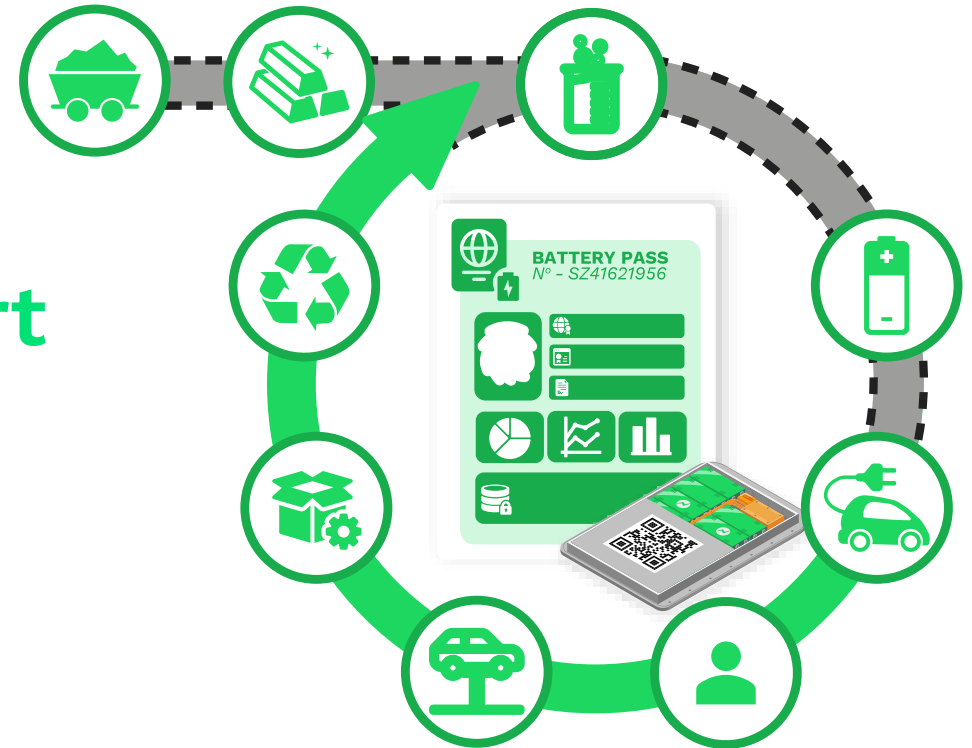


# Unlocking the Value of the EU Battery Passport

An exploratory assessment  
of economic, environmental  
and social benefits

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November 2024



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# The EU battery passport could create value for business, authorities and consumers – but to fully leverage its potential, interventions beyond regulation are needed (1/2)

1

The battery passport, **as per the Battery Regulation, promises to unfold economic, environmental, and social benefits by enabling seven direct use cases, especially for circular management of batteries downstream of manufacturing:** reliable communication of ESG data, informed purchasing decisions, eased servicing, precise risk assessment for transport of used batteries, more efficient recycling, simplified residual value determination, and streamlined trade of used batteries through marketplaces

2

The battery passport **could significantly expand value creation by enabling five additional potential use cases:** Increased end-of-life collection, effective data exchange and reporting, industry benchmarking, accurate market overview, and informed policy design. These **potential use cases would be enabled in three steps:**

- a) Endorse additional specifications of voluntary data attributes and link to the upstream due diligence traceability requirement
- b) Integrate the battery passport in regulated downstream processes and systems
- c) Aggregate data attributes from different battery passports across the European market

3

The above twelve use cases could play a central role in **establishing a sustainable battery system, promoting financing, investment, cost savings and economic growth that is decoupled from resource use, strengthening the ability to reach climate neutrality by 2050, mitigating pollution and biodiversity loss, and ensuring a just transition**

4

**Value chain stakeholders can harness the economic, environmental, and social benefits of the battery passport and overcome the associated requirements and efforts through proactive and collective action** (see next slide)

# The EU battery passport could create value for business, authorities and consumers

## – but to fully leverage its potential, interventions beyond regulation are needed (2/2)



**Companies along the battery value chain should consider battery passports as a strategic opportunity to generate value.** We find that:

- Information availability through the battery passport could create **upstream, downstream, and roundstream benefits through an increase in the credibility and reliability of supply chain data** and green claims for product differentiation, **informed purchasing decisions**, eased servicing, improved used battery transport risk assessment, more efficient reporting, **streamlined trade of used batteries**, enabled industry benchmarking and an accurate market overview
- Performance data could simplify the **residual value determination** and **reduce procurement, including technical testing costs for independent operators, by ~ 2-10%**
- Composition and dismantling information could make the **recycling process more efficient** and **reduce the costs for pre-processing and subsequent treatment in recycling by ~ 10-20%**

**Companies should proactively establish strategies to maximise above value creation and minimise efforts.** For an EV manufacturer, battery passport **implementation effort is mostly caused by data management tasks (50%+), while 90%+ of tasks involve fixed costs**



**The regulator should facilitate the realisation of this value by creating conducive conditions and offering targeted support to companies struggling with capacity.** To fully materialise the value creation potential of the battery passport, we recommend the following:

- The battery passport should be **integrated wherever possible into existing regulatory procedures and systems**, e.g. as a source of information in Green Public Procurement.  
Additionally, reported battery passport information should be leveraged for the design of upcoming policies and policy changes
- **Additional data attributes should be endorsed** in a separate “beyond regulation” battery passport section to enable the battery passport to be used as a B2B tool
- The battery passport **should be used in vehicle de-registration and export procedures**, which could **lead to more secondary active materials becoming available, potentially fulfilling ~ 5-20%** of material demand for projected European passenger vehicles in 2045



**Consumers could benefit from battery passport information through informed purchasing decisions and residual value determination improvements.** Benefits and data of the passport need to be communicated effectively to motivate engagement

# Acknowledgements

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The authors would like to thank all organisations contributing to this assessment for their time and knowledge.

**37** industrial companies




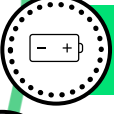



**10** research organisations

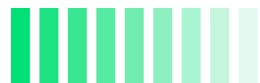
**3** subject matter experts

**11** service companies

**2** not-for-profit organisations

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# Chapter 1: Overview of results



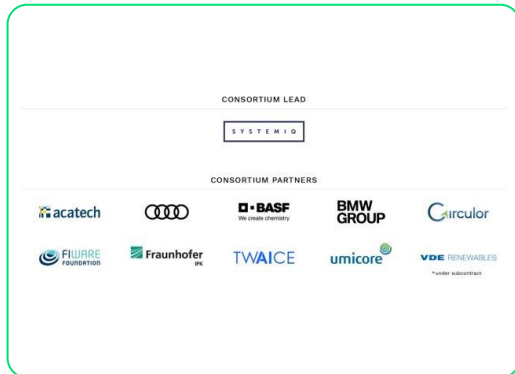
# The battery passport, a breakthrough EU innovation, is actively supported by the Battery Pass consortium, which aims to create resources facilitating its implementation

The **battery passport** is a breakthrough EU innovation to digitally support sustainable, circular, high-performing batteries



- A **digital product passport** (DPP) is a novel concept **making available comprehensive life cycle information** of a physical product in digital format introduced by the European Union as part of its broader regulatory ambition towards sustainability and a digitalised economy
- The battery passport will be **required from February 2027 onwards** by the EU Battery Regulation, encompassing around 90 data attributes from seven content clusters for **electric vehicle (EV), light means of transport (LMT) and industrial batteries with a capacity > 2kWh**
- Next to the European Union, **similar** (regulatory) **efforts** on the introduction of a digital product or battery passport are **ongoing globally**

The **Battery Pass consortium** set out to create resources that support the implementation of the EU battery passport by industry










- The “Battery Pass” is a consortium of 11 partners from industry, science, technology and beyond, co-funded by BMWK **aiming to advance the implementation of the EU battery passport** and therefore also collaborating with other major initiatives in the DPP space (e.g. CIRPASS, GBA, Catena-X)
- Initiated and led by the systems change company Systemiq, the Battery Pass works to create **industry guidance** on content requirements, the **technical reference framework** for DPP, a **software demonstrator**, and a **value assessment**
- This document presents the first of two publications addressing the value assessment and focuses on **modelling the benefits of individual use cases qualitatively and quantitatively** (illustrative)



# The value assessment represents a collaborative effort of the Battery Pass consortium that covers a comprehensive scope and is validated by external stakeholders

## Scope of the assessment and methodological process

Requirements		Value		Impact dimensions				
								
Mandatory requirements <sup>1</sup>	+	Voluntary additions	vs.	Economic (e.g. cost efficiency)	+	Environmental (e.g. GHG emissions)	+	Social (e.g. health and safety)

### Battery Pass consortium partner perspective

15

Consortium group meetings

6

Sub-working groups

### External battery industry perspective

&gt;30

Expert interviews

2

Public consultations

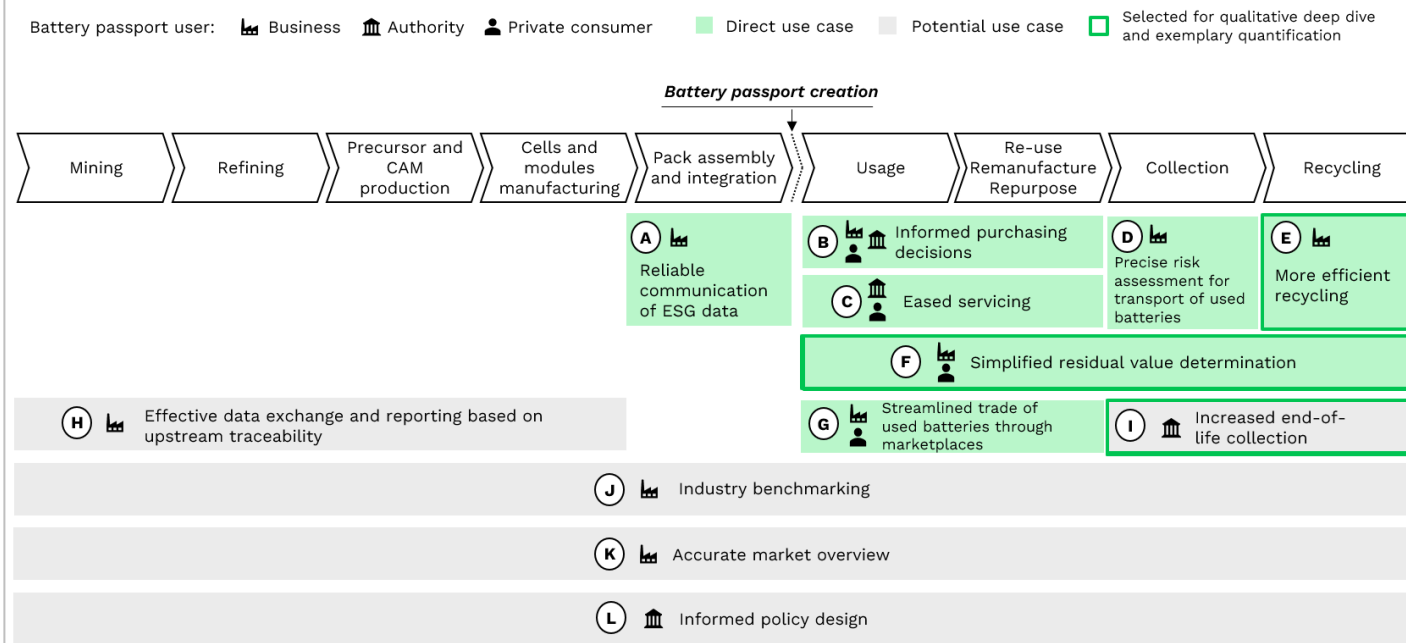
- The value assessment was led by Systemiq in a **collaborative effort with the Battery Pass consortium and validated by external stakeholders** to incorporate the perspective of the entire battery value chain
- The scope includes **mandatory requirements as well as voluntary additions** and differentiates between benefits and drawbacks in three impact dimensions (economic, environmental and social)
- While all battery categories requiring a passport are included in the overall assessment, the **deep dives focus on EV batteries**, and a **separate analysis highlights differences for industrial batteries**

# Benefits of the battery passport arise throughout the value chain, but predominantly in a battery's service life

## Overview of benefits and use cases

- The battery passport provides **added value** compared to the general reporting requirements<sup>1</sup> from the Battery Regulation by **collecting data in a digital format and making it securely accessible** to users with the respective access rights
- So called “**use cases**” describe **processes which could be improved by using the battery passport** and are **identified to understand** which **economic, environmental and social benefits** arise by using the passport
- We identified and qualitatively described **twelve battery passport use cases** along the value chain, of which we **assessed three in further detail** qualitatively and quantitatively
  - Seven “**direct**” use cases result from **mandatory data attributes** required by the EU Battery Regulation in combination with their respective access rights
  - Five “**potential**” use cases could be enabled provided certain **conditions** are in place which would go **beyond current regulatory requirements**

### Overview of battery passport use cases along the value chain





# Seven direct use cases such as more efficient recycling, are enabled by mandatory data points, unlocking value along the downstream value chain

## Direct use cases<sup>1</sup>

Mandatory data attributes



respective access rights

Use case	Benefit		
<b>(A) Reliable communication of ESG data</b>			
<b>(B) Informed purchasing decisions</b>			
<b>(C) Eased servicing</b>			
<b>(D) Precise risk assessment for transport of used batteries</b>			
<b>(E) More efficient recycling processes</b>			
<b>(F) Simplified residual value determination</b>			
<b>(G) Streamlined trade of used and waste batteries through marketplaces</b>			

Benefit:



Economic



Environmental



Social

Level of benefit:



No



Low

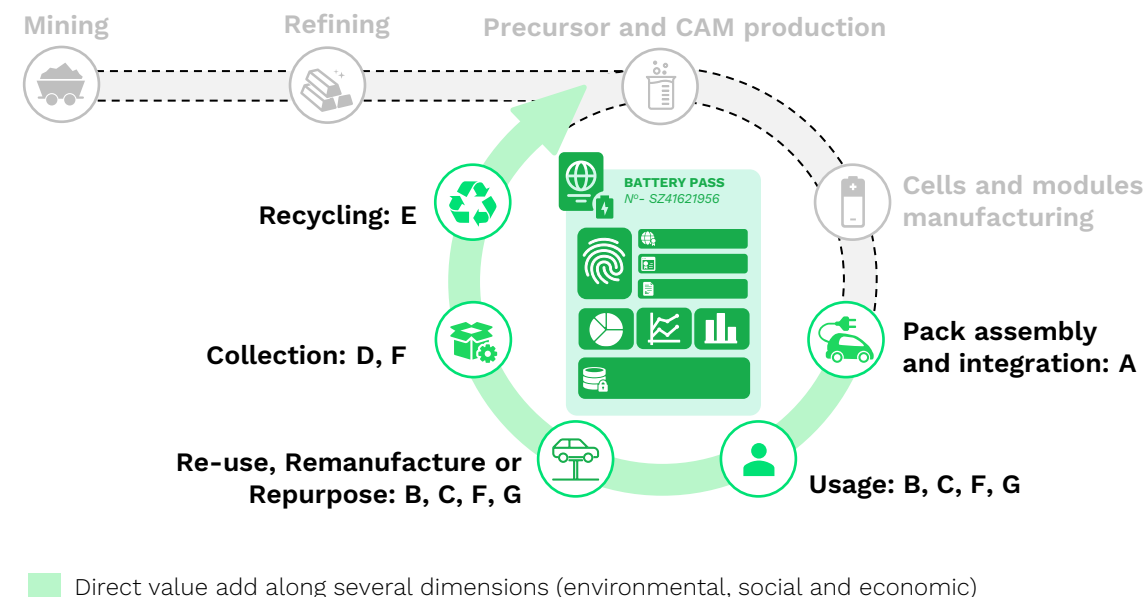


Middle



High

### Distribution of direct use cases along the value chain





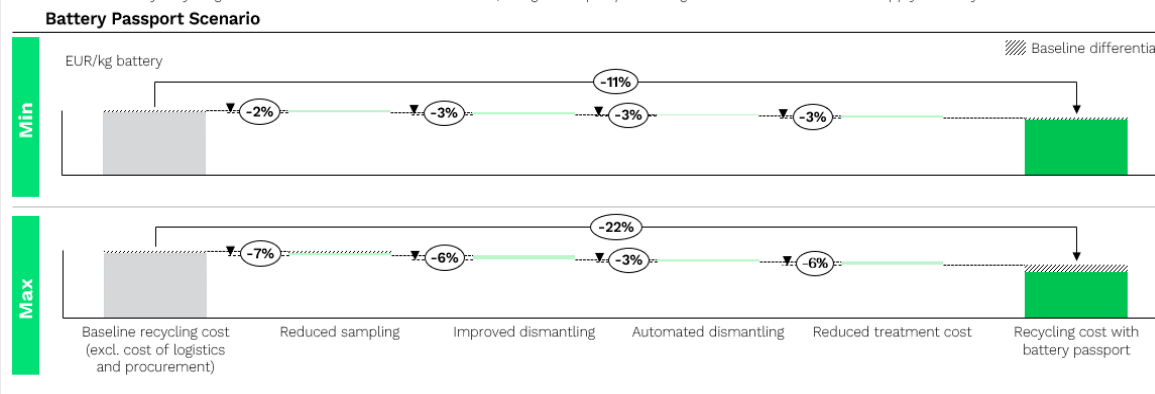
# More efficient recycling and simplified residual value determination could lead to significant cost savings and environmental impact reduction

## Deep dive use case E: More efficient recycling processes

- Data available from the battery passport could **enable recycling process improvements** leading to economic (pre-processing and recycling cost reduction), environmental (secondary material increase, CO<sub>2</sub> reduction) and social (health and safety improvements) benefits
- An initial quantification<sup>1</sup> of potential improvements of the mechanical-hydrometallurgical process route, indicates that composition and dismantling data might **decrease recycling costs for pre-processing and treatment by ~ 10-20%** based on current generic recycling cost estimations for NMC batteries

### Recycling costs reduction through the battery passport<sup>1</sup>

**Micro perspective:** Example High-Nickel NMC (622) EV Battery; generic mechanical-hydrometallurgical recycling cost (excl. cost of logistics and procurement)  
 Note that LFP battery recycling has different unit economics – however, the general pre-processing cost reduction levers could apply similarly.



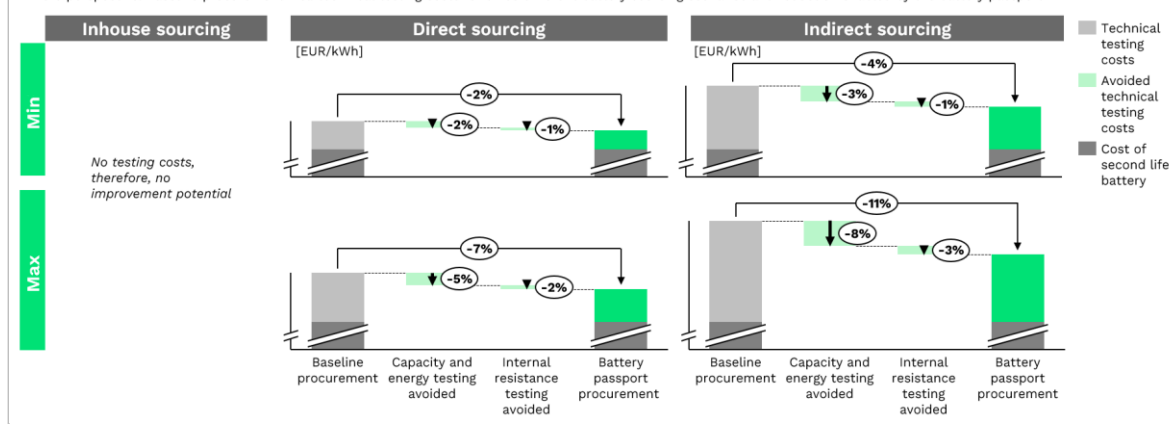
- Additionally recovered active materials **could meet up to 25% of the difference between the technically possible maximum recovery rates and recovery rate targets** from the battery regulation<sup>1</sup>

## Deep dive use case F: Simplified residual value determination

- Historic performance and durability information available through the battery passport could **improve the residual value determination process** by reducing the need for technical tests and improving the accuracy of the assessment. Thereby, decisions between second-life and recycling could be facilitated
- An initial quantification<sup>2</sup> of the residual value determination process for three different battery sourcing scenarios shows that through avoiding technical tests, **~2-10% of the procurement including technical testing costs could be reduced** for independent second-life operators

### Second-life procurement and technical testing costs reduction through the battery passport<sup>2</sup>

**Micro perspective:** Baseline procurement incl. technical testing costs for three different battery sourcing scenarios and reduction enabled by the battery passport



- Due to the decrease of costs, we estimate a proportional increase in batteries going into second-life, which **could fulfil ~ 6-20% of the demand for stationary battery energy storage** in Europe<sup>2</sup>



# Conditions beyond regulatory requirements (upstream traceability, integration into official downstream processes and aggregated data) could enable five potential use cases

## Potential use cases<sup>1</sup>

Conditions required beyond regulatory requirements	Use case	Benefit		
<b>Application of traceability systems for data collection</b> The Battery Regulation and passport data requirements increase the need for reliable and credible data in upstream value chains. This could be enabled by gathering the data via traceability systems which, when complementing battery passport solutions, could unlock another use case through optimising data processing and use.	<b>(H) Efficient data exchange and reporting based on upstream traceability</b>			
<b>Integration into official downstream processes</b> To ensure battery collection, additional information on the downstream status as well as integration into official processes such as export control are needed. This would unlock another use case.	<b>(I) Increased end-of-life collection</b>			
<b>Aggregation of data from different passports</b> Aggregation of data from different battery passports, solved through an EU Commission-provided infrastructure or managed by specialised service providers, could provide additional information on market or organisation level and thereby unlock further use cases.	<b>(J) Industry benchmarking</b>			
	<b>(K) Accurate market overview</b>			
	<b>(L) Informed policy design</b>			





# Additional macroeconomic benefit of the passport may be caused by greater secondary material availability on the European market

## Deep dive use case I: Increased end-of-life collection

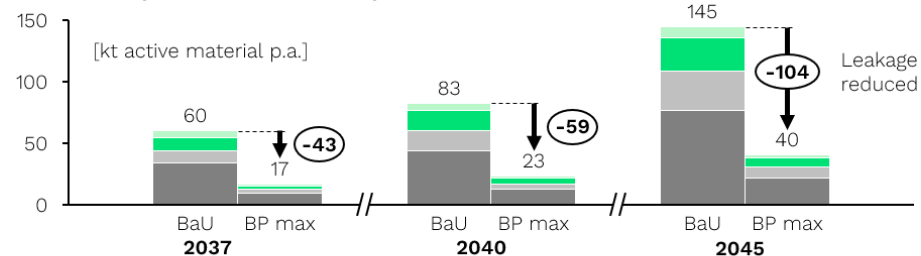
- Integration of the battery passport into regulated downstream processes with additional data attributes could **support authorities in identifying and thereby reducing illegal exports and illegal treatment**. This would result in benefits such as increased supply security, recycling revenue increase, health and safety, as well as reduced emissions
- An initial quantification<sup>1</sup> shows that a reduction of battery leakage through the battery passport could lead to **more secondary active materials available** that could **fulfil ~ 5-20% of projected European passenger EV demand** in 2045
- Moreover, the additional availability of secondary active material in the EU market could **increase recycling revenue by ~ 5-15%** and **cause a ~ 2-10% reduction of carbon emissions** associated with raw material extraction of active materials required to meet EV battery demand

### Reduction of battery leakage through the battery passport leading to additionally available secondary materials<sup>1</sup>

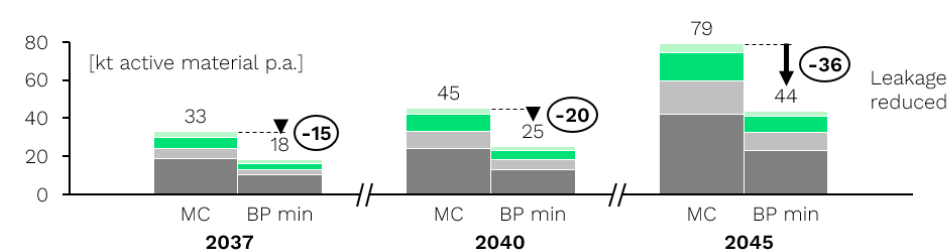
Macro perspective: Materials available on the European market

#### Leakage of batteries in baseline vs battery passport scenarios

Maximum expected reduction example:



Minimum expected reduction example:

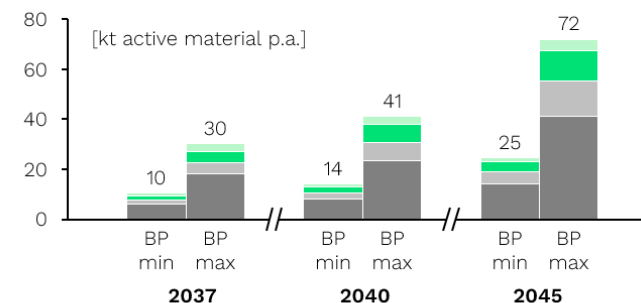


Cobalt Lithium Manganese Nickel

#### Secondary material additionally available

By reducing the amount of battery leakage from the European market through battery passport levers, we estimate that by 2045:

- ~ 2-5 kt cobalt
  - ~ 4-10 kt lithium
  - ~ 5-15 kt manganese
  - ~ 15-40 kt nickel
- could be additionally available each year.





# Applicability of use cases partly varies for industrial batteries due to technological, usage, and business characteristics

The added value is strongly affected by industrial batteries' different applications and characteristics

## Use case assessment for industrial batteries

In contrast to EV batteries, Industrial batteries are characterised in **different sub-categories** and a **broad range of chemistries, applications**, with **varying market conditions** and **processes** affecting the use cases



- **Differing characteristics and use patterns** of industrial applications (e.g. energy storage, electric logistics solutions, heavy duty) **as well as correspondingly varying business processes reduce benefits**
- The **broad range of technologies/chemistries** (Li-ion, Pb-acid, Ni-based or redox-flow) used in industrial batteries introduces specific characteristics that **distinguish the value assessment** for subgroups of industrial batteries
- Benefits associated with detailed **dynamic data** are **not applicable** to industrial batteries if they are missing a **battery management system/connectivity**

### General use case applicability to industrial batteries<sup>1</sup>

Use Case	✓ Equally applicable	- Partly applicable
Ⓐ Reliable communication of ESG data	All Batteries	-
Ⓑ Informed purchasing decisions	Batteries with BMS	Batteries without BMS
Ⓒ Eased servicing	-	All Batteries
Ⓓ Precise risk assessment for transport of used/waste batteries	Batteries with BMS	Batteries without BMS
Ⓔ More efficient recycling processes	Batteries with Li-Ion and emerging chemistries	Batteries except Li-Ion and emerging chemistries
Ⓕ Simplified residual value determination	-	All Batteries
Ⓖ Streamlined trade of used/waste batteries through marketplaces	All Batteries	-
Ⓗ Efficient data exchange and reporting based on upstream traceability	All Batteries	-
Ⓘ Increased end-of-life collection	-	All Batteries
Ⓙ Industry benchmarking	Batteries with BMS	Batteries without BMS
Ⓚ Accurate market overview	Batteries with BMS	Batteries without BMS
Ⓛ Informed policy design	All Batteries	-

1. Compared to EV batteries, "All Batteries" in table refers to all batteries within the battery category industrial batteries. Please refer to the detailed analysis on [slides 119-127](#) and the annex on [slides 180-192](#) for more detailed information.





# All use cases are applicable to Light Means of Transport batteries, but several significant differences exist

**Light means of transport (LMT) batteries** are used for the **traction** of e.g., **e-bikes** or **e-scooters**.

- Several LMT **specific market, technological, and legal characteristics** impact the battery passport value



## Use case assessment for LMTs

- (A) Reliable communication of ESG data
- (B) Informed purchasing decisions
- (C) Eased servicing
- (D) Precise risk assessment for transport of used/waste batteries
- (E) More efficient recycling processes
- (F) Simplified residual value determination
- (G) Streamlined trade of used/waste batteries through marketplaces
- (H) Efficient data exchange and reporting based on upstream traceability
- (I) Increased end-of-life collection
- (J) Industry benchmarking
- (K) Accurate market overview
- (L) Informed policy design



- **Missing connectivity during the use-phase of many LMTs** is a **barrier for unlocking full battery passport potential** (impacts use cases B-G, J-L).
- **Improving process efficiency with battery passports is a key opportunity for LMT industry**, given the limited digitalisation among many SME manufacturers, the relatively low battery value, and the complex regulatory landscape (impacts use case C-I).
- **Two detailed use case assessments highlight benefits specific for LMT batteries:**
  - C) Eased servicing:** Battery passports can assist with removability & replaceability requirements, and potentially enhance safety & customer support by including voluntary repair information.
  - I) Increased end-of-life collection:** End-of-life information in the battery passport can help achieve specific collection rates.
- An additional excursus shows the **potential of the battery passport to facilitate e-bike theft control** through voluntary measures.





# The battery passport also presents challenges that could lead to drawbacks which diminish the overall value if left unmitigated

## Challenges and drawbacks<sup>1</sup>

- **Technical and battery passport system challenges** are expected to mostly **affect** the **passport issuer** and require industry collaboration, investment in emerging technology and authority support in enforcing standards
- **Capability and resource challenges** are estimated to mainly **impact SMEs** and necessitate early intra-organisational alignment, harmonised requirements and financial support

**Challenges:** Difficulties or obstacles that **stakeholders are facing when creating, maintaining or using the battery passport**

### 1 Technical and battery passport system

- Connected to required technical design of the battery passport
- Relevance varies based on stakeholder's role in the system

### 2 Capabilities and resources

- Linked to stakeholder's individual abilities
- Relevance varies based on stakeholder's size<sup>1</sup> and capabilities

### Mitigation strategies

- **Policymakers and authorities:** Define clear regulatory requirements, consult with industry and civil society, support harmonised standards, enforce data security regulations, promote research and development
- **Businesses:** Prepare early with fallback plans, engage in standardisation, invest in interoperable technologies, and implement strong data governance for security.

- **Policymakers and authorities:** Provide financial support or incentives, define clear regulatory requirements, harmonise with international regulations, and raise awareness among stakeholders
- **Businesses:** Align internally, invest in training, collaborate through industry networks, form strategic technology partnerships, and adjust contracts with customers and supply chain partners.



While unmitigated challenges may decrease the passport's overall value, the **benefits** derived from above explained use cases are **expected to outweigh the drawbacks**

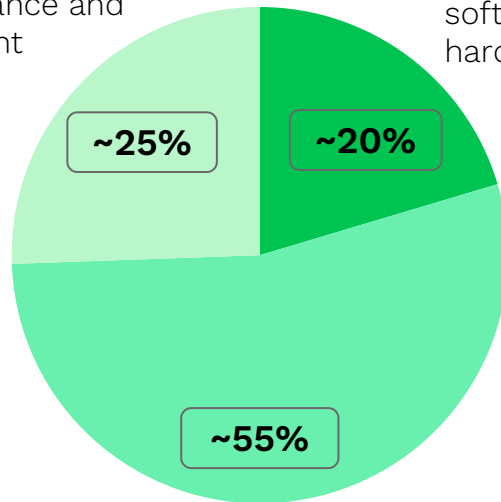


# Battery passport implementation effort for economic operators is ~55% caused by data management and most tasks will classify as fixed costs

## Averaged relative efforts of implementation categories<sup>1</sup>

### Operations and management

Incl. software maintenance, access rights management, cloud hosting services, labelling, IT governance and project management



### System set-up and provisioning

Incl. battery passport software development and hardware set-up

### Data management

Incl. collection, integration, and certification

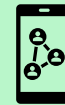
**Disclaimer:** Values in the chart are based on limited data with high divergence → numbers should only be interpreted directionally

## Highlights



### The battery passport is primarily a data management effort

→ Standards, processes, and technologies to streamline data management are key impact areas to facilitate net value of the battery passport



**Upstream data collection as well as software development are considered the most significant sub-tasks** of the battery passport implementation

→ Software and data savviness is a key lever that impacts passport implementation effort



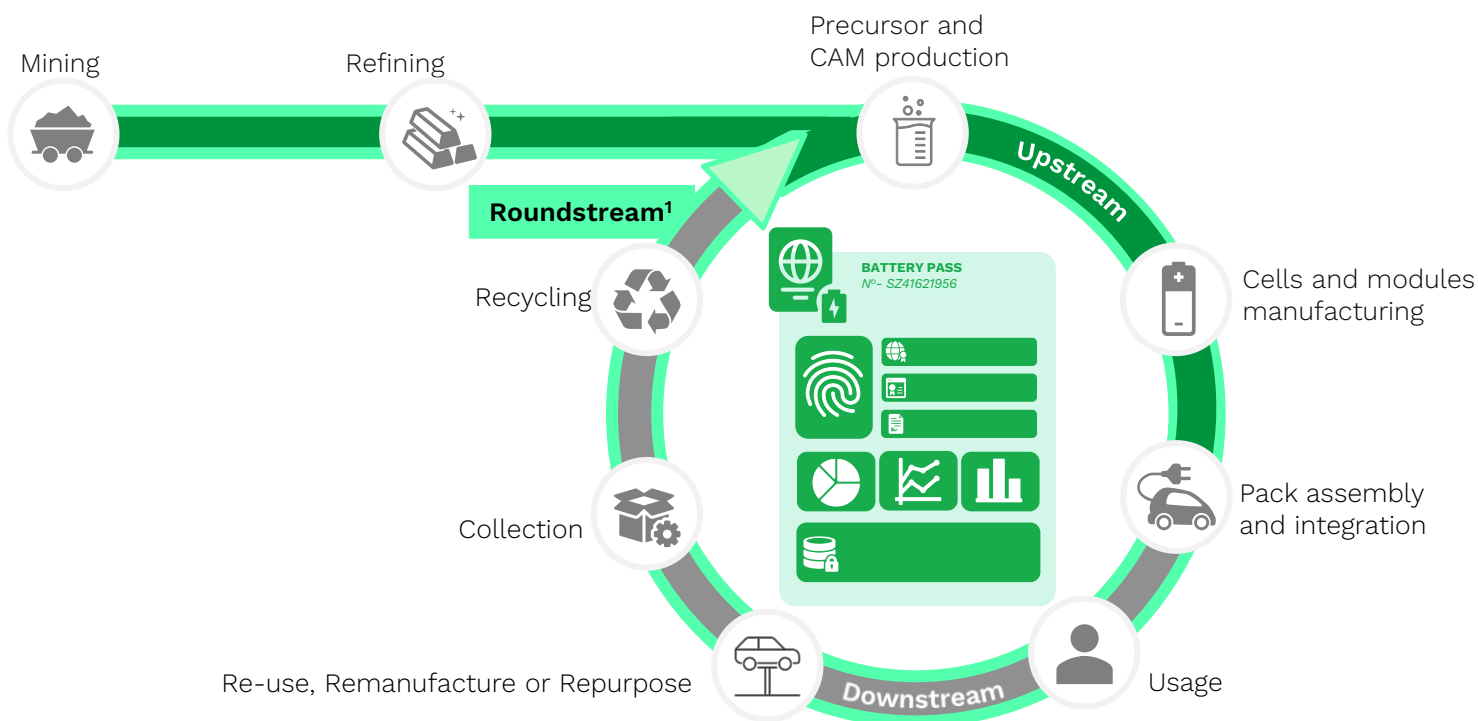
**90%+ of efforts translate to fixed costs** with significant tasks such as software development, maintenance, and project management being independent of the volume of sold batteries

→ Third-party service providers that can spread fixed costs across multiple clients may reduce implementation effort



# On system level, the battery passport could establish upstream, downstream and roundstream improvements

## Battery passport system-view across the value chain



## Battery passport could...

Create an **upstream level playing field** to foster competition through innovation

Establish ESG profiling as additional **visible differentiators (competitive advantage)**

Shape **closer ties with suppliers and customers** (e.g. on responsible sourcing)

Safeguard information needs for **end-of-life process management, development, and optimisation** (responsible recycling)

Make **secondary raw materials more affordable, available, and tuned to needs** through efficiency gains

**Digitalise the value chain** to enable aligned R-strategies, resource efficiency, and circular battery designs

**Trigger reflection processes that create the required awareness** for system changes



# To enable the benefits of battery passports, businesses should act now to prepare for implementation, and policymakers resolve open questions



## Businesses should proactively...



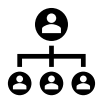
**1. Assess implementation requirements** against business readiness for:

- Initial battery passport software development and hardware set-up
- Data collection and management
- Battery passport operations



**2. Identify strategic opportunities** of the battery passport:

- Assess which benefits are possible (revenue, cost, funding, resilience, emissions, materiality, social benefit optimisation)
- Establish a business case and model environmental impact metrics
- Define an implementation roadmap



**3. Select implementation strategies** by leveraging and enhancing internal capabilities, sourcing capabilities, and/or joining forces with industry peers



## Policymakers should clarify 10 questions<sup>1</sup>...

- 1 What is the **legal framework** underlying user obligations to share data during the battery use phase with economic operators?
- 2 What does **“up-to-date”** mean for dynamic data attributes?
- 3 How is lack of **connectivity of batteries** (various reasons of missing internet connection) addressed?
- 4 How will data **aggregation across battery passports** be achieved?
- 5 How should **additional voluntary data attributes** be integrated in the battery passport?
- 6 Are technical and system developments over time adequately covered by **versioning mechanisms**?
- 7 Is the passport **integrated into deregistration, export control and market surveillance processes**?
- 8 What is the **concrete definition of the data points and the framework** of the DPP system?
- 9 How is **data from downstream third parties incorporated and how is responsibility transferred** during EO<sup>2</sup> changes?
- 10 How are **access rights** defined?



# The ambition to digitalise value chains extends beyond batteries to other sectors such as textiles and electronics

Cross-sector DPP relevant delegated acts timeline 2024-2027<sup>1</sup>

Delegated act	2024				2025				2026				2027			
	II	III	IV		I	II	III	IV	I	II	III	IV	I	II	III	IV
Start of EU-funded DPP pilot projects <sup>2</sup>	● May															
ESPR published	● Aug															
Adoption of ESPR Working plan					● May											
Delivery of DPP standards By CEN & CENELEC								● Dec								
Del. Act for Textiles DPP published								● Jan								
Del. Act for iron & steel DPP published								● Apr								
Battery Passport enters into force													● Feb			
End of EU-funded DPP pilot projects													● Apr			
Textiles DPP enters into force													● Jul			
Environmental Vehicle Passport enters into force <sup>3</sup>									● Nov				● Nov			
Iron & steel DPP enters into force													● Oct			

Roll-out highlights and key factors of DPP enablement

1) The expected benefits of other DPPs are incentivising an ambitious DPP rollout across sectors:

- a) A DPP for textiles, iron and steel, and an Environmental Vehicle Passport (EVP) are scheduled to enter into force within 8 months after the battery passport
- b) Further DPPs, including construction, electronics, chemicals and energy-related products such as hydrogen, are in discussion

2) To enable this ambitious rollout of DPPs:

- a) Businesses implementing other DPPs can use the **battery passport as a blueprint**
- b) Policymakers can use insights from **battery passport deployment for enhanced policy design of other DPPs**
- c) Policymakers should take **four general steps to mitigate the significant challenges** of implementing DPPs

Visit [slides 161-167](#) for details

Source: CIRPASS Consortium (2024)

1. **Timelines** could change by the time this content is published.
2. **Pilot projects** will showcase functioning DPPs through 13 circular pilots in various sectors
3. **The Euro 7 legislation mandates** November 2026 (newly approved car types) and November 2027 (any newly approved car). **The EC might propose** a regulated DPP in electronics by 2030, after 2030, or not at all, depending on the performance of initial DPPs and political support



## Chapter 2: Introduction

- Battery Passport
- Battery Pass consortium



# A digital product passport (DPP) is a novel concept making available comprehensive life cycle information of a physical product in digital format

## Core elements and functioning of the battery passport system

### DPP definition

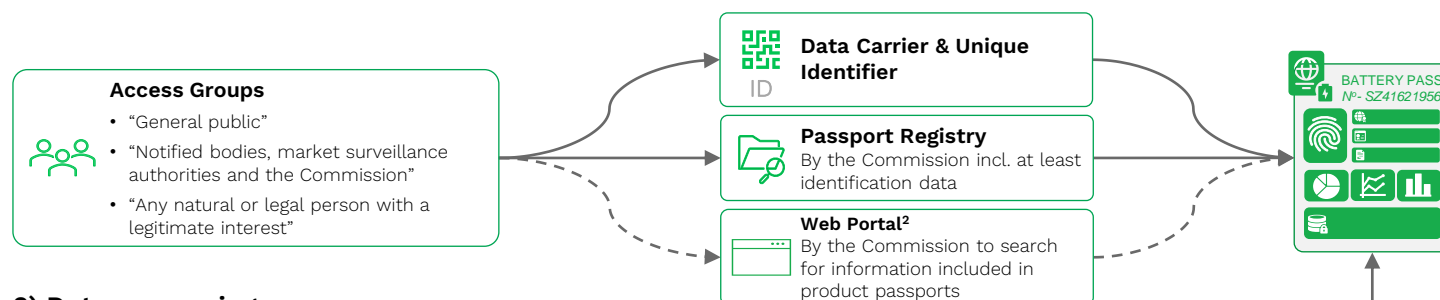
The Council of the European Union<sup>1</sup> defines a digital product passport (DPP) as:

“A set of data specific to a product that includes the information specified [...] and that is accessible via electronic means through a data carrier.<sup>1</sup>”

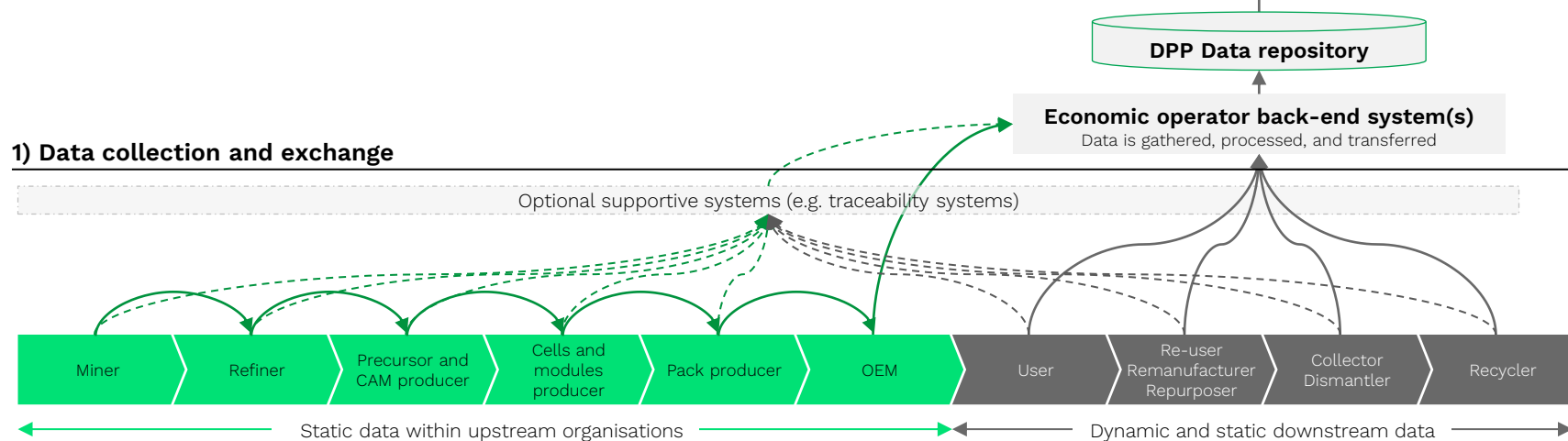
### DPP functioning

- 1) Data is collected within organisations and exchanged between value chain players
- 2) Data is gathered, processed and transferred to the product passport by the economic operator
- 3) Data is accessed from product passport by pre-defined groups based on respective access rights

### 3) Data access



### 2) Data processing



### 1) Data collection and exchange

# The European Union is introducing DPPs as part of its broader regulatory ambition towards sustainability with the first one being required for batteries from 2027

NOT EXHAUSTIVE<sup>1</sup>

## European Green Deal

Comprehensive plan to make the EU climate-neutral by 2050, safeguard biodiversity, establish a circular economy and eliminate pollution, while boosting the competitiveness of the European industry and ensuring a just transition for the regions and workers affected

## Circular Economy Action Plan

Initiative promoting the sustainable use of resources, especially in resource-intensive sectors with high environmental impact

### Ecodesign for Sustainable Product Regulation

Entered into force

- Released in Dec 2023, as central part to the Commission's strategy for eco-friendly and circular products
- Extends beyond current Ecodesign Directive, which exclusively addresses energy-related products
- Aims to promote environmental sustainability across a broader range of

Introduces **digital product passports** as a general concept

### Battery Regulation

Entered into force

- Initially proposed in 2020 complementing the Strategic Action Plan for Batteries
- Entered into force in Aug 2023 replacing the EU Battery Directive
- Provides a legal framework aiming to promote sustainability, circularity, safety and transparency

Mandates a **battery passport** for all EV, LMT, and industrial (>2kWh) batteries starting Feb 2027

*Focus of this document*

### End-of-Life Vehicle Regulation

Proposal

- Proposed in Jul 2023, as result of the review of the End-of-life Vehicle Directive
- Will replace the End-of-life Vehicle Directive as well as the Type-approval Directive
- Governs the entire vehicle life cycle, from design to end-of-life treatment

Mandates a **circularity vehicle passport** starting 7 years after entry into force of the regulation



# Via the EU battery passport, the Commission aims to support the overarching objectives of the Battery Regulation by promoting sustainability and circularity through transparency

## Stakeholder group

## Battery passport objective

### Business



“ It should **provide** remanufacturers, second-life operators and recyclers with up-to-date **information for the handling of batteries** and specific actors with tailored information such as on the state of health of batteries  
&  
**allow economic operators** to gather and re-use in a more efficient way the information and data on individual batteries placed on the market and **to make better informed choices in their planning activities** ”

### Private Consumer



“ The battery passport should **provide the public with information about batteries placed on the market and their sustainability requirements**. That information would **enable end-users to make informed decisions** when buying and discarding batteries. ”

### Authorities



“ It should be possible for the battery passport to **support market surveillance authorities** in carrying out their tasks under this Regulation (...)  
&  
(...) **help facilitate and streamline the monitoring and enforcement of the regulation** carried out by EU and Member State authorities. ”

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# The scope of information to be made available via the battery passport is extensive with up to 90 data attributes covering seven content clusters

NOT EXHAUSTIVE

## Data categories for the battery passport (select data attributes shown below)<sup>1</sup>



Battery ID: 0101010

Battery passport ID: 1111010

Responsible economic operator

### General information

- Manufacturing info (identity, place, date)
- Battery category
- Battery weight
- Battery status

### Labels and certifications

- Symbols and labels
- Meaning of labels & symbols
- Declaration of conformity
- Compliance of test results

### Carbon footprint

- Carbon footprint
- Weblink to CF study
- CF performance class

### Supply chain due diligence

- Due diligence report

### Materials and composition

- Hazardous substances
- Battery chemistry
- Critical raw materials
- Materials used in cathode, anode, electrolyte

### Circularity & resource efficiency

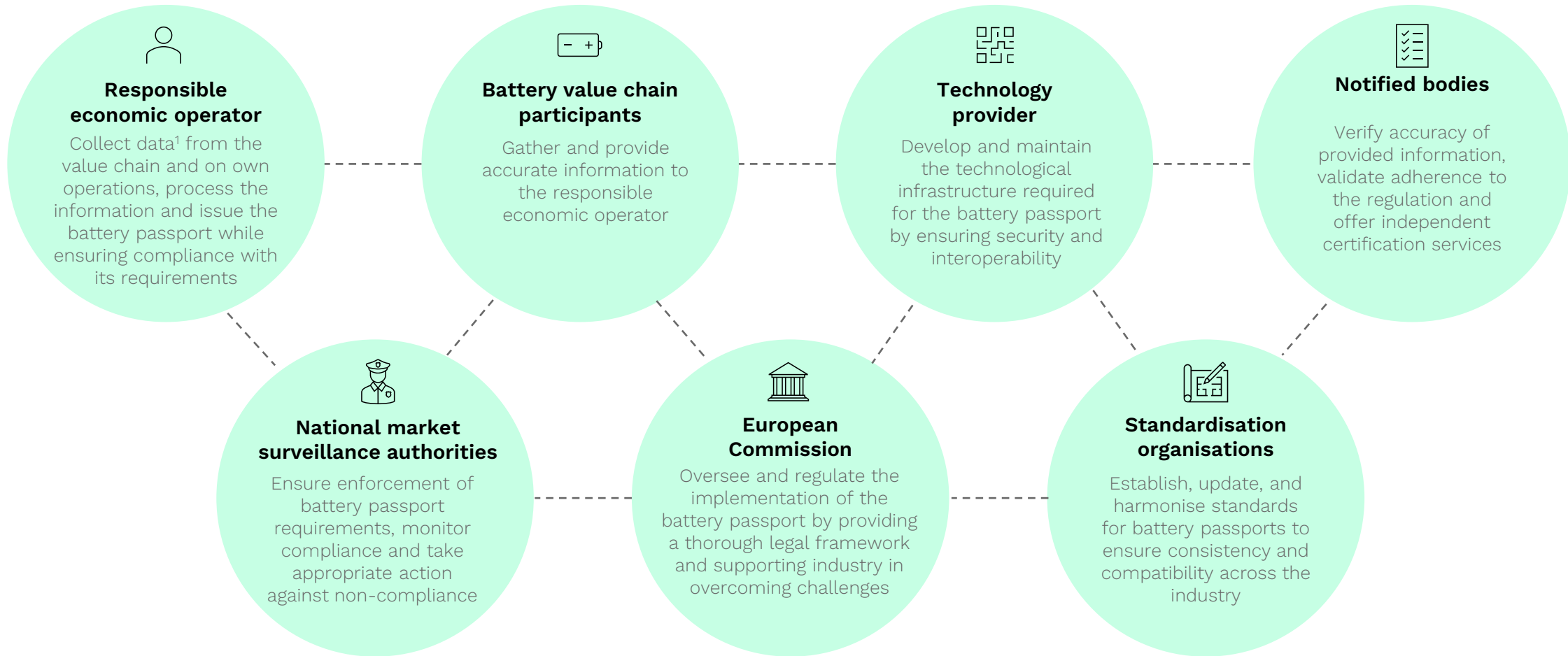
- Recycled content shares
- Manuals for removal, disassembly, dismantling
- Component part numbers & spare parts information
- Safety measures/instructions

