewhere with a diversified supply chain can gain.

What to do

Build one supplier evidence trail. The same data answers the passport, due diligence, forced labour and resilience questions.

14 Dec 2027

The EU ban on products made with forced labour applies

Regulation (EU) 2024/3015

30%

Minimum share of auctioned renewable volume (or 6 GW a year) judged on factors other than price

Net-Zero Industry Act

Six things to build in the next two quarters

1	**Map the passport data**	Match every data point to a system in your plant or a supplier duty. The gaps become your work plan.
2	**Prepare the carbon footprint**	Collect data per model and plant now, and run the study once the EU method is adopted.
3	**Fix supplier contracts**	Add data schedules for cells, battery-management systems and enclosures, tied to payment.
4	**Complete safety testing**	IEC 62619, IEC 62933-5-2 and UN 38.3 on the shipping product, and a plan for UL 9540A.
5	**Settle producer duties**	Agree who is the producer in each market. If it is you, register and appoint an authorised representative.
6	**Prepare due diligence**	A policy before August 2027 if you will be above €40m turnover, and supplier evidence either way.

Words used in this paper

Battery passport
A digital record for each battery, reached through a QR code, that holds data on what the battery is, how it was made and how it has been used.

Carbon-footprint declaration
A statement of the greenhouse gases released in making a battery model at a given plant, from raw materials through production.

Due diligence
A company's checks on how the cobalt, natural graphite, lithium and nickel in its batteries were sourced, verified by a third party.

Industrial battery
The regulation's category for batteries made for industrial use, which includes the racks, packs and containers used for stationary storage.

LMT battery
A battery for a light means of transport, the regulation's term for small, light electric vehicles.

CE marking
The mark that shows a product meets the EU rules that apply to it.

Authorised representative
A company in the EU that acts for a producer based outside the EU and carries out duties on its behalf.

Net-Zero Industry Act (NZIA)
An EU law that, among other things, makes member states apply criteria other than price to part of the renewable energy they auction.

EU battery passport registry
The EU register, open since 20 July 2026, that records each battery's unique identifier and where its passport can be found.

Sources

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Figures and regulatory positions were checked on 6 November 2026. The rules in this area change quickly, so use this paper as a map and check the primary sources before you commit budget. This is general information, not legal, tax or investment advice.

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Talk to us

We can work out what each EU obligation asks of your products and your suppliers, and by when.

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