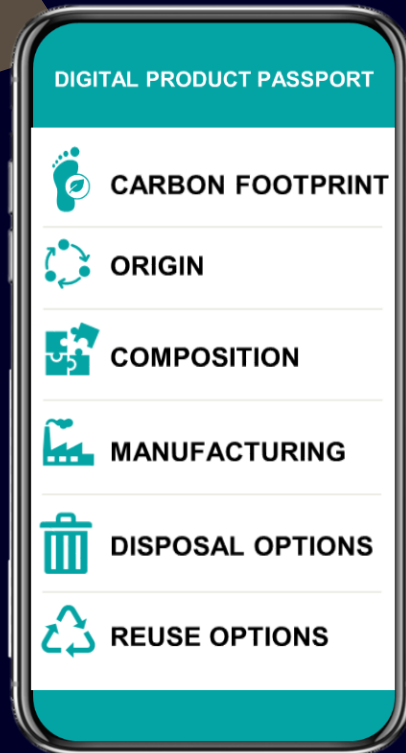


Does the new brave world of the Battery Passport start 2027?

Will it be a curse or a blessing for the battery ecosystem?



What is a Digital Product Passport?



A **Digital Product Passport (DPP)** digitally documents a product's journey through its entire **lifecycle**, creating a single source of truth for all stakeholders.

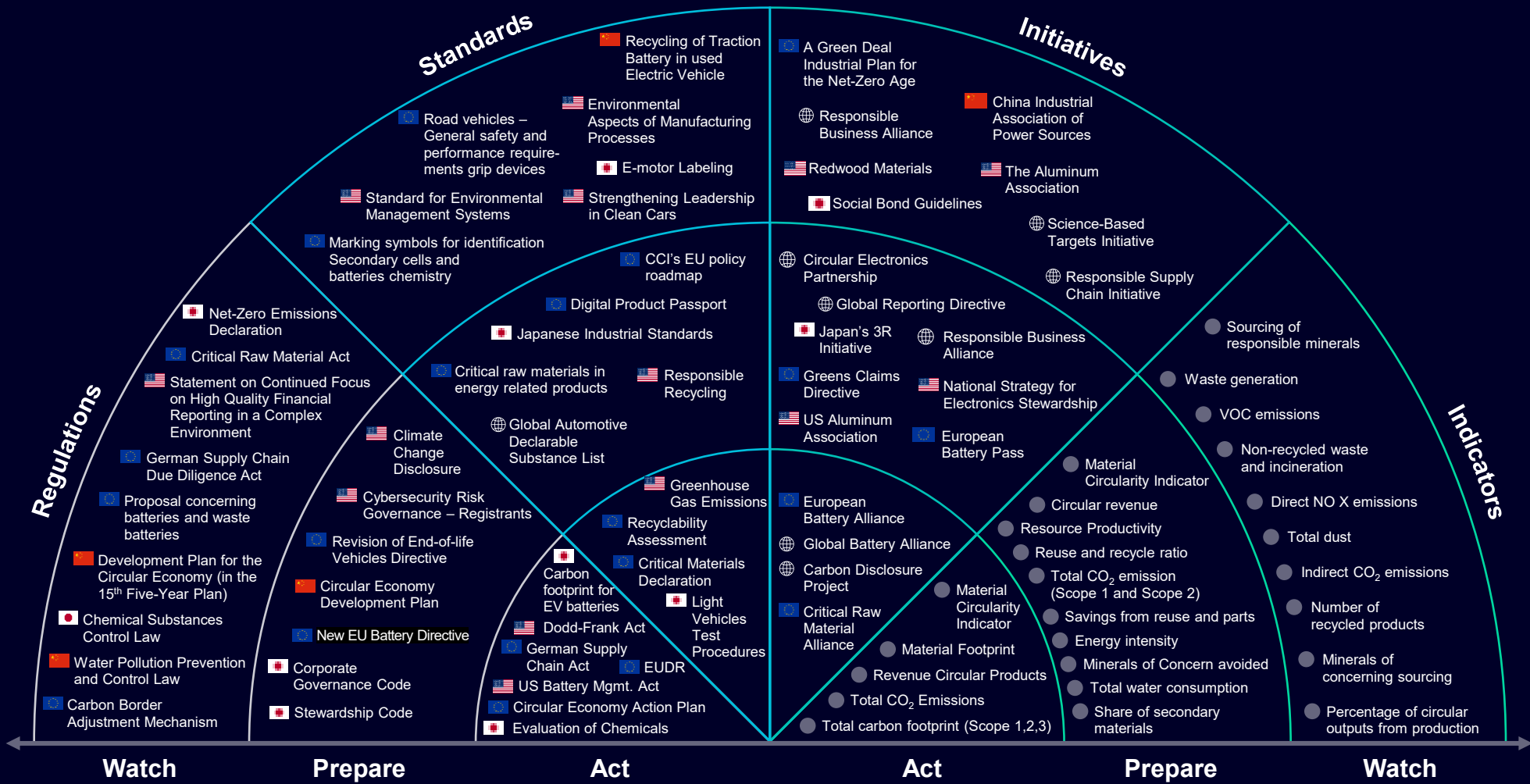


DPPs provide **access to standardized product information** from composition and manufacturing to end-of-life.