### Performance & durability

- Capacity, energy, power, SoH
- Expected lifetime
- Negative events

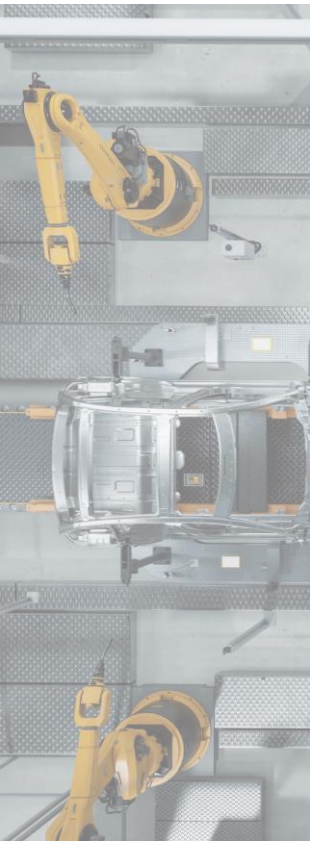
# The introduction of the battery passport affects the organisations across the battery ecosystem differently



NOT EXHAUSTIVE<sup>1</sup>



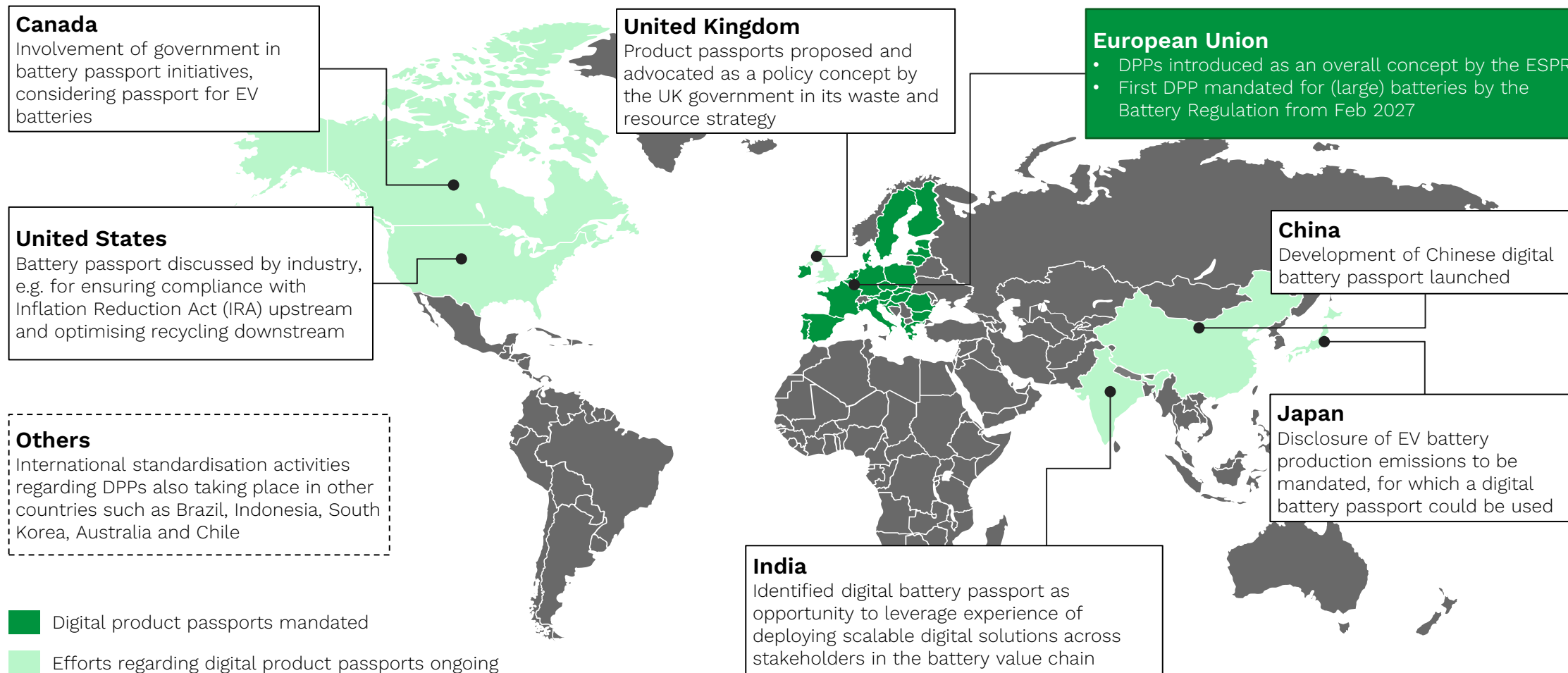
# The industry expects the battery passport to enable efficient operations, product differentiation and a digital and green market development

To create value for businesses, the battery passport should enable:



 Efficient operations	★★★ Product differentiation	 Digital and green market
<ul style="list-style-type: none"><li>• <b>Value chain optimisation:</b> Optimise supply chains by incorporating data into sourcing and strategic processes</li><li>• <b>Process optimisation:</b> Leverage data to increase speed and automate processes</li><li>• <b>Decision-making and planning:</b> Enhance design, production, re-use, and recycling decisions with battery life cycle insights and market intelligence</li></ul>	<ul style="list-style-type: none"><li>• <b>Transparency:</b> Report environmental and social responsibility to customers and end-consumers</li><li>• <b>Value proposition:</b> Emphasise product performance attributes for market differentiation and comparability</li><li>• <b>Product management:</b> Ensure quality control and safety through comprehensive product specifications and performance records</li></ul>	<ul style="list-style-type: none"><li>• <b>Value chain digitalisation:</b> Advance data economy and ecosystems growth to maximise the value of data and systems</li><li>• <b>Sustainable business models:</b> Enable multiple life uses through battery data, enhance services and develop/optimize circular business models</li><li>• <b>Level playing field:</b> Establish a fair and equitable environment to support a green EU industry and enhance resource resilience in value chains</li></ul>

## Next to the European Union, similar efforts on the introduction of a digital product / battery passport are ongoing globally





## Chapter 2: Introduction

- Battery Passport
- Battery Pass consortium

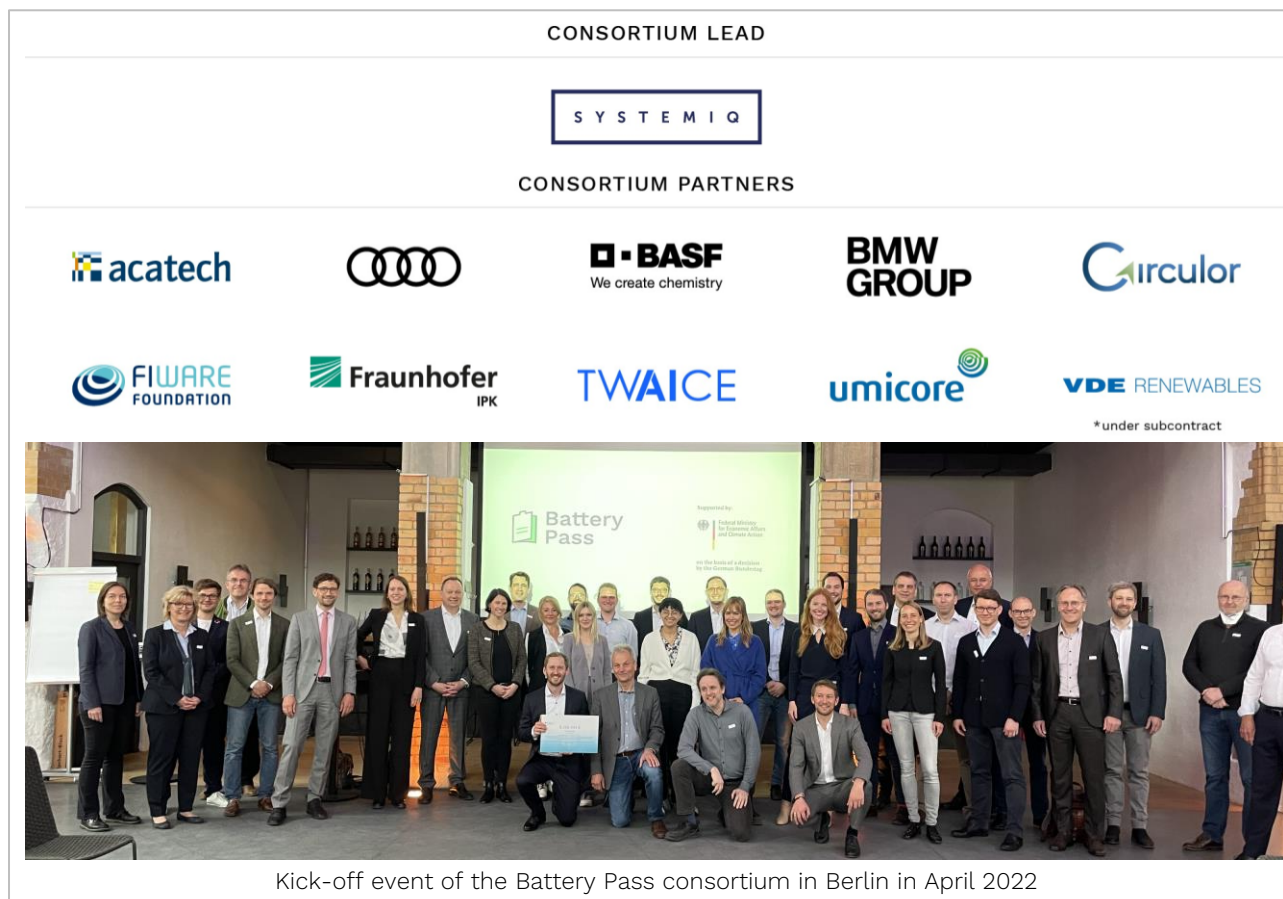




# The Battery Pass is a consortium of 11 partners from industry, science, technology and beyond, co-funded by BMWK aiming to provide guidance on the EU battery passport

## Key facts on the Battery Pass consortium

- Evolved from the Circular Economy Initiative Germany
- 11 partners from industry, science, technology and beyond
- Co-funded by the German Federal Ministry for Economic Affairs and Climate Action (BMWK) with EUR 8.2 mn
- Aiming to advance the implementation of and provide guidance on the EU battery passport
- 3-year timeframe from April 2022 to April 2025
- Five work packages include:
  - Project coordination and stakeholder engagement
  - Guidance on content requirements
  - Guidance on technical battery passport system
  - Development of a software and physical demonstrator
  - Value assessment of individual use cases and system benefits



# The Battery Pass consortium draws upon a network of associated and supporting partners and guidance of its Advisory Council

## The Battery Pass partner network

### Associated Partners



### Supporting Partners



### Advisory Council





## The Battery Pass consortium supports and collaborates with other major initiatives active in the digital product passport space



- European Commission “Digital-2021-Trust-01-DIGIPASS” winner
- Kicked off in October 2022 lasting 18 months (March 2024)
- Funding volume: EUR 2 mn
- Partners: 31 organisations
- Objective: build a common understanding of a cross-sectoral DPP
- Focus: Batteries, Textiles, Electronics



- Leading global voluntary passport initiative
- Objective: enabling transparency and accountability for risks and ESG impacts in EV battery value chains by creating a digital twin of the battery and aggregating data in a battery passport
- 3 early-stage proof of concepts were launched at WEF 2023
- Release of first set of ESG metrics (GHG Rulebook, Child Labour and Human Rights Indices) with additional metrics to follow



- Developing a comprehensive data ecosystem with standardised global data exchange for data-driven value chain in the automotive industry
- Based on GAIA-X data space technology to support data sovereignty with distributed data management and sophisticated identity and access management
- Focusing on several use cases including decarbonisation and ESG reporting, circularity and battery passport, and others








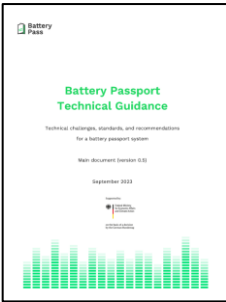
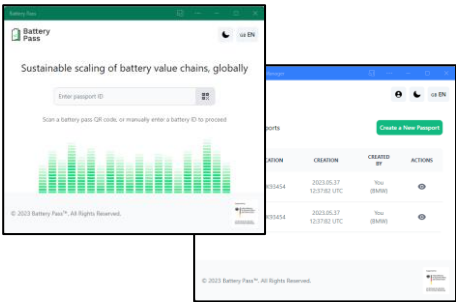

CircuBAT



And many more...



# The scope of our guidance covers content requirements, the standards, architecture, and challenges of the technical passport system, two demonstrator and the value assessment

	 <b>Content Guidance</b>	 <b>Technical Guidance</b>	 <b>Demonstrator</b>	 <b>Value Assessment</b>
<b>Objective</b>	Provide comprehensive and timely guidance on the content reporting requirements mandated by the EU battery passport to value chain participants	Provide an overview to economic operators on what the technical battery passport system could look like and which technical standards it should support	Provide a platform which integrates results on battery passport data and system and verifies technological feasibility of the passport	Provide an analytical study to motivate stakeholders along the value chain to use the battery passport proactively and leverage its full potential
<b>Scope</b>	Content Guidance report, data attribute longlist, CO <sub>2</sub> specific documents, EC position paper, outlook on secondary legislation	Technical Standard Stack incl. mapping of existing standards as well as key challenges and recommendations	Software prototype (TRL 5 <sup>1</sup> ) covering exemplary real-world data as well as physical demonstrator built with LEGO	Exploratory assessment of economic, environmental, and social benefits for stakeholders and system, as well as challenges and efforts
<b>Publication</b>	<div><p>Originally published in Apr 2023, update in Dec 2023</p></div>	<div><p>Published in March 2024</p></div>	<div><p>Draft released in March 2024</p></div>	<div><p>September 2024</p></div>

Focus of this document

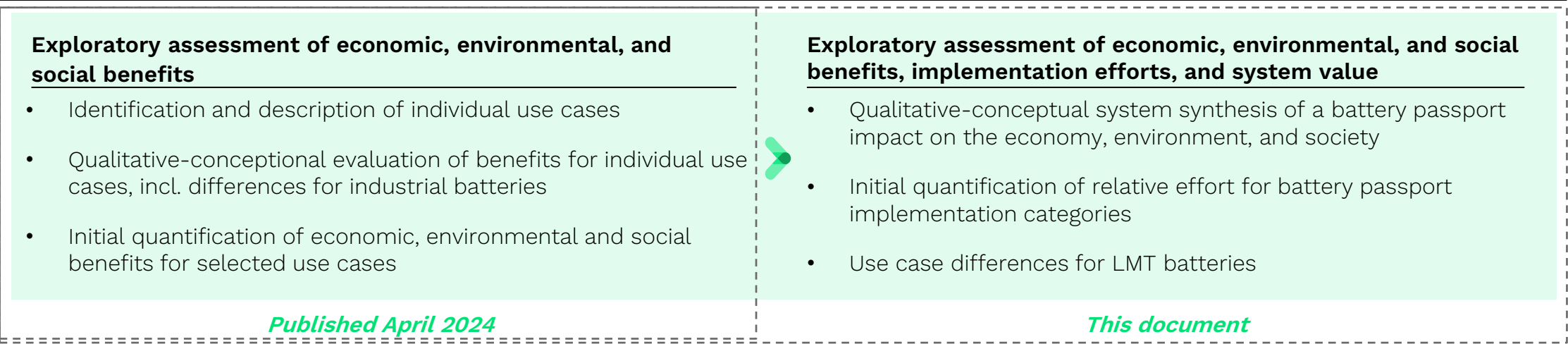
# This document presents an updated version of the first publication, including an assessments of LMT benefits, implementation effort, and overall system value

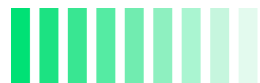
## Objective

Provide an analytical study to motivate individual stakeholders to use the battery passport proactively and leverage its full potential incl. convincing the European Commission about additional value add potential beyond the current mandatory scope.

Therefore, describe and evaluate potential benefits for businesses, public users and authorities based on qualitative and select quantitative assessments.

## Work steps





## Chapter 3: Methodology



# The use case assessment has been a collaborative effort of the consortium and validated by external stakeholders to incorporate the perspective of the battery value chain

## Methodological process for the value assessment

Battery Pass consortium partner perspective	15	<ul style="list-style-type: none"> <li>Developed the methodology and use case longlist</li> <li>Reviewed qualitative and quantitative use case assessments</li> </ul>
	6	<ul style="list-style-type: none"> <li>Developed the qualitative and quantitative use case assessments</li> <li>Performed additional cross-cutting analyses</li> </ul>
External battery industry perspective	>30	<ul style="list-style-type: none"> <li>Provided expertise on use cases and value chain perspectives</li> <li>Reviewed qualitative and quantitative assessments and assumptions</li> </ul>
	2	<ul style="list-style-type: none"> <li>Provided feedback on methodology and use case longlist</li> <li>Highlighted additional use cases and value add potentials</li> </ul>

# The overall assessment includes all battery categories requiring a passport, deep dive focus on EV batteries, and a separate analysis on industrial and LMT batteries

## Battery categories included in the value assessment

All battery categories  
requiring a battery passport



EV batteries



Industrial batteries  
> 2 kWh



Light Means of  
Transport  
(LMT) batteries

### General use case assessment

- Overall use case description includes all relevant battery categories
- Does not consider the detailed differences of these categories

### Deep dive analyses

- Deep dive analysis (qualitative assessment and initial quantification) with more narrow system boundaries due to its complexity
- EVs selected as they represent the largest number of batteries requiring a battery passport

### Separate analysis on differences for industrial batteries




- Separate analysis for industrial batteries as they encompass different battery chemistries, system designs, and applications
- Differentiates the use case applicability by specific characteristics of industrial batteries

### Separate analysis on differences for LMT batteries

- Separate analysis for LMT batteries as several LMT specific market, technological, and legal characteristics impact the battery passport value

# The scope includes mandatory requirements as well as voluntary additions and differentiates between benefits and drawbacks in three impact dimensions

## Scope of the value assessment

1	<b>Requirements</b> Mandatory + voluntary additions	<b>Value add from current regulatory scope</b> as defined by the EU Battery Regulation	+	Additional <b>value add possibilities</b> enabled by conditions <b>beyond regulatory requirements</b>
2	<b>Value</b> Benefits vs. drawbacks	<b>Benefits</b> <ul style="list-style-type: none"><li>• Enabled by so called “direct” and “potential” use cases along the life cycle</li><li>• Result in positive impacts for different stakeholders (businesses, private consumer, authorities)</li></ul>	vs.	<b>Drawbacks</b> <ul style="list-style-type: none"><li>• Resulting from challenges stakeholders face when implementing and maintaining the passport requirements</li><li>• Could reduce the overall benefit</li></ul>
3	<b>Impact dimensions</b>	 <b>Economic</b> (e.g. cost efficiency)	 <b>Environmental</b> (e.g. GHG emissions)	 <b>Social</b> (e.g. health and safety)

# 1 While mandatory requirements result from the regulatory text, voluntary aspects are identified by exploring value add potentials beyond the regulatory scope

## Source

### Mandatory requirements



- Art. 77 and Annex XIII of the EU Battery Regulation as published in the Official Journal of the European Commission
- Content Guidance by the Battery Pass consortium

## Further insights

- Most data attributes need to be reported irrespectively of the battery passport, only select ones exclusively for it
- Each data attribute is assigned to a list of predefined access groups:
  - General public
  - Notified bodies, market surveillance authorities and the Commission
  - Any natural or legal person with a legitimate interest
- Full interoperability with other digital product passports and a high level of security and privacy are to be ensured

### Voluntary additions

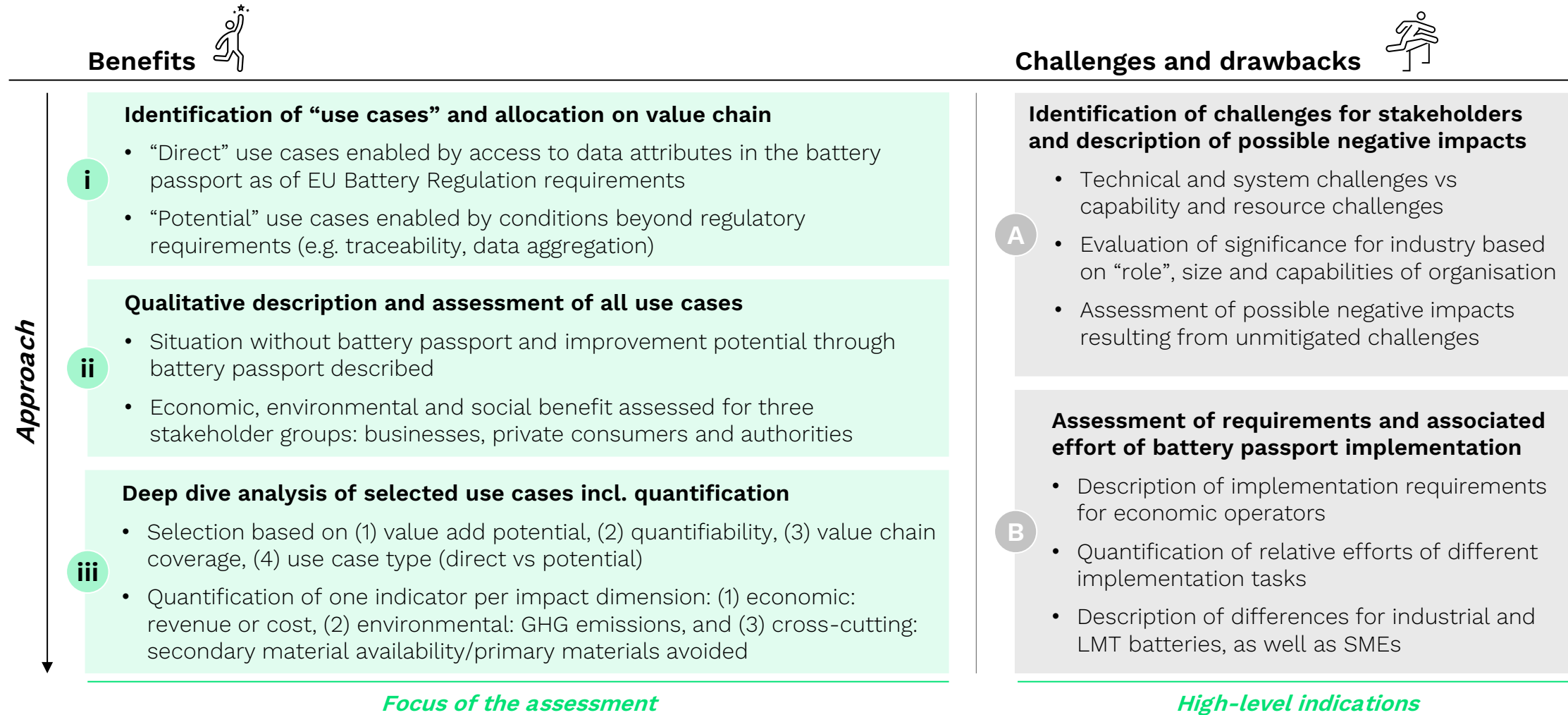


- Battery Pass value assessment working group

- Additional voluntary data attributes considered a value add. Proposal to define basic criteria to clearly differentiate between requirements and voluntary attributes as well as ensure credibility
- Upstream traceability through interconnected traceability systems
- Integration of passport with other processes and systems
- Enablement of systems for data aggregation




## 2 Benefits have been derived and assessed in a three-step approach, augmented by an assessment of challenges, drawbacks and requirements



### 3 In general, the impact assessment covers an economic, environmental and social dimension as well as a cross-cutting one for the quantification

BENEFITS – NOT EXHAUSTIVE AND EXEMPLARY

 Used for quantification of selected deep dive use cases<sup>1</sup>



#### Economic

- Gross domestic product increase
- Revenue increase
- Cost decrease
- Immaterial value creation



#### Environmental

- GHG emissions decrease
- Water pollution decrease
- Biodiversity preservation
- Natural resource conservation



#### Social

- Upheld human rights standards
- Creation of local jobs
- Improved governance structures
- Health and safety increase

#### Cross-cutting

- Secondary materials available / primary material avoided
- Reduced waste



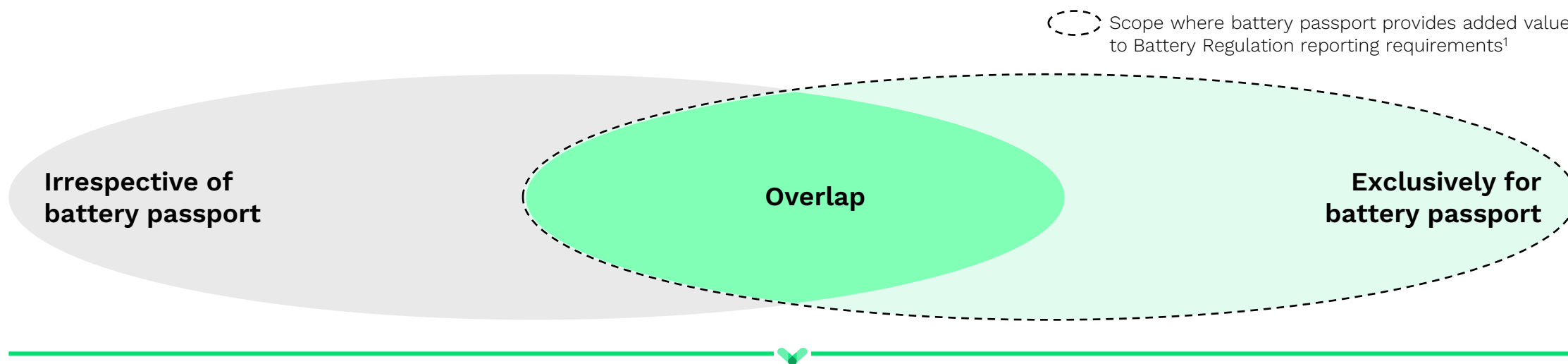
## Chapter 4: Benefits

- Overview
- Direct use cases
- Potential use cases



# The battery passport provides added value to general requirements from the Battery Regulation by collecting data in a digital format and making it accessible

## Battery Regulation reporting requirements



## Battery passport benefits (data and systems)

- Information **collected** in a harmonised manner<sup>2</sup>
- Information **made accessible** to different stakeholders
- Information **digitised and converted into an interoperable format**

1. See Annex ([slide 171](#)) for the list of exact data attributes per category and refer to the Battery Pass Content Guidance (Battery Pass consortium (2023a)) for detailed reporting requirements

2. Benefits apply only to exclusive battery passport requirements; in overlap section information already needs to be collected in a harmonised manner for requirements irrespective of the battery passport

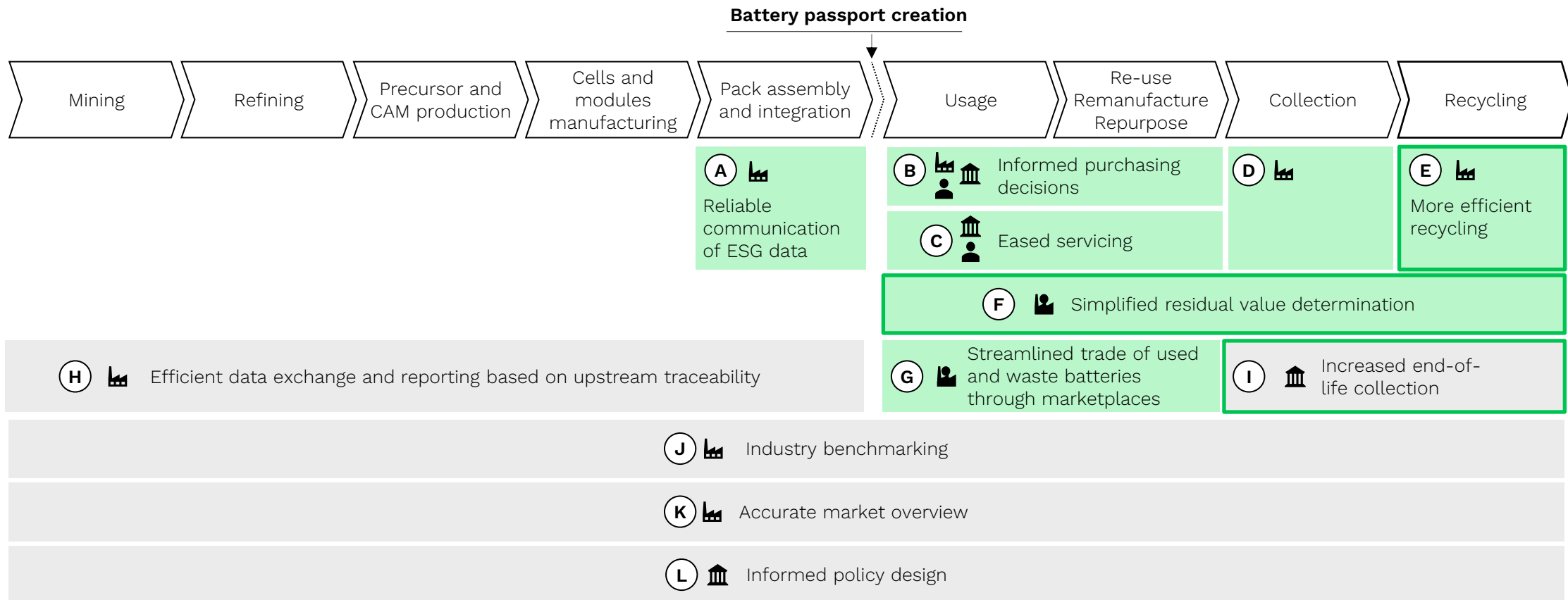
# Benefits resulting from using the battery passport are enabled by so called “use cases”

## Key terms used in the “benefits” chapter

Use cases	... <b>describe processes which could be improved by using the passport</b> and are <b>identified to understand which</b> economic, environmental and social <b>benefits could arise</b> from the battery passport
Direct use cases	...are <b>enabled by access to mandatory data attributes as of EU Battery Regulation requirements</b>
Potential use cases	...are enabled by <b>conditions beyond regulatory requirements</b> (e.g. traceability, data aggregation, process integration)
User	...describes the <b>individual or organisation accessing information via the battery passport</b> (process improvements could also lead to benefits for stakeholders beyond the core user)

# Overall, 12 use cases of the battery passport were identified along the value chain

Battery passport user:  Business  Authority  Private consumer  Direct use case  Potential use case  Selected for qualitative deep dive and initial quantification






























# Brief qualitative-conceptual use case description (1/3)

**Battery passport user:** Business Authority Private consumer **Benefit:** Economic Environmental Social **Level of benefit:** No Low Middle High

Use case	Short description	Type	User	Benefit			Links
<b>A</b>	<b>Reliable communication of ESG data</b> Companies selling batteries with outstanding ESG performance (e.g. due diligence report, carbon footprint) could leverage the battery passport for product differentiation.	Direct					One Pager
<b>B</b>	<b>Informed purchasing decisions</b> Access to reliable and comparable information about the battery (e.g. carbon footprint and durability) facilitates well-informed purchasing decisions.	Direct	  				One Pager
<b>C</b>	<b>Eased servicing</b> Information on the design and characteristics of the battery (e.g. dismantling information, spare part supplier) facilitate servicing activities, especially for independent workshops.	Direct	 				One Pager
<b>D</b>	<b>Precise risk assessment for transport of used batteries</b> Information about the history of the battery (e.g. accidents, number of deep discharge events) supports the correct categorisation and thereby minimises the risk of using insufficient transport precautions.	Direct					One Pager

## Brief qualitative-conceptual use case description (2/3)

**Battery passport user:**  Business  Authority  Private consumer **Benefit:**  Economic  Environmental  Social **Level of benefit:**  No  Low  Middle  High

Use case	Short description	Type	User	Benefit			Links
							
<b>(E)</b>	<b>More efficient recycling processes</b> Availability of data on battery composition and dismantling enables more efficient recycling processes by e.g. reducing sampling efforts and optimising the dismantling process.	Direct					 One Pager  Deep Dive
<b>(F)</b>	<b>Simplified residual value determination</b> Performance and durability data (e.g. remaining capacity, internal resistance) enable downstream businesses and private users to better assess the residual value of the battery to decide between recycling or second life and its specific second-life application.	Direct					 One Pager  Deep Dive
<b>(G)</b>	<b>Streamlined trade of used and waste batteries through marketplaces</b> Marketplaces could optimise the matching of supply and demand by utilising comparable information from battery passports, connecting buyers with suitable batteries and reducing transaction costs.	Direct					 One Pager
<b>(H)</b>	<b>Efficient data exchange and reporting based on upstream traceability</b> Indirectly enabled by the battery passport requirements, upstream traceability systems could enable the exchange of company-specific data in supply chains, providing a tool for efficient and dynamic data reporting with increased credibility and reliability.	Potential					 One Pager



# Brief qualitative-conceptual use case description (3/3)

Battery passport user: Business Authority Private consumer    Benefit: Economic Environmental Social    Level of benefit: No Low Middle High

Use case	Short description	Type	User	Benefit			Links
I	<b>Increased end-of-life collection</b> Additional downstream information could support authorities in preventing “battery leakage” (illegal exports and treatment) by leveraging the passport for export control and market surveillance.	Potential					One Pager Deep Dive
J	<b>Industry benchmarking</b> Data aggregated from battery passports could be used for own benchmarking purposes (e.g. of performance and sustainability indicators) or to guide consumer and investor decisions.	Potential					One Pager
K	<b>Accurate market overview</b> Information aggregated from batteries on the market, including status and expected lifetime, could facilitate market studies and projections, aiding business planning activities along the value chain.	Potential					One Pager
L	<b>Informed policy design</b> More accurate data on the battery stock in the different life cycle stages (e.g. material volumes) aggregated from different battery passports could provide information for fact-based policy design.	Potential					One Pager

# Different use cases are interdependent, influencing one another through amplifying or delaying effects

A: Reliable communication of ESG data

B: Informed purchasing decisions

C: Eased servicing

D: Precise risk assessment for transport of used batteries

E: More efficient recycling

F: Simplified residual value determination

G: Streamlined trade of used and waste batteries through marketplaces

H: Efficient data exchange and reporting based on upstream traceability

I: Increased end-of-life collection

J: Industry benchmarking

K: Accurate market overview

L: Informed policy design

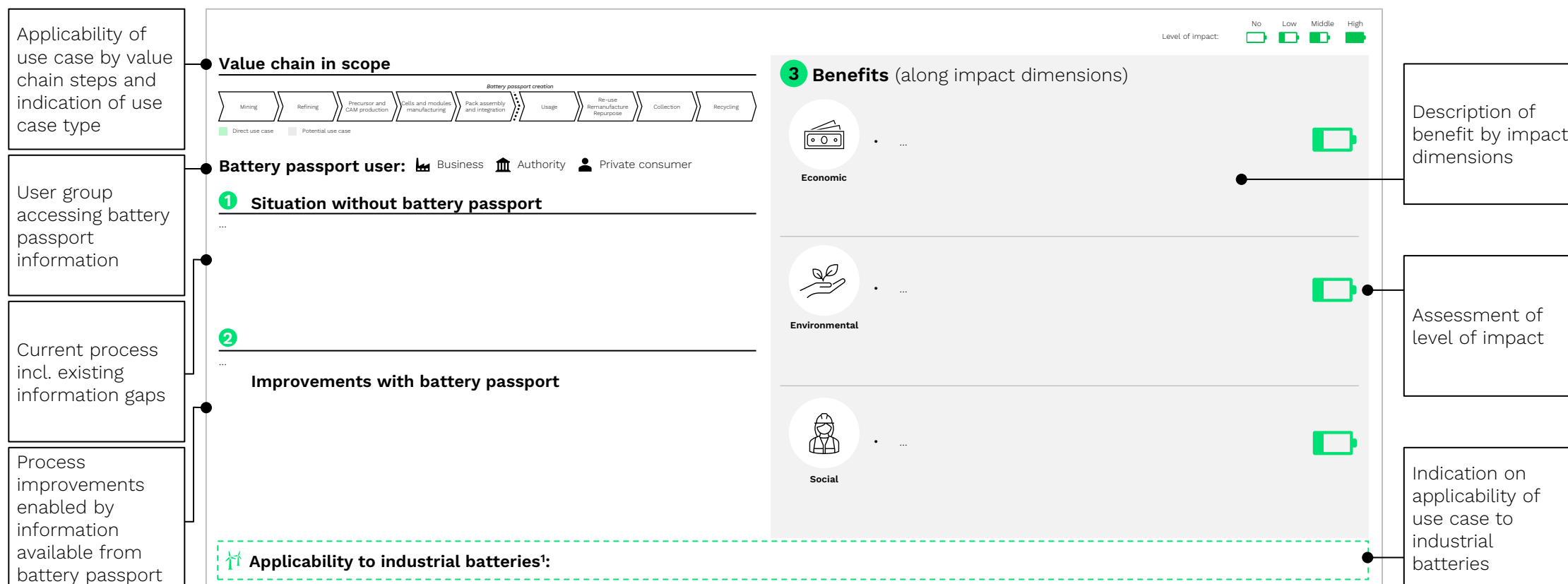
	2												
	A	B	C	D	E	F	G	H	I	J	K	L	
A		+								+		+	"+" use case 1 amplifies use case 2
B													
C													
D		+	+		+	+	+		+				"-" use case 1 delays use case 2
E	+												
F		+			-		+						
G					-								
H	+	+											
I					+								
J	+	+									+	+	
K												+	
L													

## Examples

- Use case A amplifies use case B: Due to companies leveraging the battery passport to reliably communicate the ESG performance of a product, customers are empowered to make more informed purchasing decisions.
- Use Case F delays use case E: Due to the dynamic data on the battery passport, the residual value determination gets simpler, i.e., fewer tests are required to evaluate whether a battery is suitable for a second-life. Consequently, more batteries will be re-used, remanufactured or repurposed, therefore the recycling of these batteries is delayed.

# All use cases are further described using the following overview structure

## Core elements of use case “one pagers”



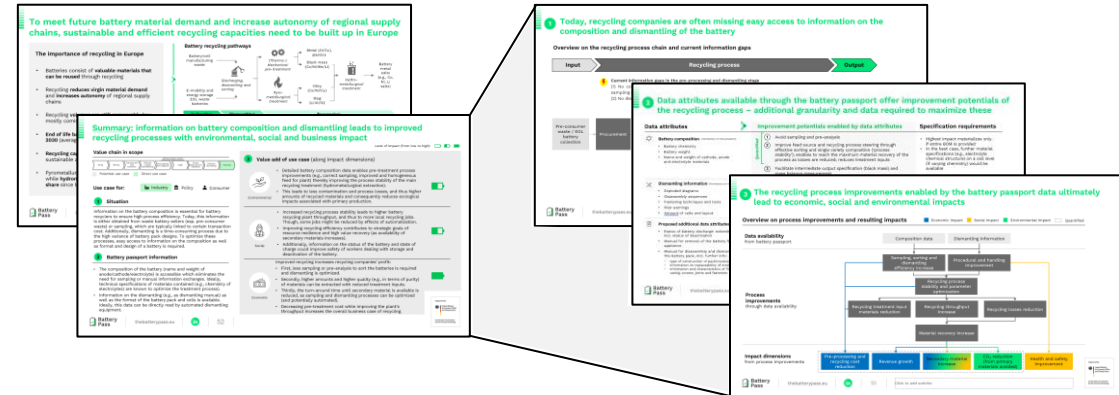
# Selected use cases are chosen for a deep dive including further qualitative details as well as an initial quantification of the impact

## Selected deep dive use cases

- E** More efficient recycling (direct use case – see [slides 64 -76](#))
- F** Simplified residual value determination (direct use case – see [slides 76 - 86](#))
- I** Increased end-of-life collection (potential use case – see [slides 97 - 107](#))

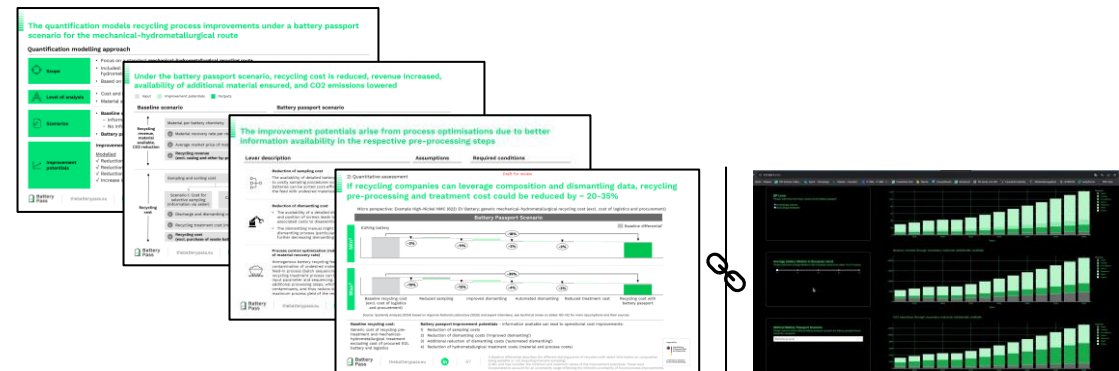
### Qualitative assessment

- Introduction to market need and problem statement
- Deep dive into the three categories of the “one pager” summary
  1. Situation without the battery passport
  2. Improvements with the battery passport
  3. Benefits (along impact dimensions)



### Quantitative assessment

- Description of quantification modelling approach
- Overview on analytical quantification steps
- Details on levers, assumptions and required conditions
- Calculation results
- Interactive visualisation





## Chapter 4: Benefits

- Overview
- Direct use cases
  - Use case descriptions
  - Deep dives
- Potential use cases



# Direct use cases result from mandatory data attributes required by the EU Battery Regulation in combination with the respective access rights

**Mandatory data attributes and their respective access rights enable seven direct use cases:**

Mandatory data attributes <sup>1</sup>	+ Access rights <sup>2</sup>	=	(A)	(B)	(C)	(D)	(E)	(F)	(G)	Direct use cases
General information	Public or persons with a legitimate interest					X			X	<b>(A)</b> Reliable communication of ESG data <b>(B)</b> Informed purchasing decisions <b>(C)</b> Eased servicing <b>(D)</b> Precise risk assessment for transport of used batteries <b>(E)</b> More efficient recycling processes <b>(F)</b> Simplified residual value determination <b>(G)</b> Streamlined trade of used and waste batteries through marketplaces
Labels and certifications	Public or notified bodies, market surveillance authorities and the Commission			X					X	
Carbon footprint	Public		X	X						
Supply chain due diligence	Public		X	X					X	
Materials and composition	Public or persons with a legitimate interest and the Commission			X		X	X	X	X	
Circularity and resource efficiency	Public or persons with a legitimate interest and the Commission		X	X	X		X			
Performance and durability	Public or persons with a legitimate interest and the Commission			X	X	X		X	X	

1. Only overarching data categories listed

2. Can vary between different data attributes in one category

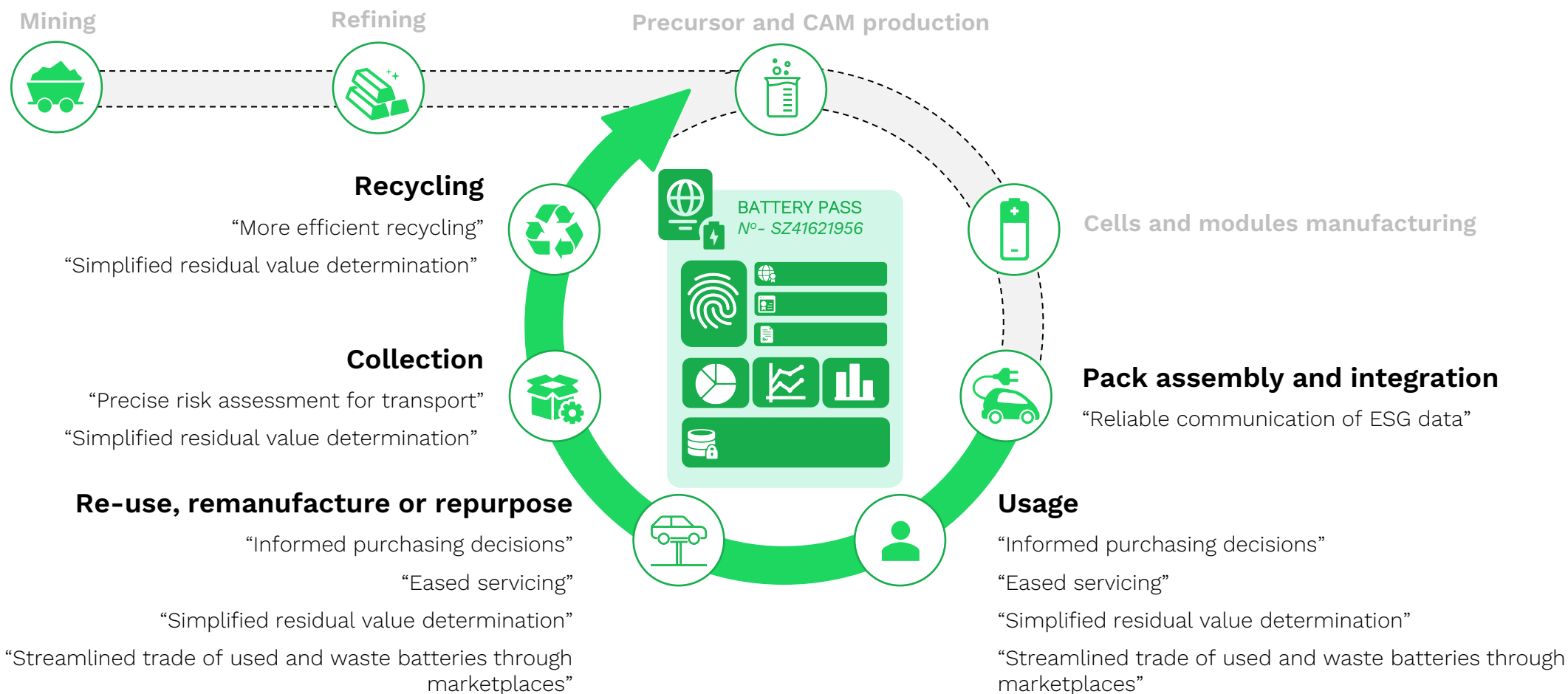
Please refer to the Battery Passport Content Guidance (Battery Pass consortium (2023a)) for more information on the data attributes

# Direct use cases of the battery passport mainly unlock value along the downstream value chain

EXEMPLARY

**Value of the passport:**

- Potential additional value beyond regulatory compliance pending conditions beyond regulatory requirements (see “potential” use cases)
- Direct value add along several dimensions (environmental, social and economic)





## Chapter 4: Benefits

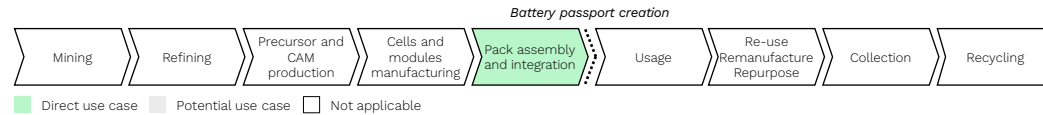
- Overview
- Direct use cases
  - Use case descriptions
  - Deep dives
- Potential use cases





# A Reliable communication of ESG data: Companies selling batteries with outstanding ESG performance could leverage the battery passport for product differentiation

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

In light of new regulations and increasing sustainability requirements of customers, responsible economic operators (and suppliers to a certain extent) need to communicate various ESG data to ensure compliance and differentiate themselves from competitors. Today, this is often not done in a comparable and credible manner.

## 2 Improvements with battery passport

The battery passport is expected to increase customer awareness of product ESG performance. Companies selling batteries could leverage the passport for a reliable communication as it provides direct access to the following upstream information that needs to be calculated, verified and reported in the context of the EU Battery Regulation:

- Carbon footprint (carbon footprint as declared and performance class)
- Supply chain due diligence (information indicated in the due diligence report)
- Circularity and resource efficiency (recycled content)

Further ESG information based on harmonised methodologies and verified under different regimes (e.g. human rights and child labour indices by the GBA) could be added on a voluntary basis.<sup>1</sup>

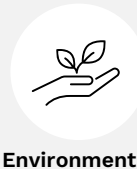
**Applicability to industrial batteries<sup>2</sup>:** Equally applicable for all industrial batteries

Level of impact:  No  Low  Middle  High

## 3 Benefits (along impact dimensions)



- Economic operators excelling on ESG performance of their products could attract eco-conscious consumers as well as green public procurement, secure sustainable investment, and enhance brand reputation thereby driving revenue and long-term economic success



- Carbon footprint and recycled content information are made transparent for consumers. This incentivises economic operators to improve their environmental impact to outperform competitors



- Consumer access to the due diligence report could encourage economic operators to proactively mitigate social risks in their supply chains (e.g. human rights violations)



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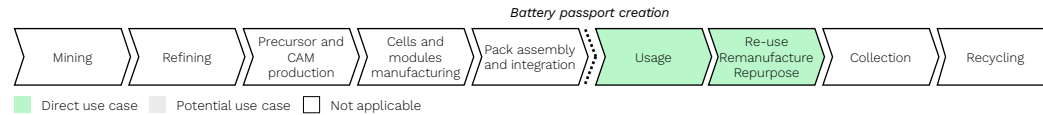


on the basis of a decision  
by the German Bundestag

# B Informed purchasing decisions: Access to reliable and comparable information about the battery facilitates well-informed purchasing decisions

Level of impact: No Low Middle High

## Value chain in scope



## Battery passport user:

Business Authority Private consumer

## 1 Situation without battery passport

Technical performance and sustainability crucially determine the decision to buy a battery. In a continuously growing market, public and private purchasers require trusted, transparent, and comparable information about a battery to make an informed decision, which today is not easily available in a harmonised manner. This holds true both for a new and used battery.

## 2 Improvements with battery passport

The following information on a battery's technical performance and sustainability is designated for public access and could empower end-consumers to make informed purchasing decisions:

- Labels, symbols, documents of certifications (symbols, labels, declaration of conformity)
- Carbon footprint (carbon footprint as declared and performance class)
- Supply chain due diligence (information indicated in the due diligence report)
- Materials and composition (battery chemistry)
- Circularity and resource efficiency (recycled content, information on separate collection etc.)
- Performance and durability (rated capacity, expected lifetime etc.)

## 3 Benefits (along impact dimensions)



### Economic

- Access to labels and certifications as well as performance and durability information, such as rated capacity and expected lifetime, empowers buyers to make economically sound decisions considering the resale value when buying a first life battery and negotiating the purchase price for second-life batteries
- Information on the battery chemistry enables educated buyers to select the most suitable chemistry based on their specific needs, optimising its usage and extending the battery's longevity, ultimately translating into financial savings and value



### Environmental

- Private and corporate end-consumers, as well as purchase departments of public institutions that leverage the data for green public procurement policies, could reduce the impact on the environment by deciding in favour of more sustainable batteries and putting pressure on manufacturers to improve on e.g. GHG emissions



### Social

- Information on supply chain due diligence enables consumers to decide in favour of batteries meeting certain social sustainability standards along the battery supply chain, thereby putting pressure on manufacturers to improve



**Applicability to industrial batteries<sup>2</sup>:** Equally applicable for industrial batteries with BMS

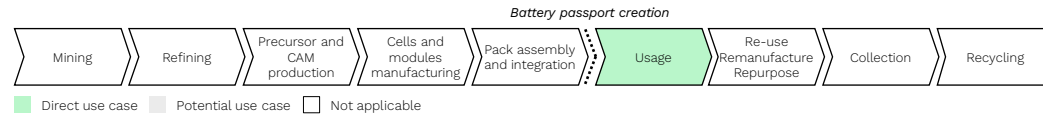
Less applicable for industrial batteries without BMS

1. The battery passport connects to a Due Diligence report outlining social risks and mitigation measures by the economic operator. In contrast to the environmental indicators, this information is not easy to evaluate or compare, diminishing the effectiveness of this benefit
2. For more information, please refer to subchapter on [slides 117-127](#)

# **Eased servicing: Information on the design and characteristics of the battery could facilitate servicing activities, especially for independent repair workshops**

Level of impact: No Low Middle High

## Value chain in scope



## Battery passport user:

Business Authority Private consumer

## 1 Situation without battery passport

Limited access to technical information and a lack of standardisation make professional servicing of batteries difficult, especially for independent repair workshops<sup>1</sup>. This results in a limited range of service options and thus restricts consumer choice of repair shops.

## 2 Improvements with battery passport

The following passport information about the battery's state and handling instructions could ease the servicing, especially for independent workshops:

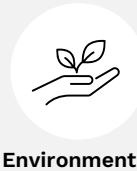
- Circularity and resource efficiency (manuals for removal as well as disassembly and dismantling, contact details for spare parts, safety measures and instructions)
- Performance and durability (state of charge, current internal resistance, number of deep discharge events, accidents, etc.)

As a prerequisite, service providers are to be designated as "interested persons" to gain access to the respective passport information.

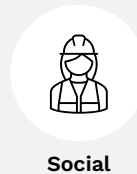
## 3 Benefits (along impact dimensions)



- Leveraging the available data enables workshop technicians to streamline the diagnosis of battery issues and repair procedures, thereby saving valuable time and effort
- Performance and durability information could be used to provide handling advice to users aiming for increased battery lifetime, which results in a reduced cost of ownership



- Eased servicing could extend the lifetime of batteries and therefore lowers GHG emissions since fewer batteries and materials are required
- Repair enabled by available data could minimise spare part usage thereby conserving resources



- Decentralised access to passport data could foster localised repair shops thereby creating local employment opportunities



**Applicability to industrial batteries<sup>2</sup>:** — Less applicable for all industrial batteries

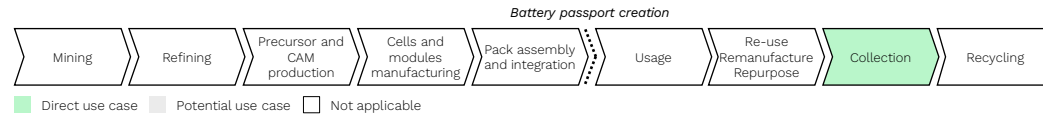


**Separate analysis with differences for LMT batteries<sup>3</sup>**

# D Precise risk assessment for transport of used batteries: Information about the history of the battery minimises the risk of insufficient transport precautions

Level of impact: No Low Middle High

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

Transporting used batteries involves the risk of dangerous reactions in the case of defects. Compliance with international regulations for transporting hazardous goods, requires battery categorisation. Currently, this categorisation relies heavily on optical evaluation, which is insufficient for accurately assessing battery risks.

Furthermore, the Battery Regulation differentiates between "waste batteries" and "used batteries." Shipping used batteries requires testing the State of Health and evaluating hazardous substances (Article 72 and Annex XIV). On the other hand, shipping waste batteries involves obtaining permits, which is a time-consuming process.

## 2 Improvements with battery passport

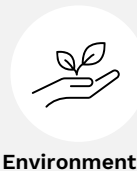
- Battery passport information on performance and durability (e.g. state of charge, current internal resistance, time spent in extreme temperatures, number of deep discharge events, accidents, etc.) could support the correct categorisation and thereby minimise the risk of insufficient transport precautions.<sup>2</sup>
- Furthermore, the following passport information could support the distinction between "waste" and "used" batteries<sup>1</sup>
  - General battery and manufacturer information (battery identification)
  - Battery materials and composition (hazardous substances)
  - Performance and durability (capacity fade)

## 3 Benefits (along impact dimensions)

A correct categorisation and corresponding precautions (a) as well as a clearer distinction between "waste" and "used" batteries (b) could enable businesses collecting batteries to:



- Enhance transport safety and reduce the financial risk for battery shippers (a)
- Avoid time-consuming waste transportation permits, leading to a reduction of battery storage costs (b)



- Reduce incidents thereby limiting environmental pollution (a)



- Reduce accidents thereby limiting threats to health and safety of transportation personnel (a)



**Applicability to industrial batteries<sup>2,3</sup>:** Equally applicable for industrial batteries with BMS



Less applicable for industrial batteries without BMS



Not applicable for industrial batteries with external storage



thebatterypass.eu



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- It still needs to be assessed whether the information available via the battery passport is sufficient to comply with the testing requirements of Article 72 and Annex XIV
- Note that drivers / logistics operators must adhere to [the regulations for the Carriage of Dangerous Goods](#)
- For more information, please refer to subchapter on [slides 117-127](#)

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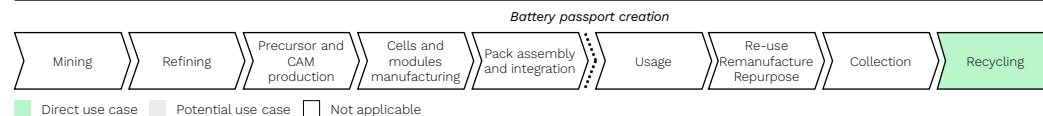


on the basis of a decision by the German Bundestag

# E More efficient recycling: Availability of data on battery composition and dismantling could increase process efficiency by e.g. reducing sampling efforts

Level of impact: No Low Middle High

## Value chain in scope



## Battery passport user:

Business Authority Private consumer

## 1 Situation without battery passport

Information on the battery composition is essential for battery recyclers to ensure high process efficiency. Today, this information is either obtained from waste battery sellers (esp. pre-consumer waste) or sampling, which are typically linked to certain transaction costs. Additionally, dismantling is a time-consuming process due to the high variance of battery pack designs. To optimise these processes, easy access to information on the composition as well as format and design of a battery is required.

## 2 Improvements with battery passport

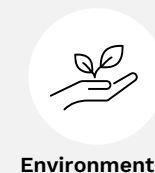
- The composition of the battery (name and weight of anode/cathode/electrolyte) is accessible via the battery passport, which could eliminate the need for sampling or manual information exchanges – ideally, technical specifications of materials contained (e.g. chemistry of electrolytes) are known to optimise the treatment process<sup>1</sup>
- Furthermore, information on the dismantling (e.g. as dismantling manual) as well as the format of the battery pack and cells is available – ideally, this data could be directly read by automated dismantling equipment
- The availability of battery passport information on performance and durability (e.g., state of charge, time spent in extreme temperatures, number of deep discharge events, accidents etc.) could enable an optimal battery deactivation<sup>2</sup>
- As a prerequisite, authorised recycling companies are to be designated as “interested persons” to gain access to the respective passport information

## 3 Benefits (along impact dimensions)

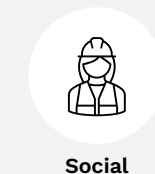


Information availability via the battery passport could decrease the costs of the recycling process:

- Less sampling or pre-analysis to sort the batteries is required and discharge and dismantling could be optimised
- More materials could be recovered with reduced treatment inputs (reduction of process losses due to lower contamination)
- Faster turnaround times for secondary materials, as sampling and dismantling processes could be optimised (and potentially automated)
- Decreasing pre-treatment cost while improving the plant's throughput could increase the overall business case of recycling



- Detailed battery composition data could enable pre-treatment process improvements (e.g. correct sampling, improved and homogeneous feed for plant) that increase the process stability of the main recycling treatment (hydrometallurgical extraction), resulting in less contamination and process losses and thus higher quantities of recycled materials and consequently reducing the environmental impact associated with primary production



- Information on performance and durability (e.g. status of the battery and state of charge) could improve safety of workers dealing with storage and deactivation of the battery
- Increased recycling process stability through information availability could lead to higher battery recycling plant throughput, and thus to more local recycling jobs - though some jobs might be reduced by effects of automation
- Improving recycling efficiency through available information could contribute to strategic goals of resource resilience and high value recovery



**Applicability to industrial batteries<sup>2</sup>:** Equally applicable for industrial batteries with Li-Ion and emerging chemistries

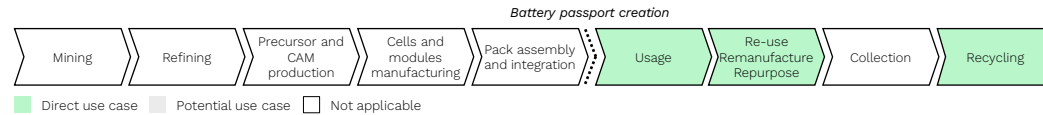
Less applicable for industrial batteries except Li-Ion and emerging chemistries

1. It still needs to be assessed whether the information available via the battery passport is sufficient to comply with the testing requirements of Article 72 and Annex XIV.  
2. To ensure safety, recycling operators should use passports as a secondary mechanism for efficiency, continuing to conduct own assessments of status of electrical charge  
For more information, please refer to subchapter on [slides 117-127](#)

# F Simplified residual value determination: Performance and durability data could support in assessing the residual monetary value as well as remaining useful life

Level of impact: No Low Middle High

## Value chain in scope



## Battery passport user:

Business Authority Private consumer

## 1 Situation without battery passport

The residual value (monetary as well as remaining useful life) is a crucial indicator to manage used batteries, i.e. assess their resale value and decide between recycling or second-life applications. Today, it is challenging for independent second-life operators<sup>1</sup> or end-consumers to accurately assess the residual value of batteries due to a lack of standard procedures on measuring the battery's state of health and reporting on its historic usage. Therefore, time-consuming as well as costly tests are required.

## 2 Improvements with battery passport

The following battery passport information on battery characteristics and historic usage of the battery simplify the residual value determination by reducing the effort for initial technical tests<sup>3</sup>, which could also increase the number of batteries going into a second life:

- Battery materials and composition (battery chemistry)
- Performance and durability (capacity fade, State of certified energy (SOCE), current internal resistance, accidents etc.)

As a prerequisite, second-life operators and end-consumers are to be designated as "interested persons" to gain access to the respective passport information.

## 3 Benefits (along impact dimensions)



### Economic

- Easy access to information on the first life of the battery reduces the need for costly tests to estimate the residual value of a battery<sup>3</sup>
- Reliable and comparable performance data facilitates a transparent resale value determination which could lead to increased revenue of the battery seller or lower cost of the buyer



### Environmental

- An improved allocation between recycling and second-life could increase the quantity of batteries being re-used, remanufactured or repurposed, thereby reducing the need for primary raw material extraction and lowering GHG emissions associated with battery production



### Social

- N/A



**Applicability to industrial batteries<sup>2</sup>:** Less applicable for all industrial batteries

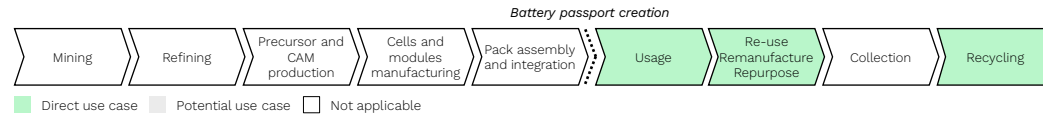
1. Independent second-life operators refer to businesses that specialise in repurposing or reusing batteries that are operating independently of the original manufacturers or brands  
 2. For more information, please refer to subchapter on [slides 117-127](#)  
 3. This refers to technical tests needed to determine the resale value or whether a battery is suitable for a second-life application; advanced and costly tests are still required to certify a battery for second-life usage (e.g. the current industry standard UL-1974)






# Streamlined trade of used and waste batteries through marketplaces: Reliable and comparable data from passports could be used to connect buyers with batteries

Level of impact:  No  Low  Middle  High

## Value chain in scope



## Battery passport user:

 Business  Authority  Private consumer

## 1 Situation without battery passport

Today, most used and waste batteries are traded via direct contractual arrangements. This includes high transaction costs as information exchange between a large network of decentralised collectors and sellers needs to be organised. Some marketplaces already exist, but unreliable and incomparable information make it challenging to establish a trustworthy foundation for purchase decisions. Consequently, additional tests are often required further escalating procurement costs.

## 2 Improvements with battery passport

- Access to battery passport information via marketplaces could increase the availability, reliability and comparability of decision-relevant information and thus connect buyers with the most suitable batteries for the desired application. Relevant information from different battery passports are e.g.:
  - General information (manufacturing information, battery weight)
  - Labels, symbols, documents of certifications (symbols, labels, decl. of conformity)
  - Materials and composition (battery chemistry)
  - Performance and durability data, e.g.: remaining capacity or energy, expected lifetime, age distribution, negative events
- Additional voluntary data like physical damage data could enable a more effective end-of-life allocation process
- As a prerequisite, operators submitting used batteries to marketplace are to be designated as "interested persons" to gain access to the dynamic passport data

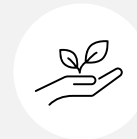
## 3 Benefits (along impact dimensions)

A marketplace integrates battery passports and its information and thus could:



### Economic

- Significantly reduce transaction costs through more reliable and comparable information available for both buyers and sellers of used and waste batteries, fostering cost savings, e.g. by avoiding or reducing technical tests
- Provide easy access for buyers to large quantities of used and waste batteries to enable resource strategies (e.g. for second-life applications, securing feedstock for recycling)



### Environmental

- Foster a more effective allocation of used and waste batteries as information on usage and performance enable the allocation to remanufacturing, repurposing or recycling, thereby extending the lifetime, e.g. in second-life applications to reduce resource needs, where used batteries were previously recycled



### Social

- N/A



## Applicability to industrial batteries<sup>1</sup>:



Equally applicable for all industrial batteries



## Chapter 4: Benefits

- Overview
- Direct use cases
  - Use case descriptions
  - Deep dive: **(E)** More efficient recycling processes
- Potential use cases



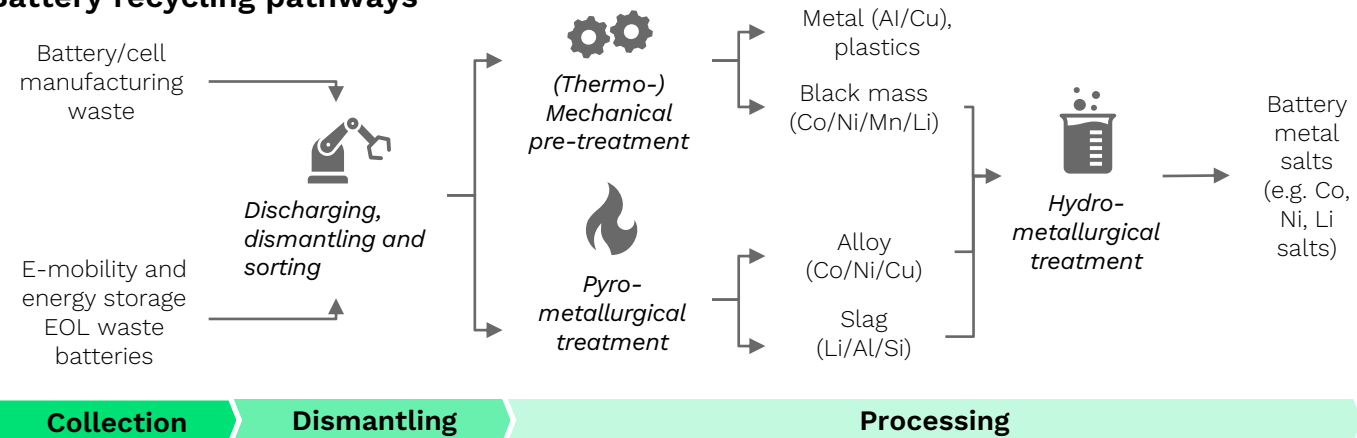


# To meet future battery material demand and increase autonomy of regional supply chains, sustainable and efficient recycling capacities need to be built in Europe

## The importance of recycling in Europe

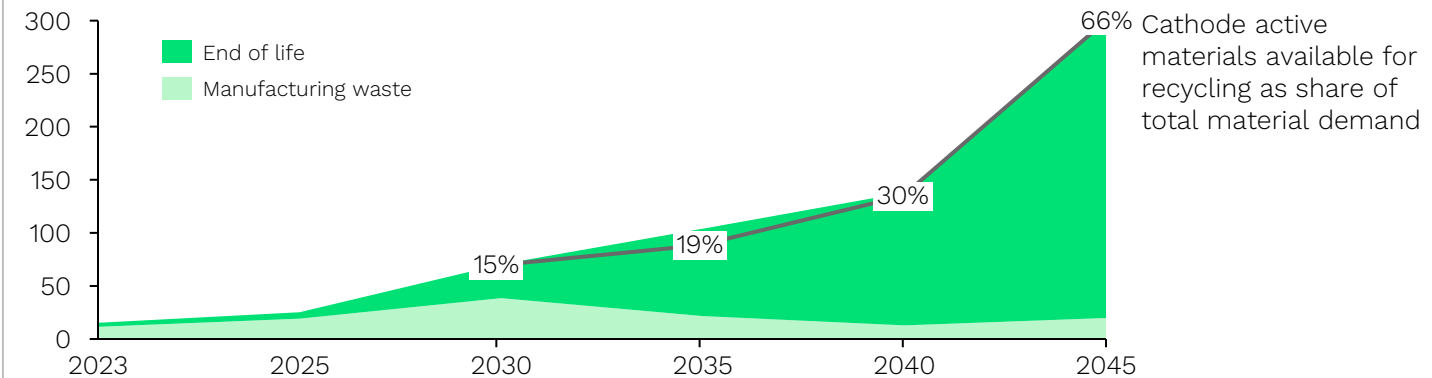
- Batteries consist of **valuable materials that could be re-used** through recycling to **reduce primary material demand** and **increase autonomy** of regional supply chains
- Pyrometallurgical recycling has dominated in the past, while **hydrometallurgical takes over market share** since leading to higher material recovery rates
- In Europe, plants **totalling over 300 kt recycling capacity** (all battery materials)<sup>1</sup> have already been announced – until 2030, **capacities of up to ~900 kt** are expected
- Current recycling **volumes are still low**, mostly coming from manufacturing waste
- End-of-life battery volumes will rise and surpass manufacturing waste from 2030 onwards** (average battery life 10-14 years)

## Battery recycling pathways



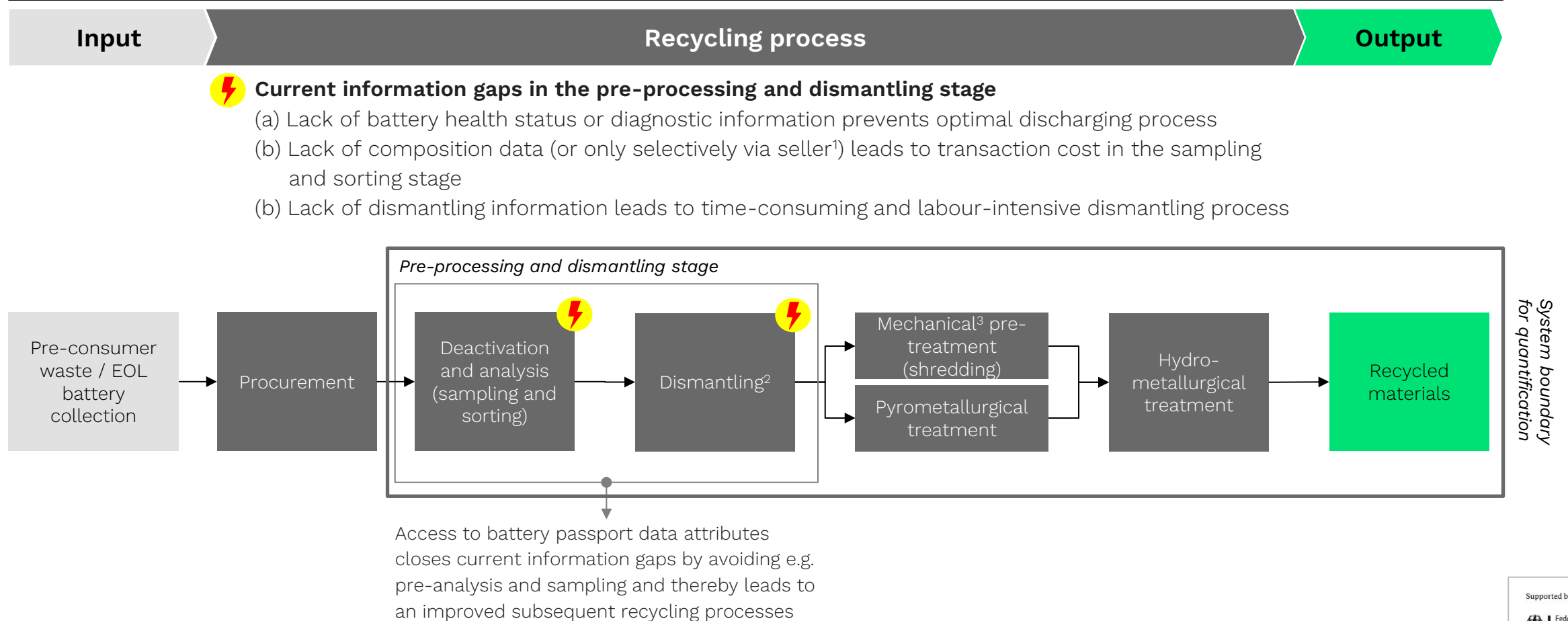
## EU battery cathode active materials<sup>2</sup> available for recycling and share of demand

Kilotons p.a.



# 1 Today, recycling companies often lack easy access to information on the composition and for dismantling of the battery

## Overview on the recycling process chain and current information gaps



1. Mostly relevant for pre-consumer waste batteries / off-spec cells and batteries  
 2. As some battery recyclers shred entire battery packs, the dismantling information gap only exists where battery packs and modules are dismantled.  
 3. Might include pyrolysis to remove organic compounds (thermal pre-treatment)

## 2 Battery passport data offers the potential to improve the recycling process – additional granularity and data is required to maximise these

### Data attributes



#### Battery composition

(mandatory on the passport)

- Battery chemistry
- Battery weight
- Name, weight and detailed composition of cathode, anode and electrolyte materials<sup>1</sup>
- Composition of other battery components (e.g. power electronics)<sup>1</sup>



#### Dismantling information

(mandatory on the passport)

- Exploded diagrams
- Disassembly sequences
- Fastening techniques and tools
- Risk warnings
- Number of cells and layout



#### Proposed additional data attributes

- Information from previous handling operations
  - Battery diagnostics
  - Risk assessment report (if standardised)
  - status of battery discharge (extended state of charge incl. status of deactivation)
- Manual for removal of the battery from the appliance
- Manual for disassembly and dismantling of the battery pack, incl. further information:
  - Type of construction of pack/modules/cells
  - Information on replaceability of modules/cells
  - Information and characteristics of fillings, casing, screws, joints and fasteners
- Status change attribute “recycled”

### Improvement potentials enabled by data attributes

Quantified

- 1 Avoid sampling and pre-analysis
- 2 Improve feed source and recycling process steering through effective sorting and single variety composition (“process stability”); enables to reach the maximum material recovery of the process as losses are reduced; reduces treatment inputs
- 3 Facilitate intermediate output specification (black mass) and mass-balance measurement

Quantified

- 4 Optimise battery dismantling process (process efficiency)
- 5 Automate battery dismantling process through machine-readable format

- 6 Increase operational safety in storage and pre-processing
- 7 Improve efficiency in process handling if information from previous handling operations can be integrated into recycling pre-treatment (e.g. deactivation)
- 8 Optimise removal of battery from appliance (safety and procedure)  
Maximise dismantling optimisation potential, see levers 4 and 5 above
- 9 Enable recycled material certificate tracing and reporting of recycled content

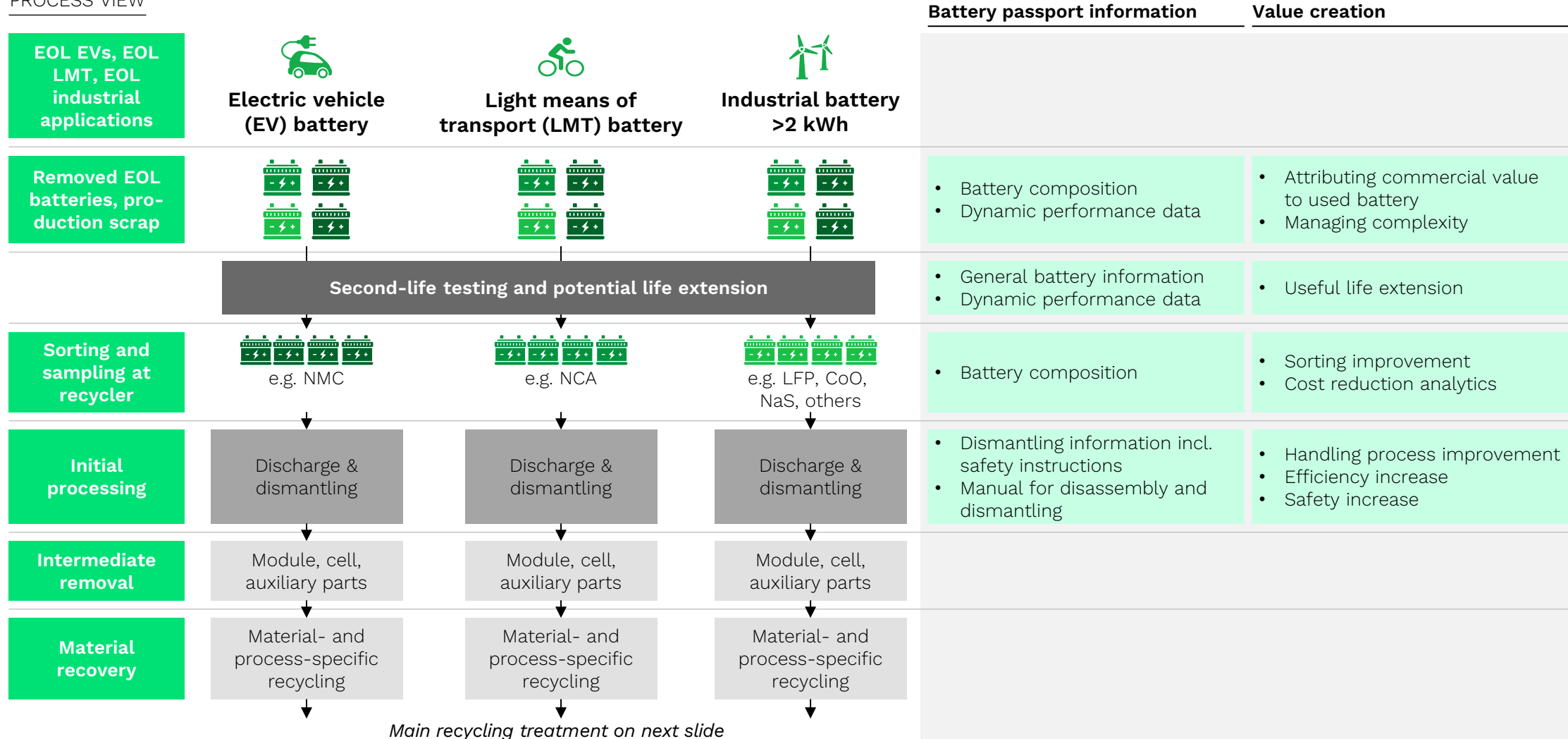
### Specification requirements

- Highest impact materialises if entire bill of materials is provided
- In the best case, further material specifications (e.g. electrolyte chemical structure) on a cell level (if varying chemistry) would be available, but confidentiality concerns remain due to lack of standardisation<sup>1</sup>
- Information should be provided in a standardised structure and in machine-readable format (e.g. translating diagrams into text)
- Automated dismantling equipment to be set-up
- Battery passport information need to be integrated into existing safe working procedures (SWPs) and workflows requiring training and other process adoption efforts
- Accuracy and reliability of additional attributes must be guaranteed

1. The granularity for providing the detailed composition data and the specification of battery components for which the general composition data will be applicable is not specified in the EU battery regulation with further standardisation required. For further information on the battery passport data attributes, please refer to the Battery Passport Content Guidance (Battery Pass consortium (2023a))

# The battery passport could enable value creation along the battery recycling pre-processing chain if it is integrated in current workflows and procedures

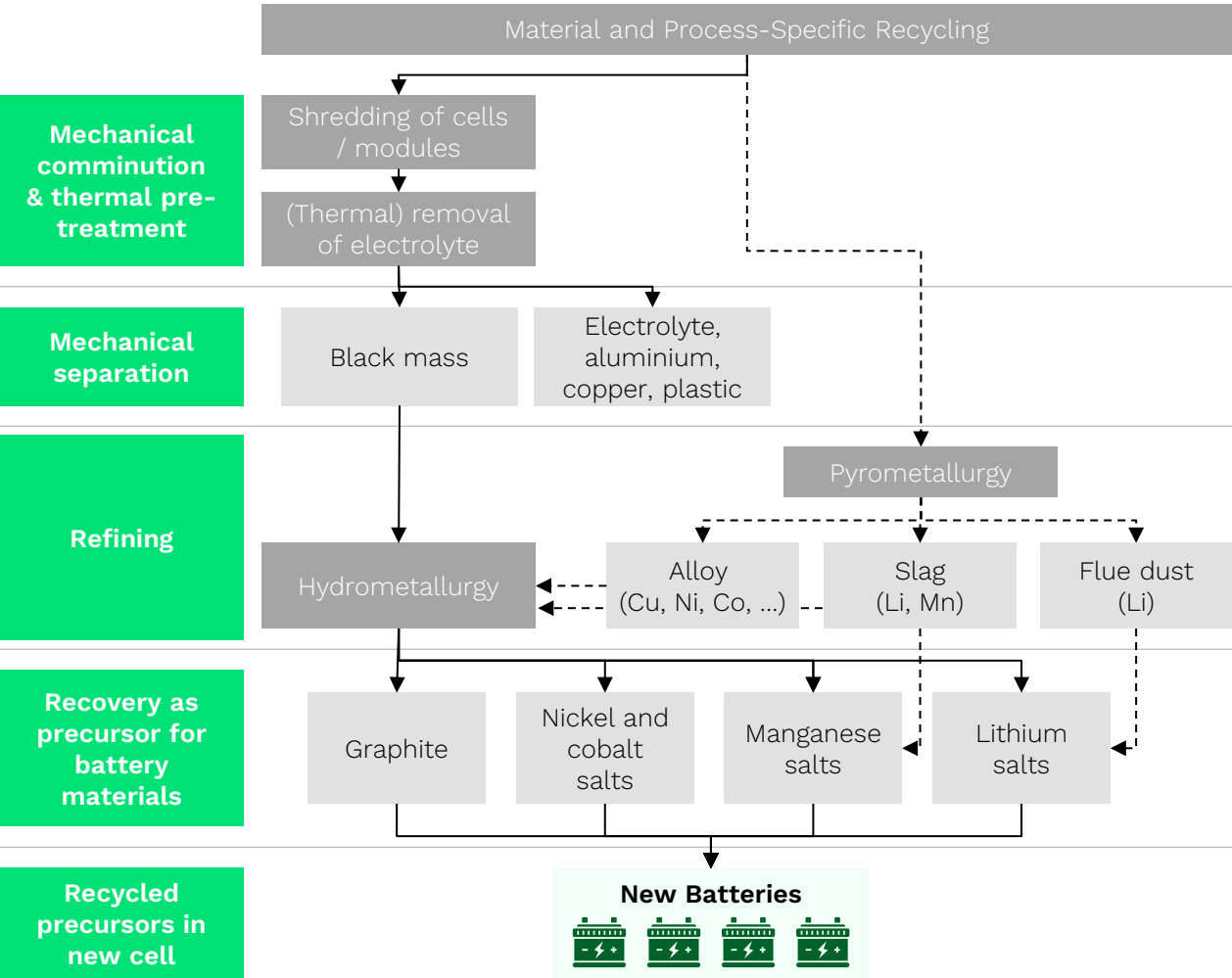
## PROCESS VIEW



Main recycling treatment on next slide

# The pre-processing optimisations lead to improved material- and process-specific treatment processes

PROCESS VIEW



Battery passport information	Value creation
<ul style="list-style-type: none"><li>Battery composition</li></ul>	<ul style="list-style-type: none"><li>Improved mass balancing for recovery rates</li></ul>
<ul style="list-style-type: none"><li>Battery composition</li></ul>	<ul style="list-style-type: none"><li>Higher yields due to lower contamination</li><li>Lower operating cost due to lower re-processing</li><li>Higher asset utilisation due to optimised feed</li></ul>
<ul style="list-style-type: none"><li>Additional attribute "Recycled"</li></ul>	<ul style="list-style-type: none"><li>Recycled material certificate tracing</li></ul>
<ul style="list-style-type: none"><li>Additional attribute "Recycled"</li></ul>	<ul style="list-style-type: none"><li>Reporting of recycled content</li></ul>

### ③ The recycling process improvements enabled by the battery passport data ultimately lead to economic, social and environmental impacts

#### Overview on process improvements and resulting impacts

■ Economic impact ■ Social impact ■ Environmental impact □ Quantified

##### Data availability

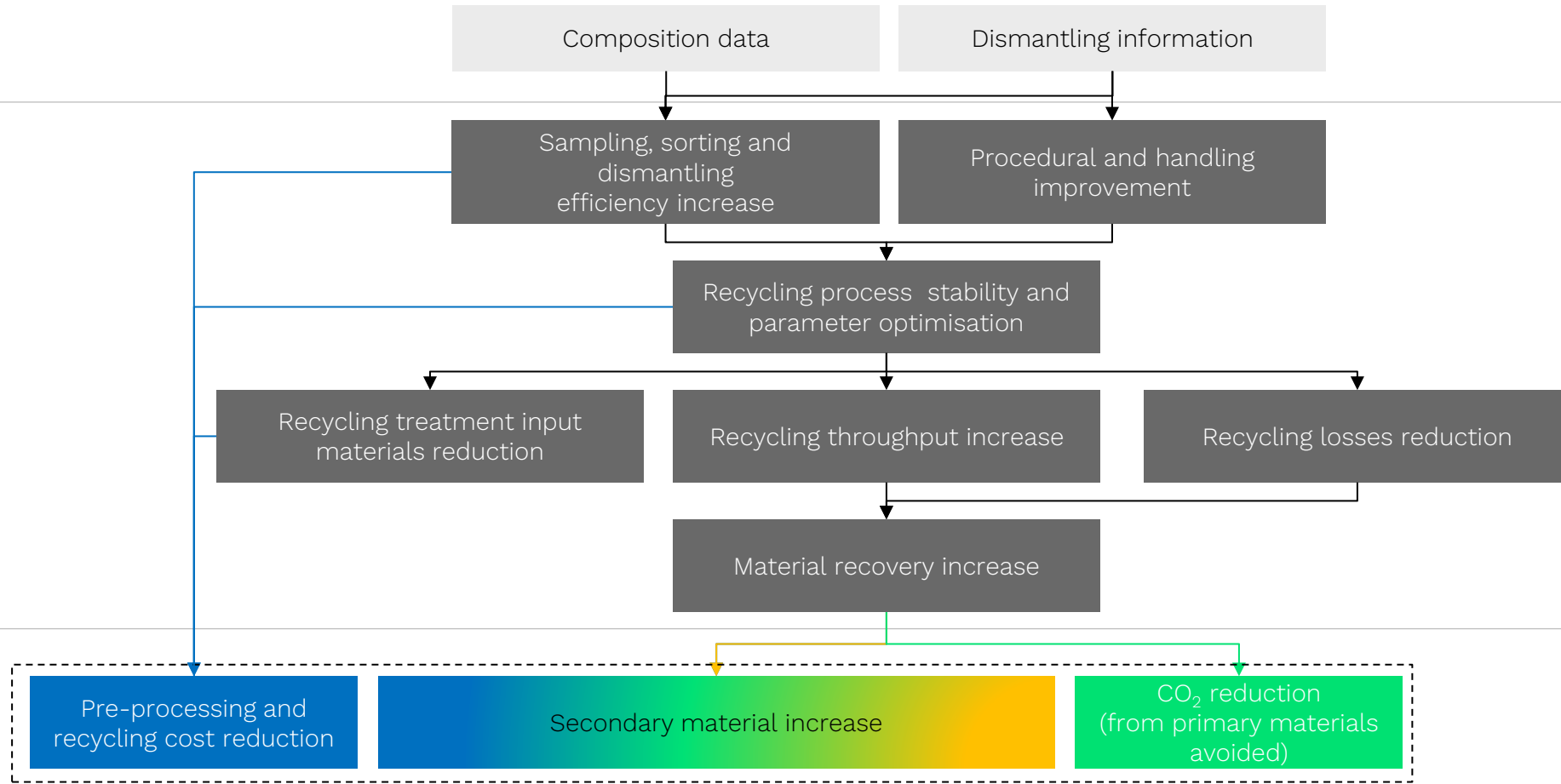
from battery passport

##### Process improvements

through data availability





##### Impact dimensions

from process improvements



# The quantification models recycling process improvements under a battery passport scenario for the mechanical-hydrometallurgical route

## Quantification modelling approach

 <b>Scope</b>	<ul style="list-style-type: none"> <li>Focus on a generic <b>mechanical-hydrometallurgical recycling route</b> (excl. procurement and logistics)</li> <li>Included: <b>cost</b> of pre-processing (sampling, discharge, dismantling), mechanical pre-treatment and hydrometallurgical treatment</li> <li>Based on the materials recovered, additionally available material related CO<sub>2</sub> reductions are modelled</li> </ul>										
 <b>Level of analysis</b>	<ul style="list-style-type: none"> <li>Cost and revenue on process-level (micro): <b>single battery and recycling process</b></li> <li>Material availability and associated CO<sub>2</sub> reduction on system-level (macro): <b>parameters aggregated on EU-level</b></li> </ul>										
 <b>Scenarios</b>	<ul style="list-style-type: none"> <li><b>Baseline scenario:</b> for cost side reflecting different starting points of recyclers:             <ul style="list-style-type: none"> <li>Information available via the seller of the waste battery (manufacturing waste battery)</li> <li>No information available (EOL waste battery)</li> </ul> </li> <li><b>Battery passport scenario</b> (based on below improvement potentials)</li> </ul>										
 <b>Improvement potentials</b>	<p><b>Improvements with directly measurable impacts on baseline revenue and cost</b> in percentage ranges</p> <table> <thead> <tr> <th>Modelled</th><th>Not modelled, but additional benefits prevalent</th></tr> </thead> <tbody> <tr> <td>✓ Reduction of sampling and sorting costs</td><td>× Intermediate output specification/certification (black mass)</td></tr> <tr> <td>✓ Reduction of dismantling costs</td><td>× Plant-level throughput increase through more efficient pre-processing</td></tr> <tr> <td>✓ Reduction in recycling treatment costs</td><td>× CO<sub>2</sub> reductions from decreased contamination</td></tr> <tr> <td>✓ Increase in materials recovered</td><td>× Procedural safety increase</td></tr> </tbody> </table>	Modelled	Not modelled, but additional benefits prevalent	✓ Reduction of sampling and sorting costs	× Intermediate output specification/certification (black mass)	✓ Reduction of dismantling costs	× Plant-level throughput increase through more efficient pre-processing	✓ Reduction in recycling treatment costs	× CO <sub>2</sub> reductions from decreased contamination	✓ Increase in materials recovered	× Procedural safety increase
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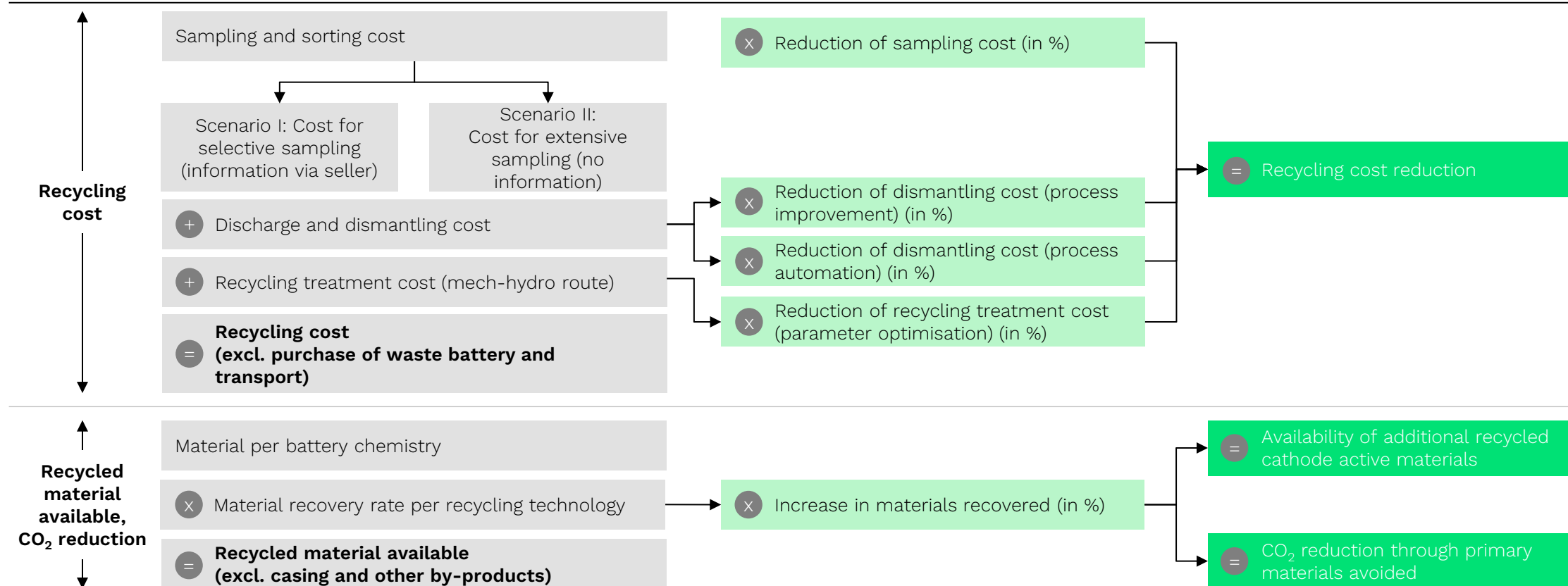
# Under the battery passport scenario, recycling cost is reduced, revenue increased, availability of additional material ensured, and CO2 emissions lowered

SIMPLIFIED

Input   Improvement potentials   Outputs

## Baseline scenario

## Battery passport scenario



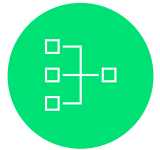


# The improvements arise from process optimisations due to better information availability in pre-processing steps – the better the process integration, the higher the potentials

## Lever description

## Assumptions

## Required conditions



### Reduction of sampling cost

- The availability of detailed battery composition and chemistry data leads to costly sampling procedures no longer being required. Thus, the batteries could be sorted cost-efficiently without the risk of contaminating the feed with undesirable materials. Note that sampling will be required even with the battery passport, but the amount of batteries sampled can be reduced. Over time, with increasing data accuracy and process integration, sampling efforts will likely gradually decrease.