DPPs support products' **sustainability**, promote their **circularity** and strengthen **legal compliance**.

Global regulatory landscape with Battery related initiatives at the core of circularity efforts



Graphic Source: Siemens Advanta Consulting



Legal framework and further regulations



Legal basis

The DPP's original legal basis can be found in the **Ecodesign for Sustainable Products Regulation (ESPR)** ([EU 2024/1781](#))



Product specific delegated acts (iron and steel, textiles, aluminum, tyres, furniture, ICT, energy related products)

Source: [European Commission](#)

Other legislations also refer to the DPP



- Battery Regulation ([EU 2023/1542](#))
- EURO 7 (EVP) ([EU 2024/1257](#))
- Construction Products Regulation ([EU 2024/3110](#))
- Detergent Regulation ([COM/2023/217 final](#))
- Toy Safety Regulation ([COM/2023/462 final](#))
- EU Data Act ([EU 2020/1828](#))
- Machinery Regulation ([EU 2023/1230](#))
- Critical Raw Materials Act ([EU 2024/1252](#))
- Packaging and Waste Packaging Regulation ([EU 2025/40](#))
- Green Claims Directive ([COM/2023/166 final](#))
- End-of-life vehicles ([COM/2023/451 final](#))

A closer look at the European Battery Regulation

European Battery Regulation



Content Guidance



Battery Pass

The European Commission released the [Ecodesign for Sustainable Products Regulation](#) (ESPR) containing relevant regulatory changes to achieve a climate neutral and circular European economy:

> 2025

It is mandatory to **validate the carbon footprint** of each battery model for its entire lifecycle through a third-party

> 2027

All the batteries exceeding 2 kWh will need a digital passport, which reveals relevant information along the battery's lifecycle and can be accessed through a QR code

> After 2027

After 2027, the ESPR will mandate the implementation of Digital Product Passports (DPPs) across various industries such as textiles, electronics, construction materials

The Battery Pass Consortium released the [Content Guidance](#) for the EU Battery Passport, detailing reporting requirements for suppliers in the battery value chain

100 data attributes

were determined structured into 7 subtopics:

- General battery and manufacturer information
- Compliance, labels, certifications
- Battery carbon footprint
- Supply chain due diligence
- Battery materials and composition
- Circularity and resource efficiency
- Performance and durability

The content guidance specified which data points are mandatory and which are voluntary – depending on the type of the battery (EV, LMT, Other industrial batteries >2kWh and stationary >2kWh)

Source: thebatterypass.eu

The Economic Operator is responsible for fulfilling the battery passport requirement

The Responsible Economic Operator ...

... who places the battery on the market or puts it into service is responsible for meeting the battery passport requirements.
The main responsibilities for the battery passport include **creating** a new passport, as well as **updating** and **storing** the information within it.

The Economic Operator can be:

Option A: Manufacturer

The term “manufacturer” refers to any natural or legal person that manufactures a battery or has a battery designed or manufactured and markets that battery under its own name or trademark or puts it into service for its own purposes.

Option B: Importer

The “importer” is established within the EU and places a battery on the market from a third country.

Option C: Representative

The economic operator is explicitly allowed to authorize another operator “to act on their behalf”.

For example, if an EU-based car manufacturer buys battery cells and assembles them into an electric vehicle battery, they are considered the manufacturer and thus the economic operator responsible for the battery passport.