↓ 50-80% sampling cost decrease

- Detailed battery composition data, incl. chemical specification and characteristics of battery materials
- Information available on cell level



### Reduction of dismantling cost

- The availability of a detailed dismantling manual, including, e.g., format and position of screws or presence and type of glues leads to a reduction of time required and associated costs to disassemble the battery pack
- The dismantling manual might be used to automatise parts dismantling process (particularly heavy and hazardous operations), further decreasing dismantling operation costs

↓ 20-40% dismantling cost decrease

↓ Additional 20-30% dismantling cost decrease

- Standardised format of dismantling information, in the best case as machine-readable dismantling manual
- Exploded view of the battery, incl. format and depth of information
- Automation equipment and software



### Process control optimisation (reduction of treatment cost and increase of material recovery rate)

- Homogenous battery recycling feedstock, that is pre-processed without contamination of undesired materials, would improve the feed-in process (batch sequencing) and process parameters. Thus, recycling treatment process could be optimised in terms of controlling input parameter and sequencing. This reduces treatment costs as it prevents additional processing steps, which would be required to remove contaminants, thus reducing losses in these steps. In turn, input the maximum process yield of the recycling process could be achieved

↓ 10-20% material and process cost decrease (hydromet. process)

↑ 1-2% material recovery rate increase (translates into material availability, and CO<sub>2</sub> reduction)

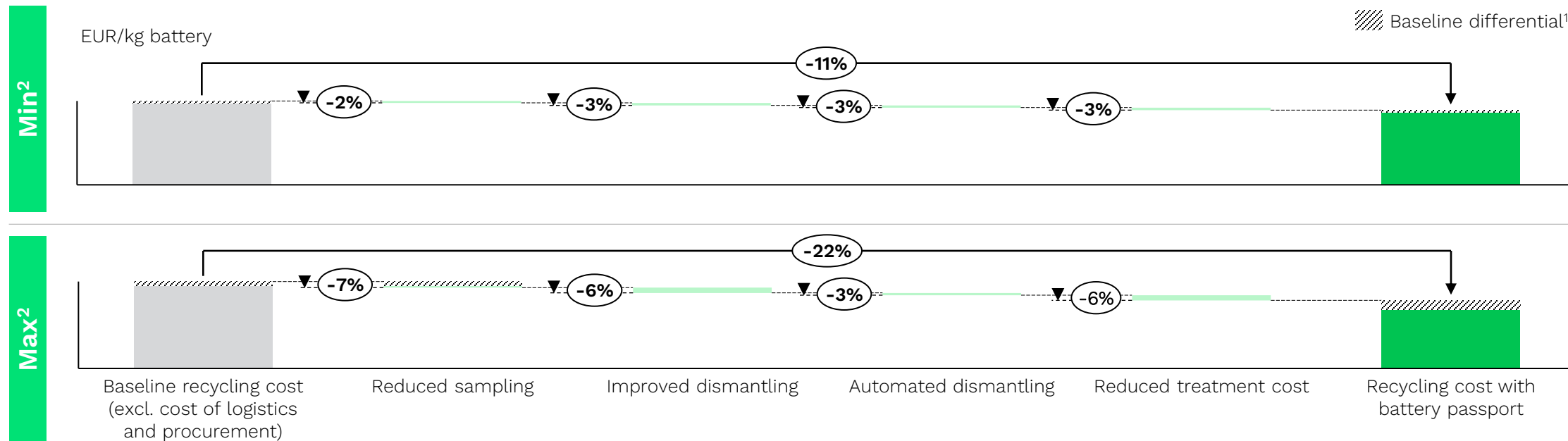
- Detailed battery composition data, including the chemical specification and characteristics of the battery materials, including electrolyte, glues and other elements potentially influencing the recycling process

# If recycling companies can leverage composition and dismantling data, recycling pre-processing and treatment cost could be reduced by ~ 10-20%

**Micro perspective:** Example High-Nickel NMC (622) EV Battery; generic mechanical-hydrometallurgical recycling cost (excl. cost of logistics and procurement)

*Note that LFP battery recycling has different unit economics – however, the general pre-processing cost reduction levers could apply similarly.*

## Battery Passport Scenario



Source: Systemiq analysis (2024) based on Argonne National Laboratory EverBatt (2023) and expert interviews, see technical annex on slides 130-132 for main assumptions and their sources

### Baseline recycling cost:

Generic cost of recycling pre-treatment and mechanical-hydrometallurgical treatment excluding cost of procured EOL battery and logistics

### Battery passport improvement potentials – information available can lead to operational cost improvements:

- 1) Reduction of sampling costs
- 2) Reduction of dismantling costs ("improved dismantling")
- 3) Additional reduction of dismantling costs ("automated dismantling")
- 4) Reduction of hydrometallurgical treatment costs (material and process costs)

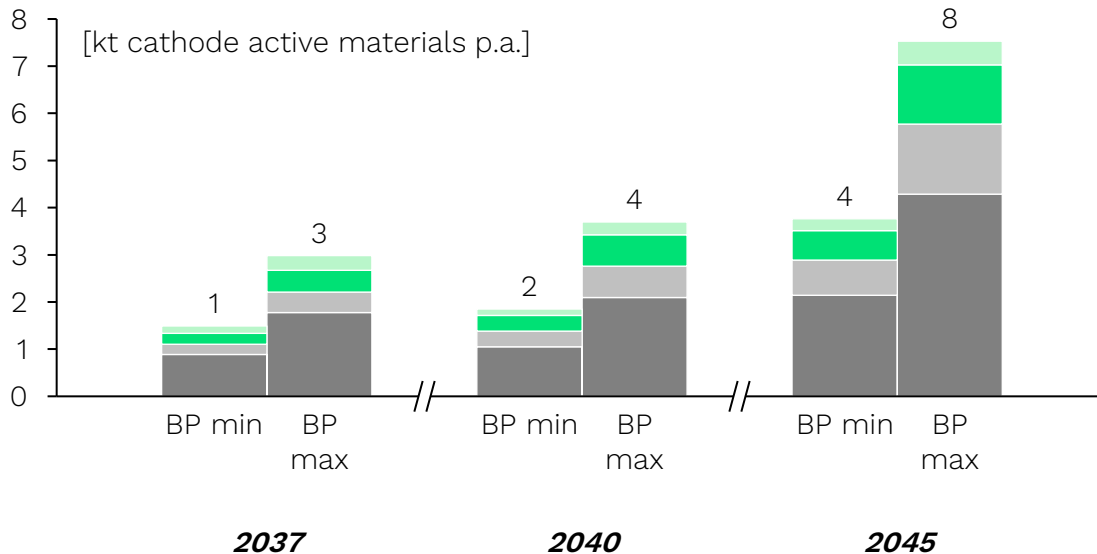
1. Baseline differential describes the different starting points of recyclers with select information on composition being available or not (requiring intensive sampling).
2. Min and max consider the minimum and maximum values of the improvement potentials. These were incorporated to account for an uncertainty range reflecting the inherent uncertainty of future process improvements.

# Improving the battery recycling process could lead to additional active materials recovered and associated carbon emissions reduced

Macro perspective: Materials additionally available on the EU market and corresponding CO<sub>2</sub> reduction

## Additional cathode active materials recovered

Due to slightly increased material recovery rates, we estimate that **European recyclers could recover between ~4-8 kt of additional cathode active materials each year**, starting 2045.

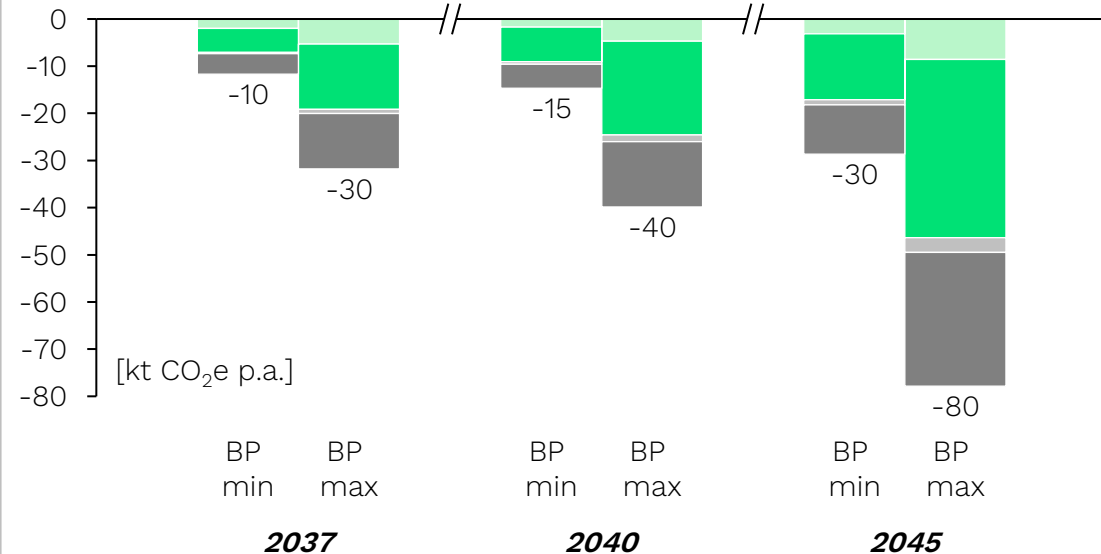


Source: Systemiq analysis (2024), active material intensity based on IEA (2023a) and Leader et al. (2019) see technical annex on slides 130-132 for main assumptions and their sources

➤ Additionally, recovered active materials could meet up to **1/4 of the difference between the technically possible maximum recovery rates and recovery rate targets** from the battery regulation.<sup>1</sup>

## CO<sub>2</sub> reduction through primary materials avoided

Due to the additional secondary active materials available from increased material recovery, we estimate that **~ 30-80 kt CO<sub>2</sub> equivalents could be reduced each year**, starting 2045<sup>2</sup>.



Source: Systemiq analysis (2024), emission factors based on Ecoinvent (2024), cut-off cumulative LCIA v.3.9.1, see technical annex on slides 130-132 for main assumptions and their sources

➤ Additionally, recovered secondary material **only marginally (<1%) reduces the carbon footprint associated with primary** active materials required to meet the demand for EV batteries.

- Assuming max recovery rates for Ni, Co, Mn (98%) and Li (90%) as per Argonne National Laboratory EverBatt (2023). Reduction of contamination due to battery passport info yields additionally recovered materials, expressed as % of the difference between max technically possible recovery rates and battery regulation material recovery rate targets.
- This graph does not include any general decarbonisation pathways.



## Chapter 4: Benefits

- Overview
- Direct use cases
  - Use case descriptions
  - Deep dive: **(F)** Simplified residual value determination
- Potential use cases

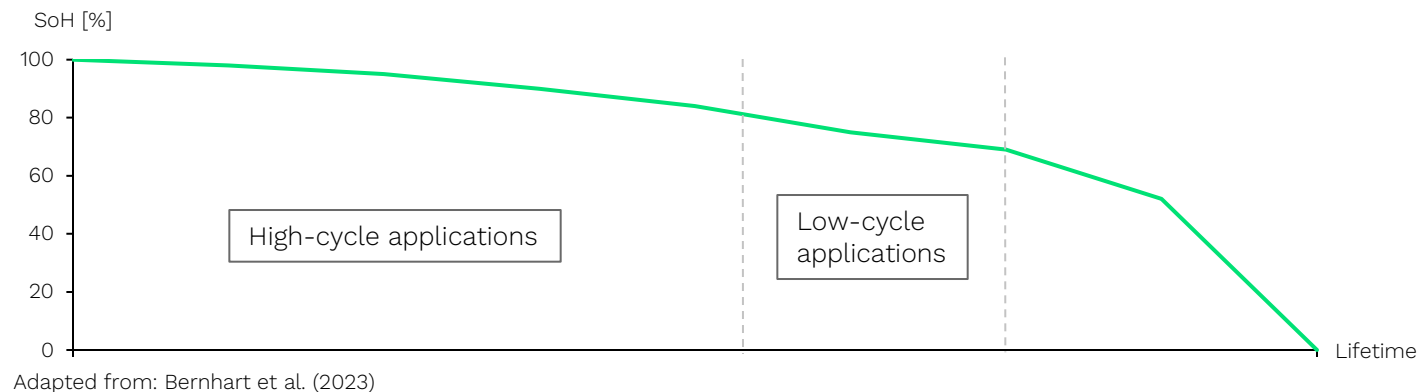


# Introduction: EOL EV batteries still have around 70% remaining capacity and could be commercially attractive for a 2nd life, yet their technical suitability is difficult to estimate

## The technical suitability of second-life batteries

- EV batteries usually **reach their end-of-life** in their first application due to decreasing range when they are **at an estimated state of health between 70-80%**
- **Depending on their usage profile**, they are still **suitable for different, less demanding applications** (high-cycle vs. low-cycle)
- However, a **single state of health value does not provide a reliable indication** of its future development. Therefore, more information is needed to make a qualified decision
- **Stationary storage systems** present the largest application area for second-life EV batteries
- As much larger volumes of EV batteries are being purchased, **second-life EV batteries** have the potential to maintain **commercial attractiveness for stationary storage**<sup>1</sup>

## Suitability of batteries for different second-life applications depending on their state of health:



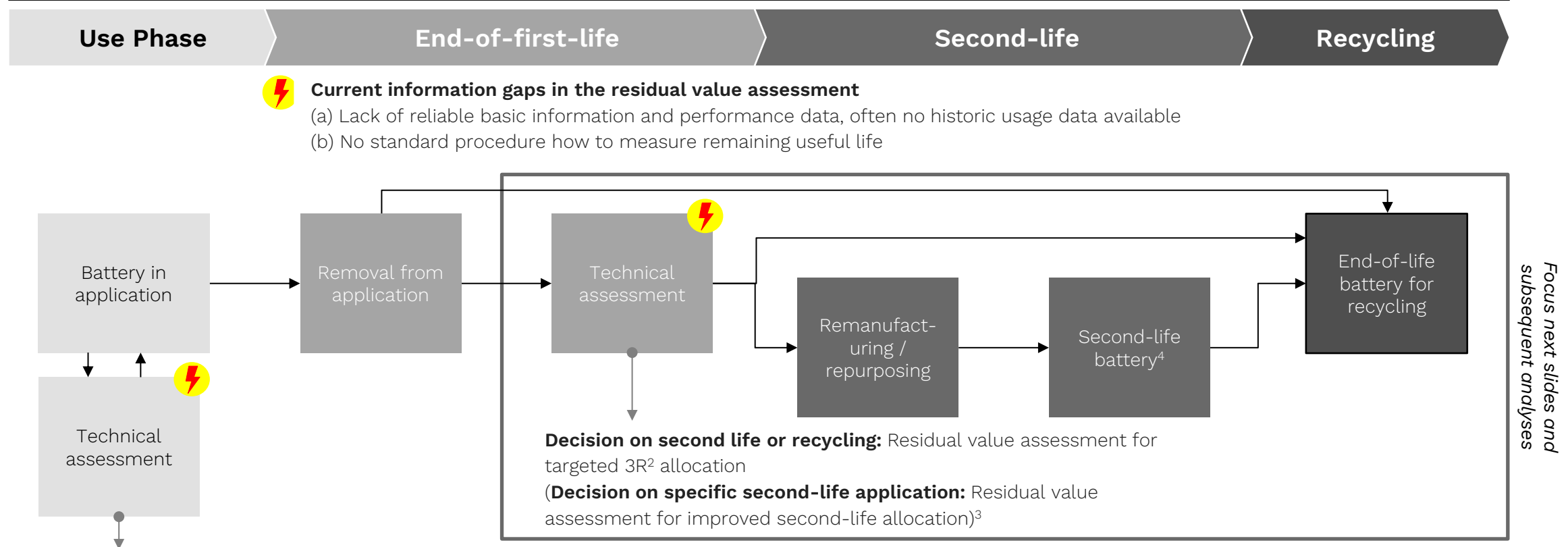
## Varying development of the state of health over the years:



# 1 Currently, determining the residual value is challenging due to a lack of standard procedures, reliable basic information and historical performance data

EXEMPLARY<sup>1</sup>

## Overview on the residual value determination process and current information gaps



**Change of ownership:** Residual value determination for reliable resale value

**Repair / insurance:** Residual value determination for improved repair cost estimations

1. No standard process exists today
2. Remanufacturing, repurposing or recycling
3. Specific 2<sup>nd</sup> life application likely already included in decision on 2<sup>nd</sup> life or recycling
4. Additional tests, e.g. State of Charge/Open Circuit Voltage testing, are needed for BMS recalibration. For safety and guarantee purposes, further tests and certifications are required, e.g. the current standard UL-1974

## 2 Data attributes available through the battery passport offer improvement potentials by reducing the need for technical tests and improving the accuracy of the assessment

Data attributes <sup>1</sup>		Improvement potentials enabled by data attributes	Specification requirements
Dynamic	<b>Capacity and energy</b> <ul style="list-style-type: none"> <li>Rated capacity</li> <li>Capacity fade</li> <li>State of certified energy (SOCE)</li> </ul>	<b>Internal Resistance</b> <ul style="list-style-type: none"> <li>Current internal resistance</li> <li>Internal resistance increase</li> </ul>	<ul style="list-style-type: none"> <li>Should contain several data points, 6 to 12 months with a monthly resolution<sup>2</sup></li> <li>Dynamic data need to be actively measured and logged (e.g. by the BMS) during the battery lifetime</li> <li>All information should be accessible for modules as the batteries are usually transferred to their second-life in modules</li> </ul>
	<b>Expected lifetime</b> <ul style="list-style-type: none"> <li>Expected lifetime in cycles and calendar years</li> <li>Current number of (full) charging and discharging cycles</li> </ul>	<b>Power Capability</b> <ul style="list-style-type: none"> <li>Original power capability</li> <li>Power fade</li> </ul>	
	<b>Negative events</b> <ul style="list-style-type: none"> <li>Accidents</li> </ul>	<b>Temperature conditions</b> <ul style="list-style-type: none"> <li>Time spent charging during extreme temperatures</li> <li>Time spent in extreme temperatures</li> </ul>	
Static	<b>Battery composition</b> <ul style="list-style-type: none"> <li>Battery chemistry</li> </ul>	<ul style="list-style-type: none"> <li>Facilitate the calculation for economically more viable route (re-use/repurpose vs. recycling) by considering the material value of the battery</li> </ul>	

### Improvement potentials enabled by data attributes

Quantified

- 1 Reduce effort for initial technical tests (consisting of capacity and energy testing, internal resistance testing)
- 2 Increase number of batteries going into second life
- 3 Improve accuracy of assessment of suitability for second life and safety risks
- 4 Streamline allocation to suitable second-life application (high-cycle vs. low-cycle applications)
- 5 Facilitate the calculation for economically more viable route (re-use/repurpose vs. recycling) by considering the material value of the battery

1. As deep dive focuses on EV batteries, only those required for EVs listed  
 2. Such that a gradient of State of certified energy (SOCE) or capacity fade could be derived, to detect the “knee point” (where the state of health of the battery starts declining rapidly)

### ③ The residual value determination improvements enabled by the battery passport data lead to economic, social and environmental benefits

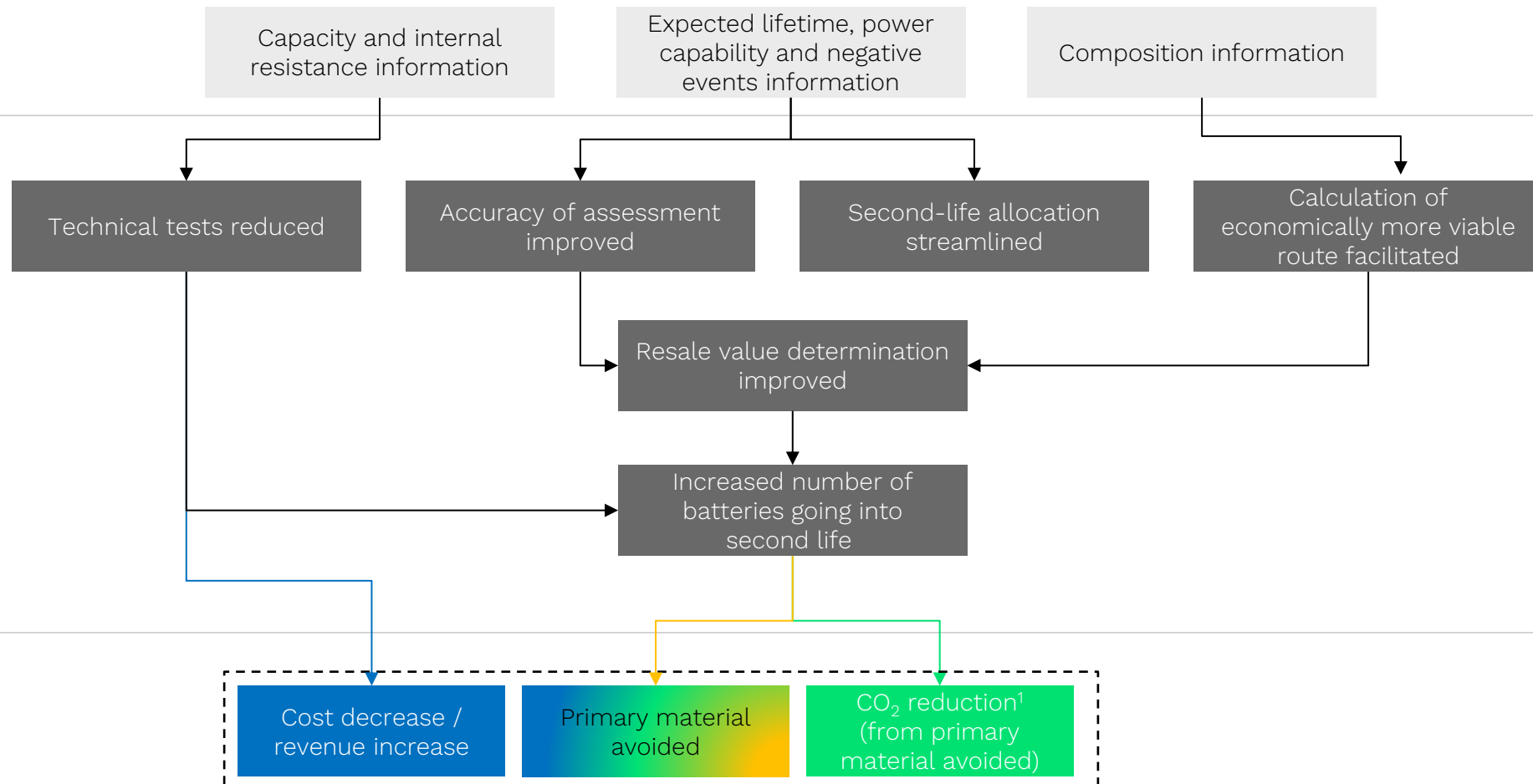
#### Overview on process improvements and resulting impacts

■ Economic impact ■ Social impact ■ Environmental impact □ Quantified

**Data availability**  
from battery passport

**Process improvements**  
through data availability





**Impact dimensions**  
from process  
improvements





# The quantification models the residual value determination process for three different battery sourcing scenarios and respective information availability

## Quantification modelling approach

 <b>Scope</b>	<ul style="list-style-type: none"> <li>Battery application: First life electric passenger vehicles (BEV), second-life: stationary battery energy storage system (SBESS)</li> <li>Geography: Europe (EU27, Norway, Iceland, Switzerland and United Kingdom)</li> <li>Timeframe: 2037-2045 (with the battery passport being required from Feb 2027, the respective batteries will reach the end of their first life in 2037 with an average lifetime of 10 years assumed)</li> </ul>				
 <b>Level of analysis</b>	<ul style="list-style-type: none"> <li>Cost and revenue on process-level (micro): <b>single battery/module for procurement incl. technical testing costs</b></li> <li>Primary material avoided and associated CO<sub>2</sub> reduction on system-level (macro): <b>parameters aggregated on EU-level</b></li> </ul>				
 <b>Scenarios</b>	<ul style="list-style-type: none"> <li><b>Baseline scenarios:</b> <ul style="list-style-type: none"> <li>Inhouse sourcing: battery information available via BMS (e.g. first life OEM is also second-life operator)</li> <li>Direct sourcing: some battery information provided (e.g. partnership with OEM)</li> <li>Indirect sourcing: no reliable battery information available (e.g. open marketplace)</li> </ul> </li> <li><b>Battery passport scenario</b> (based on below improvement potentials)</li> </ul>				
 <b>Improvement potentials</b>	<p><b>Improvements with directly measurable impacts on baseline costs and material avoidance</b></p> <table border="0"> <tr> <th>Modelled</th><th>Not modelled, but additional benefits prevalent</th></tr> <tr> <td> <ul style="list-style-type: none"> <li>✓ Testing effort reduced</li> <li>✓ Increase in batteries going into second-life</li> </ul> </td><td> <ul style="list-style-type: none"> <li>× Accuracy of assessment increased</li> <li>× Allocation to suitable second-life application streamlined</li> <li>× Calculation for economically more viable route facilitated</li> </ul> </td></tr> </table>	Modelled	Not modelled, but additional benefits prevalent	<ul style="list-style-type: none"> <li>✓ Testing effort reduced</li> <li>✓ Increase in batteries going into second-life</li> </ul>	<ul style="list-style-type: none"> <li>× Accuracy of assessment increased</li> <li>× Allocation to suitable second-life application streamlined</li> <li>× Calculation for economically more viable route facilitated</li> </ul>
Modelled	Not modelled, but additional benefits prevalent				
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# Under the battery passport scenario, technical testing costs are reduced, and the batteries re-used for a second-life application increased

SIMPLIFIED

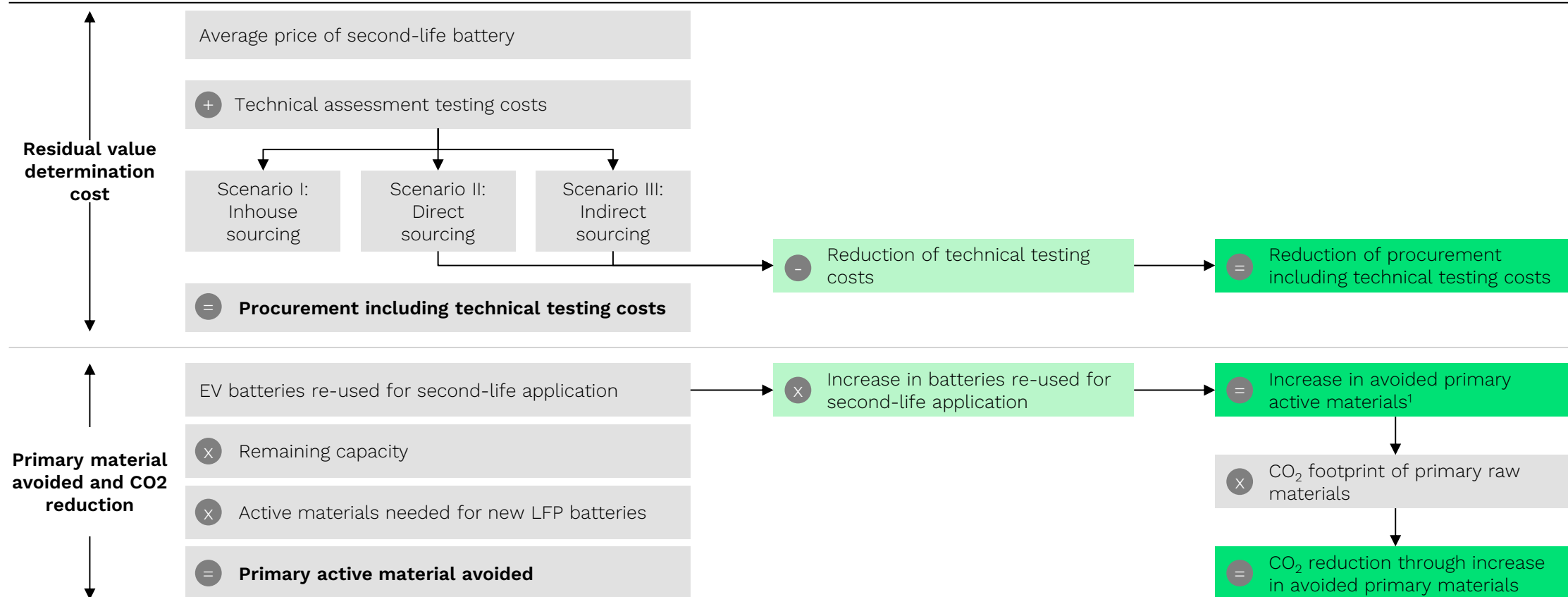
Input

Improvement potentials

Outputs

## Baseline scenario

## Battery passport scenario



# The battery passport could lead to a reduction of technical testing costs and thereby increase the number of batteries going into a second-life application

## Lever description



### Reduction of technical testing costs

- Access to detailed (historical) information on battery capacity and energy as well as internal resistance, could reduce costs associated with technical tests required to assess battery suitability for a second-life application, especially for independent second-life operators that do not already have access to this information through the BMS.

## Assumptions

- ↓ 100% reduction of capacity and energy testing
- ↓ 100% reduction of internal resistance testing

## Required conditions

- Standardised and reliable performance and durability data on the battery passport that are accepted in second-life certification procedures to assess suitability for reuse



### Increase in batteries going into a second-life application

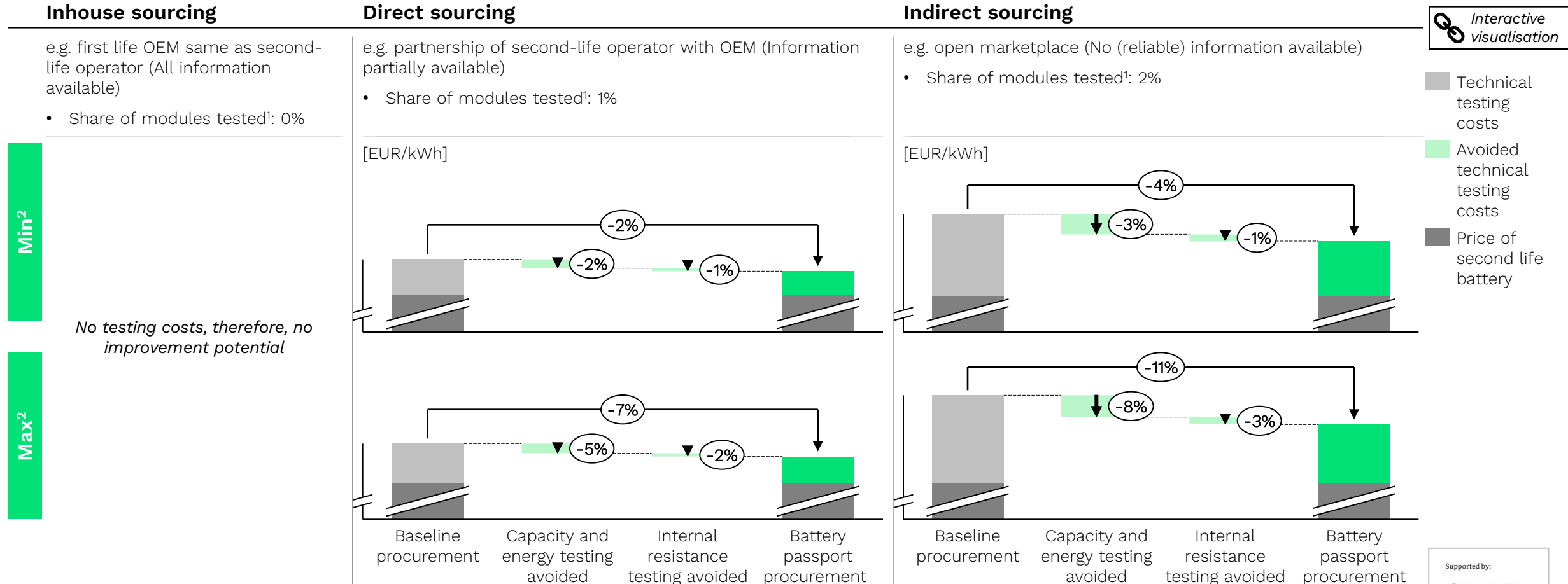
- We estimate that reducing technical testing costs could lead to an increase in batteries going into a second-life application, as this supports their economic competitiveness compared to new batteries.

- ↓ 0.4 % - 3.4 %<sup>1</sup> more batteries going into a second-life application

- End-of-life EV batteries substituting new LFP batteries for stationary battery energy storage

# The cost reduction depends on the testing needs in the different scenarios; we estimate that ~ 2-10% of the procurement including technical testing costs could be reduced

Micro perspective: Baseline procurement incl. technical testing costs for three different battery sourcing scenarios and reduction enabled by the battery passport



## Excursus: Though innovations lead to reduced material demand and increased energy efficiencies, repurposed batteries are more environmentally beneficial than new ones

### Is a second life always more sustainable?

The environmental footprint of batteries varies depending on their chemistry

➤ **It needs to be considered what type of chemistry is being substituted.**

Furthermore, battery impacts could be mitigated by:

- (a) Extending their lifespan through reusing and repurposing
- (b) Innovations reducing material demand and increasing efficiency

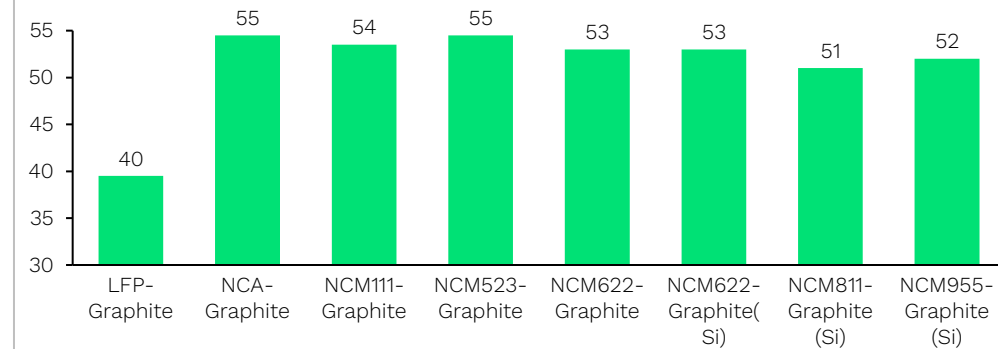
A recent study<sup>1</sup> investigates whether technological innovations may alter the current waste hierarchy, emphasising repurposing over recycling, as this could enable retired batteries to promptly supply constituent materials for use in low-material demand, higher-performing batteries:

- Life Cycle Assessment of 24 scenarios in total, covering changes in cathode chemistry, anode material, and recycled content for new and retired electric vehicle lithium-ion batteries
- Examines the environmental impact of two end-of-life management routes:
  - a) Recycling the battery immediately after its first use to create a new, less material-intensive battery
  - b) Repurposing the battery for stationary storage followed by recycling

➤ **Repurposing end-of-life lithium-ion batteries is generally more environmentally beneficial than manufacturing a new battery for the same stationary use. However, recycling immediately could be preferable in certain scenarios, especially with decreased cycling efficiency.**

**Cradle-to-gate emissions of cell production in Europe by battery chemistry in 2020**

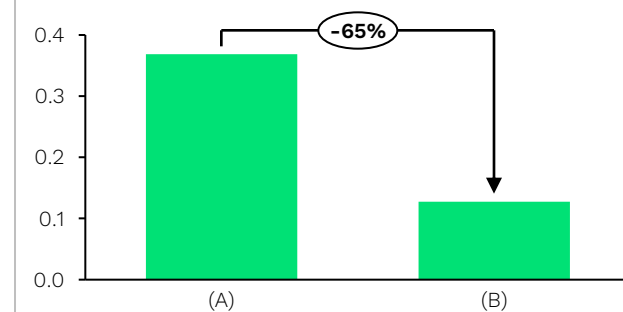
[kg CO<sub>2</sub> eq/kWh capacity]



Adapted from Xu et al. (2022)

**Comparison of cradle-to-grave emissions of one scenario**

[kg CO<sub>2</sub> eq/1 kWh cycled]



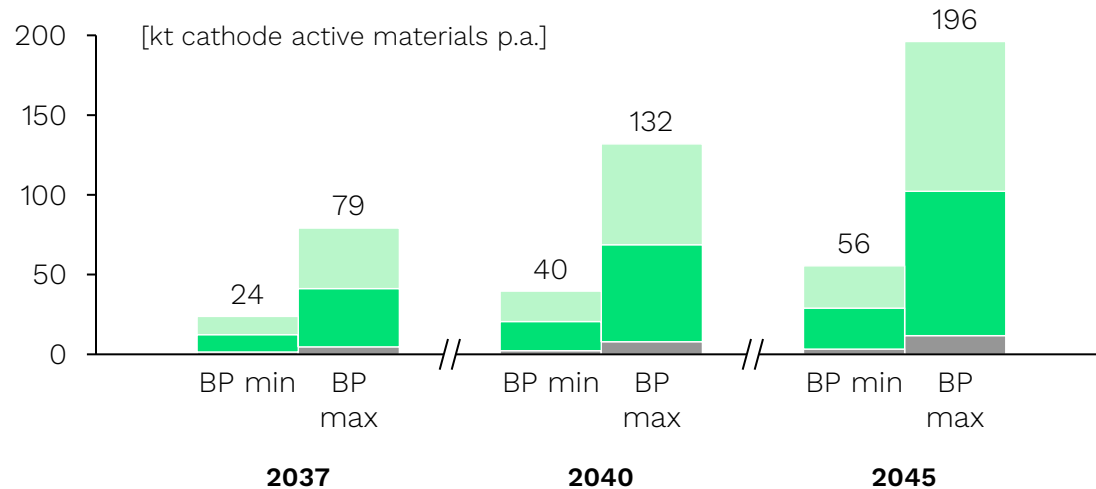
Adapted from Dunn et al. (2023)

# The estimated increase in batteries going into a second-life could fulfil ~ 6-20% of demand for stationary battery energy storage and reduce carbon emissions

Macro perspective: Primary raw materials avoided and CO<sub>2</sub> reduction through primary materials avoided on the European market

## Primary raw material avoided

Due to the decrease of technical testing costs, **we estimate a proportional increase in batteries going into second-life of 0.4-3.4%**, this **leads to ~ 60-200 kt of primary cathode active materials that could be avoided** annually by 2045 when these batteries substitute LFP batteries (e.g. for stationary battery energy storage).

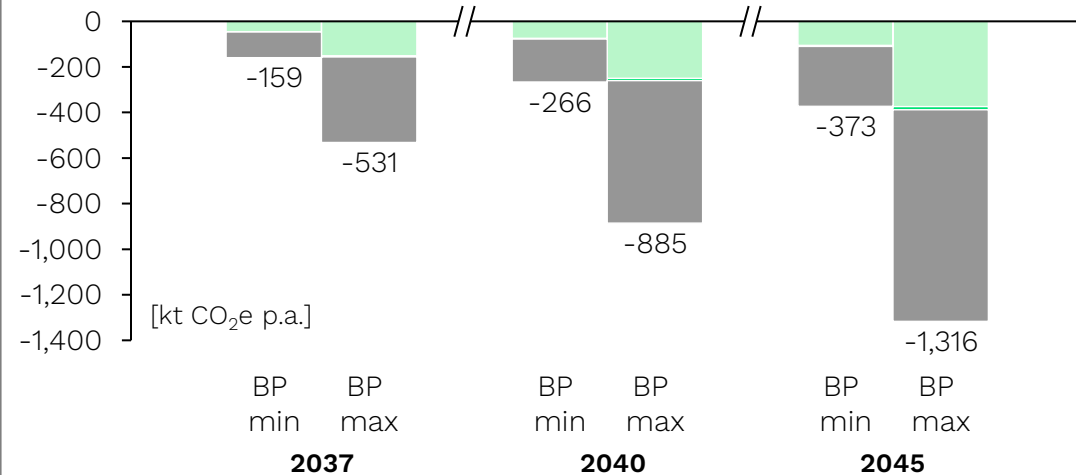


Source: Systemiq analysis (2024), active material intensity based on IEA (2023a) and Leader et al. (2019) see technical annex on slides 133-135 for main assumptions and their sources

This could fulfil ~ 6-20 % of demand for stationary battery energy storage in Europe.<sup>1</sup>

## CO<sub>2</sub> reduction through primary materials avoided

Based on the primary raw materials avoided, we estimate that **between ~ 370 and 1300 kt of CO<sub>2</sub> eq. could be reduced** annually by 2045.



Source: Systemiq analysis (2024), emission factors based on Ecoinvent (2024), cut-off cumulative LCIA v.3.91.1, see technical annex on slides 133-135 for main assumptions and their sources

This **reduction is mainly caused by avoided primary lithium**, which has by far the highest carbon footprint of the three active materials in LFP batteries.

1. Assuming max recovery rates for Ni, Co, Mn (98%) and Li (90%) as per Argonne National Laboratory EverBatt (2023). Reduction of contamination due to battery passport info yields additionally recovered materials, expressed as % of the difference between max technically possible recovery rates and battery regulation material recovery rate targets.
2. This graph does not include any general decarbonisation pathways.



## Chapter 4: Benefits

- Overview
- Direct use cases
- Potential use cases



# Potential use cases could be enabled provided certain conditions are in place which would go beyond current regulatory requirements

## Conditions required beyond regulatory requirements...



## ...to enable potential use cases



### Application of traceability systems for data collection

The Battery Regulation and passport data requirements increase the need for reliable and credible data in upstream value chains. This could be enabled by gathering the data via traceability systems which establish proof of provenance and responsible sorting and, when complementing battery passport solutions, could unlock another use case through optimising data processing and use.

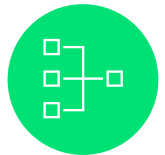
**H** Efficient data exchange and reporting based on upstream traceability



### Integration in regulated downstream processes and systems

To ensure battery collection, additional information on the downstream status as well as integration into official processes such as export control are needed. This would unlock another use case.

**I** Increased end-of-life collection



### Aggregation of data from different passports

Aggregation of data from different battery passports, solved through an EU Commission-provided infrastructure or managed by specialised service providers, could provide additional information on market or organisation level and thereby unlock further use cases.

**J** Industry benchmarking

**M** Accurate market overview

**L** Informed policy design





## Chapter 4: Benefits

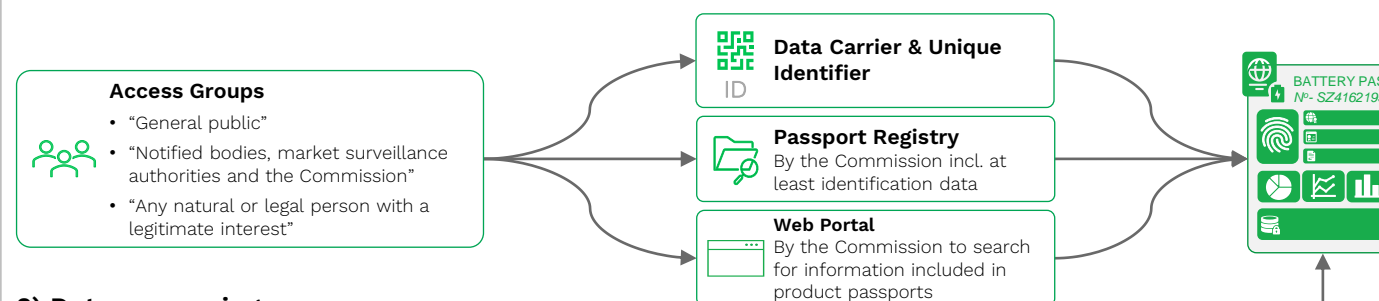
- Overview
- Direct use cases
- Potential use cases
  - Enabled by application of traceability systems for data collection
  - Enabled by integration in regulated downstream processes
  - Enabled by aggregation of data from different passports



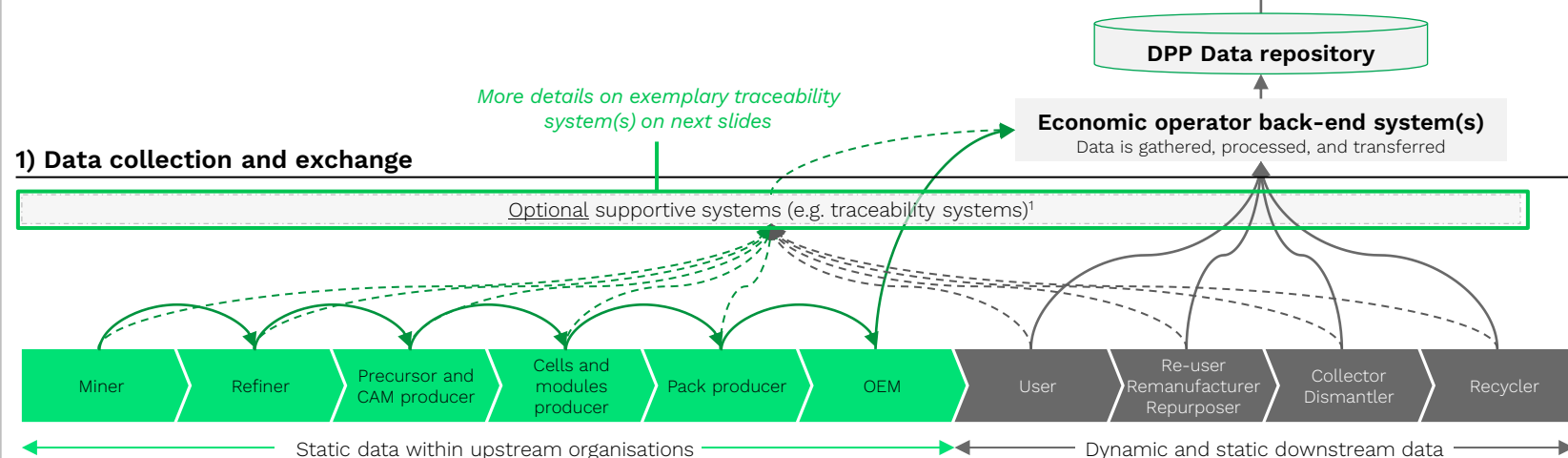
# The Battery Regulation and battery passport data requirements increase the need for reliable, trustworthy, and consistent data flows in upstream value chains

- The EU battery passport **requires information** from the upstream value chain
- Today, the **upstream value chain is often opaque** to a battery manufacturer
- For ESG metrics, the battery manufacturer must **rely on claims of direct suppliers**
- Article 49 of the Battery Regulation defines the establishment and operation of a **system of control and transparency**, which could be realised with a traceability system
- The application of traceability systems fosters the **digitalisation** of the complete upstream value chain
- This leads to **higher reliability** of data gathering since data will be collected automatically
- Based on all information, cross-referencing (e.g. mass-balance) is possible that allows further **verification and validation** of data that leads to higher data quality
- The additional information allows economic operators **better assessments of potential risks**, which leads to better risk mitigation strategies and, finally to more resilient supply chains

## 3) Data access



## 2) Data processing

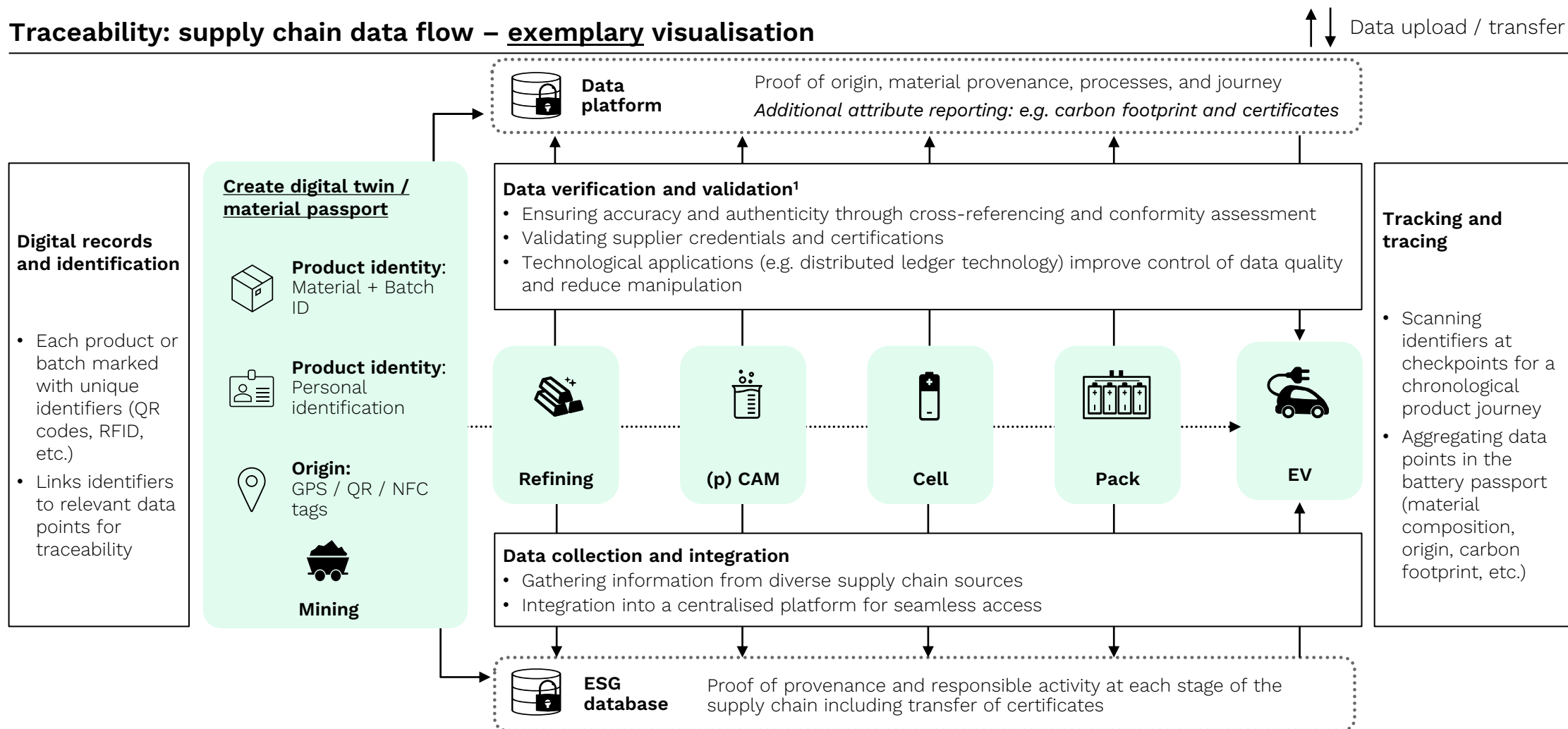


## 1) Data collection and exchange

1. Traceability systems are optional supportive systems for the collection of battery passport data along the supply chain. Note that other means to collect supply chain data may be applied for achieving EU battery regulation compliance (e.g. reverse reporting).

# Traceability systems could enable this upstream data collection verifiably and could complement battery passport solutions, if data and systems are interoperable

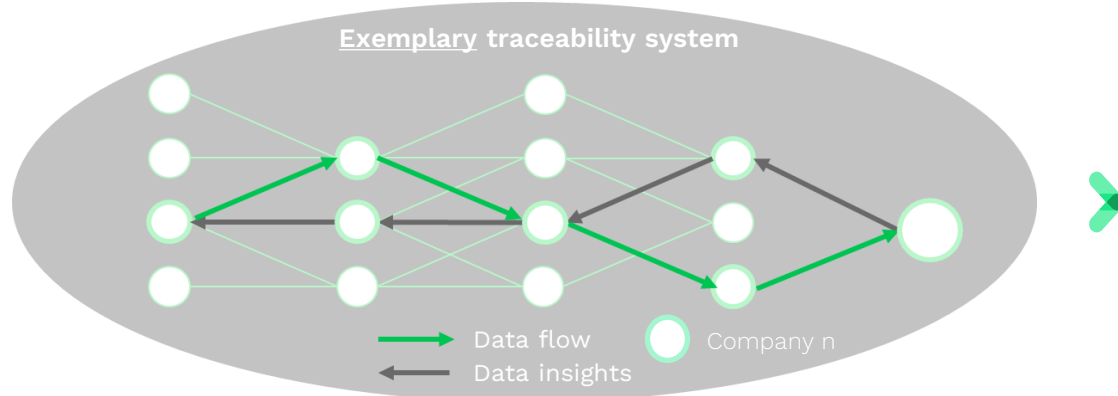
## Traceability: supply chain data flow – exemplary visualisation



# Upstream data collection through traceability and other data exchange systems could unlock a potential passport use case through optimising data processing and use

## A traceability system enables the productive use of data by facilitating data collection and verification

### HOW



### Purposes and configurations of traceability systems

- **Digital chain of custody:** Guarantees correct accounting and corroborates a link between ingoing content, e.g. "sustainable" "recycled" by harmonised definitions, and the final outgoing product
- **Carbon tracing:** Enables standardised exchange of carbon emissions data between organisations and accounting solutions
- **Geographical material and component tracking:** Traces materials and components along the value chain up to the point of provenance

### WHY

#### Mechanisms unlocking benefits

- Improving company-specific data availability in upstream supply chains
- Creating credibility and reliability of data through verification procedures
- Establishing systems for peer-to-peer data exchange and data relationships
- Connecting upstream data to company systems (e.g. procurement ERPs)
- Big data analytics across supply chain indicators and attributes

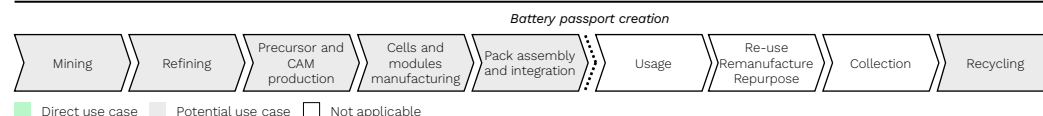
#### Benefits of data collection and exchange

- Trustworthy and reliable interorganisational reporting of data and certificates
- Reduction of transaction costs for data collection, aggregation, and verification
- Company-specific identification of ESG metrics and data
- Risk mitigation and supply chain resilience (advanced insights into supply chains)

# H Efficient data exchange and reporting based on upstream<sup>1</sup> traceability: traceability systems could improve the reliability and efficiency of data reporting

Level of impact: No Low Middle High

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

Companies need information about the (sustainability of the) product to comply with regulatory requirements, mitigate risks, and meet market and consumer preferences. This information needs to be requested and collected and is often not available in an interoperable, comparable and certified format.

## 2 Improvements with battery passport

Data attributes from the upstream supply chain need to be gathered and digitised for the battery passport:

- Supply chain due diligence (due diligence report), traceability or chain of custody required as per Article 49 1(d)
- Carbon footprint (in total and share per life cycle stage)
- Circularity and resource efficiency (recycled content shares)

Collecting carbon footprint and circularity data via traceability systems can enhance credibility and reliability through digital certification and verification procedures (see aforementioned slides). Interconnecting upstream traceability systems to the battery passport facilitates efficient and dynamic data reporting by enabling the exchange of company-specific data within supply chains. Reporting on other regulation such as the EU CRMA, U.S. IRA 30D tax credits and UFLPA plus India could be facilitated.

## 3 Benefits (along impact dimensions)



### Economic

- Data reporting and exchange systems could increase the efficiency of the data collection process and thus reduce cost of reporting (compared to manual reporting)
- Emerging data ecosystems that span across the supply chain could enable supplier selection and engagement strategies based on more granular, company-specific data
- Leveraging upstream traceability systems increases the quality and integrity of shared data through embedded verification procedures



### Environmental

- Company-specific and dynamic ESG information in a digital and interoperable format could support identifying hotspots and actively engage with their suppliers to reduce carbon emissions and develop material circularity strategies
- Data exchange systems and benchmarking across the supply chain enable supplier engagement strategies and supplier selection decisions
- Tracing recycled materials (e.g. through chain of custody certificates) increase the reliability of associated claims

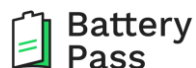


### Social

- Traceability systems (e.g. chain of custody systems) could lead to more granular transparency on the social sustainability of suppliers to manage and mitigate social risks
- Audits, verification, and validation along the supply chain improves the credibility of social sustainability claims



**Applicability to industrial batteries<sup>2</sup>:** Equally applicable for all industrial batteries



thebatterypass.eu



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1. Upstream includes the procurement of recycled materials, i.e. embedding recycled content traceability from recycler to CAM producer, the battery carbon footprint, and supply chain due diligence requirements..
2. For more information, please refer to subchapter on [slides 119-127](#)



## Chapter 4: Benefits

- Overview
- Direct use cases
- Potential use cases
  - Enabled by application of traceability systems for data collection
  - Enabled by integration in regulated downstream processes
  - Enabled by aggregation of data from different passports



## The battery passport could offer a solution to solve the difficulties in tracking the whereabouts of batteries downstream and thereby increase collection

### Today it is difficult to track the whereabouts of batteries

- The battery passport, as required by the EU Battery Regulation, does not require any information on when and where a battery was recycled or if it was exported
- The regulation specifies reporting requirements for producers and waste management operators on the number of batteries placed on the market as well as treated to the member states authorities, which then report to the Commission
- However, there is no direct link between the reported quantities of batteries placed on the market and treated,<sup>1</sup> potentially leading to discrepancies, especially when batteries are sold in one member state and recycled or exported in another
- In existing tools that monitor the raw materials in the battery value chain, such as the RMIS developed by the JRC, information on the whereabouts within the member states are not yet included, and exports are assumed to be zero as they cannot be quantified
- To ensure absolute collection, it is essential to have precise information about the location and quantities that could be collected

### The battery passport could provide a solution

Certain conditions are needed

- Additional data attributes to be able to track the downstream status of the battery (recording export and recycling locations)
- Automated integration of the battery passport in regulated downstream processes such as customs control for exports, as already proposed by the ESPR<sup>2</sup> yet mainly targeting imports, and market surveillance processes
- Integration into required administrative procedures, such as vehicle de-registration for the example of EV batteries as the largest amount, yet a similar solution still needs to be found for industrial and LMT batteries where no de-registration is required

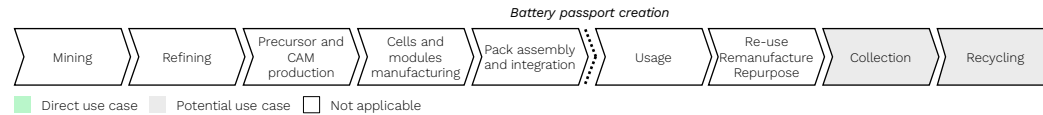
The battery passport could also be incorporated in future reviews and improvements of waste legislation

1. For more information on reporting to authorities and battery status, please refer to the Battery Pass consortium Content Guidance (2023a, p. 40, p. 68)  
2. Council of the European Union (2023) (ESPR, Art. 13) proposes an interconnection of the DPP registry with the EU Customs Single Window Certificates Exchange enabling automated exchange

# I Increased end-of-life collection: Additional information could aid in preventing battery leakage by leveraging the passport for export control and market surveillance

Level of impact: No Low Middle High

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

Currently, around a third of passenger vehicles leaving European roads are in “unknown whereabouts” due to illegal or opaque exports or undocumented EOL treatment. With an increasing share of EVs in the European fleet, this poses a significant risk of losing valuable battery materials from the European market (battery leakage).

## 2 Improvements with battery passport

This use case is enabled through the integration of the battery passport into regulated downstream processes – specifically under the following conditions:

- Integration of battery passport into de-registration, export control and market surveillance processes
- Using the information on the state of health to support the differentiation between end-of-life vehicle and used vehicle<sup>1</sup>
- Reporting of additional information in the passport:
  - Amend “battery status” by “exported” and “recycled”
  - Indicate the “name of authenticated exporter” and “name of authorised recycling facility” as well as the “battery owner”
  - Add the “date of export” and “date of recycling treatment”

## 3 Benefits (along impact dimensions)

Leveraging the battery passport for formalising de-registration, export control and market surveillance could lead to:



### Economic

- Increased material availability in the regional market which leads to higher revenues for recycling companies
- Improved oversight that contributes to a level playing field for EU-based battery recyclers
- Increased availability of secondary material from the regional market which reduces cost for battery producers vs importing primary material from outside the EU



### Environmental

- A higher and formal collection of batteries that increases the regional availability of material for recycling and thereby reduces the environmental impact since replacing primary by secondary material and avoiding inferior EOL treatment
- Fewer exports to regions with a lack of proper waste management, thus reducing local contamination



### Social

- A reduction of illegal and inferior recycling practices, that often involve unsafe methods like open burning, therefore enhancing public safety and health



**Applicability to industrial batteries<sup>2</sup>:** Less applicable for all industrial batteries



**Separate analysis with differences for LMT batteries<sup>3</sup>**





## Chapter 4: Benefits

- Overview
- Direct use cases
- Potential use cases
  - Enabled by application of traceability systems for data collection
  - Enabled by integration in regulated downstream processes
  - Deep Dive: ① Increased end-of-life collection
  - Enabled by aggregation of data from different passports

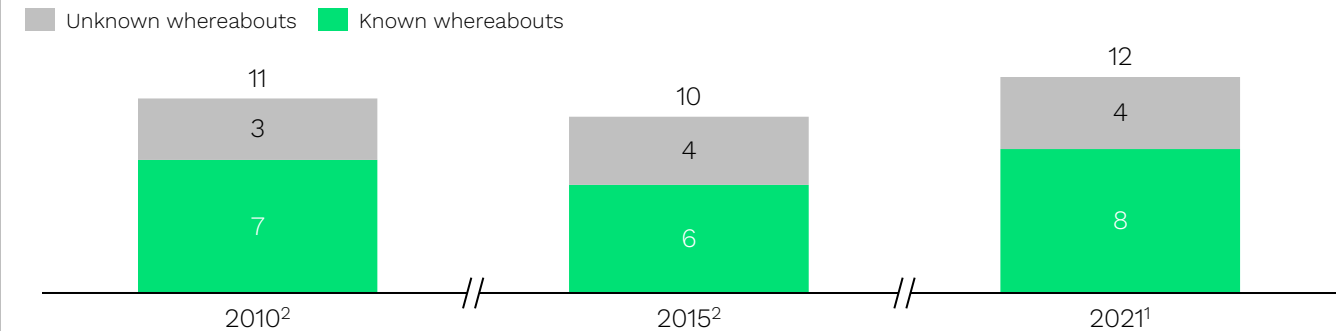


# Introduction: Vehicles (incl. their batteries) leaving Europe with unknown whereabouts are an environmental and safety threat and a waste of resources particularly for recycling

## EU vehicles with unknown whereabouts

- Around a third of passenger vehicles leaving European roads are in “unknown whereabouts” (uncertainty about whether the vehicle was handled by an (un) authorised recycling facility or exported<sup>1</sup>)
- The reasons range from:
  - Illegal treatment and export mainly caused by profits from sale of spare parts and metals<sup>2</sup>
  - Unclear differentiation between used vehicles and end-of-life vehicles leading to illegal exports of end-of-life vehicles
  - Undocumented treatment in authorised facilities
- The impact is substantial incl.:
  - Environmental pollution
  - Safety hazard
  - Resource waste
  - Lack of material available for recycling

## Number of passenger vehicles leaving European roads by whereabouts status<sup>1,2</sup> in mn



## Relevance for electric vehicle (EV) batteries

- Missing EVs incl. their batteries result in regional loss of critical materials, such as cobalt, nickel, lithium, manganese and graphite
- Waste batteries may become a burden in markets without the capacity and infrastructure for safe and effective treatment<sup>3</sup>

 Issue of illegal exports and dismantling is similar for other battery types (e.g. waste from electrical and electronic equipment)<sup>4</sup>

## Excursus: The draft revision of the End-of-Life Vehicle Directive aims to tackle the issue of unknown whereabouts – the battery passport could support this objective

### Draft revision of the End-of-Life Vehicle Directive (“Circular Vehicles Regulation”)<sup>1</sup>

Measures to reduce unknown whereabouts



- Circular design: Call for a **circularity vehicle passport**
- Increased and smarter collection:
  - Harmonised reporting for vehicle registration (incl. de- and re-registration) in the EU via the “MOVE-HUB” electronic system
  - Dismantlers and recyclers' obligations to check and report on end-of-life vehicles (ELV) and issue a certificate of destruction (CoD)<sup>2</sup>
  - Enforceable guidelines to distinguish between ELVs and used vehicles
  - Tighter export requirements for used vehicles (roadworthiness checks) to prevent illegal export of ELVs
  - Enhanced collection of ELVs, with obligations on vehicle owners to deliver their vehicle to an authorised treatment facility
- Increased responsibility: Reinforced extended producer responsibility (for automotive OEM)



### How does the battery passport relate to this?

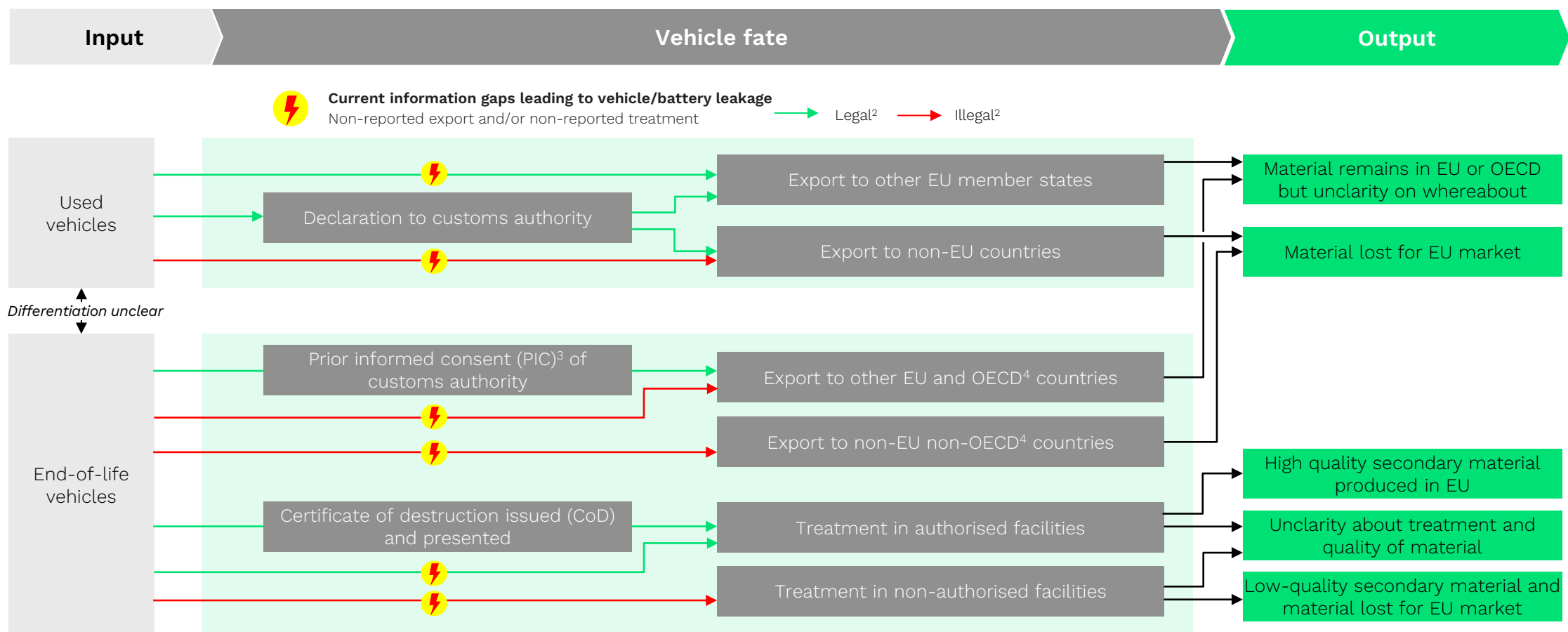


- The battery passport is already **required around 5-7 years** before the circularity vehicle passport will be implemented
- It **concerns the individual battery** that could be treated or exported **independent of the vehicle** and therefore needs to be documented separately
- Circularity information required by the battery passport could serve as a **blueprint for the circularity vehicle passport**
- The battery passport of an EV battery should ideally be **connected to the circularity vehicle passport** for as long as it is in the vehicle and support in confirming the roadworthiness of an EV
- The scope of the battery passport goes beyond EVs incl. **other applications** (industrial batteries > 2kWh and LMT batteries)

# 1 Existing information gaps for EVs currently lead to unclarity on whereabouts and treatment of the vehicle/battery, material leakage and low-quality recycling



BATTERIES WITHIN VEHICLES<sup>1</sup>

## Overview on the vehicle fate and current information gaps



1. Batteries can also be treated or exported independently from the vehicle; yet leakage of battery within the vehicle currently considered to be most relevant.
2. European Commission (2021)
3. To be obtained when exporting hazardous waste according to UN law
4. The Waste Shipment Regulation bans export of hazardous waste outside of the OECD

## 2 Integration of the battery passport into existing processes as well as additional data attributes could avoid illegal exports, illegal treatment and further non-reporting

Improvement potentials		Specifications beyond regulatory requirements...	
		 Additional data attributes	+  Integration of battery passport in process
Quantified	1 Avoid illegal exports	<ul style="list-style-type: none"><li>Amend “battery status” by “exported”</li><li>“Name of authenticated exporter”</li><li>“Date of export”</li><li>“Destination”</li></ul>	<p>Integration into <b>de-registration of used vehicles</b> and <b>export</b> control could support authorities in preventing illegal export:</p> <ul style="list-style-type: none"><li>De-registration of used vehicles: SOH accessible via the battery passport could support the differentiation between used vehicles and end-of-life vehicles (ELV) in the de-registration, only “used vehicles” eligible for export<sup>2</sup></li><li>Export control: Additional data attributes on the passport could be used for verification of export by the customs authority and facilitate automated export controls (ESPR<sup>1</sup> (Art. 13) proposes an interconnection of the DPP registry with the EU Customs Single Window Certificates Exchange enabling automated exchange)</li></ul>
	2 Avoid illegal treatment	<ul style="list-style-type: none"><li>Amend “battery status” by “recycled”</li><li>“Name of authorised recycling facility”</li><li>“Date of recycling treatment”</li><li>“Battery owner”</li></ul>	<p>Integration into <b>de-registration of ELVs</b> could support authorities in preventing illegal treatment:</p> <ul style="list-style-type: none"><li>De-registration of ELVs: Additional data attributes on the battery passport could be used to verify authorised treatment when de-registering a vehicle by linking it to the CoD that needs to be presented as a prerequisite to de-register an ELV<ul style="list-style-type: none"><li>When the battery was recycled, additional data attributes could be used to validate treatment in an authorised recycling facility</li><li>If the battery was not recycled but sold as a spare part or for a second-life, the required battery’s status options (repurposed, re-used, or remanufactured) could be used for verification</li></ul></li></ul>
	3 Avoid non-reported exports to other EU member states and non-reported treatment in authorised facilities (currently not illegal)	<ul style="list-style-type: none"><li>Same as (1) and (2)</li></ul>	<p>Integration into <b>market surveillance</b> could close further information gaps on whereabouts and fates of batteries, improving market oversight and potentially aiding efforts to increase collection:</p> <ul style="list-style-type: none"><li>The unique identifiers of the respective batteries as available on the passport could be linked to the quantities reported to the competent authorities<sup>3</sup> to identify disparities between batteries introduced to the market and those collected as waste</li></ul>

For all: Connection to circularity vehicle passport once implemented as well as integration of battery passport into future reviews of waste legislation

1. Council of the European Union (2023)  
2. Could require exception for vehicles with battery swapping technology  
3. Producer and waste management operators report to the component authorities, member states report to the Commission (see Battery Pass consortium (2023, p.42))

### ③ The process improvements result in economic, social and environmental impacts, e.g. increased supply security, recycling revenue and safety as well as reduced emissions

#### Overview on process improvements and resulting impacts

■ Economic impact ■ Social impact ■ Environmental impact □ Quantified

##### Data availability

from battery passport

##### Integration

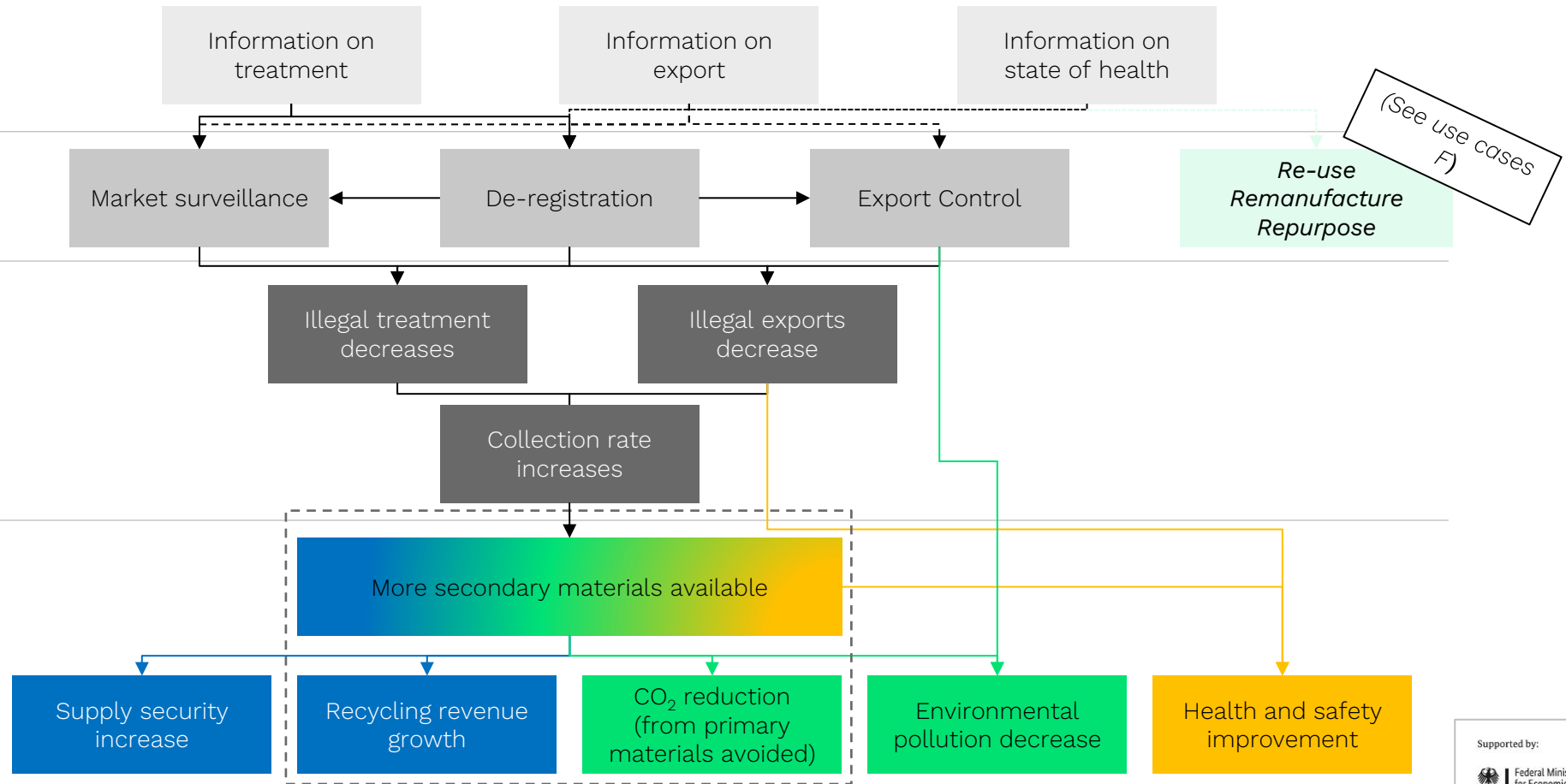
of the battery passport into existing processes

##### Process improvements

through data availability and integration

##### Impact dimensions

from process improvements



# The quantification models potential impacts from increasing the end-of-life collection of EV batteries when reducing illegal exports and illegal treatment

## Quantification modelling approach



### Scope

- Battery application: Electric passenger vehicles (BEV and PHEV)
- Geography: Europe (EU27, Norway, Iceland, Switzerland and United Kingdom)
- Timeframe: 2037-2045 (with the battery passport being required from Feb 2027, the respective batteries will reach their EOL earliest in 2037 with an average lifetime of 10 years assumed)



### Level of analysis

**System-level perspective** (macroeconomic): EV battery collection in Europe

- Secondary (active) materials additionally available in Europe [t]
- CO2 reduced by additionally available secondary materials (primary materials avoided) [t CO2 eq.]
- Revenue created by selling additionally available materials [EUR]



### Scenarios

- **Baseline scenarios** (materials lost by leakage):
  - Business as usual: Average rate of vehicles with unknown whereabouts in Europe
  - More control: Best case in Europe achieved by efficient regional policy incentives<sup>1</sup> (example of Denmark)
- **Battery passport scenario** (based on below improvement potentials)



### Improvement potentials

**Improvements with directly measurable impacts on baseline secondary material availability** in percentage ranges

#### Modelled

- ✓ Reduction of illegal exports
- ✓ Reduction of illegal treatment

#### Not modelled, but additional benefits prevalent

- × Accuracy of assessment increased
- × Reduction of non-reported exports to other EU member states and non-reported treatment in authorised facilities (currently not illegal)

# Under the battery passport scenario, secondary material is additionally available, which leads to increased recycling revenue and CO<sub>2</sub> reduction through avoiding primary materials

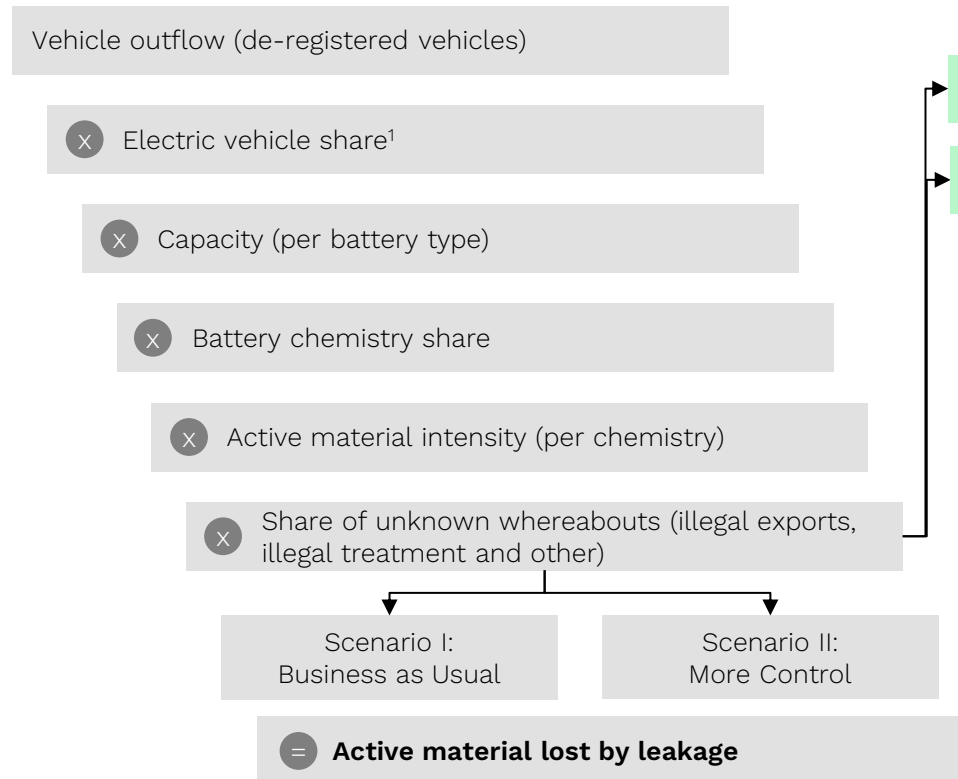
SIMPLIFIED

Input

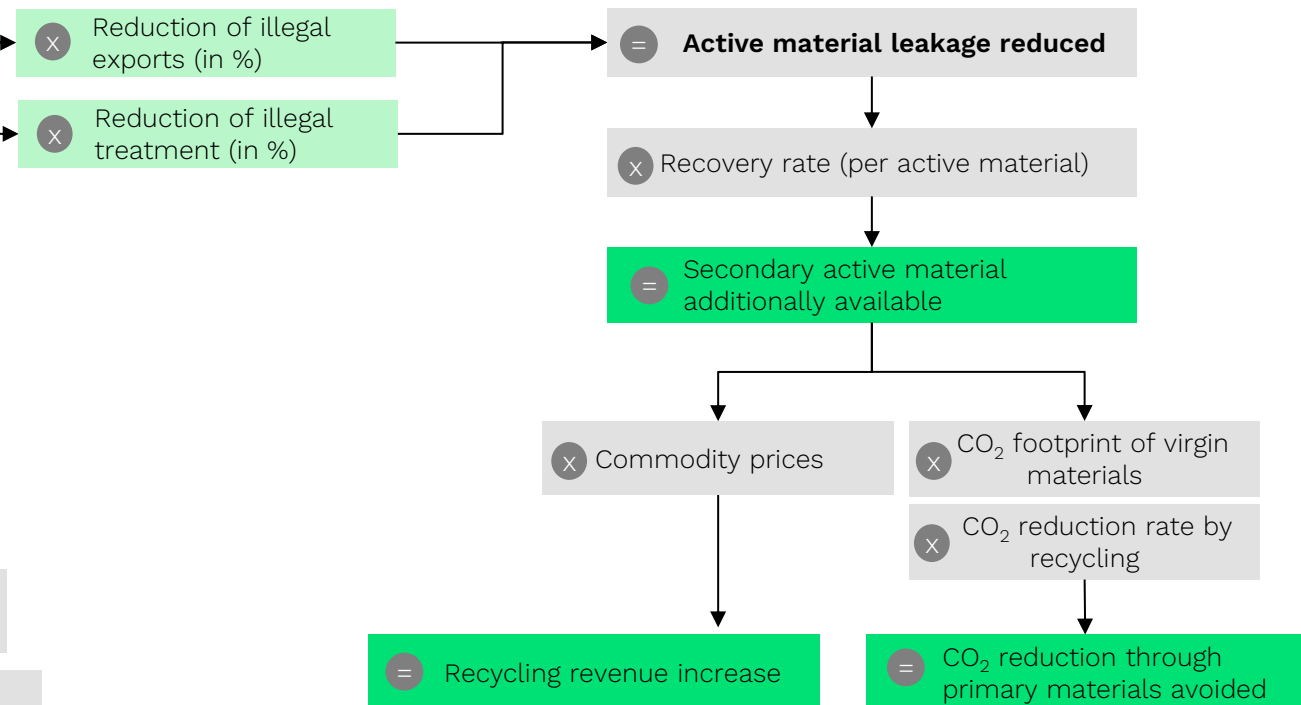
Improvement potentials

Outputs

## Baseline scenario



## Battery passport scenario





# The battery passport could have the potential to reduce illegal exports and illegal treatment under certain conditions

## Lever description



### Reduction of illegal export

- Around 40% of vehicles with unknown whereabouts are exported illegally.<sup>1</sup>
- Integrating the battery passport in the de-registration of used vehicles and export control processes could reduce illegal vehicle exports.
- (For more information, please refer to (1) on slide 94)

## Assumptions

↓ 50-80%<sup>2</sup> decrease of illegal exports

## Required conditions

- Interconnection of battery passport registry with national vehicle registration offices
- Interconnection of battery passport registry with EU Customs Single Window Certificates Exchange
- Additional data attribute on the battery passport
- Definition of a minimum SOH value for an EV to be defined as roadworthy and therefore qualify for export as a used vehicle



### Reduction of illegal treatment

- Around 50% of vehicles with unknown whereabouts are treated in non-authorized facilities.<sup>1</sup>
- Integrating the battery passport into the de-registration of ELVs could reduce illegal treatment of EVs and their batteries in non-authorized facilities.
- (For more information, please refer to (2) on slide 94)

↓ 50-80%<sup>2</sup> decrease of illegal treatment

- Interconnection of battery passport registry with national vehicle registration offices
- Additional data attributes on the battery passport
- Battery passport included or linked to CoD of vehicle

1. European Commission; Oeko-Institut (2017)  
 2. Maximum reduction assumed to be 80%, as complete elimination of illegal exports or treatment is unlikely, yet further regulation pressure will promote a significant decrease. Minimum reduction set at 50%, as example of Denmark compared to the EU has shown that policy measures could reduce the proportion of unknown whereabouts, and thus illegal exports and treatment, by around 50%.

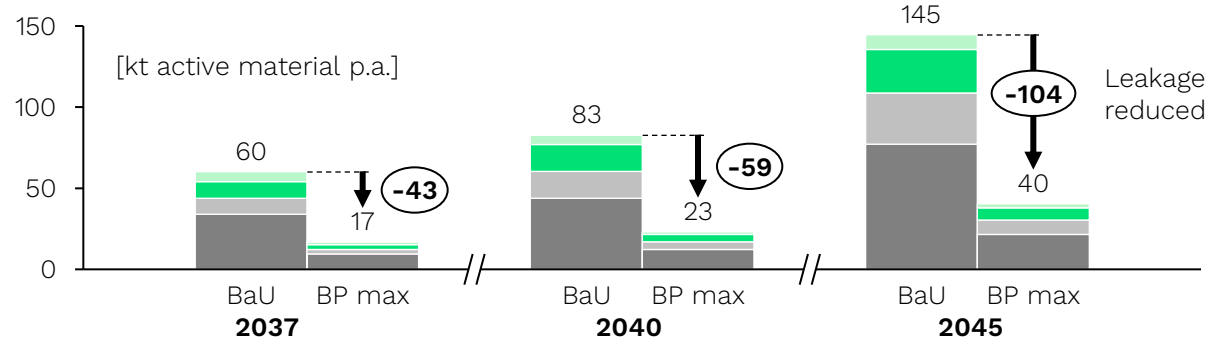
# The reduction of battery leakage through the battery passport could lead to more secondary active materials available fulfilling ~ 5-20% of passenger EV demand in 2045

Macro perspective: Materials available on the European market

## Leakage of batteries in baseline vs battery passport scenarios

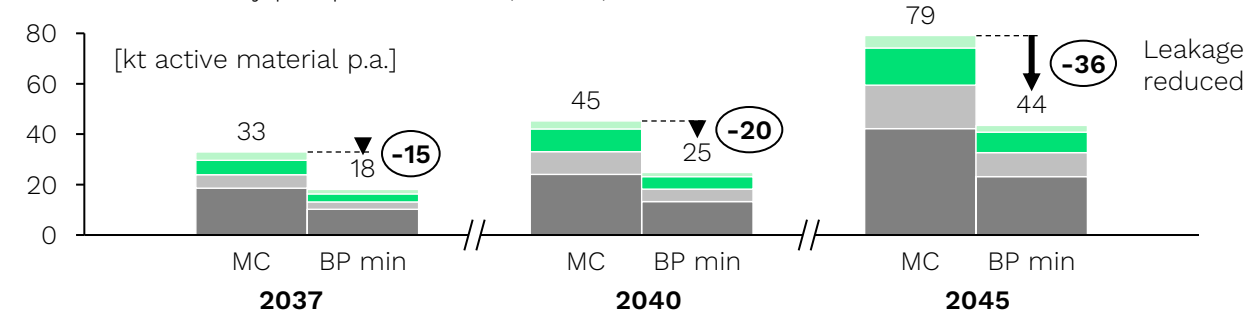
### Maximum expected reduction example:

Leakage of active material in business as usual (BaU) scenario vs. 80% reduction of illegal exports and treatment in battery passport scenario (BP max)



### Minimum expected reduction example:

Leakage of active material in more control (MC) scenario vs 50% reduction of illegal exports and treatment in battery passport scenario (BP min)

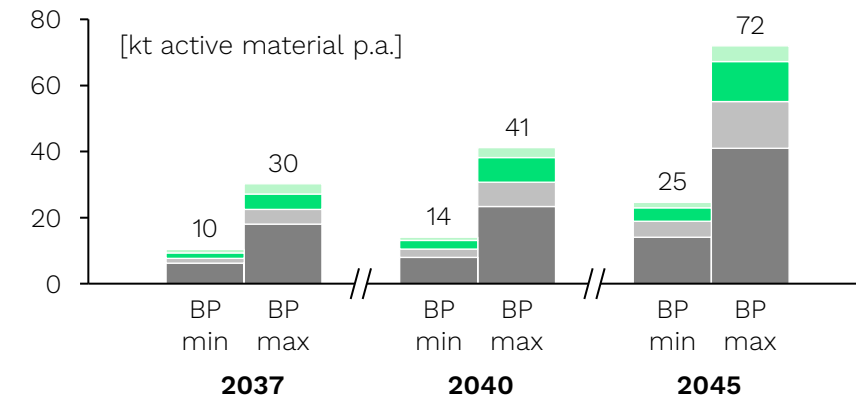


## Secondary material additionally available

By reducing the amount of battery leakage from the European market through battery passport levers, we estimate that by 2045:

- ~ 2-5 kt cobalt
- ~ 4-10 kt lithium
- ~ 5-15 kt manganese
- ~ 15-40 kt nickel

could be additionally available each year.



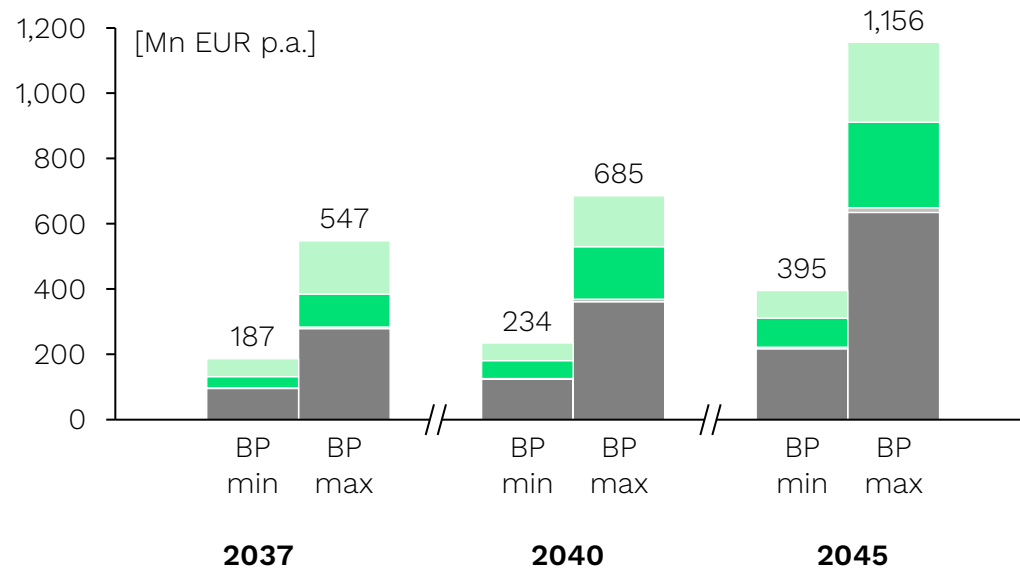
This could fulfil between 5 and 20% of the active material demand for passenger electric vehicles in Europe.

## Increased availability of secondary active material in the European market could increase recycling revenue by ~ 5-15% and reduce carbon emission by ~ 2-10%

Macro perspective: Recycling revenue increase and CO<sub>2</sub> reduction based on secondary materials additionally available on the European market

### Recycling revenue increase

Due to the additional secondary active materials available from reducing battery leakage, we estimate that **European recyclers could increase their revenue by EUR ~ 400 – 1,200 Mn each year** starting 2045.

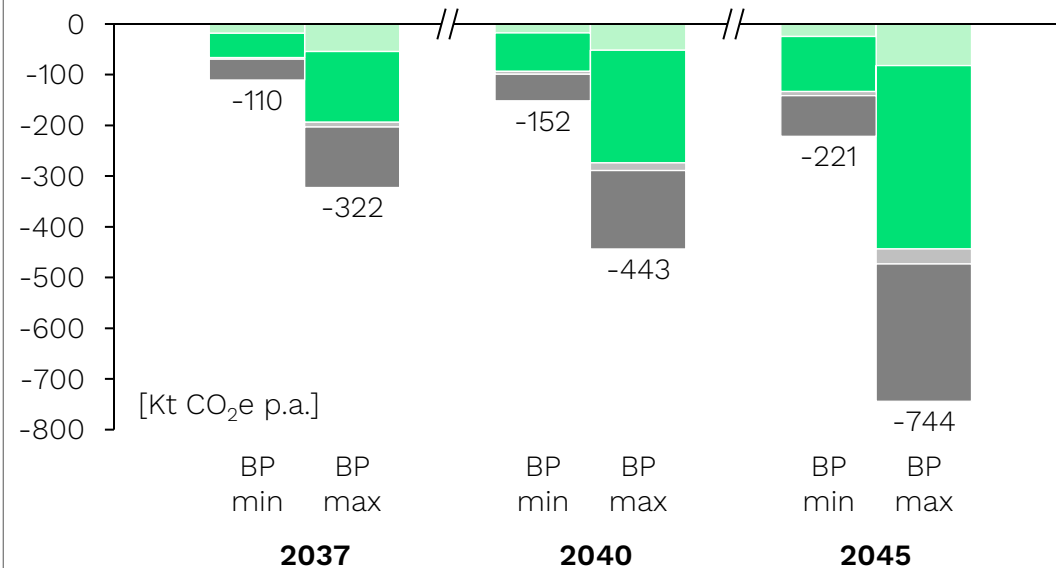


Source: Systemiq analysis (2024), commodity prices based on 5 year-averages from DERA (2023), see technical annex on slides 136-138 for main assumptions and their sources

➤ Reducing battery leakage could increase the revenue of the EU recycling market by ~ 5-15%.<sup>1</sup>

### CO<sub>2</sub> reduction through primary materials avoided

Due to the additional secondary active materials available from reducing battery leakage, we estimate that **~ 220-740 kt CO<sub>2</sub> equivalents could be reduced each year** starting 2045.



Source: Systemiq analysis (2024), emission factors based on Ecoinvent (2024), cut-off cumulative LCIA v.3.91.1, see technical annex on slides 136-138 for main assumptions and their sources

➤ Reducing battery leakage could reduce ~ 2-10% of the carbon footprint associated with the raw material extraction of active materials required to meet the demand for EV batteries.



## Chapter 4: Benefits

- Overview
- Direct use cases
- Potential use cases
  - Enabled by application of traceability systems for data collection
  - Enabled by integration in regulated downstream processes
  - Enabled by aggregation of data from different passports



# Battery passport data aggregation combines data of passports across an organisation or the market to provide additional information

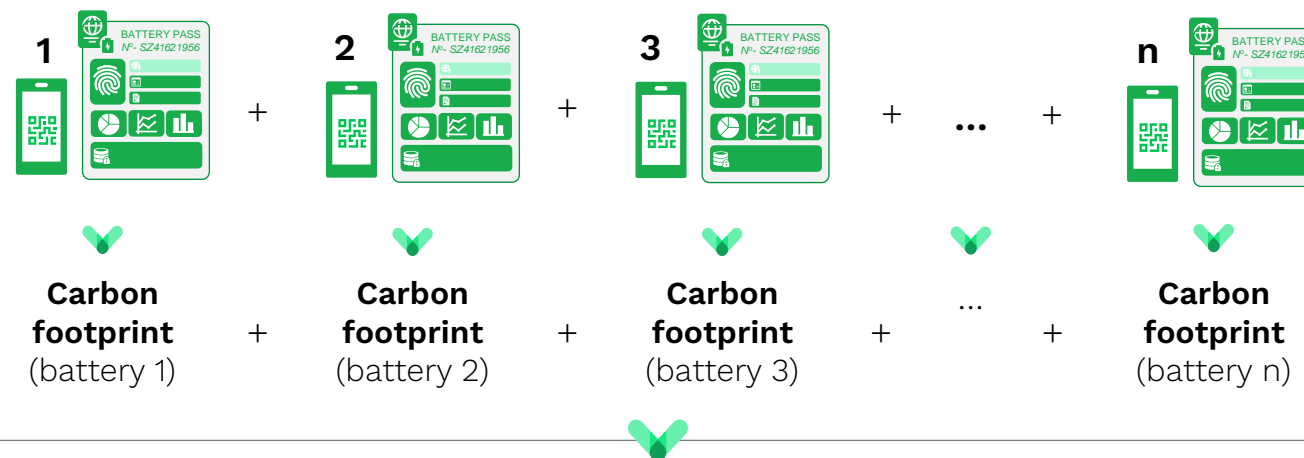
## The understanding of battery passport data aggregation

- Battery passport data aggregation is the **aggregation of static or dynamic data attributes over different battery passports**
- It is to be **differentiated from data aggregation in the battery upstream value chain**, where data is aggregated before being transferred to one battery passport
- The aggregated battery passport data could be categorised by different data attributes, e.g.
  - Battery category
  - Battery chemistry
  - Battery model
  - Manufacturing plant
  - ...



## The process of aggregating data from different passports<sup>1</sup>

Example: Battery carbon footprint



Different aggregation outputs<sup>2</sup>: e.g. average carbon footprint (battery 1, 2, 3, ..., n)

# Aggregation of data from different battery passports unlocks further use cases and could be done either on market or organisation level

## Why is the aggregation of battery passport data important?

Several use cases with significant potential are **only possible with battery passport data aggregation**

- J – Industry benchmarking
- K – Accurate market overview
- L – Informed policy design

For other, direct use cases, **battery passport data aggregation** is no precondition, but **unlocks further benefits**

- B – Informed purchasing decisions
- G – Marketplaces for used batteries

## Data aggregation level



### Market level:

All potential use cases (J, K, L) require the aggregation of data sets over different battery passports **across the entire market**. Also, use case B and G are supported by battery passport data aggregation on market level.

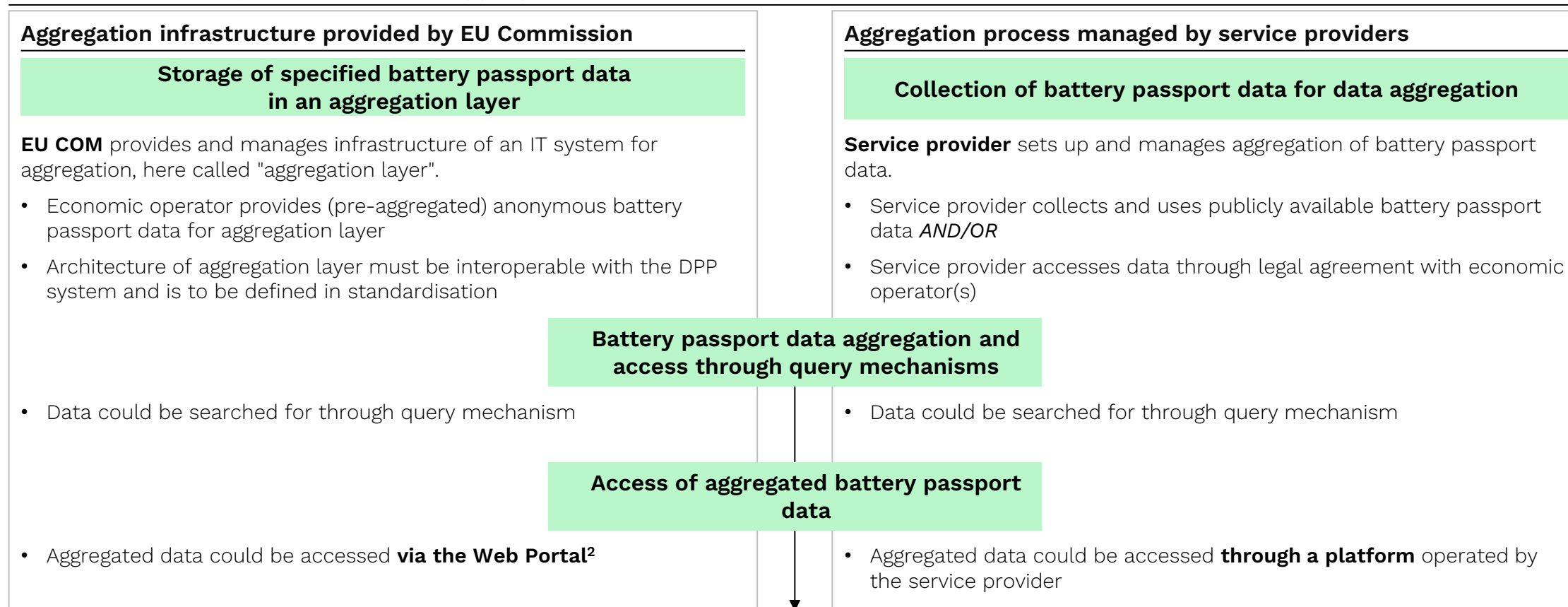


### Organisation level:

The direct use cases B and G are strengthened through the aggregation of data sets over different battery passports **across one organisation**.

# The technical implementation of data aggregation could be solved through an EU Commission-provided infrastructure or managed by specialised service providers

## How could battery passport data aggregation be technically implemented?<sup>1</sup> Two potential approaches



1. Battery passport data might be missing partially or completely (e.g. due to connectivity reasons) during (pre-) aggregation processing and calculations. This issue has to be considered and handled properly to prevent incorrect results.