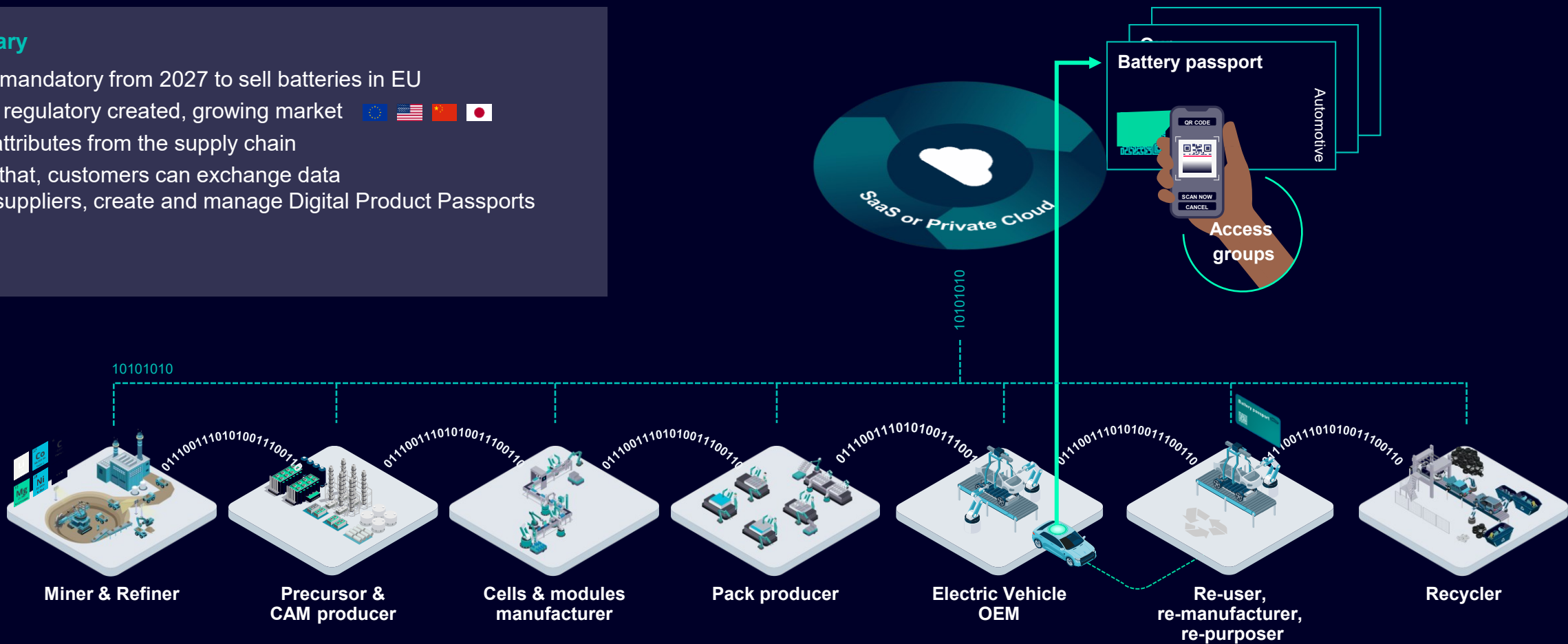


Source: thebatterypass.eu

Battery Passport – A collection of 100 data points from the value chain acting as a **License to operate** for the economic operator

Summary

- DBP mandatory from 2027 to sell batteries in EU
- New, regulatory created, growing market 
- 100 attributes from the supply chain
- With that, customers can exchange data with suppliers, create and manage Digital Product Passports



Graphic Source: Siemens Advanta Consulting

Is the battery passport a curse?

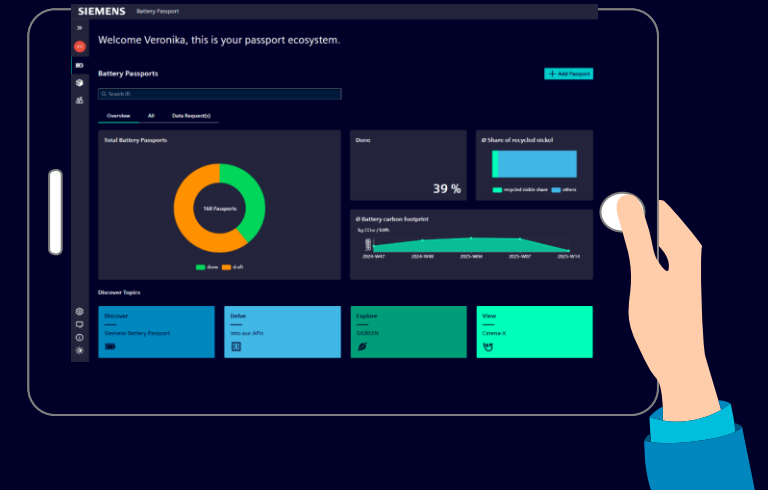


Is the battery passport a blessing?



From the legal basics to the real-life questions:

- ✓ How does the Battery Passport (BP) enhance recycling efficiency and ensure compliance with EU regulations, based on practical examples and challenges?
- ✓ How can integrated value chains and enhanced collaboration overcome industry inertia, supply chain complexity, and data silos and how are "make vs. buy" decisions and infrastructure development supported?
- ✓ How can BP investments be justified through cost savings, risk mitigation, and new business models and how can hidden costs be avoided?
- ✓ What future potential does the BP offer regarding CO₂ transparency, real-time data, and high-quality recycling streams and how does this support OEM strategies and their value chains?



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