2. More information on the Web Portal see [slide 112](#)

# A web portal or independent platforms could allow for the access of aggregated data on market level and depend on the access rights group

## Sourcing of battery passport data for aggregation

Aggregation of data requires access to battery passport data, which could generally be accessed via

- Data carrier and unique identifier
- Web portal

The **web portal is more suitable as data source for aggregation** as it includes searchable information of different battery passports.




Data carrier and unique identifier only provide access to the information of one individual battery passport.

### Web Portal

as described in Recital 34a and Article 12a of the ESPR<sup>1</sup>

### Independent Platforms

as defined through individual contracts between economic operators and service providers

 <b>Set-up and Management</b>	By the Commission	By service providers (economic operators)
 <b>Information</b>	Web portal should allow stakeholders to search for information (on market level) included in product passports	a) Publicly available information (on market level) OR b) Information defined by economic operator (on organisational level)
 <b>Access</b>	Stakeholders could search for information depending on their respective access rights group (as specified in delegated acts): <ul style="list-style-type: none"><li>• “General public”</li><li>• “Notified bodies, market surveillance authorities and the Commission”</li><li>• “Any natural or legal person with a legitimate interest”</li></ul>	a) Public access OR b) Access defined by economic operator

1. The Web Portal is not mentioned in the EU Battery Regulation, only in the ESPR. The Web Portal’s functioning is not described in detail. Its set-up and management lay within the responsibility of the Commission.



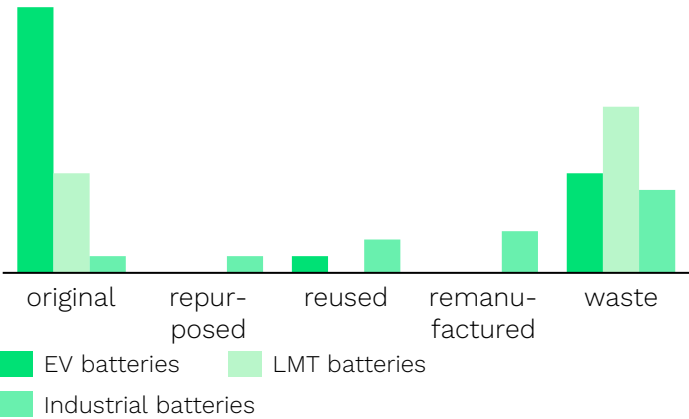
# Different aggregation outputs such as average values or distributions are possible and could be regarded with respect to e.g. the battery category, calendar year or lifetime

## Illustrative results of battery passport data aggregation

Depending on data attribute and its format, different aggregation outputs such as average values or distributions are possible. The aggregated information may be categorised per battery category (**Example 1**), the calendar year (**Example 2**) or battery age (**Example 3**), for example.

### Example 1: Battery status<sup>1</sup>

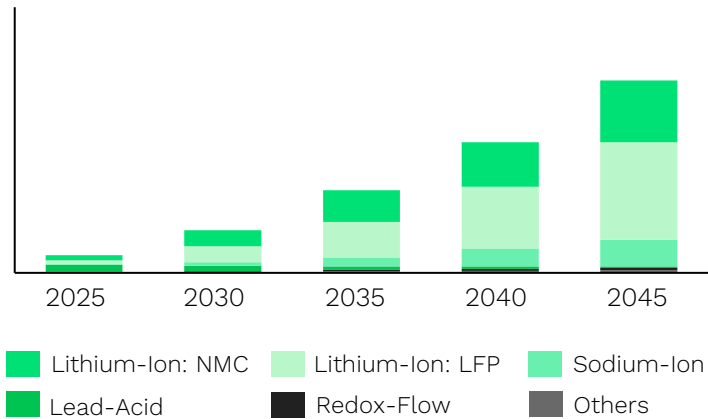
Number of batteries in the different battery status options, per battery category<sup>2</sup>



**Format:** String (text)  
**Access:** Persons with a legitimate interest and Commission (OR as defined by economic operator<sup>3</sup>)  
**Information level:** Market (OR organisational<sup>3</sup>)

### Example 2: Battery chemistry in EU Market<sup>1</sup>

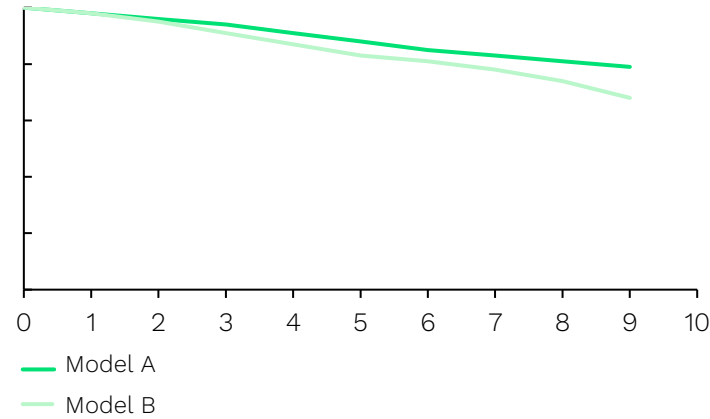
Battery mass [t] in EU market in different calendar years, per battery chemistry



**Format:** String (text)  
**Access:** Public  
**Information level:** Market

### Example 3: Remaining capacity<sup>1</sup>

SOCE [%] per battery age [years] for different battery models



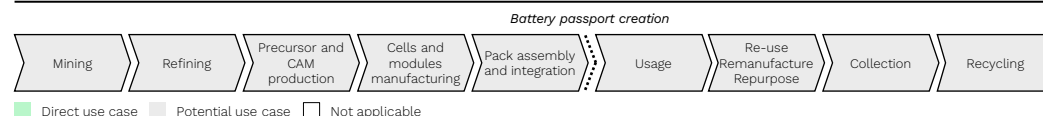
**Format:** Decimal/integer  
**Access:** Persons with a legitimate interest and Commission (OR as defined by economic operator<sup>3</sup>)  
**Information level:** Organisation

1. Arbitrary data  
2. e.g. EV batteries will be repurposed as industrial batteries that will have a battery status “repurposed”  
3. If the data aggregation process is managed by service provider and the data usage is determined by legal agreement between economic operator and service provider

# J Industry benchmarking: Data aggregated from battery passports could be used for own benchmarking purposes or to guide consumer and investor decisions

Level of impact: No Low Middle High

## Value chain in scope



## Battery passport user:

Business Authority Private consumer

## 1 Situation without battery passport

Today, reference values to compare and evaluate the battery industry, specific players and their products along several dimensions such as technical as well as sustainability performance are limited, often relying on individual company statements rather than providing a comprehensive market level overview. Rapidly changing technological advancements, particularly in emerging battery chemistries and manufacturing processes further complicate maintaining an up-to-date comparison.

## 2 Improvements with battery passport

Based on data aggregated from battery passports, reference values could be determined, and benchmarking performed. Relevant aggregated battery passport data for this use case include:

- Carbon footprint (carbon footprint as declared and performance class)
- Supply chain due diligence (information indicated in the due diligence report)
- Circularity and resource efficiency (recycled content)
- Performance and durability (rated capacity, expected lifetime, etc.)

## 3 Benefits (along impact dimensions)



### Economic

- Aggregated data on technical and sustainability performance of the industry could prompt organisations to enhance their performance for maintaining or increasing competitiveness
- By leveraging aggregated data for promoting better performing products through comparison, the respective market position could be improved, and sales and profits be increased
- Business models of benchmarking providers could draw on aggregated data



### Environmental

- Visibility of environmental performance in comparison to the market could move the entire value chain towards competing through less carbon-intensive products and an overall more environmentally friendly market



### Social

- Transparency on a battery model's social impact compared to the market could incentivise producers to implement practices and standards to decrease the social risks associated with the battery production



1



## Applicability to industrial batteries<sup>2</sup>:



Equally applicable for industrial batteries with BMS



Less applicable for industrial batteries without BMS

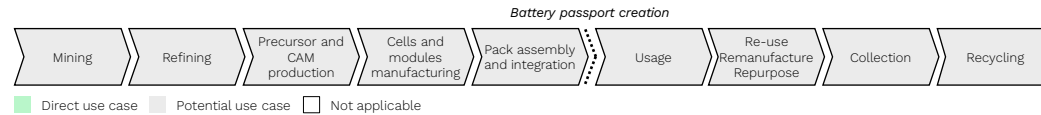
1. The battery passport connects to a Due Diligence report outlining social risks and mitigation measures by the economic operator. In contrast to the environmental indicators, this information is not easy to evaluate or compare, diminishing the effectiveness of this benefit.

2. For more information, please refer to subchapter on [slides 119-127](#)

# K Accurate market overview: Aggregated information on batteries could improve market studies and projections, aiding business planning activities along the value chain

Level of impact: No Low Middle High

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

Businesses along the entire value chain require precise planning to align resources (human resources as well as assets like plants or machines) in accordance with certain material flows. However, battery demand and downstream flows are volatile and difficult to predict. In order to strategically plan their business activities, market studies and projections are conducted, yet obtaining accurate real-world data is difficult.

## 2 Improvements with battery passport

Information aggregated from battery passports could increase the accuracy of market studies and forecasts through real-world data and thus improve the market overview needed by companies in the entire value chain for their planning activities. In aggregated form, the following data attributes provide an insight into the material flows and battery capacity on the market:

- General information (manufacturing info, battery weight, battery status)
- Materials and composition (battery chemistry, critical raw materials)
- Circularity and resource efficiency (recycled content shares)
- Performance and durability (rated capacity, expected lifetime)

## 3 Benefits (along impact dimensions)



### Economic

- Enhanced accuracy in predicting battery inflow empowers downstream businesses such as remanufacturers, collectors or recyclers to optimise their asset utilisation, thus increasing their revenue
- Real-world data on battery material flows and capacity could improve demand forecasts and thereby support upstream players such as CAM or cell manufacturers in mitigating the financial risks of the dynamic battery market and ensuring competitiveness



### Environmental

- Through an improved overview on material flows, second-life strategies are encouraged as they could become economically more profitable, which would result in extending the battery's lifetime and therefore reducing its environmental footprint



### Social

- N/A



## Applicability to industrial batteries<sup>1</sup>:



Equally applicable for industrial batteries with BMS

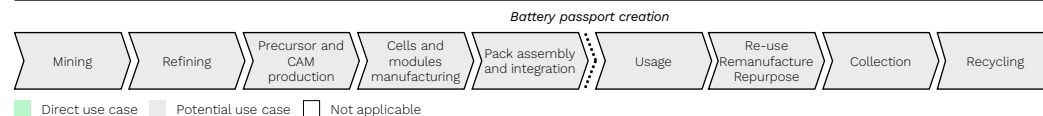


Less applicable for industrial batteries without BMS

# L Informed policy design: More accurate data on the battery stock aggregated from battery passports could support fact-based policy design

Level of impact: No Low Middle High

## Value chain in scope



**Battery passport user:** Business Authority Private consumer

## 1 Situation without battery passport

So far, regulatory institutions are missing a comprehensive overview on battery market dynamics. The EU Battery Regulation partly addresses this shortfall via its public reporting requirements, though no information in aggregated format with a link to the actual batteries currently exists. To make effective decisions and interventions in the rapidly evolving battery industry, policymakers require a consolidated and up-to-date dataset.

## 2 Improvements with battery passport

Access to aggregated data derived from battery passports could enable informed policy design. The data could provide a comprehensive overview of battery market dynamics and associated environmental and social risks. This spans various sustainability dimensions, mainly but not limited to:

- General information (manufacturing info, battery status)
- Carbon footprint (carbon footprint as declared and performance class)
- Supply chain due diligence (information indicated in the due diligence report)
- Materials and composition (battery chemistry, critical raw materials)
- Circularity and resource efficiency (recycled content)
- Performance and durability (rated capacity, expected lifetime etc.)

**Applicability to industrial batteries<sup>2</sup>:** Equally applicable for all industrial batteries

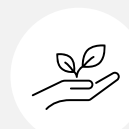
## 3 Benefits (along impact dimensions)

Aggregated battery passport data on:



**Economic**

- General information as well as material and composition would allow tracking material flows and trends, informing policies targeted at reducing dependencies on specific resources or regions and increasing supply chain resilience
- Performance and durability could support policymakers with information on available batteries for repurposing or recycling, facilitating the implementation of policies (e.g. incentive schemes) to bolster industry capacities in handling the anticipated battery volume



**Environmental**

- The carbon footprint by battery category and chemistry would enable policymakers to better specify carbon footprint thresholds and incentivise better performing battery technologies
- Battery chemistries and actual recycled content shares could enable policymakers to compare these with target values for relevant materials in place, balancing environmental objectives with market feasibility
- Performance and durability allow an assessment for setting adequate minimum requirements for batteries, increasing their lifetime and reducing the total resources used for batteries



**Social**

- The due diligence report would allow policymakers to get a clearer view on social impacts and risks, thereby improving the basis for revising social requirements such as the recognition of specific supply chain due diligence schemes



1

1. The battery passport connects to a Due Diligence report outlining social risks and mitigation measures by the economic operator. In contrast to the environmental indicators, this information is not easy to evaluate or compare, diminishing the effectiveness of this benefit.

2. For more information, please refer to subchapter on [slides 119-127](#)



## Chapter 5: Benefit differences for industrial and LMT batteries

- Analysis on differences for industrial batteries
- Analysis on differences for LMT batteries



## Two separate analyses for industrial and light means of transport batteries consider specific characteristics and benefits for the battery passport use case assessment

### Industrial batteries

- Specifically designed for industrial use;
- intended for industrial use after being prepared for reuse;
- or any other battery that weighs more than 5 kg and is neither EV, LMT, portable, or SLI battery.

### Light means of transport (LMT) batteries

- Provide electric power for traction to wheeled vehicles;
- applied in e.g. e-bikes and e-scooters;
- $\leq 25$  kg battery weight.

**Both** industrial batteries and LMT batteries **have specific market, technological, and legal characteristics that impact the battery passport value.**

**To gain a more granular understanding of the benefits** of the battery passport, extended use case assessments are carried out.

**Separate analysis of key differences in benefits of battery passport for industrial batteries**

**Separate analysis of key differences in benefits of battery passport for LMT batteries**

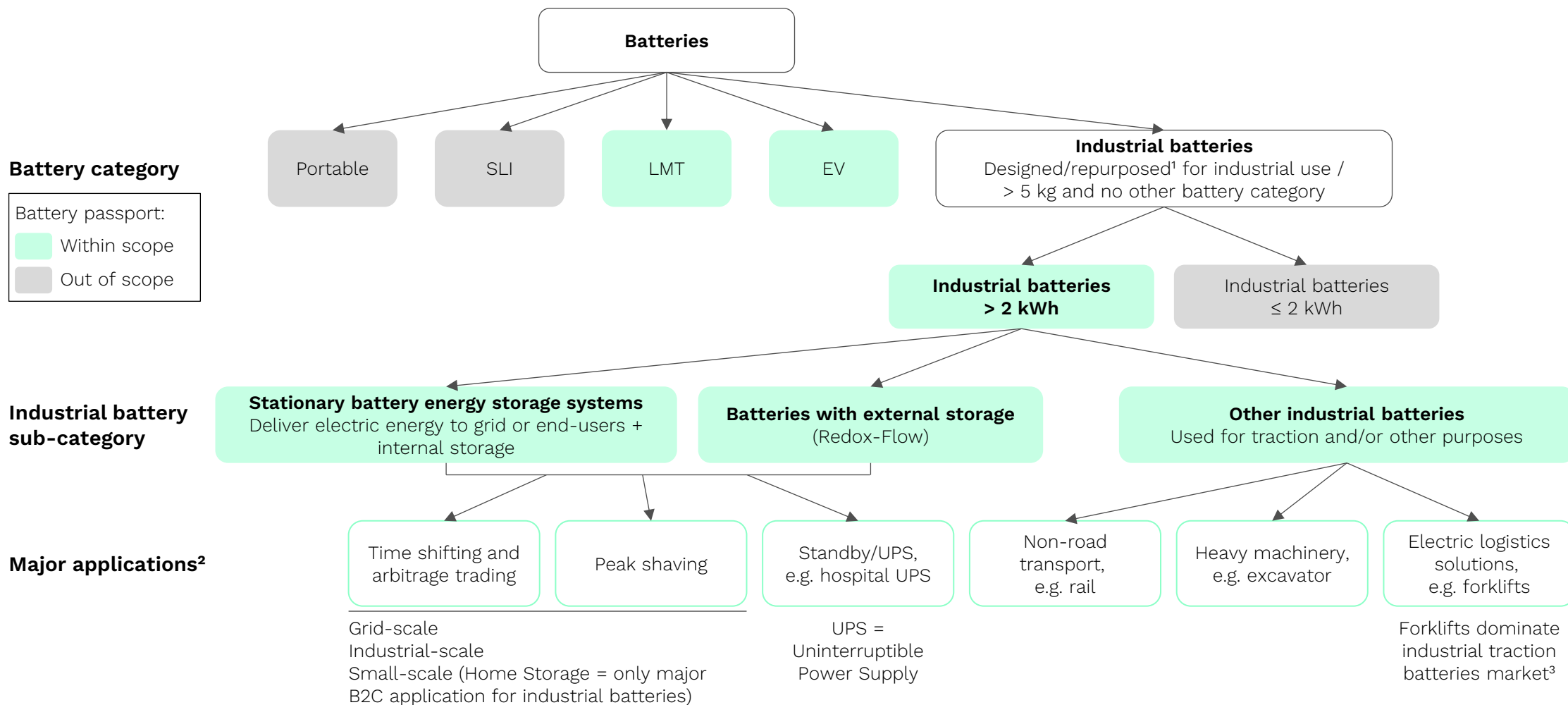


## Chapter 5: Benefit differences for industrial and LMT batteries

- Analysis on differences for industrial batteries
- Analysis on differences for LMT batteries



# Industrial batteries are characterised in different sub-categories and a broad range of applications, with varying market conditions and processes affecting the use cases



1. A number of industrial batteries may be repurposed batteries (e.g. a former EV battery is repurposed into an industrial battery). However, repurposing used industrial batteries is a less likely scenario.
2. Market conditions and processes (e.g. servicing processes) can vary among industrial batteries applications, resulting in an impact on the applicability of the overall use case assessment.
3. cf. Global Market Insights Report (2023)



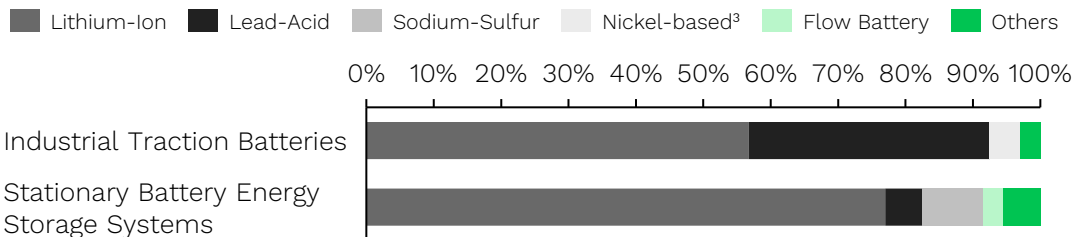
## \* Industrial batteries encompasses a broad range of battery chemistries and technologies with specific characteristics that affect the use case assessment

### Exemplary overview of diverse chemistries and technologies used in industrial batteries:

	Chemistry / Technology	Application	
		Industrial Traction	Stationary Storage
BMS	Lithium-Ion	X	X
	High Temperature	X	X
	Redox-Flow		X
	Lithium-Sulfur	X	X
	Sodium-Ion	X	X
No BMS	Lead-Acid	X	X
	Nickel-Based	X	X

Emerging chemistries

### Global market share by battery chemistry (2022)<sup>2</sup>



**Dynamic data** in the battery passport is **not available without BMS and internet connectivity**. This requires distinction of batteries with and without BMS/connectivity<sup>1</sup>.

Chemistries involve **varying characteristics and processes**, e.g. different safety aspects and recycling processes for Li-Ion and Pb-Acid.

These specific characteristics **affect the applicability of the general use case assessment to industrial batteries**

1. It is currently assumed that all batteries should have a BMS and log dynamic data. Discussions ongoing on how to handle batteries currently without BMS, e.g. monitoring-only tools for lead-acid batteries.
2. Estimation, Global Market Insights (2023)
3. In the diagram, high temperature zebra (Sodium Nickel Chloride) batteries are classified as Nickel-based.

## Excursus: Batteries with external storage differ greatly from the other battery systems, even in industrial batteries

### Characteristics of batteries with external storage

#### Definition per Battery Regulation:

“...a battery that is specifically designed to have its **energy stored exclusively** in one or more **attached external devices**.”<sup>2</sup> This type of battery relates primarily to **Redox-Flow** systems.

#### Technology

Most commonly **energy** is stored in the liquid **electrolyte** that circulates in two separately pumped circuits.

The electrolyte reacts in the cell's **membrane stack, releasing electrical energy**.

Most common **electrolyte chemistry**: **Vanadium-redox** or **zinc-bromine**.

#### System design

Usually large systems with **high capacities**.

**Capacity correlates** with the **stored** amount of **electrolyte** and **contained concentration of charge carriers** inside of the storage containers.

**Power** can be scaled **independently from capacity** through design of the stack.

#### Data availability

Due to system design, the **BMS can extract less information** than for lithium-ion batteries: Some data points can only be accurately determined by chemical sampling.

**Dynamic data** is **less relevant for safe operation** of such a system.

#### Use phase / End-of-life

The **valuable material** is the **electrolyte**<sup>1</sup> and the systems have **long lifetimes**.

E.g. the **electrolyte** in vanadium-based **batteries degrades little** during use and can be treated to restore capacity.

At EoL, some **electrolytes can be removed and re-used or recycled**.

### Effects on the battery passport

- **Several battery passport data not applicable**, in particular performance and durability data:
  - **Dynamic monitoring of resistance or capacity fade** are **less meaningful** for such systems
- **Vastly different evaluation methods** for data attributes, including definition of **system boundaries, e.g.**
  - **Performance and durability data**, e.g. remaining capacity
  - **Carbon footprint**
- **Dynamic data more scarcely available**

The differences for batteries with external storage are included in the analysis on this general level. An assessment of any deviating detail, however, is out of scope for this work.

## § The EU Battery Regulation specifies several diverging rules for the different industrial battery sub-categories that affect the use case assessment

**Article 8** **Recycled content** in industrial batteries, electric vehicle batteries, LMT batteries and SLI batteries

**Article 10** **Performance and durability requirements** for rechargeable industrial batteries, LMT batteries and electric vehicle batteries

Within the category “industrial batteries”, the **rules** in **Articles 8** and the **minimum values** laid out in **Article 10** **apply only to industrial batteries with a capacity greater than 2 kWh, except those with external storage.**

**Article 12** **Safety** of stationary battery energy storage systems

**Article 14** Information on the **state of health** and **expected lifetime** of batteries

The **rules** in Article 12 **apply only to stationary battery energy storage systems** (SBESS) and in **Article 14 only to SBESS** within the category “industrial batteries”.

**Article 7** **Carbon footprint** of electric vehicle batteries, rechargeable industrial batteries and LMT batteries

The **rules** in Article 7 shall **apply** 54 months **later for rechargeable industrial batteries with external storage** compared to all other rechargeable industrial batteries, corresponding delegated/implementing acts 48 months later.

The various industrial battery subgroups have **different requirements as to which data attributes must be reported for the battery passport** and from which point in time.

# Main characteristics for industrial batteries regarding approach to use case analysis



## Diverse industrial battery market

- Broad range of applications and (re) manufacturers
- Home storage only major B2C application
- Forklifts dominate traction market



## Broad variation of battery chemistries, two clusters

- **BMS/no BMS:** Dynamic data not available without BMS and connectivity
- Varying processes for different chemistries



## Legal requirements are heterogeneous

**Specifications in the EU Battery Regulation** for different industrial battery subgroups

### Identify within use cases scope

- **Differing market conditions and processes** for industrial battery applications
- **Lacking dynamic data** without BMS
- **Varying processes** without BMS/regarding different chemistries
- **Differing data requirements** for subgroups

### Analyse

**Impact of differences on benefits** defined for the individual use cases

### Assess

**Applicability of general use case assessment to industrial batteries**

## A separate analysis for industrial batteries shows the applicability of all use cases while highlighting differences due to technological, usage, and business characteristics (1/3)

General use case	Applicability	Key takeaway for industrial batteries specific analysis <sup>1</sup>
(A) <b>Reliable communication of ESG data</b>	<div>✓ All industrial batteries</div>	For industrial batteries, the <b>overall benefits regarding reliable communication of ESG data remain consistent</b> . In the case of <b>batteries with external storage</b> , the <b>key aspects</b> of the general use case scenario could be <b>leveraged at a later time or on a voluntary basis</b> .
(B) <b>Informed purchasing decisions</b>	<div>✓ Industrial batteries with BMS</div> <div>– Industrial batteries without BMS</div>	The <b>battery passport supports informed purchasing decisions for industrial batteries with BMS/connectivity</b> , offering analogous benefits to the general use case. <b>The applicability is reduced for industrial batteries without BMS/connectivity</b> as they lack detailed dynamic data that can inform purchasing decisions <b>after a usage period</b> .
(C) <b>Eased servicing</b>	<div>– All industrial batteries</div>	<b>Battery passport data could facilitate inhouse servicing and predictive maintenance</b> for industrial batteries. <b>Yet, benefits for servicing through independent workshops is less applicable</b> because of predefined service contracts or processes that are predominant for most industrial batteries. Moreover, <b>benefits arising from dynamic data do not apply to industrial batteries without BMS/connectivity</b> .
(D) <b>Precise risk assessment for transport of used/waste batteries</b>	<div>✓ Industrial batteries with BMS</div> <div>– Industrial batteries without BMS</div>	The risk assessment for transportation of used/waste batteries with BMS benefits from dynamic data via the battery passport independent of battery category and the <b>use case</b> is therefore <b>equally applicable to industrial batteries with BMS</b> . The <b>risk assessment of industrial batteries without a BMS</b> (e.g. Pb-acid, Ni-based) is less complex and <b>does not require dynamic data</b> via the battery passport.

1. General use case applicability to industrial batteries: 

✓ Equally applicable

– Partly applicable

✗ Not applicable

## A separate analysis for industrial batteries shows the applicability of all use cases while highlighting differences due to technological, usage, and business characteristics (2/3)

General use case	Applicability	Key takeaway for industrial batteries specific analysis <sup>1</sup>
(E) <b>More efficient recycling processes</b>	<ul style="list-style-type: none"> <li>✓ Industrial batteries with Li-Ion and emerging chemistries</li> <li>– Industrial batteries except Li-Ion and emerging chemistries</li> </ul>	The use case for <b>more efficient recycling processes</b> is <b>applicable to batteries with Li-ion or emerging chemistries independent of battery category</b> . Handling of <b>other battery chemistries</b> such as Pb-acid, NiMH or those in batteries with external storage, however, <b>do not need advanced sampling or complex dismantling</b> , so that the data contained in the battery passport offers <b>less added value</b> .
(F) <b>Simplified residual value determination</b>	<ul style="list-style-type: none"> <li>– All industrial batteries</li> </ul>	Due to more exhaustive service lives of <b>industrial batteries</b> , they are <b>rarely used in second life applications</b> . Therefore, the <b>residual value determination</b> is <b>only needed for transfer of ownership within the same application, which limits the applicability of the use case</b> . Exceptions could be heavy duty applications, e.g. in agriculture & construction. Additionally, the <b>absence of dynamic data for industrial batteries without a BMS/connectivity limits the potential of the use case</b> further for this subgroup.
(G) <b>Streamlined trade of used/waste batteries through marketplaces</b>	<ul style="list-style-type: none"> <li>✓ All industrial batteries</li> </ul>	The <b>battery passport could be leveraged for streamlined trade of used/waste batteries through marketplaces equally for industrial batteries</b> . The different handling of batteries downstream, where these batteries are typically directly recycled rather than re-used or re-purposed does not affect the benefits of their streamlined trade.
(H) <b>Efficient data exchange and reporting based on upstream traceability</b>	<ul style="list-style-type: none"> <li>✓ All industrial batteries</li> </ul>	<b>Battery passport data requirements</b> that could be <b>fulfilled through a traceability system enable a more transparent supply chain equally for all industrial batteries</b> , with negligible differences compared to the general analysis of this use case.

1. General use case applicability to industrial batteries: ✓ Equally applicable    – Partly applicable    ✗ Not applicable

## A separate analysis for industrial batteries shows the applicability of all use cases while highlighting differences due to technological, usage, and business characteristics (3/3)

General use case	Applicability	Key takeaway for industrial batteries specific analysis <sup>1</sup>
I Increased end-of-life collection	<div>–</div> All industrial batteries	For industrial batteries, <b>predetermined and monitored take-back processes</b> already result in a <b>higher collection rate</b> compared to EV batteries. Additionally, the <b>bulkiness and immobility</b> of many industrial batteries serve as <b>barriers to illegal exports</b> . Consequently, the <b>potential use case of increased end-of-life collection</b> , facilitated by additional non-mandatory information on the battery passport, is <b>less applicable to industrial batteries</b> .
J Industry benchmarking	<div>✓</div> Industrial batteries with BMS <div>–</div> Industrial batteries without BMS	<b>Aggregated data could enable benchmarking</b> of industrial batteries <b>with benefits</b> of the general use case <b>remaining consistent for industrial batteries with BMS and all static data</b> . <b>No benchmarking of detailed dynamic performance data</b> , is possible for batteries <b>without BMS/connectivity</b> , however.
K Accurate market overview	<div>✓</div> Industrial batteries with BMS <div>–</div> Industrial batteries without BMS	<b>Aggregating data</b> of battery passports <b>could enable an accurate market overview</b> equally <b>for industrial batteries with BMS</b> , with negligible variations in data availability. However, a <b>detailed market overview specifically relating to batteries' conditions</b> (e.g. state of health) is <b>not available for industrial batteries without BMS/connectivity</b> .
L Informed policy design	<div>✓</div> All industrial batteries	Almost all battery pass data attributes could contribute to this use case. <b>Overall</b> , the <b>data availability</b> deviates <b>little for industrial batteries</b> with negligible impact on the use case benefits. Therefore, <b>informed policy design enabled through aggregating passport data applies equally to all industrial batteries</b> . Given the broader variance in industrial applications, <b>additional differentiation in application-specific information would add further benefits to this use case</b> .

1. General use case applicability to industrial batteries: 

✓

 Equally applicable 

–

 Partly applicable 

✗

 Not applicable



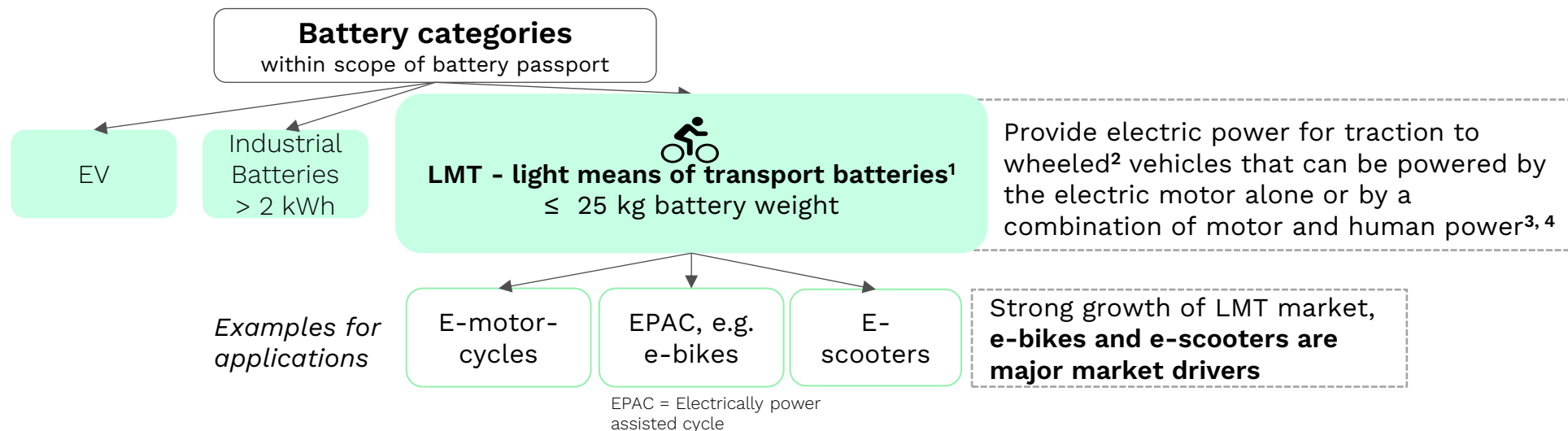
## Chapter 5: Benefit differences for industrial and LMT batteries

- Analysis on differences for industrial batteries
- Analysis on differences for LMT batteries





# Light means of transport (LMT) batteries are characterised by diverse applications and a market of diverse players and business models



## Key LMT specific market characteristics

- E-bikes are mostly **privately owned**;
- E-scooters are often offered in **shared mobility** models;
- LMT battery market is characterised by few major players, **LMT application market** is more **fragmented**.
- While **secondhand markets are expanding**, only limited use cases of second life applications are expected;
- Thefts of high-value e-bikes are increasing**, with generally low detection rates.

# The LMT market is characterised by several technological aspects that distinguish it from other battery categories



## Key LMT specific technological characteristics

### Battery Design

- **Large variety of battery designs** with broad range of number of cells<sup>1</sup> exist, typically the function follows form;
- The cell chemistry is typically lithium-ion, with a **generally lower battery value** of LMT batteries compared to EV batteries;
- LMT batteries typically account for **lower proportion of total product value** compared to EV batteries.

### Connectivity

- LMT batteries typically include a battery management system, **connectivity modules** for the use phase are **often absent**;
- Connectivity features are **primarily implemented in middle to premium market** segments.

### Digitalisation

- **Major variations in degree of digitalisation and potential for streamlining processes** in LMT industry<sup>2</sup>.

# LMT batteries and their applications are subject to specific regulations under various legal frameworks

## § Key LMT-specific legal characteristics

LMT batteries are the only battery category within battery passport scope affected by the following legal provisions:

### EU Battery Regulation

#### Article 60 Collection of waste LMT batteries

- **Producers** or designated **producer responsibility organisations** must conform with minimum collection targets:
  - (a) **51 %** by 31 December **2028**;
  - (b) **61 %** by 31 December **2031**.

#### Article 11 Removability and replaceability of portable and LMT batteries

- **Batteries** and **individual cells** in the battery pack shall be **readily removable and replaceable**<sup>1</sup>;
- **Spare batteries to be available for at least five years**<sup>2</sup>.

### Right to Repair Directive

- **Mandatory repair options** and **information** provided by manufacturers;
- Enforcement of **transparent repair processes and pricing**;
- **Incentives** to opt for repair, such as repair vouchers and funds.

### Further legal measures

- **EU tariffs** on imports of e-bikes and pedelecs from e.g. China.
- **Bans of e-scooters on public means of transport** for battery safety risks (e.g. London, Munich);
- The EU Commission will prepare **rules on the safety of micromobility devices**<sup>3</sup>.

1. By an independent professional throughout the product's lifetime; LMT batteries shall be considered *readily replaceable* where, after its removal from LMT, when it can be substituted by another compatible battery without affecting the functioning, the performance or the safety of that appliance or light means of transport.

2. After placing the last unit of the equipment model on the market at reasonable prices.

3. The new EU Urban Mobility Framework: For repaired LMT batteries (as referenced in Battery Regulation).

# The market, technological, and legal characteristics specific to LMT batteries and applications are pertinent to the battery passport use case assessment

## Key LMT specific characteristics...



- Varying business models
- Fragmented application market
- More secondhand than second-life use
- Increase in e-bike theft



- Missing connectivity during use phase
- Varying digitalisation among economic operators
- Lower battery value



- EU Battery Regulation LMT specifics
- Right to Repair Directive
- Further legal measures

**...influence the battery passport's value,**  
presenting specific  
barriers, opportunities,  
and benefits.



Applications / Market















Technology



Regulatory Framework

# The separate LMT analysis confirms the applicability of all use cases, highlighting both minor and significant differences

## Use case assessment for LMTs

<b>(A)</b> Reliable communication of ESG data	
<b>(B)</b> Informed purchasing decisions	
<b>(C)</b> Eased servicing	
<b>(D)</b> Precise risk assessment for transport of used/waste batteries	
<b>(E)</b> More efficient recycling processes	
<b>(F)</b> Simplified residual value determination	
<b>(G)</b> Streamlined trade of used/waste batteries through marketplaces	
<b>(H)</b> Efficient data exchange and reporting based on upstream traceability	
<b>(I)</b> Increased end-of-life collection	
<b>(J)</b> Industry benchmarking	
<b>(K)</b> Accurate market overview	
<b>(L)</b> Informed policy design	

### Missing connectivity during the use phase is a barrier for unlocking full battery passport potential

- In the low-price segment in particular, connectivity modules required for transmitting dynamic data to the battery passport are often missing.
- Defining the update frequency and technical options<sup>1</sup> is essential** for LMTs without existing connectivity, to comply with requirements and fully benefit from use cases B, C, D, E, F, G, J, K, and L.

### When connectivity is not considered, benefits of use cases A, B, D, G, F, H, J, K, L align with general use cases, with several nuanced examples and specifics

- Use case F: is **mainly** expected for **second-hand use**, with limited application to second-life applications;
- Use case H: battery passports could **facilitate control of EU tariffs on e-bikes** from e.g. China<sup>2</sup>;
- Use case L: **safety insights** (e.g. information on accidents) could **support policy decisions on banning e-scooters** from public transport through aggregated battery passport data.

### Improving process efficiency with battery passports is a key opportunity for LMT industry

- Given the limited digitalisation among many SME manufacturers, the relatively low battery value, and the complex regulatory landscape, the LMT industry stands to gain significantly from the battery passport use cases C, D, E, F, G, H, I.

## Two use cases with more detailed LMT analysis

Use cases C and I have significant differences for LMT batteries which are described in separate one-pagers

## Excursus on e-bike theft control

The potential of the battery passport to facilitate e-bike theft control is described in separate one-pager excursus




# C Eased servicing

## Use case analysis specific to LMT batteries

Key takeaways

- **Battery passport information** can **facilitate battery removal and disassembly**. **Safety concerns** and risks when replacing individual cells should be **thoroughly evaluated**;
- **Voluntary inclusion of repair history** details could **enhance safety, facilitate future servicing, reduce warranty disputes**;
- **Voluntary inclusion of Right to Repair** directive **information** could **facilitate customer support**.

### Key differences for use case “Eased servicing”

 <b>Removability and replaceability</b>	LMT batteries and individual battery cells included in the battery pack, shall be readily removable and replaceable by an independent professional during the lifetime of the product.
 <b>Right to Repair Directive</b>	Applications with LMT batteries are within scope of the Right to Repair directive
 <b>Repair events and workshops</b>	LMTs batteries face frequent repair / maintenance events which are carried out in a diverse market of independent service providers.

### Improvements with battery passport

- The information on removal and disassembly in the battery passport can improve and streamline the currently often manual disassembly process, which needs to handle high variance in design and small production series of batteries.
- Overall, safety risks concerning removal/replacement of individual cells should be thoroughly considered.
- Pertinent information, voluntarily included in the battery passport, can facilitate customer service, e.g.: European repair information form; link to an online matchmaking repair platform.
- Voluntary integration of notifications into battery passport could enable direct communication of new battery repair options to end-consumers.
- Comprehensive and easily accessible data can enable customer support teams to provide more accurate and timely assistance, enhancing customer satisfaction.
- The battery passport can include standardised servicing and safety procedures, ensuring that technicians follow best practices during maintenance events.
- Including voluntary details of battery repair status and history in battery passports could improve future servicing and enhance safety.<sup>1</sup>
- Servicing history information could help manage warranty claims more effectively.

1. Standardising repair definitions is a crucial prerequisite for the handling of repair information.




# I Increased end-of-life collection

## Use case analysis specific to LMT batteries

Key takeaways

- **Battery passport information** can help to **foster responsible disposal practices** and to **achieve LMT specific collection targets**;
- **Business-owned LMTs** (e.g. shared micromobility services) already have high collection rates, battery passport **impact** is **expected to be minimal**.

### Key differences for use case “Increased end-of-life collection”

 <b>LMT collection rates</b>	<p>The EU Battery Regulation foresees specific collection rates <sup>1</sup> for LMT batteries:</p> <p>(a) 51% by 31 December 2028; (b) 61% by 31 December 2031 (Article 60(3)).</p>
 <b>Privately owned waste LMT batteries</b>	<ul style="list-style-type: none"><li>• Illegal export is not a problem comparable to EV batteries, due to lower value batteries;</li><li>• Hoarding of LMT batteries that are no longer used is considered a barrier for high collection rates.</li></ul>
 <b>Business owned waste LMT batteries</b>	<p>If businesses own the LMT batteries throughout their lifetime (e.g. shared micromobility providers) collection rates are already high.</p>



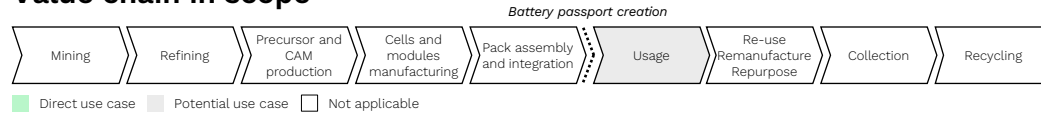
### Improvements with battery passport

- The inclusion of specific data points like the Information on waste prevention and management of used batteries (Article 74) in the battery passport can boost collection rates by enhancing end-user participation.
  - It provides clear information on collection points and take-back programs, making it easier for users to properly dispose of batteries.
  - The information in the battery passport can raise awareness about potential effects of hoarding on the environment and economy and foster responsible disposal practices.
- 
- In this case, primarily due to the existing fixed contractual take-back processes, the battery passport is not expected to significantly impact end-of-life collection rates. These established systems already ensure a high level of collection efficiency, reducing the need for additional measures from the battery passport.

<sup>1</sup> Calculation of Collection Rates are defined in Annex XI

# Excursus: Voluntary integrations of the battery passport as a standard framework with other systems could be leveraged to improve e-bike theft protection and control

## Value chain in scope

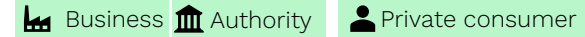


## Situation

- **Thefts of high-value e-bikes are increasing**
- Every year around 580,000 e-bikes are stolen in Europe<sup>1</sup>
- Low rate solving of cases (< 10%)<sup>2</sup>
- Marketplaces for used e-bikes exist and are expanding
- Increasing number of **voluntary solutions for e-bike theft protection** exist **with no standard framework**, among others:
  - Attached GPS trackers to e-bikes, connected to e-bike and/or third-party software
  - E-bike locks with digital keys
  - Voluntary e-bike pass containing all relevant information and creation of automatic theft report
  - Battery serial number: possibility to check database providing information if serial number has been reported



## Battery passport user:



## Potential improvements with battery passport

The battery passport could unlock benefits when used as a **standard framework connected with other systems or services voluntarily**:

- **Integration with existing GPS tracking**  
The battery passport could be linked to GPS trackers and be used by authorities as a monitoring system.
- **Enhanced resale monitoring**  
The battery passport could be linked to resale platforms, to monitor secondary markets for suspicious activity. This could help to identify and intercept stolen goods before they are sold.
- **Consumer alerts**  
The battery passport could highlight stolen batteries by alerting consumers upon scanning the QR code.





## Chapter 6: Challenges, mitigations and implementation requirements

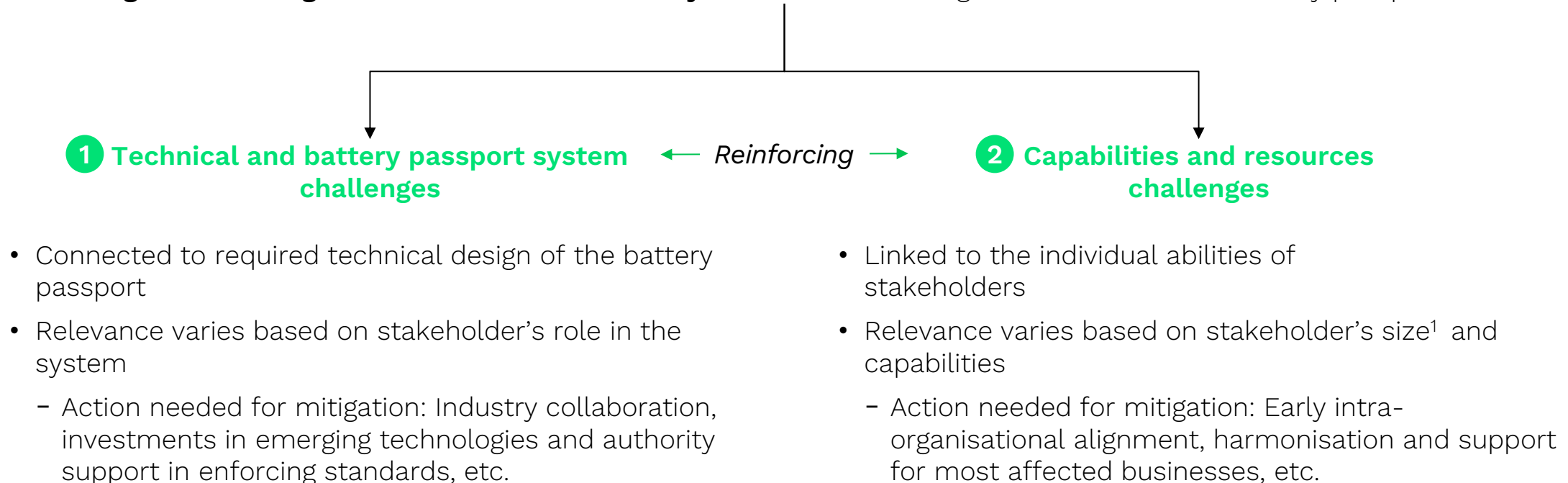
- Challenges, drawbacks and mitigations
- Implementation requirements



# Stakeholders might need to overcome certain challenges when creating, maintaining or using the battery passport

## Challenges

- Difficulties or obstacles that **stakeholders are facing when creating, maintaining or using the battery passport**
- **Unmitigated challenges could lead to unnecessary drawbacks** reducing the net value of the battery passport



# 1 Technical and battery passport system challenges: Industry collaboration, investment in emerging technology and authorities enforcing standards needed to overcome challenges

NOT EXHAUSTIVE

## Technical and battery passport system challenges

### Technical set-up

- Unavailability of harmonised standards
- Lack of reliable, interoperable infrastructure
- Inefficiencies in handling large data volumes
- Complexity of integrating data into existing systems
- Limited access to crucial IT resources

### Data security

- Varying security measures across organisations and regions
- Risk of intellectual property rights infringement
- Exposure to unauthorised access risks
- Concerns about privacy and security of personal data

### Data accuracy

- Lack of audit processes
- Insufficient data quality and lacking reliability (lack of granular and real-time data)

### Collaboration

- Missing of data-sharing agreements
- Limited trust among stakeholders
- Difficult coordination within and between organisations

## Action needed for mitigation



### Policymaker and authorities:

- Define clear, consistent and specific regulatory requirements ([see slide 160](#))
- Consult and consider feedback from industry representatives and civil society organisations
- Facilitate the development and adherence to harmonised industry standards
- Establish and enforce stringent regulations to ensure data security
- Provide support for research and developments addressing technical challenges



### Businesses:

- Prepare early and implement simple “fallback plans” due to complexity of new subjects and technologies
- Participate in standardisation efforts
- Invest in emerging technologies to build an interoperable infrastructure and facilitate data exchange
- Implement robust data governance frameworks to ensure data security

## 2 Capabilities and resources challenges: Early intra-organisational alignment, harmonised requirements and financial support needed to overcome challenges

NOT EXHAUSTIVE

### Capability and resource challenges

<b>Financial constraints</b>	<ul style="list-style-type: none"> <li>Limited financial resources</li> <li>Financial risks, including for third-party services and security breaches</li> <li>Increased costs for personnel and IT</li> </ul>
<b>Inexperience</b>	<ul style="list-style-type: none"> <li>Knowledge gaps and technical complexities</li> <li>Human resource scarcity and skill shortage</li> <li>Difficulties in understanding and interpreting complex technical data</li> <li>Lack of skills to navigate and understand digital platforms</li> </ul>
<b>Internal complexity</b>	<ul style="list-style-type: none"> <li>Complex coordination across departments and teams</li> <li>Organisational resistance</li> <li>Limited understanding of purpose and benefits</li> </ul>
<b>Regulatory complexity</b>	<ul style="list-style-type: none"> <li>Numerous and stringent regulatory requirements</li> <li>Uncertainties in European regulatory framework</li> <li>Diverse requirements across various countries or regions</li> </ul>



### Action needed for mitigation



#### Policymaker and authorities:

- Define clear, consistent and specific regulatory requirements
- Provide financial support or incentives to businesses and other stakeholders most affected by challenges
- Harmonise requirements with other national and international regulations
- Raise awareness and inform businesses, consumers and other stakeholders about the requirements



#### Businesses:

- Align early within the company to streamline coordination and overcome resistance
- Invest in training and hire experienced workforce
- Explore industry networks and collaboration on data exchange (such as Catena-X and GBA)
- Form strategic partnerships with technology providers
- Discuss requirements with customers and supply chain partners and adjust contracts

# Technical and battery passport system challenges mostly affect the passport issuer; capability and resource challenges mainly impact SMEs

## Relevance of challenges by stakeholder

Low

Medium

High

Business

Authority

Private consumer

1 Technical and battery passport system				
Role in the system	 Data provider (e.g. miner) Data receiver and provider (e.g. cell manufacturer) Passport issuer (e.g. automotive OEM) <sup>1</sup>			   Data receiver (e.g. recycler, end-consumer, authorities)
Technical set-up	<div></div>	<div></div>	<div></div>	<div></div>
Data security	<div></div>	<div></div>	<div></div>	<div></div>
Data accuracy <sup>2</sup>	<div></div>	<div></div>	<div></div>	<div></div>
Collaboration	<div></div>	<div></div>	<div></div>	<div></div>
Impact expected to be <b>highest for the role of the passport issuer</b> (economic operator responsible for the battery passport)				

2 Capabilities and resources				
Size and capabilities	 SME <sup>3</sup> MNC <sup>4</sup>		 Authorities	 End-consumer
Financial constraints	<div></div>	<div></div>	<div></div>	<div></div>
Technological inexperience	<div></div>	<div></div>	<div></div>	<div></div>
Internal complexity	<div></div>	<div></div>	<div></div>	<div></div>
Regulatory compliance	<div></div>	<div></div>	n/a	<div></div>
Impact anticipated to be <b>most significant for SMEs</b>				

1. Economic operator placing the battery on the market

2. High data accuracy is important from all stakeholders, but lacking accuracy most impacts the passport issuer (responsible for the passport) and the data receiver (most dependent on good data to derive insights)

3. SME: small- and medium-sized enterprises

4. MNC: multi-national corporations



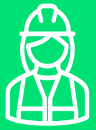
# Benefits enabled by the battery passport use cases are likely to outweigh the drawbacks arising from unmitigated challenges

NOT EXHAUSTIVE

■ Effort required for the implementation

■ Negative impacts of the implementation

■ Positive impacts of the implementation

	Drawbacks	vs	Benefits	
 Economic	<b>Investment needed</b> in the passport software/hardware, data management, and the passport operations	<	<b>Cost decrease</b> enabled by more efficient operations	Deep-dive in next slides
	<b>Competitive disadvantage</b> of less advanced companies when failing to fulfil responsibilities and requirements	<	<b>Revenue increase</b> through new business models and product differentiation for sustainable players and high-quality batteries	
 Environmental	<b>Raw materials needed</b> for additional (IT) infrastructure	<	<b>Natural resource conservation</b> achieved through circular processes leading to decreased demand in primary material	
	<b>GHG emissions</b> caused by increased energy demand for data exchange and storage	<	<b>GHG emissions decrease</b> as a result of building more environmentally friendly and circular value chains	
 Social	<b>Tension, stress and additional workload</b> while implementing and transitioning	<	<b>Increase in health and safety</b> through data availability decreasing accidents and risks caused by defective batteries	
	<b>Digital divide</b> in the case of unequal access to digital infrastructure, devices or digital literacy	<	<b>Strengthened human rights and reduced child labour</b> through more transparent supply chain due diligence	
	<b>Job displacement</b> of lower-skilled jobs that become automated or unnecessary	<	<b>Job creation</b> through digital transformation leading to generation of higher skilled jobs	



## Chapter 6: Challenges, mitigations, and implementation requirements

- Challenges, drawbacks and mitigations
- Implementation requirements



## The battery passport implementation requires three general effort steps that include several underlying tasks

### Step 1

#### System set-up and provisioning

- Battery passport software development and licenses
- Hardware set-up for battery passport (company-owned)

### Step 2

#### Data collection, integration, certification

- Data collection (external upstream, static vs dynamic)
- Data integration (extraction, transformation, loading)
- System and data certification

### Step 3

#### Operation and management

- Software maintenance, service fees (SaaS<sup>1</sup>) and updates
- Access rights management
- Cloud hosting services
- Labelling
- IT governance (membership fees, tech selection)
- Project management, third-party consulting and legal



1

# System set-up and provisioning task explanations

Effort categories and tasks		Task explanation: Effort to...
System set-up and provisioning	Battery passport software development and licenses	<p><b>Develop the battery passport software</b> (distributed DPP system services) and/or purchase software licenses</p> <ul style="list-style-type: none"><li>- Entails salaries (developers, designers, testers, etc.), licenses for development tools, costs for software libraries or frameworks, and training</li><li>- Developing and establishing the internal system architecture<sup>1</sup>, as well as the front-end<sup>2</sup> and back-end software for the battery passport</li><li>- Developing (or integrating) and establishing the relevant interfaces, APIs and translator services (internal, to ECC central services, to third-party backup services)</li><li>- Ensuring proper mechanisms for downstream data inclusion and hand-overs when transfers of responsibility occur (e.g. with the remanufacture of batteries)</li></ul>
	Hardware set-up for battery passport solution	<ul style="list-style-type: none"><li>- <b>Establish additional hardware the company requires to enable the battery passport</b></li><li>- This includes servers, routers, switches, firewalls and storage systems</li></ul>

1. See chapter 5 (p. 66) of Battery Pass [Technical Guidance](#) for detail on architecture  
2. Visit the [Battery Pass demonstrator](#) for example user interface

## Data collection, integration, certification effort task explanations

Effort categories and tasks		Task explanation: Effort to...
Data collection	External upstream	<ul style="list-style-type: none"> <li>- <b>Collect upstream data for new batteries.</b></li> <li>- Established once for each battery passport, but data requires regular updates to keep upstream data of future battery passports up-to-date</li> <li>- Utilising traceability software could help for proficient levels of supply chain transparency and potential cost savings if multiple battery models are involved</li> </ul>
	Internal static	<b>Collect internal static data from different departments for new battery models.</b> Also included is <b>additional hardware, especially test stands that may be required to obtain internal static data.</b>
	Internal dynamic	<ul style="list-style-type: none"> <li>- <b>Regularly collect performance data from each battery during its use-phase</b></li> <li>- Given high volumes/frequency of data collection, this is likely automated and entails mostly integration efforts (assessed separately in next category)</li> <li>- Additional development efforts for the battery management system to calculate and accommodate all dynamic data requested in the battery passport</li> </ul>
Data integration		<ul style="list-style-type: none"> <li>- <b>Technically extract, load and transform data</b> as well as complete manual tasks such as verification</li> <li>- Integrations need to be established via APIs<sup>1</sup> to connect different data sources such as the battery management, PLM<sup>1</sup>, ERP<sup>1</sup>, SCM<sup>1</sup>, and traceability systems with the battery passport back-end</li> </ul>
Verification and reporting		<b>Auditing data and systems regarding the declaration of conformity and reporting on testing</b>

### 3 Battery passport operation and management effort task explanations

Effort categories and tasks		Task explanation: Effort to...
Battery passport operation	Cloud hosting services	<b>Provide and maintain access to virtual servers for storing, managing and processing passport data on external cloud infrastructure.</b> This includes efforts for data migration, archiving and independent providers to maintain back-ups
	Software maintenance, service fees and updates	<ul style="list-style-type: none"> <li>- <b>Apply corrective, adaptive, perfective, and preventive maintenance and updates</b> on company-owned software</li> <li>- Recurring fees for third-party software integrations (battery passport components can be bought on a functional level)</li> </ul>
	Access rights management	<ul style="list-style-type: none"> <li>- <b>Manage software access to restricted battery passport data, based on stakeholder access groups</b> being specified in coming EC delegated acts</li> <li>- Includes the correct handling of credentials (e.g. Verifiable Credentials) and the management of all relevant access policies<sup>1</sup></li> </ul>
Labelling	Product identifiers and labelling software/hardware	Obtain all <b>relevant technology and licences to create QR codes and apply them to batteries</b> in the production line. Provide dealers and online marketplace providers with a digital copy of the data carrier or unique product identifier, to allow accessibility to potential customers where they cannot physically access the product.
IT governance	Membership and onboarding fees	<b>Finance memberships to data spaces</b> such as Catena-X, Gaia-X Digital Clearing Houses
	Changes in selected technology and software changes	<b>Select, monitor and maintain changes to third-party tools</b> such as e.g. a traceability system and the overall BP system architecture
Project overhead	Project management	<b>Manage the battery passport implementation</b> , including personnel training
	Third-party consulting and legal costs	<b>Apply third-party services for business, technical, and legal matters</b> related to the battery passport

# Methodology: The relative effort of battery passport implementation tasks for economic operators was approximated using an agile Fibonacci estimation

A 7-step methodology was used to approximate relative effort of implementation tasks

## Industry input via survey



- ① Established **survey to rate relative effort** of each implementation task on a Fibonacci scale<sup>1</sup>
- ② Filled out by **8 different companies** including 4 EV manufacturers, 3 solution providers, and an industrial battery manufacturer<sup>2</sup>

## Bottom-up approximation



- ③ Researched **benchmark values for each implementation tasks**
- ④ **Approximated efforts via simple calculations** (e.g. FTEs<sup>3</sup> x avg. salary for data scientist) if direct benchmarks unavailable
- ⑤ Set-up **cost ranges for each task**<sup>4</sup>
- ⑥ **Translated mid-point of each range onto the Fibonacci scale** (normalisation with subsequent mapping to a range of 0 to 377)<sup>1</sup>

## Result aggregation



- ⑦ **Discussion / interviews of Fibonacci approximation results** to calibrate and understand differences in assumptions for each implementation task

1. Visit technical annex on [slide 194](#) for detail  
 2. Given limited data on industrial battery manufacturer efforts, these were not included in the quantification of results, with focus set primarily on EV manufacturers  
 3. Full-time-employees  
 4. Cost ranges only provided as Fibonacci values, because €-values highly sensitive and confidential

# Scope: Focus on effort to a large-scale EV manufacturer as economic operator and efforts exclusively associated with the battery passport

Efforts are estimated specifically for a large EV manufacturer and the 3 effort categories are scoped exclusively to the battery passport

## Effort is estimated for:

- The economic operator, specifically a large EV manufacturer (>100,000 batteries sold)
- A scenario in which the battery passport software is developed in-house
- Effort that is exclusively associated with the passport



1

### Passport software development and hardware

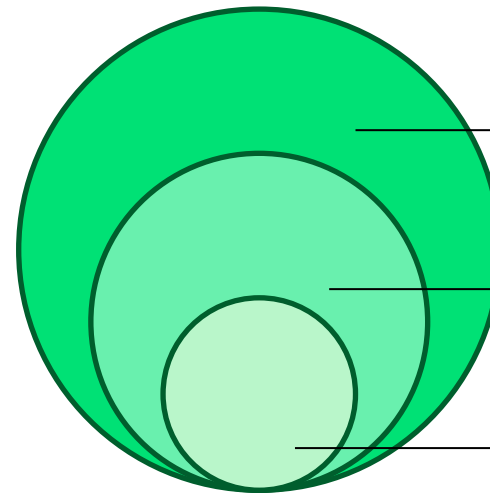
3

### Passport operations and management

→ Effort associated with e.g. existing server hardware or management of tasks required independent of the passport are out of scope

2

## Data collection, integration, and certification efforts scope:



### Data integration and certification scope

European Green Deal, Circular Economy Action Plan, Strategic Action Plan on Batteries

Battery Regulation

### Data collection scope

Battery Passport

→ Effort for collecting data such as carbon footprint and the due diligence report is out of scope because it is mandated independent of a battery passport

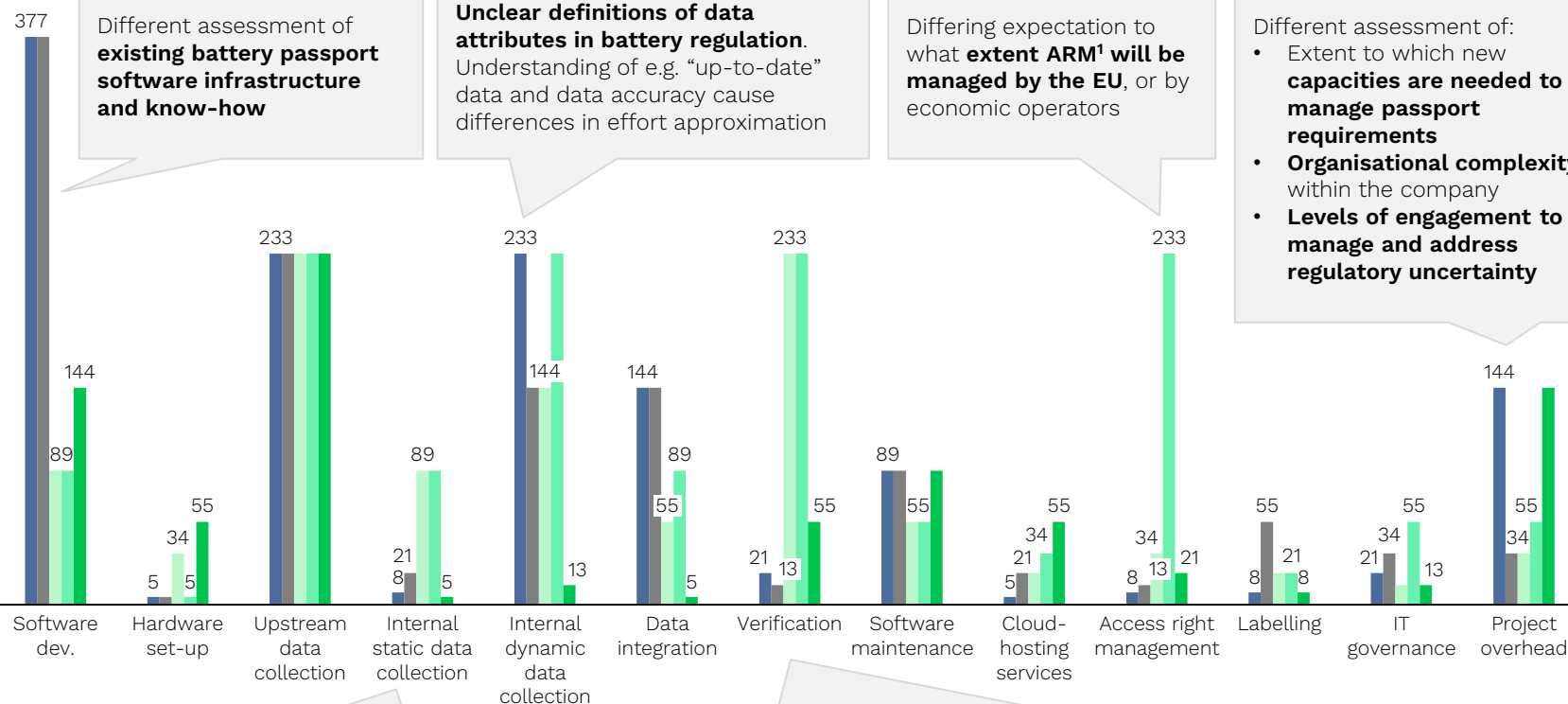
**Disclaimer:** The passport is a first-of-its-kind initiative that will fully impact 2027 onwards → efforts are a rough approximation only

# Battery passport implementation effort estimates vary significantly across different companies

## Battery Passport implementation effort Fibonacci results for each task

Deviation of efforts related to...

Bottom-up approx. DPP solution provider EV manufacturers



## Highlights

**Interpretation of effort varies significantly and yields only directional insights on effort** due to:

### 1. Lack of clarity on how much effort the passport will entail

- In particular, uncertainty in regulation was repeatedly flagged as a cause of uncertainty in effort, mostly in dynamic data integration, certification, ARM<sup>1</sup>, and project overhead
- Regulators should aim to clarify/ specify the battery regulation to reduce uncertainty for businesses

### 2. Differing circumstances across companies (size, resources, etc.)

- This is especially the case for the passport software development and project overhead

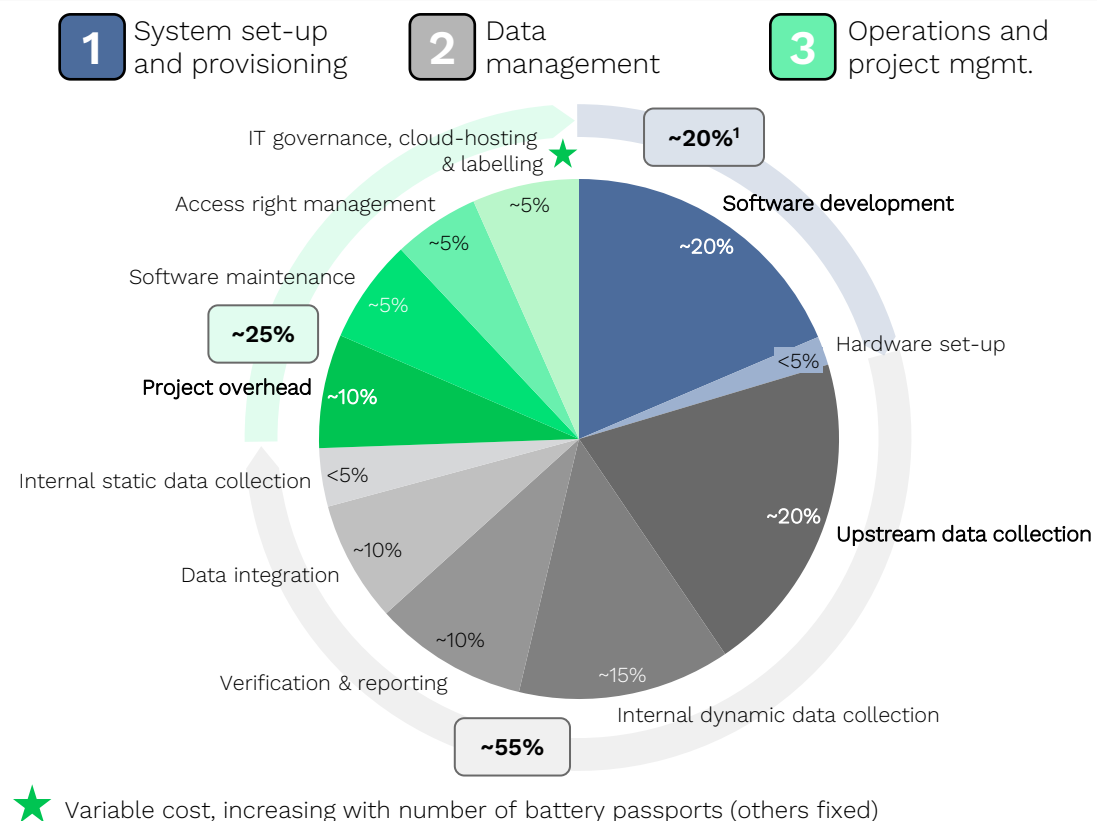
### 3. Human error or bias in the estimation

Different assessment of **required test hardware for static aging**

Expectation that **initial system set-up and high continuous auditing efforts to warrant completeness and correctness** of data will exist, vs the expectation that while initial set-up of auditing system is significant across all reporting systems, they are limited over time and for a scope restricted to passport attributes

# Approximate battery passport implementation effort for EV economic operators is caused mostly by data management, while most tasks classify as fixed costs

## Averaged relative efforts of implementation categories and tasks<sup>1</sup>



**Disclaimer:** Values in the chart are highly uncertain and based on limited data, with coefficients of variation<sup>2</sup> of up to 130% → numbers should only be interpreted directionally

## Highlights

**Data management is the most significant category (~55%)** of effort to implement the battery passport. In the words of one EV manufacturer: “The battery passport is primarily a data management task”  
→ Standards, processes, and technologies to streamline data management are key impact areas to facilitate net value of the battery passport

**Software development and upstream data collection are the largest tasks (~20%)** of the battery passport implementation, followed by internal dynamic data collection (15%)  
→ Software and data knowledge is a key lever that impacts passport implementation effort

**90%+ of efforts translate to fixed costs** with significant tasks such as software development, maintenance, and project management being independent of the volume of sold batteries and only the last category identified as mostly variable  
→ Third-party service providers that can spread fixed costs across multiple clients may reduce total implementation effort

# LMT or industrial battery economic operators, and SMEs in general, could face a higher relative effort to implement the battery passport



## Differences for LMT and industrial batteries

### Multiple SMEs especially in LMT vehicle market

- Fragmented market; higher share of SMEs in LMT vehicles market
- Low market power; reliance on single suppliers
- Lower market volume for industrial batteries compared to the electric vehicle market

### Lower battery value to cover expenses

- Lower unit price → higher relative effort for passport implementation, especially for LMTs
- Lower battery value with less precious materials → less incentive for recycling investments

### Differing effort for data collection

- Several attributes do not apply or only apply to industrial/LMT batteries (e.g. capacity threshold for exhaustion or initial self-discharging rate)<sup>1</sup>
- Connectivity: batteries w/o BMS or connectivity module require added effort to collect performance data (e.g. remaining capacity) and fulfill regulation
- LMT batteries face different handling operations, e.g. more frequent repair/maintenance events



## Differences for SMEs

### Lower economies of scale

- Estimated 90%+ of effort will be fixed costs → spread across fewer batteries sold, increasing effort per unit of production
- Smaller scale also entails lower market power and potentially higher variable costs (e.g. lower bulk order benefits)

### Lower economies of scope

- Lower likelihood for SMEs to benefit from using existing technological, financial, and human resources to implement the battery passport
- Required investments potentially higher for SMEs relative to larger enterprises

### Easier change management

- Lower internal complexity could reduce management costs of the passport implementation



## Implications

### Battery passport as a service

Likely beneficial for SMEs to work with DPP providers that:

- Spreads fixed costs across multiple clients
- Possess existing solutions and resources to supply the battery passport

Providers could be dedicated DPP-as-a-Service companies or battery manufacturers providing passport with batteries sold

### Industry collaboration

Consortia or alliance with other companies to share costs and resources for passport implementation

### Government support

Potentially high relative costs to SMEs, especially for LMT and industrial batteries, may necessitate EU support





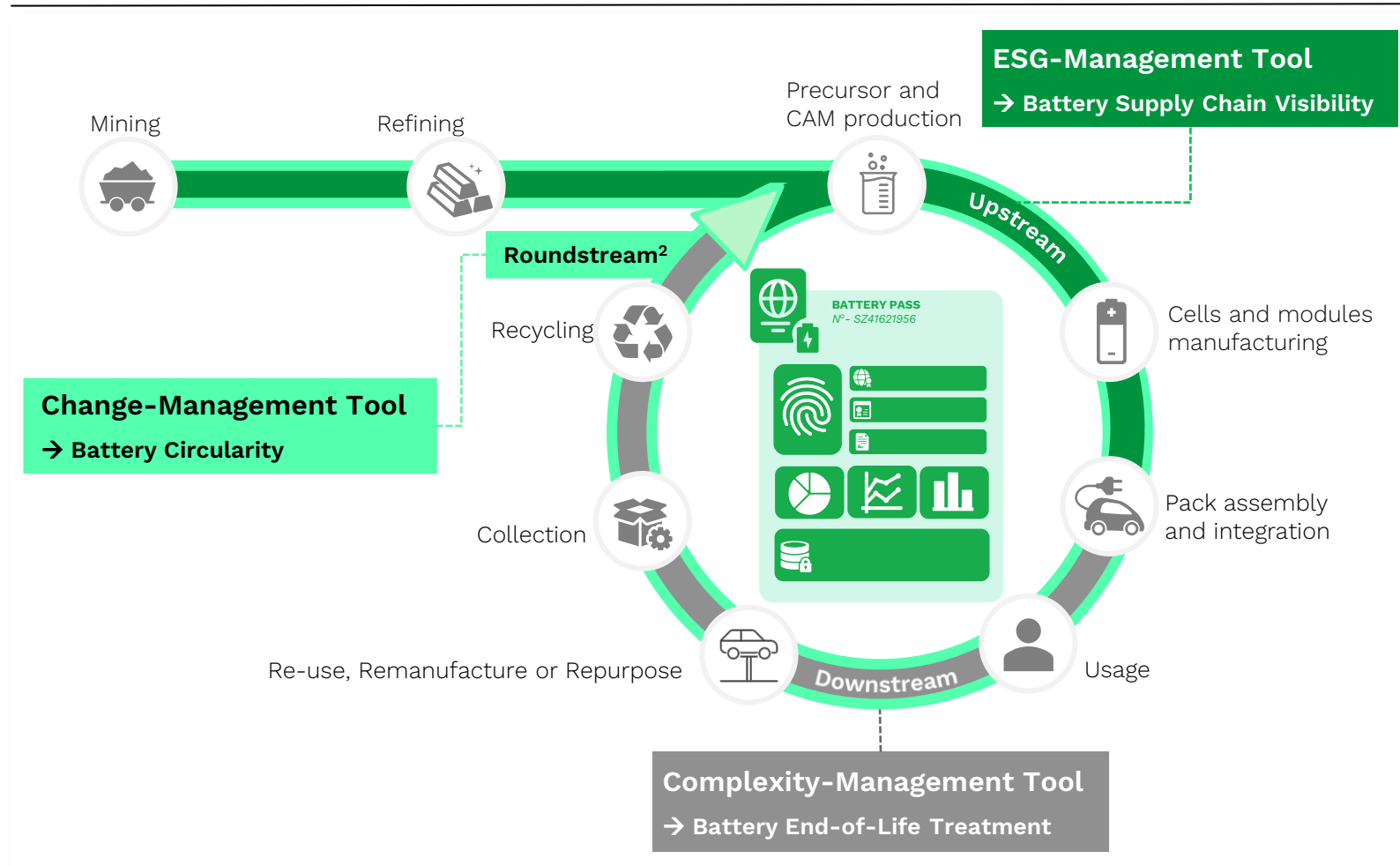
## Chapter 7: Synthesis and way forward

- Synthesis of potential system-value
- Proactive action for successful battery passport implementation
- Outlook on DPPs in general



# The battery passport promises to unfold system<sup>1</sup> benefits via 3 domains

## Battery passport system-view across the value chain



## Battery passport could...

Create an **upstream level playing field** to foster competition through innovation

Establish ESG profiling as additional **visible differentiators (competitive advantage)**

Shape **closer ties with suppliers and customers** (e.g. on responsible sourcing)

Safeguard information needs for **end-of-life process management, development, and optimisation** (responsible recycling)

Make **secondary raw materials more affordable, available, and tuned to needs** through efficiency gains

**Digitalise the value chain** to enable aligned R-strategies, resource efficiency, and circular battery designs

**Trigger reflection processes that create the required awareness** for system changes

# Total impact: The battery passport entails system implications that strongly map to EU green deal targets

Dimension	Synthesis of value from value chain agent perspective	Green Deal targets
 <b>Economy</b>	<ul style="list-style-type: none"> <li>• <b>Revenue increases</b> – Improved ESG differentiation, regional material availability, recycling yields, and value determination for resale revenues</li> <li>• <b>Cost reductions</b> – Improvement in reporting, supplier engagement, battery servicing, value determination, transactions, shipping, sampling, dismantling, and material input</li> <li>• <b>Improved access to capital</b> – Comparable ESG reporting enables capital allocation to performers</li> <li>• <b>Level playing field</b> – Increased transparency on regulatory requirements for market participants</li> <li>• <b>Risk mitigation and resilience</b> – Increased critical raw material availability and demand forecasts</li> </ul>	 <b>Financing and Investment</b>
 <b>Environment</b>	<ul style="list-style-type: none"> <li>• <b>Increased circular economy</b> – Increased incentive for circularity and enablement of life cycle productivity (improved recycling/servicing efficiency and EOL battery collection/allocation<sup>1</sup>)</li> <li>• <b>Reduced GHG emissions</b> – Transparent, comparable and systematic carbon footprint information and an improved circular economy</li> <li>• <b>Less pollution</b> – Awareness of logistics, collection, and export conditions</li> </ul>	 <b>Climate Neutrality by 2050</b>
 <b>Society</b>	<ul style="list-style-type: none"> <li>• <b>Mitigated social supply chain risk</b> – Improved transparency on supply chain conditions</li> <li>• <b>Local employment</b> – Empowerment of R-strategies and new business opportunities</li> <li>• <b>Health and safety improvement</b> – Responsible sourcing and end-of-life treatment</li> </ul>	 <b>Zero Pollution Ambition</b>
		 <b>Protecting Biodiversity</b>
		 <b>Just Transition</b>

# Once enabled, data aggregation across all EU battery passports make “roundstream” benefits a key value proposition to businesses and society

## Data aggregation unlocks significant system benefits

Beyond the benefits of individual battery passports, the **aggregation of data across all European battery passports promises significant system value**

For businesses, this aggregation entails 3 roundstream benefits:

1. Inform **upstream procurement strategies** on battery models or suppliers
2. Improve **internal understanding** for the effectiveness of circularity and decarbonisation measures
3. Create **downstream awareness** of product differentiation

Society and policymakers can also better **understand trends over time, supporting purchasing and policy decisions, respectively**

→ **Aggregated data amplifies the ability and incentive for sustainability measures beyond that of individual passports**

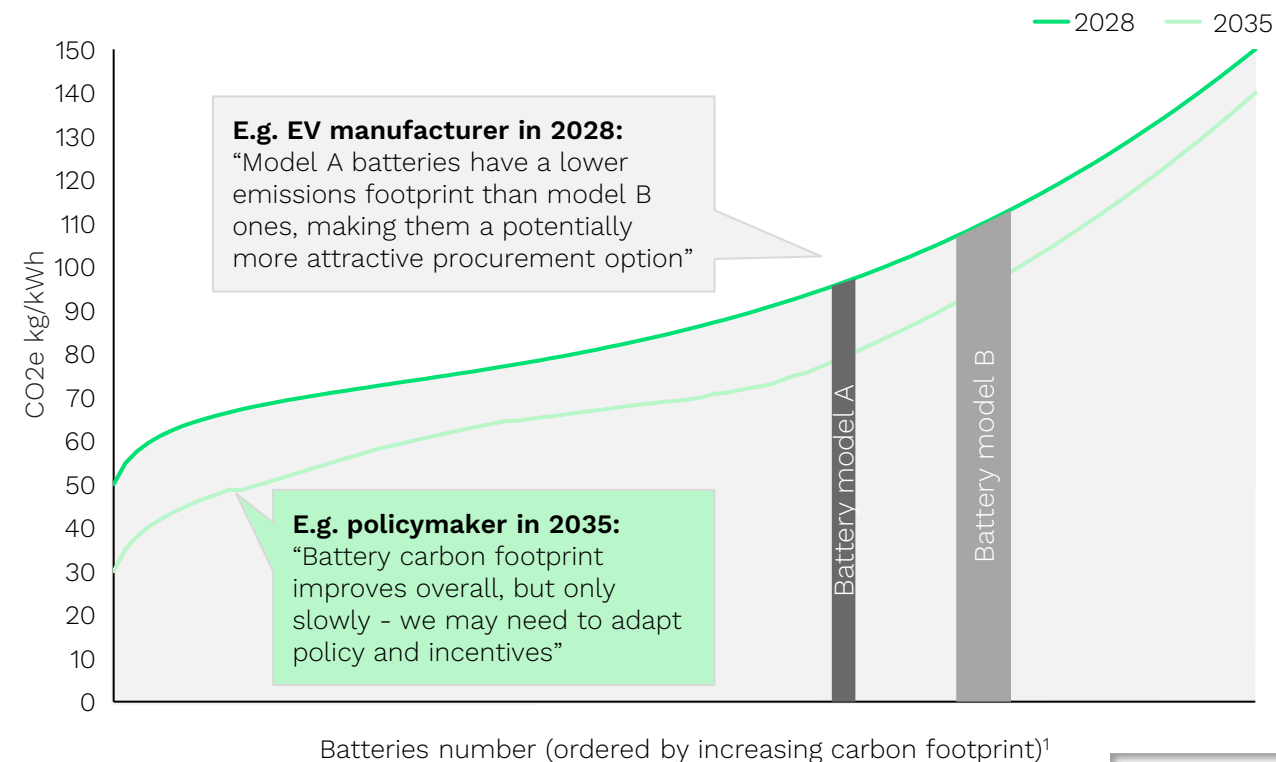
Note: For these benefits to materialise, the **EU needs to enable data aggregation across passports**

→ Visit [slides 108-116](#) for details on technical requirements

## Example of enabled visualisation via battery passport data aggregation

**Distribution of carbon footprint across all EV batteries in the European market in 2028 and 2035**

*Indicative example chart only, with synthetic data*





## Chapter 7: Synthesis and way forward

- Synthesis of potential system-value
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# A need to act: Businesses should proactively prepare in three steps to maximise value creation of the battery passport implementation

## 1. Establish operational readiness for implementation

**Assess requirements** versus corresponding business readiness in three effort categories:

1

Initial **battery passport development**  
([details](#))

2

**Data management**  
([details](#))

3

Battery **passport operations**  
([details](#))



**Data providers (upstream)**



**Battery passport providers**

**Requirements should be monitored**, as these will still evolve (see "[unanswered questions](#)")

## 2. Identify strategic opportunities of the battery passport

**a) Internally assess which battery passport benefits are possible** (e.g. dismantling cost reductions in recycling):



**Revenue** increases, **cost** reductions, access to **capital**, or **supply chain resilience** ([details](#))



GHG **emission** reductions, **circular economy** improvements, or **pollution** mitigation ([details](#))



Mitigated **social supply chain risks**, **health and safety** concerns, or increased local **employment** ([details](#))

**b) Establish a business case and/or model environmental and social impact** (e.g. quantification of dismantling cost savings vs required investments)

**c) Define an implementation roadmap to address identified opportunities** (e.g. types and timelines of required investments for automated dismantling)

## 3. Select implementation strategies



**Use and enhance internal capabilities**

Communicate requirements and provide training and resources to internal departments / teams



**Source capabilities**

Understand solution provider landscape and available services, and strategically partner



**Join forces**

Collaborate with industry peers and consortia to share knowledge and/or investments

For first-mover benefits: Join demonstrators and pilots to gain practical experience and knowledge ahead of a mandate. First OEMs are starting to issue DPPs already today - when non-compliant solutions are not an issue, but an opportunity for learning.

# There are 4 strategic questions businesses should address in preparation for a battery passport implementation

## 1. Wait or act?

Analyse cost of inaction (e.g. potential loss of customer contracts or even market access, excess costs due to late implementation) compared to cost of action (e.g. redundant implementation; uncertain requirements raising development costs; immature supplier data).

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## 2. Compliance vs business value?

Consider if battery passports are a compliance necessity (limited value, lower cost) or a strategic opportunity. While minimal solutions may suffice for tactical compliance (e.g., SoH, durability), advanced solutions offering detailed data (e.g., due diligence, circularity) can enhance value through improved sourcing, transparency, and partnerships, providing a competitive edge.

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## 3. Make or buy?

DPP service providers and consortia, such as Catena-X, have started offering solutions for battery passports. Assess your organisation's capacities, capabilities, economic situation and strategic position: you may consider developing value-creating solutions in-house (for corporates with scale) or buy standard solutions outsourcing the fulfilment of your legal requirements (for SMEs with limited scale).

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## 4. Existing infrastructure or green-field?

You might still have legacy infrastructure or have already started building a new one. Consider how this affects your make-or-buy decision and your cost position. Starting from scratch can seem daunting and costly but keeping legacy infrastructure in place might come with further efforts.

# A set of unanswered questions should be monitored as policymakers establish final specifications to unlock full system potential

Unanswered questions	Required measures by policy-makers	Relevance
1 What is the <b>legal framework</b> underlying user obligations to share data during the battery use phase with EOs <sup>1</sup> ?	Analyse and address required legal frameworks to enable dynamic data sharing while protecting user privacy rights	<b>Potential exploitation of user data</b> and associated mistrust of the public
2 What does <b>“up-to-date”</b> mean for dynamic data attributes?	Provide information on how to interpret requirement of “up-to-date” dynamic data	<b>Uncertainty of implementation effort</b> and potential cost advantage to companies least ambitious on battery passport
3 How is a lack of <b>connectivity of batteries</b> (various reasons of missing internet connection) addressed?	Ensure exception management in data analytics due to data gaps from lack of connectivity	<b>Realistic interpretation of data</b> and expectation management for implementation
4 How will <b>aggregation of data across battery passports</b> be achieved and adequately covered systemically?	Provide and manage infrastructure of an “aggregation layer” IT system, and provide access via a “Web Portal” <sup>2</sup>	Required to <b>enable industry benchmarking (J)</b> , <b>accurate market overview (K)</b> , and <b>informed policy design (L)</b> use cases
5 How should <b>additional voluntary data attributes</b> be integrated in the battery passport?	Specify guideline on additional voluntary data reporting	Uncertainty of utilisation of battery passport as a <b>business tool, including new business models</b>
6 Are technical and system developments over time adequately covered by <b>versioning mechanisms</b> ?	Establish adequate versioning mechanisms and implementation rules in battery passport system design	Necessary to <b>avoid compatibility problems</b> over time in operations across battery passport systems
7 Is the passport <b>integrated into deregistration, export control and market surveillance processes</b> , and are additional attributes requested?	Integrate the battery passport for export control, amend “battery status” by “exported” and “recycled”, and mandate export / recycling name and date	Required to <b>enable increased end-of-life collection and reduction of illegal vehicle/battery exports (L)</b>
8 What is the <b>concrete definition of the data points</b> and the <b>framework</b> of the DPP system?	Clarify the definition and framework through close work in standardisation	Enables <b>conformity with battery regulation</b> and ensures <b>applicability of legal requirements</b>
9 How is <b>data from downstream third-parties incorporated and the transfer of responsibility managed</b> ?	Decide on process for downstream third-party data inclusion and harmonise the mechanism for transfer of responsibility	It is necessary to <b>establish responsibilities and roles for up-to-date use of phase data and battery passports</b>
10 How are <b>access rights defined</b> ?	Specify the access rights definition in a delegated act as soon as possible	Required to <b>prevent access conflicts and provide clarity on implementation effort</b>

→ Multiple questions need to be addressed by the European Commission; in the meantime, businesses should proactively address known system requirements to avoid an unprepared implementation by 2027





## Chapter 7: Synthesis and way forward

- Synthesis of potential system-value
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# The battery passport can serve as a source of insights for the successful deployment of future DPPs

**1** The ambition to digitalise value chains extends **beyond batteries to other sectors**

**2** **Use cases of the battery passport are largely applicable** to upcoming and potential DPPs

**3** Businesses facing the implementation of other DPPs can use multiple **battery passport elements as a blueprint**

**4** Policymakers can leverage **learnings from the battery passport to improve the deployment of further DPPs**

**5** Policymakers should take **four general steps to mitigate the significant challenges** of implementing DPPs

# 1 The ambition to digitalise value chains extends beyond batteries to other sectors

Cross-sector DPP relevant delegated acts timeline 2024-2027<sup>1</sup>

Delegated act	2024				2025				2026				2027			
	II	III	IV		I	II	III	IV	I	II	III	IV	I	II	III	IV
Start of EU-funded DPP pilot projects <sup>2</sup>	● May															
ESPR published		● Aug														
Adoption of ESPR Working plan					● May											
Delivery of DPP standards By CEN & CENELEC								● Dec								
Del. Act for Textiles DPP published									● Jan							
Del. Act for iron & steel DPP published										● Apr						
Battery Passport Enters into force													● Feb			
End of EU-funded DPP pilot projects													● Apr			
Textiles DPP Enters into force														● Jul		
Environmental Vehicle Passport Enters into force <sup>3</sup>											● Nov				● Nov	
Iron & steel DPP Enters into force															● Oct	

Roll-out highlights and key factors of DPP enablement

- 1) The expected benefits of other DPPs (details) are incentivising an ambitious DPP rollout across sectors:
- a) A DPP for textiles, iron and steel, and an Environmental Vehicle Passport (EVP) are scheduled to enter into force within 8 months after the battery passport.

b) Further DPPs, including construction, electronics, chemicals and energy-related products such as hydrogen, are in discussion
- 2) To enable this ambitious rollout of DPPs:
- a) Businesses implementing other DPPs can use the battery passport as a blueprint (details)

b) Policymakers can use insights from battery passport deployment for enhanced policy design of other DPPs (details), e.g. delegated acts on recycled content calculation and CO2 footprinting

c) Policymakers should take four general steps to mitigate the significant challenges of implementing DPPs (details)

Source: CIRPASS Consortium (2024)

1. Timelines could change by the time this content is published.
2. Pilot projects will showcase functioning DPPs through 13 circular pilots in various sectors
3. The Euro 7 legislation mandates November 2026 (newly approved car types) and November 2027 (any newly approved car). The EC might propose a regulated DPP in electronics by 2030, after 2030, or not at all, depending on the performance of initial DPPs and political support

## 2 Use cases of the battery passport are largely applicable to upcoming and potential DPPs

### Use case applicability

High
  Medium
  Low
  N.A.

Use cases	Batteries <sup>1</sup>	Vehicles	Textiles	Electronics	Iron & Steel	Hydrogen
<b>A</b> Reliable communication of ESG data	Low	High	High	High	Low	Low
<b>B</b> Informed purchasing decisions	Low	High	Medium	High	Low	Low
<b>C</b> Eased servicing	Medium	Medium	Medium	Medium	N.A.	N.A.
<b>D</b> Precise risk assessment for transport	Low	Low	N.A.	N.A.	N.A.	N.A.
<b>E</b> More efficient recycling processes	High	High	High	Low	Low	N.A.
<b>F</b> Simplified residual value determination	High	High	Low	Medium	N.A.	N.A.
<b>G</b> Streamlined trade of waste	Low	Low	Low	Medium	N.A.	N.A.
<b>H</b> Efficient data exchange and reporting	Low	Low	High	Low	Low	Low
<b>I</b> Increased end-of-life collection	High	High	Medium	Low	N.A.	N.A.
<b>J</b> Industry benchmarking	High	High	High	High	Medium	Medium
<b>K</b> Accurate market overview	Low	Low	Low	Low	Low	Low
<b>L</b> Informed policy design	High	High	High	High	Medium	Medium

**Note: This approximation is directional only. Actual applicability and value is influenced by multiple factors, such as what data and other requirements will characterise future DPPs. Furthermore, additional use cases, not included here, may exist in other sectors.**

### 3 Businesses facing the implementation of other DPPs can use multiple battery passport elements as a blueprint

#### Transferable aspects of the battery passport

##### System set-up and provisioning of the DPP hard- and software

- **Back-end, interoperable system architecture** is largely reuseable by other DPPs
- **Front-end software** is likely to be adapted to different data requirements, but fundamental functionalities can be reused
- **Hardware set-up requirements** will be the same, including servers, routers, switches, firewalls and storage systems

##### Data collection, integration, and certification

- **Upstream data collection** will require similar processes of supplier communication and organisational setup
- Some **upstream data attributes** will be similar, such as carbon footprint and recycled content, with analogous standards
- **Internal data collection as well as data integration** will be simpler for most other DPPs, as dynamic performance data will often not be relevant<sup>1</sup>
- **Auditing procedures** are likely directly transferable to other DPPs

##### Passport operations

- **Cloud hosting services, software maintenance, IT governance and access rights management in other DPPs** will use the same procedures as the battery passport
- **Labelling requirements** could differ between DPPs, given different product characteristics
- **Project management procedures** are streamlined via available experience of requirements and how to address them (while this is internal information of companies, experienced service providers may provide relevant insights)

#### General implications



A wider and lower cost **offering of developed technical DPP solutions** that can be integrated

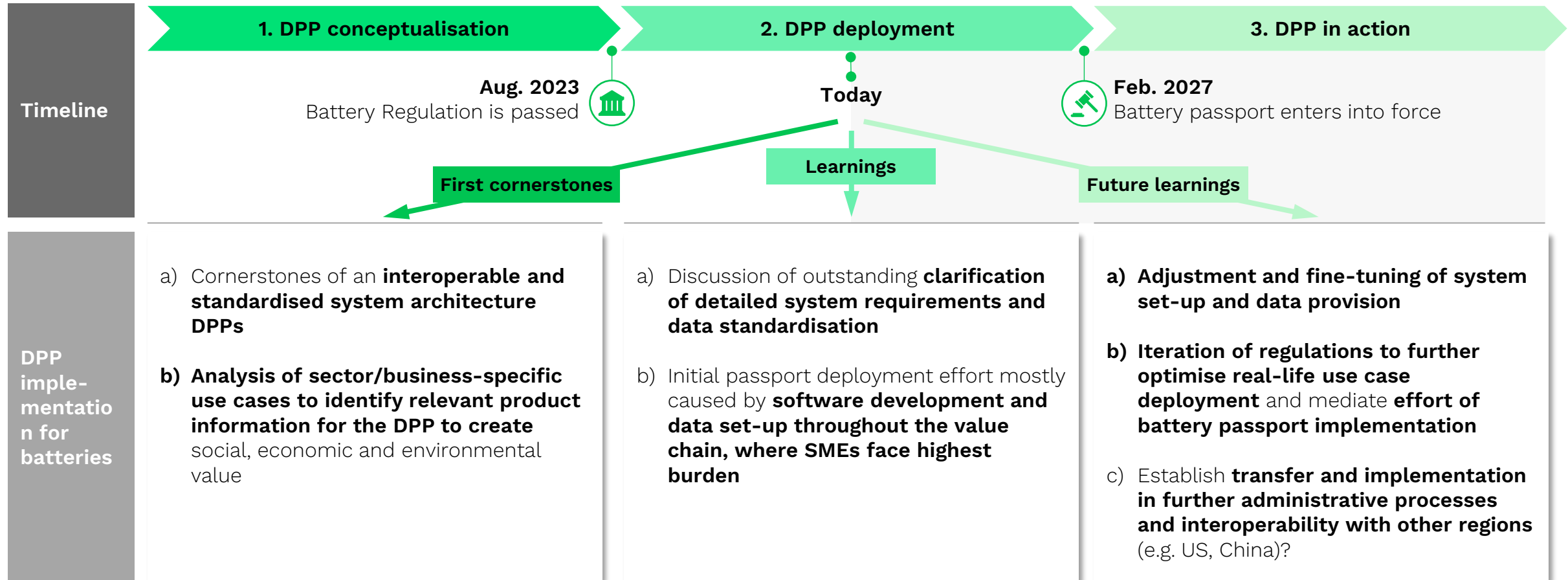


Detailed **documentation available on battery passport system set-up**, partially valid for other DPPs



A more **experienced set of service providers** that can be contracted, and personnel that can be hired

# 4 Policymakers can use insights from the battery passport deployment for enhanced policy design of other DPPs



# 5 Policymakers should take four general steps to mitigate the significant challenges of implementing DPPs

## Core challenges accompany DPP deployment

### Implementation

- DPPs entail significant **implementation effort** for businesses, and thus represent a bureaucratic burden
- The **specifics of technical implementation** are unclear and unharmonised

### Awareness

- Some businesses are unaware of upcoming **DPP requirements**
- **The value of DPPs is unclear** to some stakeholders across the sector and value chain

### Regulation

- **Interoperability** with other countries, DPPs, and regulations is not warranted
- **Regulation does not adapt** as insights on most sensible requirements evolve

## Policymakers should take 4 steps to ensure system success across DPPs

1

### Create clarity and support

Pre-empt uncertainty well ahead of entry into force by creating an easily accessible single source of truth and installing required support structures, particularly for SMEs

2

### Ensure sectoral and global interoperability

Safeguard that various DPPs make sense together, particularly in overlapping or adjacent sectors, and continuously nurture their fit into a global context

3

### Leverage science and industry collaboration

Establish sources/consortia for transparent and qualified recommendations, involving academia, policy, business and civil society organisations disseminating through publications and events

4

### Maintain flexibility to adapt to insights

Ensure flexibility to adjust the regulatory framework, particularly data requirements and functionalities of the system as insights evolve



## End of main section



This project receives funding from the [German Federal Ministry for Economic Affairs and Climate Action](#) by resolution of the German Bundestag under grant agreement No 16BZF335.





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# The scope of the battery passport goes beyond existing reporting requirements from the Battery Regulation

## Reporting of information required for:

### Battery Regulation independent from battery passport AND in battery passport

Attribute	Number	Attribute	Number
Battery unique identifier	1	Role of end-users in contributing to: waste prevention and the separate collection of waste batteries	53-54
Manufacturer's identification	2	Information on separate collection, take-back, collection points and preparing for re-use, preparing for repurposing and recycling operations	55
Manufacturing date and place	3-4	State of certified energy (SOCE)	58
Battery category and weight	5	Self-discharging rates: Initial, current, evolution of	59-61
EU declaration of conformity, ID of EU declaration of conformity, Results of tests reports	8- 10	Rated capacity, Capacity fade	62, 64
Separate collection symbol, Meaning of labels and symbols, Cadmium and lead symbols	11-13	Original power capability, Power capability fade	69, 71
Critical raw materials	14	Round trip energy efficiency: Initial and at 50% of cycle-life, Remaining round trip energy efficiency, Round trip energy efficiency fade	74-77
Battery chemistry	15	Initial internal resistance on battery cell level, on battery pack level	78, 81
Hazardous substances: Name, Hazard classes and/or categories, Related identifiers, Location, Concentration range	19-23	Expected lifetime: Number of charge-discharge cycles	86
Impact of substances on the environment, human health, safety	24	Number of (full) charge-discharge cycles	87
Battery carbon footprint (CF): Share of CF/life cycle stage (raw material acquisition and pre-processing; main product production; distribution; EOL and recycling); CF performance class, Web link to public CF study	25-31	Energy and Capacity throughput	90-91
Information of the due diligence report	32	Date of putting the battery into service	95
Extinguishing agent, safety measures/instructions	42-43	Time spent:	98-101
Pre-consumer recycled: nickel, cobalt, lithium, lead, nickel share	44-47	<ul style="list-style-type: none"> <li>In extreme temperatures above and below boundary</li> <li>Charging during extreme temperatures above and below boundary</li> </ul>	
Post-consumer recycled: nickel, cobalt, lithium, lead, nickel share	48-51		

### Only in battery passport

Attribute	Number
Battery status	7
Cathode, anode, electrolyte materials: Name, Related identifiers, Weight	16-18
Manual for: <ul style="list-style-type: none"> <li>Removal of the battery from the appliance</li> <li>Disassembly and dismantling of the battery pack</li> </ul>	36-37
Sources for spare parts: postal, e-mail and web address	38-40
Part numbers for components	41
Renewable content share	52
Nominal, minimum and maximum voltage	66-68
State of Charge (SoC)	65
Maximum permitted battery power	72
Cycle-life reference test	88
C-rate of relevant cycle-life test	89
Capacity threshold for exhaustion	92
Warranty period of the battery	94
Temperature range idle state (lower and upper boundary)	96-97
Information on accidents	102



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# Technical annex recycling case (1/2)

ONLY MAIN INPUTS

Input			Source	
Cost of recycling	Recycling process cost		[EUR/kg]	
	Sampling & sorting (information via sampling)		0.32-0.64 €	
	Sampling & sorting (selective information from seller)		0.16-0.32 €	
	Dismantling		1.08 €	
	Mechanical-hydrometallurgical treatment		5.48 €	
Battery passport scenario assumptions	Scenario assumptions		Minimum [%]	Maximum [%]
	Increase in materials recovered		1%	2%
	Reduction of sampling cost		50%	80%
	Reduction of dismantling cost (process improvement)		20%	40%
	Reduction of dismantling cost (process automation)		20%	30%
	Reduction of recycling treatment cost (material and process cost only)		10%	20%
Material per battery chemistry	NMC (111)		Material composition [kg/kg]	
	Lithium		0.03	
	Cobalt		0.08	
	Nickel		0.08	
	Manganese		0.07	
	Copper		0.17	
	Aluminium		0.09	
	Graphite		0.20	
	Plastics		0.02	
	Electrolyte organics		0.09	
	Anode binder		0.01	
	Others		0.39	
	NMC (622)		Material composition [kg/kg]	
	Lithium		0.03	
Cobalt		0.04		
Nickel		0.13		
Manganese		0.04		
Copper		0.18		
Aluminium		0.09		
Graphite		0.22		
Plastics		0.02		
Electrolyte organics		0.09		
Anode binder		0.00		
Others		0.36		
Argonne National Laboratory (2023)				

# Technical annex recycling case (2/2)

ONLY MAIN INPUTS

Input			Source
Recovery rate (per active material)	Active material	Recovery rate [%]	EU minimum recovery targets from 2031 as defined in the Battery Regulation (European Commission (2023a)) and values provided in the EverBatt model by the Argonne National Laboratory (2023)
	Cobalt	95.00%	
	Graphite	0.00%	
	Iron	0.00%	
	Lithium	80.00%	
	Manganese	80.00%	
	Nickel	95.00%	
	Sodium	0.00%	
CO <sub>2</sub> footprint of virgin materials	Active material	[kg CO <sub>2</sub> eq. / kg]	Global market activities retrieved from Ecoinvent (2024), cut-off cumulative LCIA v.3.91.1.
	Cobalt	44.89863483	
	Graphite	3.979205596	
	Iron-sulfate	0.159597627	
	Lithium	79.05499404	
	Manganese	5.503760567	
	Nickel	17.38794333	
	Sodium	2.01125836	
CO <sub>2</sub> reduction rate by recycling	CO <sub>2</sub> reduction rate by recycling for active materials [%]: 39%		Rinne et al. (2021)



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# Technical annex residual value determination case (1/2)

ONLY MAIN INPUTS

Input							Source
Average price of second-life battery	[EUR/kWh]	2023	2026	2030	2035	2040	Own convictions based on Global Sustainable Electricity Partnership (2021)
	Price	113	91	70	60	50	
Original capacity (per battery type)	[kWh]	2020		2025		2030	Own convictions based on IHS Markit forecast via T&E (2021) and Xu et al. (2022)
	BEV	54		68		72	
	PHEV	13		15		19	
Modules per pack	Modules per pack [amount]: 8						Samsung SDI (2016)
Modules tested in scenarios	[%]				2020		Assumption based on expert interviews
	Inhouse sourcing				0		
	Direct sourcing				1		
	Inhouse sourcing				2		
Technical assessment costs	[Euro/Module tested]		Min		Max		Assumption based on expert interview; test cost breakdown educated guess from industry expert based on time needed for respective tests
	Capacity and energy testing		750		2500		
	Internal resistance testing		250		833		
	SOC/OCV testing		2000		6667		
	Technical assessment cost		3000		10000		
			One temperature		3 temperatures		

# Technical annex residual value determination case (2/2)

ONLY MAIN INPUTS

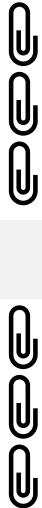
Input					Source
Baseline share of batteries going into second-life	[%]	2023	2025	2030	Own convictions based on data from CES (2023)
	Repurposing	9%	9%	15%	
	Remanufacturing	1%	1%	2%	
	SUM	10%	10%	17%	
Average remaining capacity	Average remaining capacity [%]: 70				Assumption based on expert interviews
Active materials needed for LFP battery	[kg/kWh]	Graphite	Iron	Lithium	Own convictions based on Leader et al. (2019), IEA (2023a) and IDTechEx (2021), assuming 10% material intensity decrease in 10 years
	LFP	0.8	0.77	0.1	
CO <sub>2</sub> footprint of primary active materials	Active material		[kg CO2 eq. / kg]		Global market activities retrieved from Ecoinvent (2024), cut-off cumulative LCIA v.3.91.1.
	Cobalt		44.89863483		
	Graphite		3.979205596		
	Iron-sulfate		0.159597627		
	Lithium		79.05499404		
	Manganese		5.503760567		
	Nickel		17.38794333		
	Sodium		2.01125836		





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# Technical annex collection case (1/2)

ONLY MAIN INPUTS

Input					Source				
Vehicle outflow (de-registered vehicles)	Vehicles leaving European roads [number]: 12 mn				Heinrich Böll Stiftung (2021)				
Electric vehicle share	[%]	2020	2025	2030	IEA (2023b): APS scenario				
	EV sales share	10	33	64					
Capacity (per battery type)	[kWh]	2020	2025	2030	Own convictions based on IHS Markit forecast via T&E (2021) and Xu et al. (2022)				
	BEV	54	68	72					
	PHEV	13	15	19					
Battery chemistry market share	[%]	2020	2030	2040	2050	Average of "baseline" and "high efficiency" scenarios from Energy Transition Commission (2023)			
	Na-ion	0%	4%	16%	20%				
	LNMO	0%	7%	9%	13%				
	LFP	20%	49%	36%	35%				
	LNO	0%	3%	8%	10%				
	LMR-NMC	0%	6%	8%	9%				
	NMC-highNi	25%	18%	12%	5%				
	NMC-medNi	40%	2%	0%	0%				
	NMC-lowNi	0%	0%	0%	0%				
	NMCA	0%	7%	5%	4%				
	NCA+	15%	6%	7%	5%				
Active material intensity (per chemistry)	[kg/kWh]	Cobalt	Graphite	Iron-batteries	Lithium	Manganese	Nickel	Sodium	Own convictions based on Leader et al. (2019), IEA (2023a) and IDTechEx (2021), assuming 10% material intensity decrease in 10 years
	Na-ion	0	1.1	0.7	0	0	0	0.3	
	LNMO	0	0.7	0	0.05	0.75	0.25	0	
	LFP	0	0.8	0.77	0.1	0	0	0	
	LNO	0	0.7	0	0.1	0	0.8	0	
	LMR-NMC	0.08	0.93	0	0.1	0.4	0.13	0	
	NMC-highNi	0.076	0.8	0	0.09	0.071	0.608	0	
	NMC-medNi	0.17	0.8	0	0.1	0.159	0.508	0	
	NMC-lowNi	0.313	0.8	0	0.118	0.292	0.312	0	
	NMCA	0.05	0.7	0	0.1	0.05	0.7	0	
	NCA+	0.117	0.8	0	0.106	0	0.618	0	

# Technical annex collection case (2/2)

ONLY MAIN INPUTS

Input			Source
Share of unknown whereabouts (illegal exports, illegal treatment and other)	Scenario I: Business as Usual [Share]: 37 %	Scenario II: More Control [Share]: 20%	Umweltbundesamt (2020) and ADEME (2019)
Recovery rate (per active material)	Active material	Recovery rate [%]	EU minimum recovery targets from 2031 as defined in the Battery Regulation (European Commission (2023a)) and values provided in the EverBatt model by the Argonne National Laboratory (2023)
	Cobalt	95.00%	
	Graphite	0.00%	
	Iron	0.00%	
	Lithium	80.00%	
	Manganese	80.00%	
	Nickel	95.00%	
Commodity prices	Active material	Price[EUR/kg]	5-year averages from DERA (2023)
	Cobalt	51.13 €	
	Graphite	1.22 €	
	Iron	0.30 €	
	Lithium	21.73 €	
	Manganese	1.05 €	
	Nickel	15.48 €	
CO <sub>2</sub> footprint of primary active materials	Active material	[kg CO2 eq. / kg]	Global market activities retrieved from Ecoinvent (2024), cut-off cumulative LCIA v.3.91.1.
	Cobalt	44.89863483	
	Graphite	3.979205596	
	Iron-sulfate	0.159597627	
	Lithium	79.05499404	
	Manganese	5.503760567	
	Nickel	17.38794333	
CO <sub>2</sub> reduction rate by recycling	For active materials [%]: 39%		Rinne et al. (2021)



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# A Reliable communication of ESG data

- Applications / Market
- Chemistry / Technology
- Requirements per EU Battery Regulation
- (Use case) Equally applicable
- Partly applicable
- Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

For industrial batteries, the **overall benefits regarding reliable communication of ESG data remain consistent**. In the case of **batteries with external storage**, the **key aspects** of the general use case scenario could be **leveraged at a later time or on a voluntary basis**.

## Overall applicability:

All industrial batteries

## Key differences compared to general use case

<b>Due diligence report</b>	<b>No differences:</b> Equally required for battery passport for all industrial batteries.
<b>Carbon footprint</b> (in total and share per life cycle stage)	<b>Reporting will be mandatory 54 months later for industrial batteries with external storage</b> (redox-flow-batteries) compared to all other industrial batteries.
<b>Recycled content shares</b>	<b>Reporting not required for industrial batteries with external storage<sup>1</sup></b> (redox-flow-batteries) and for (industrial) <b>batteries that do not contain cobalt, lithium, nickel or lead</b> in active materials (e.g. sodium sulphur, sodium-ion batteries).



## Applicability of general battery passport benefits

- Use case benefits equally applicable:** The significant aspects of due **diligence requirements are identical** for all batteries and do not change the benefits assessment.
- Use case benefits equally applicable (only later for batteries with external storage):** For the carbon footprint information there is only a **delay in the timeline of applicability** (54 months) for industrial batteries with external storage. Thus, benefits regarding CF reporting will not significantly deviate **for industrial batteries**.
- Use case benefits largely equally applicable:** If economic operators **voluntarily provide information** on the share of recycled content, they may **enhance their market positioning** and unlock the benefits outlined in the general use case.

See details of general use case on [slide 56](#)  
1. Batteries with external storage have additional notable system distinctions with regard to servicing which fall beyond the scope of this analysis (see excursus on [slide 121](#))

# B Informed purchasing decisions

- Applications / Market
- Chemistry / Technology
- Requirements per EU Battery Regulation
- (Use case)  
Equally applicable
- Partly applicable
- Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

### Key takeaway

The **battery passport supports informed purchasing decisions for industrial batteries with BMS/connectivity**, offering analogous benefits to the general use case. **The applicability is reduced for industrial batteries without BMS/connectivity** as they lack detailed dynamic data that can inform purchasing decisions **after a usage period**.

## Overall applicability:

- Industrial batteries with BMS
- Industrial batteries without BMS

## Key differences compared to general use case

	<b>Business relations</b>	In the context of industrial batteries, <b>purchasers are often distinct from ultimate end-users</b> (e.g. within a company distinction between buyer and forklift operator). Alternatively, there may be <b>intermediaries</b> , e.g. when an installer acquires a home storage system and subsequently sells it to the homeowner, though these processes vary internationally.
	<b>Performance and durability data</b>	Slightly <b>fewer dynamic data required</b> for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) <b>for other industrial batteries than stationary battery energy storage systems (SBESS)</b> .
	<b>Share of recycled content</b> <b>Carbon footprint</b> <b>Due diligence report</b>	See use case “Reliable communication of ESG data”
	<b>Battery chemistry</b>	<b>No differences:</b> Equally required for battery passport for all industrial batteries.
	<b>Second life/Recycling</b>	<b>Industrial batteries are mostly directly recycled</b> and there is currently no significant market for trading used industrial batteries (e.g. for second-life) except for transfer of ownership within the same application.
	<b>Performance and durability data</b>	<b>Not available for industrial batteries without a battery management system (BMS)</b> .



## Applicability of general battery passport benefits

**Use case benefits equally applicable:** Although processes differ and there may be divergent interests on the part of buyers and end-users, **the battery passport could enable an informed purchasing decision for all new industrial batteries**.

**Use case benefits equally applicable:** The information requirements deviate only little compared to the overall scope of performance and durability data. Thus, the **impact on the benefits is negligibly small**.

**Use case benefits largely equally applicable:** Use case “**Reliable communication of ESG data**” is largely equally applicable to industrial batteries, therefore the **benefits regarding informed purchasing decision** associated with these data attributes **remain consistent** with the general use case.

**Use case benefits equally applicable:** Battery chemistry is available as **part of an informed purchasing decision for all industrial batteries**.

**Use case benefits equally applicable:** The battery passport supports an informed purchasing decision for used industrial batteries, with recyclers representing the main buyers of used/waste industrial batteries.

**Use case benefits less applicable for used industrial batteries without BMS:** **Dynamic data** are not available for used industrial batteries without BMS, thus they **cannot be used for an informed purchasing decision**.

# Eased servicing

Applications / Market

Chemistry / Technology

Requirements per EU Battery Regulation

(Use case)  
Equally applicable

Partly applicable

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

Battery passport data could facilitate inhouse servicing and predictive maintenance for industrial batteries. Yet, benefits for servicing through independent workshops is less applicable because of predefined service contracts or processes that are predominant for most industrial batteries. Moreover, benefits arising from dynamic data do not apply to industrial batteries without BMS/connectivity.

## Overall applicability:

All industrial batteries

## Key differences compared to general use case

	Maintenance Business Relations	Maintenance or repair services for industrial batteries are typically included as a component of (inhouse) service contracts between the manufacturer and the B2B client or end-user of the machinery (e.g. electric logistic solutions and large-scale SBESS). Also, for B2B relations (e.g. home storage), typically services are only conducted by the manufacturer or authorised actors.
	Performance and durability data	Not available for industrial batteries without a battery management system/connectivity (BMS).
	Maintenance with/without BMS	Repairing Li-ion (and other) batteries with a BMS requires specialised knowledge, tools and attention to safety, whereby dynamic data is beneficial. Batteries without a BMS generally involve simpler repairing and maintenance with little promise of improvements through dynamic data.
	Performance and durability data e.g. negative events	Slightly fewer dynamic data required for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) for other industrial batteries than stationary battery energy storage systems (SBESS).
	Dismantling information	No differences: Equally required for battery passport for all industrial batteries.



## Applicability of general battery passport benefits

**Use case benefits less applicable for most industrial batteries<sup>1</sup>:** Since servicing is a core business case for manufacturers of industrial batteries, benefits for independent workshops are likely to be relatively small. Nevertheless, battery passport data could be used to ease inhouse servicing and predictive maintenance to a certain extent (more detailed data is needed for more profound insights).

**Use case benefits not applicable for industrial batteries without BMS:** For industrial batteries without a BMS, dynamic data is currently not available and would promise comparatively little economic benefits to facilitate repairing and predictive maintenance, also considering high investments needed to enable dynamic data flows for batteries without a BMS.

**Use case benefits equally applicable:** The information requirements deviate little compared to the overall scope of performance and durability data. Thus, the impact on the benefits is negligibly small.

**Use case benefits equally applicable:** Since dismantling information is required for all industrial battery subgroups, it is equally available for eased servicing of industrial batteries.

See details of general use case on [slide 58](#)  
1. Batteries with external storage have additional notable system distinctions with regard to servicing which fall beyond the scope of this analysis (see excursus on [slide 121](#))

# D Precise risk assessment for transport of used/waste batteries

- 📊

Applications / Market
- ⚙️

Chemistry / Technology
- 💰

Requirements per EU Battery Regulation
- ✅

(Use case)  
Equally applicable
- Partly applicable
- ❌

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

The risk assessment for transportation of used/waste batteries with BMS benefits from dynamic data via the battery passport independent of battery category and the **use case** is therefore **equally applicable to industrial batteries with BMS**. The **risk assessment of industrial batteries without a BMS** (e.g. Pb-acid, Ni-based) is less complex and **does not require dynamic data** via the battery passport.

## Overall applicability:

- ✅

Industrial batteries with BMS
- Industrial batteries without BMS

## Key differences compared to general use case

<div>💰</div> <b>Performance and durability data</b> e.g. capacity fade, negative events	Slightly <b>fewer dynamic data required</b> for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) <b>for other industrial batteries than stationary battery energy storage systems</b> (SBESS).
<div>⚙️</div> <b>Performance and durability data</b>	<b>Dynamic data not available for industrial batteries without a battery management system</b> (BMS).
<div>⚙️</div> <b>Transport by Chemistry / Technology</b>	Some industrial batteries ( <b>lead-acid, nickel-based</b> ), could already be <b>transported without a complex risk assessment</b> . The requirements differ regarding battery chemistry and the classification of hazardous substances.



## Applicability of general battery passport benefits

**Use case benefits equally applicable:** The available data could help create a precise risk assessment prior to transportation, although additional data points and definitions would be beneficial (e.g. definition of an accident in the context of industrial batteries, documents such as UN38.3 safety measures).

**Use case benefits less applicable for industrial batteries without BMS:** Battery cell chemistries, which do not have a BMS, have risk assessment methods defined by the transport regulations (e.g. ADR) that are **sufficient to ensure safe transport even without dynamic performance data**. However, static information on battery chemistry and performance, e.g. capacity provide a benefit.



# E More efficient recycling processes

-  Applications / Market
-  Chemistry / Technology
-  Requirements per EU Battery Regulation
-  (Use case)  
Equally applicable
-  Partly applicable
-  Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh





### Key takeaway

The use case for **more efficient recycling processes** is applicable to batteries with Li-ion or emerging chemistries independent of battery category. Handling of other battery chemistries such as Pb-acid, NiMH or those in batteries with external storage, however, **do not need advanced sampling or complex dismantling**, so that the data contained in the battery passport offers **less added value**.

## Overall applicability:

-  Industrial batteries with Li-ion and emerging chemistries
-  Industrial batteries except Li-ion and emerging chemistries

## Key differences compared to general use case

	<b>Need for sampling</b>	<p>Lithium-ion batteries and those with emerging chemistries currently require sampling to prevent negative impact on recycling processes.</p> <p>In contrast, lead-acid, nickel-based batteries and batteries with external storage (redox-flow)<sup>1</sup> do not require advanced sampling due to their respective chemical homogeneity.</p>
	<b>Battery composition</b>	<p>No differences: Equally required for battery passport for all batteries.</p>
	<b>Dismantling process</b>	<p>The dismantling process for lead-acid, nickel-based batteries and batteries with external storage (redox-flow)<sup>1</sup> is less complex than for lithium-ion and other emerging chemistries.</p>
	<b>Dismantling information</b>	<p>No differences: Equally required for battery passport for all batteries.</p>

## Applicability of general battery passport benefits

Use case benefits less applicable to industrial batteries with chemistries such as Pb-acid, NiMH or those in batteries with external storage: Recycling processes for those battery chemistries do not require advanced sampling.

Use case benefits equally applicable for lithium-ion (and emerging chemistries, such as sodium-ion): Recycling processes require advanced sampling.

Use case benefits less applicable to industrial batteries with chemistries such as Pb-acid, NiMH or those in batteries with external storage: Dismantling information provides less advantage for those battery chemistries as the battery dismantling process is less complex. Use case benefits equally applicable for lithium-ion (and emerging chemistries, such as sodium-ion): Established and future recycling processes could become more efficient through more automated dismantling and known battery composition).

1. Batteries with external storage have additional notable system distinctions with regard to servicing which fall beyond the scope of this analysis (see excursus on [slide 121](#))

# F Simplified residual value determination

- Applications / Market
- Chemistry / Technology
- Requirements per EU Battery Regulation
- (Use case)  
Equally applicable
- Partly applicable
- Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

### Key takeaway

Due to more exhaustive service lives of **industrial batteries**, they are **rarely used in second life applications**. Therefore, the **residual value determination is only needed for transfer of ownership within the same application, which limits the applicability of the use case**. Exceptions could be heavy duty applications, e.g. in agriculture & construction. Additionally, the **absence of dynamic data for industrial batteries without a BMS/connectivity limits the potential of the use case** further for this subgroup.

## Overall applicability:

— All industrial batteries

## Key differences compared to general use case

	<b>Business cases</b> Due to the load cycles and overall lifespan of most <b>industrial batteries</b> , they will have a <b>lower SoH or capacity at the end of their service life</b> . For instance, forklift batteries and SBESS are often used until they could no longer be repurposed. Potential business cases for residual value determination of industrial batteries include remanufacturing, insurance matters, <b>transfer of ownership</b> , with the latter the <b>most likely</b> .
	<b>Performance and durability data</b> <b>Not available for industrial batteries without a battery management system (BMS).</b>
	<b>Performance and durability data</b> e.g. capacity fade, negative events Slightly <b>fewer dynamic data required</b> for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) <b>for other industrial Batteries than Stationary Battery Energy Storage Systems (SBESS).</b>
	<b>Battery chemistry and composition</b> <b>No differences:</b> Equally required for battery passport for all industrial batteries.



## Applicability of general battery passport benefits

- Use case benefits less applicable for most industrial batteries:** Because of reduced availability of industrial for a second life, the market for residual value determination will be relatively small (compared to EV batteries) with **fewer benefits to be gained via the battery passport**.
- Use case benefits not applicable for industrial batteries without a BMS:**  
Due to the missing BMS and the inability to save the values required to determine the residual value, **the cost to enable a residual value determination is offset by the efficient recycling processes already in place**. As these batteries could be operated up to a SoH of 20-30%, recycling is more likely than resale.
- Use case benefits equally applicable:** The information requirements deviate little compared to the overall scope of performance and durability data and the **impact on the benefits is negligible**. For batteries with external storage (redox-flow-batteries), chemistry provides decisive information about the durability and residual value of the electrolyte (see excursus).
- Use case benefits equally applicable:** Battery chemistry and composition is **available as part of a simplified residual value determination for all industrial batteries**.

# G Streamlined trade of used/waste batteries through marketplaces

- 🏠

Applications / Market
- ⚙️

Chemistry / Technology
- 💰

Requirements per EU Battery Regulation
- ✅

(Use case)  
Equally applicable
- Partly applicable
- ❌

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

The **battery passport could be leveraged for streamlined trade of used/waste batteries through marketplaces equally for industrial batteries**. The different handling of batteries downstream, where these batteries are typically directly recycled rather than re-used or repurposed does not affect the benefits of their streamlined trade.

## Overall applicability:

✅ All industrial batteries

## Key differences compared to general use case

🏠 Use phase downstream	<b>Most industrial batteries are directly recycled</b> after their first life and there is no significant market for repurposing.
💰 Battery composition	<b>No differences:</b> Equally required for battery passport for all industrial batteries.
💰 Performance and durability data	Slightly <b>fewer dynamic data required</b> for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) <b>for other industrial batteries than stationary battery energy storage systems (SBESS).</b>
⚙️ Performance and durability data	<b>Not available for industrial batteries without a battery management system (BMS).</b>



## Applicability of general battery passport benefits

**Use case benefits equally applicable:** Like other batteries, industrial batteries could also be traded via a marketplace. However, due to the low probability of a second life, **marketplaces might be especially relevant for trading used batteries for recyclers.**

**Use case benefits equally applicable:** Battery composition of all industrial batteries **could be made available as information for recyclers on marketplaces.**

**Use case benefits equally applicable:** The **information requirements deviate little** compared to the overall scope of performance and durability data and the **impact on the benefits is negligible.**

**Use case benefits equally applicable:** The **differences in data availability do not have an impact on the benefits of streamlined trading** of used batteries, **since for the same chemistry/technology subgroups, consistent information is expected to be available** (e.g. lead-acid batteries are expected to be compared with other lead-acid batteries on marketplaces, thus missing dynamic data have no impact).

# H Efficient data exchange and reporting based on upstream traceability

- 📊

Applications / Market
- ⚙️

Chemistry / Technology
- 💰

Requirements per EU Battery Regulation
- ✅

(Use case)  
Equally applicable
- Partly applicable
- ❌

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

Battery passport data requirements that could be fulfilled through a traceability system enable a more transparent supply chain equally for all industrial batteries, with negligible differences compared to the general analysis of this use case.

## Overall applicability:

✅ All industrial batteries

## Key differences compared to general use case

💰 Due diligence report	No differences: Equally required for battery passport for all industrial batteries.
💰 Carbon footprint (in total and share per life cycle stage)	Reporting will be mandatory 54 months later for industrial batteries with external storage (redox-flow-batteries) compared to all other industrial batteries.
💰 Recycled content shares	Reporting not required for industrial batteries with external storage (redox-flow-batteries) and for (industrial) batteries that do not contain cobalt, lithium, nickel or lead in active materials (e.g. sodium sulphur, sodium-ion batteries).

## Applicability of general battery passport benefits

**Use case benefits equally applicable:** The significant aspects of due diligence requirements are identical for all batteries and do not change the benefits assessment.

**Use case benefits equally applicable (only later for batteries with external storage):** For the carbon footprint information there is only a delay in the timeline of applicability (54 months) for industrial batteries with external storage. Thus, benefits regarding CF reporting will not significantly deviate for industrial batteries.

**Use case benefits equally applicable:** The differences regarding recycled content have very little impact on the overall benefits assessment. In the absence of recycled content requirements, supply chain management is still a valid use case due to the significant scope of due diligence and carbon footprint requirements.

# I Increased end-of-life collection

- 🏢

Applications / Market
- ⚙️

Chemistry / Technology
- 💰

Requirements per EU Battery Regulation
- ✅

(Use case)  
Equally applicable
- Partly applicable
- ❌

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

For industrial batteries, **predetermined and monitored take-back processes** already result in a **higher collection rate** compared to EV batteries. Additionally, the **bulkiness and immobility** of many industrial batteries serve as **barriers to illegal exports**. Consequently, the **potential use case of increased end-of-life collection**, facilitated by additional non-mandatory information on the battery passport, is **less applicable to industrial batteries**.

## Overall applicability:

— All industrial batteries

## Key differences compared to general use case

<div>🏢</div> B2B Collection	In the case of <b>B2B collections</b> , e.g. used forklift batteries, the <b>return of the battery is often contractually regulated at the time of purchase</b> , so that a leak or <b>illegal export</b> of the products is <b>less likely</b> .
<div>🏠</div> B2C Collection	In the case of B2C collection, e.g. of home storage systems, batteries must be registered in advance by the manufacturer or retailer in waste management organisations (e.g. EAR in Germany). As soon as end-users want to return the batteries, they are able to contact the manufacturer or retailer, who will then initiate the take-back process, with <b>B2C processes</b> more variable compared to B2B. A leak or <b>illegal export</b> of home storage systems is <b>less likely</b> (compared to EVs) <b>due to their complex installation and stationary use</b> , and due to <b>well-defined take back processes</b> .
<div>⚙️</div> Performance and durability data	<b>Not available for industrial batteries without a battery management system (BMS).</b>
<div>💰</div> Additional information (e.g. date of export)	<b>No differences:</b> Equally possible to include additional voluntary information for all industrial batteries in battery passport.



## Applicability of general battery passport benefits

**Use case benefits less applicable for industrial batteries:** As fewer illegal exports are generally to be expected for industrial batteries, the corresponding **benefits that the battery passport could enable are limited**.

For home storage systems, where take-back processes are more variable than B2B processes, the **battery passport could offer an additional benefit in raising awareness of the need to return no longer used home storage batteries** and the associated valuable materials (instead of leaving them in the basement, e.g.) – which in turn could lead to an increased end-of-life collection.

**Use case benefits less applicable for industrial batteries without a BMS:** Industrial batteries without a BMS are **missing information relating to their State of Health, further limiting the benefits**.

**Use case benefits equally applicable:** Additional information could **help export control and market surveillance also for industrial batteries**.

# J Industry benchmarking

- Applications / Market
- Chemistry / Technology
- Requirements per EU Battery Regulation
- (Use case)  
Equally applicable
- Partly applicable
- Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

### Key takeaway

Aggregated data could enable benchmarking of industrial batteries with benefits of the general use case remaining consistent for industrial batteries with BMS. However, no benchmarking of detailed dynamic performance data is possible for batteries without BMS/connectivity.

## Overall applicability:

- Industrial batteries with BMS
- Industrial batteries without BMS

## Key differences compared to general use case

	Share of recycled content	See use case “Reliable communication of ESG data”
	Carbon footprint	
	Due diligence report	
	Performance and durability data	Slightly fewer dynamic data required for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) for other industrial batteries than stationary battery energy storage systems (SBESS).
	Performance and durability data	Not available for industrial batteries without a battery management system (BMS)/connectivity.

## Applicability of general battery passport benefits

**Use case benefits largely equally applicable:** Use case “Reliable Communication of ESG data” is equally applicable to industrial batteries. Therefore, aggregating those data attributes could enable industry benchmarking also for industrial batteries and the benefits of the general use case are largely equally applicable to industrial batteries.

**Use case benefits equally applicable:** The information requirements deviate little compared to the overall scope of performance and durability data. Thus, the impact on the benefits is negligibly small.

**Benefits not applicable for industrial batteries without BMS:** Dynamic performance and durability data are not available for industrial batteries without BMS, thereby benchmarking of dynamic performance data is not possible for this subgroup (e.g. aging of a certain battery across various applications cannot be compared).

# K Accurate market overview

- 📊

Applications / Market
- ⚙️

Chemistry / Technology
- 💰

Requirements per EU Battery Regulation
- ✅

(Use case)  
Equally applicable
- Partly applicable
- ❌

Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh

Key  
takeaway

Aggregating data of battery passports **could enable an accurate market overview** equally for industrial batteries with BMS, with negligible variations in data availability. However, a **detailed market overview specifically relating to batteries’ conditions** (e.g. state of health) is **not available for industrial batteries without BMS/connectivity**.

## Overall applicability:

- ✅

Industrial batteries with BMS
- Industrial batteries without BMS

## Key differences compared to general use case

💰 General information	No differences: Equally required for battery passport for all industrial batteries.
💰 Materials and composition	No differences: Equally required for battery passport for all industrial batteries
💰 Performance and durability data	Slightly <b>fewer dynamic data required</b> for battery passport (i.e. Art. 14/Annex VII vs Art. 10/Annex IV and XIII.) <b>for other industrial batteries than stationary battery energy storage systems</b> (SBESS).
💰 Recycled content shares	Reporting <b>not required for industrial batteries with external storage</b> (redox-flow-batteries) and for (industrial) <b>batteries that do not contain cobalt, lithium, nickel or lead</b> in active materials (e.g. sodium sulphur, sodium-ion batteries).
⚙️ Performance and durability data	<b>Not available for industrial batteries without a battery management system</b> (BMS)/connectivity.



## Applicability of general battery passport benefits

**Use case benefits equally applicable:** Though there are **slight variations in the availability of information** for industrial batteries, they **deviate little compared to the overall data available within the scope of this use case**. As a result, the impact on the benefits is negligibly small.

**Use case benefits not applicable for industrial batteries without BMS:** An **accurate market overview including dynamic data** of the service life (e.g. state of health) and the associated benefits are **not applicable for industrial batteries without BMS**.



# L Informed policy design


-  Applications / Market
-  Chemistry / Technology
-  Requirements per EU Battery Regulation
-  (Use case)  
Equally applicable
-  Partly applicable
-  Not applicable

## Use case analysis specific to industrial batteries with capacity > 2 kWh






### Key takeaway

Almost all battery pass data attributes could contribute to this use case. **Overall**, the **data availability** deviates **little for industrial batteries** with negligible impact on the use case benefits. Therefore, **informed policy design enabled through aggregating passport data applies equally to all industrial batteries**. Given the broader variance in industrial applications, **additional differentiation in application-specific information would add further benefits to this use case**.

## Overall applicability:

 All industrial batteries

## Key differences compared to general use case

	<b>Variance applications</b>	Industrial batteries are characterised by a <b>broad range of different applications</b> that have different characteristics and service life patterns.
	<b>General information</b>	<b>No differences:</b> Equally required for battery passport for all industrial batteries.
	<b>Materials and composition</b>	<b>No differences:</b> Equally required for battery passport for all industrial batteries.
	<b>Share of recycled content</b> Carbon footprint Due diligence report	See use case “Reliable communication of ESG data”
	<b>Performance and durability data</b>	<b>Not available for industrial batteries without a battery management system (BMS).</b>



## Applicability of general battery passport benefits

**Use case benefits equally applicable:** While informed policy design through the battery passport is equally applicable to industrial batteries, it is important to note that to correctly assess industrial batteries, the applications batteries are used in should be considered (e.g. differences in service lives patterns of heavy machinery batteries and forklift batteries). **Applications are not mapped in the battery passport** and it should be assessed how to **consider the subject to enable a more informed policy design**.

**Use case benefits equally applicable:** This use case comprises almost all battery passport data attributes. Therefore, the **availability of information for industrial batteries deviates little compared to the overall scope of data in the battery passport**. As a result, the **impact on the benefits is negligibly small**.





## Annex

- I. Overview of mandatory battery passport information
- II. Technical Appendix "More Efficient Recycling"
- III. Technical Appendix "Simplified residual determination"
- IV. Technical Appendix "Increased EOL collection"
- V. Use case by use case analysis on differences for industrial batteries
- VI. Technical Appendix "Effort assessment"
- VII. Synthesis and way forward



# Excursus: The relative Fibonacci agile estimation is a uniquely suited methodology to gauge the efforts of hard-to-approximate tasks

## 1 Introduction to agile estimation

- **Definition:** Agile estimation is a technique used to forecast the effort required to complete a task
- **Purpose:** To provide a relative measure of the complexity or effort associated with a set of tasks
- **Example:** Agile estimation used in software development project, to determine effort for coding a new feature vs fixing bugs vs conducting testing → allows better plan for implementation

## 4 Why use relative Fibonacci in agile estimation

- **Simplicity:** Easy to understand and apply
- **Reflects uncertainty** in estimating larger tasks, avoiding false precision
- **Relative Estimation:** Easier to establish relative efforts than absolute efforts, with Fibonacci sequence accounting for increasing difficulty to differentiate at higher magnitudes (e.g. difference between 1 and 2 is easier to estimate, than between 377 and 378 despite same absolute difference)
- **Focus on Effort:** Emphasises the effort required rather than exact costs

→ Well suited to assess hard-to-estimate efforts of the battery passport

## 2 What is the Fibonacci sequence

- **Definition:** A series of numbers where each number is the sum of the two preceding ones:

1 2 3 5 8 13 21 34 55 89 144 233 377 ...

- **Use:** The Fibonacci sequence frequently appears in mathematics (e.g. golden ratio) and biological patterns (e.g. the branching of trees), illustrating its applicability in modeling growth

## 3 How relative Fibonacci agile estimation works<sup>1</sup>

- **Step 1:** Define the different effort categories
- **Step 2:** Attribute to a well-known category an effort score on the Fibonacci scale with 0 as lowest and 377 highest<sup>2</sup>
- **Step 3:** Rate further effort categories relative to this first category
- **Step 4:** Discuss results with participants to work towards a consensus on different approximations, and understand differing interpretations

1. For more explanations, visit: <https://www.productplan.com/glossary/fibonacci-agile-estimation/>  
 2. The maximum of 377 was selected because it provides a sufficient range of magnitude, without excessively numerous options in the multiple-choice survey

# Overview of all relative Fibonacci input values

■ Part of results discussion ■ Not part of results discussion

Effort category	Task	Source of Fibonacci value estimation							
		Bottom-up approx.	DPP solution provider 1 (<250 empl.)	EV manuf. 1 (>5000 empl.)	EV manuf. 2 (>5000 empl.)	EV manuf. 3 (>5000 empl.)	EV manuf. 4 (>5000 empl.)	DPP solution provider 2 (<250 empl.)	DPP solution provider 3 (>5k empl.)
Battery passport development	Software development and licenses	377	377	89	89	144	34	144	233
	Hardware	5	5	34	5	55	21	3	3
Data collection	External upstream	233	233	233	233	233	34	8	144
	Internal static	8	21	89	89	5	34	8	34
	Internal dynamic	233	144	144	233	13	13	21	89
Data integration		144	144	55	89	5	89	34	55
Certification		21	13	233	233	55	55	34	21
Battery passport operation	Software maintenance, service fees and updates	89	89	55	55	89	34	8	8
	Cloud hosting services	5	21	21	34	55	13	8	13
	Access rights management	8	13	34	233	21	144	21	55
Labelling: identifiers, software, hardware		8	55	21	21	8	13	8	13
IT governance: membership/ onboarding fees, technology selection, software changes		21	34	13	55	13	21	8	5
Project overhead incl. project management, third-party consulting, and legal costs		144	34	34	55	144	21	8	21

An essential part of the relative Fibonacci agile estimation is a discussion and calibration of results based on underlying assumptions. Results of survey participants that could not attend these discussions were thus considered as input to discussions, but their values not directly used in the calculation of min, max, and avg. scores.

# Explanations and sources of internal bottom-up effort assessment

Category	Task	Fibonacci value	Explanation / Assumptions	Sources
Battery passport development	Software development and licenses	377	Estimated as cost for initial development of an ERP software system. Assumption of 10-12 FTEs required for 1 year. Needed for software development and architecture design. Additional expert knowledge for new up-coming technologies like DID, VC, etc. Personnel needed: Developers, testers, system architects, product owner, delivery manager, project manager.	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://doit.software/blog/software-development-costs#screen23">https://doit.software/blog/software-development-costs#screen23</a></li> <li><a href="https://www.scnsoft.com/software-development/costs">https://www.scnsoft.com/software-development/costs</a></li> </ul>
	Hardware	5	Assumption of 1 additional server installed, along with routers, switches and firewall set-up	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://www.budgetvm.com/kb/how-much-server-cost/">https://www.budgetvm.com/kb/how-much-server-cost/</a></li> <li><a href="https://rdit.com/how-much-does-a-server-cost-for-a-small-business/">https://rdit.com/how-much-does-a-server-cost-for-a-small-business/</a></li> </ul>
Data collection	External upstream	233	Labour cost combined with optional support system on traceability	<ul style="list-style-type: none"> <li>Based on range established for data collection by the European Commission, quantifying costs of due diligence: <a href="https://eur-lex.europa.eu/resource.html?uri=cellar:5ee7d299-3ad8-11eb-b27b-01aa75ed71a1.0001.02/DOC_3&amp;format=PDF">https://eur-lex.europa.eu/resource.html?uri=cellar:5ee7d299-3ad8-11eb-b27b-01aa75ed71a1.0001.02/DOC_3&amp;format=PDF</a></li> </ul>
	Internal static	8	2-5 emails/exchanges per data attribute, requiring 1-2h to address each (to write, research, address in calls), for 13 static attributes. Assumed data scientist wage	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://www.salaryexpert.com/salary/browse/cities/job/all/data-scientist/germany">https://www.salaryexpert.com/salary/browse/cities/job/all/data-scientist/germany</a></li> </ul>
	Internal dynamic	233	All dynamic data assumed available via the BMS. BMS assumed as previously existing independent of the BP, but cost required to adapt it to output following BP requirements: Remaining usable battery energy, Current internal resistance and internal resistance increase, Status of battery discharge: extended state of charge incl. status of deactivation, Number of deep discharge events, Number of overcharge events, Information on accidents	<ul style="list-style-type: none"> <li>Internal assumption</li> </ul>
Data integration		144	Effort benchmarked via cost of Extraction-Loading-Transformation tool, with added effort for connections with back-end operator system that gathers BMS data. Labor required for installation, provisioning, configuration, monitoring/verification: 0.5-1 FTE.	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://portable.io/learn/how-much-do-etl-solutions-cost">https://portable.io/learn/how-much-do-etl-solutions-cost</a></li> <li><a href="https://www.astera.com/de/type/blog/building-a-data-warehouse-cost-estimation/">https://www.astera.com/de/type/blog/building-a-data-warehouse-cost-estimation/</a></li> <li><a href="https://www.starfishetl.com/blog/How-Much-Does-Data-Integration-Cost">https://www.starfishetl.com/blog/How-Much-Does-Data-Integration-Cost</a></li> <li><a href="https://www.elastic.io/plans/">https://www.elastic.io/plans/</a></li> </ul>
Certification		21	Based on range of third-party audit costs established by the University of Columbia and OECD, quantifying costs of due diligence. Also used by a European Commission impact assessment report on the Battery Regulation. Other certification effort available as well.	<ul style="list-style-type: none"> <li><a href="https://eur-lex.europa.eu/resource.html?uri=cellar:5ee7d299-3ad8-11eb-b27b-01aa75ed71a1.0001.02/DOC_3&amp;format=PDF">https://eur-lex.europa.eu/resource.html?uri=cellar:5ee7d299-3ad8-11eb-b27b-01aa75ed71a1.0001.02/DOC_3&amp;format=PDF</a></li> <li><a href="https://it-cybersicherheit.de/iso-27001/iso-27001-kosten-zertifizierung/">https://it-cybersicherheit.de/iso-27001/iso-27001-kosten-zertifizierung/</a></li> <li><a href="https://secureframe.com/hub/iso-27001/certification-cost">https://secureframe.com/hub/iso-27001/certification-cost</a></li> <li><a href="https://www.dataguard.de/blog/iso-27001-zertifizierung-kosten#:~:text=Die%20durchschnittlichen%20Kosten%20f%C3%BCr%20die,und%20100.000%20Euro%20liegen%20k%C3%B6nnen.">https://www.dataguard.de/blog/iso-27001-zertifizierung-kosten#:~:text=Die%20durchschnittlichen%20Kosten%20f%C3%BCr%20die,und%20100.000%20Euro%20liegen%20k%C3%B6nnen.</a></li> </ul>
Battery passport operation	Software maintenance, fees and updates	89	Estimated as 20-30% of original software development costs	<ul style="list-style-type: none"> <li>Internal assumption</li> </ul>
	Cloud hosting services	5	Benchmark of a high-powered cloud-hosting AWS business plan used, including unlimited visitors and sites, a high frequency CPU, automatic daily backups, 120 GB disk space, unlimited bandwidth, 8 dedicated CPUs and 16 GB RAM	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://nestify.io/pricing/">https://nestify.io/pricing/</a></li> </ul>
	Access rights management	8	Assumption that access rights management should be largely automated, with notified bodies, authorities, the EC, and persons with legitimate interest being able to access relevant data via an acknowledged identity. Assumption that no significant additional costs as only interface to external platforms for access rights management (e.g. Catena-X) required. Benchmark value based on ARM software	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://www.getapp.com/security-software/a/access-rights-manager">https://www.getapp.com/security-software/a/access-rights-manager</a></li> </ul>
Labelling: identifiers, software, hardware		8	Benchmark from cost analysis for QR codes used in products against counterfeiting. Costs linked to ordering QR codes. Also includes effort to make production line changes and use printing machinery	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://www.euipo.europa.eu/en/observatory/enforcement/blockathon">https://www.euipo.europa.eu/en/observatory/enforcement/blockathon</a></li> </ul>
IT governance		21	Membership/ onboarding fees, technology selection, software changes. Assumed as 5% of IT-related expenses for IT governance	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://www.apqc.org/what-we-do/benchmarking/open-standards-benchmarking/measures/it-strategy-and-governance-cost">https://www.apqc.org/what-we-do/benchmarking/open-standards-benchmarking/measures/it-strategy-and-governance-cost</a></li> </ul>
Project overhead incl. project management, third-party consulting, and legal costs		144	Benchmark from the European Commission report on due diligence compliance, on costs to strengthen internal management systems, and effort for third-party consulting and personnel training. Inflation adjusted.	<ul style="list-style-type: none"> <li>Internal assumption</li> <li><a href="https://op.europa.eu/en/publication-detail/-/publication/dced6d04-92fb-4a20-a499-4dad9974aee7">https://op.europa.eu/en/publication-detail/-/publication/dced6d04-92fb-4a20-a499-4dad9974aee7</a></li> </ul>





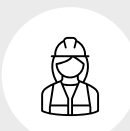
## Annex

- I. Overview of mandatory battery passport information
- II. Technical Appendix "More Efficient Recycling"
- III. Technical Appendix "Simplified residual determination"
- IV. Technical Appendix "Increased EOL collection"
- V. Use case by use case analysis on differences for industrial batteries
- VI. Technical Appendix "Effort assessment"
- VII. Synthesis and way forward








# Upstream: Battery passport creates transparency to optimise supply chains and incentivise environmental and social responsibility

Dimensions	Impact clusters	Explanation of battery passport impacts
 Economy	Revenue and investment increase	<b>ESG profiling becomes a visible differentiator</b> attracting customers and investors via enhanced brand reputation and increased trust <a href="#">A</a> , <a href="#">B</a>
	Cost optimisation	<b>Data reporting and exchange systems</b> could reduce reporting costs, while <b>data ecosystems and upstream traceability systems</b> could optimise supplier engagement and promote data quality and integrity <a href="#">H</a>
	Level-playing field	<b>Increased transparency on regulatory social and environmental requirements</b> for all market participants establishes a fair and equitable environment for businesses <a href="#">A</a> , <a href="#">B</a>
 Environment	Incentivised sustainability	<b>Increased transparency on carbon footprint, recycled content and other sustainability attributes</b> to investors, consumers, and other value chain players incentivises sustainable practices <a href="#">A</a> , <a href="#">B</a>
	Enabled supply-chain sustainability	<b>Company-specific and dynamic ESG information in a digital and interoperable format</b> <a href="#">H</a> , as well as <b>industry benchmarking and a more accurate market overview</b> <a href="#">J</a> , <a href="#">K</a> , supports the ability to identify hotspots, and engage or select suppliers based on environmental criteria
 Society	Social risks mitigation	<b>Traceability systems (e.g. chain of custody systems) and the improved transparency</b> on due diligence reports encourages mitigation of social risks in supply chains (e.g. human rights violations) <a href="#">B</a> , <a href="#">H</a>






# Downstream: Battery passport causes life-cycle productivity with significant economic, environmental and social impact

Dimensions	Impact clusters	Explanation of battery passport impacts
 <b>Economy</b>	<b>Cost reductions</b>	Insights on performance and composition reduces <b>costs for servicing</b> <a href="#">C</a> , <b>value determination</b> <a href="#">E</a> , <b>marketplace transactions</b> <a href="#">G</a> , <b>storage and shipping</b> <a href="#">D</a> , <b>sampling, dismantling</b> , and <b>material input</b> <a href="#">E</a>
	<b>Revenue increase</b>	<b>Increased resale revenues</b> with better value determination <a href="#">E</a> as well as <b>increased recycler revenues</b> <a href="#">E</a> due to higher regional material availability (through increased collection) and reduced material process losses
	<b>Supply-chain security</b>	Increased <b>secondary material availability reduces supply-chain risks</b> on required critical raw materials <a href="#">E</a> , <a href="#">E</a> , <a href="#">I</a>
 <b>Environment</b>	<b>Increased circularity &amp; lower GHG emissions</b>	<b>Increase in battery life-time</b> , <b>reduction in spare parts required</b> <a href="#">C</a> , <b>less contamination and process losses</b> during recycling <a href="#">E</a> , <b>better allocation of batteries</b> promoting reuse, remanufacture, repurposing, and recycling <a href="#">E</a> , and <b>increased end-of-life collection</b> <a href="#">I</a>
	<b>Fewer incidents of direct pollution</b>	<b>Fewer incidents during transport</b> and <b>reduction of illegal waste exports</b> with potentially ensuing pollution <a href="#">D</a> , <a href="#">I</a>
 <b>Society</b>	<b>Employment increase</b>	New, local employment in product end-of-life processes via <b>circular business models, increased recycling and additional, decentralised repair shops</b> <a href="#">C</a> , <a href="#">E</a> , <a href="#">I</a>
	<b>Health and safety improvement</b>	<b>Risk reduction in transportation</b> and <b>reduction in illegal, unsafe, and unhealthy end-of-life practices</b> <a href="#">D</a> , <a href="#">I</a>



# Roundstream: Aggregated data establishes system insights to businesses and policy-makers, promoting far reaching system impacts

Dimensions	Impact clusters	Explanation of battery passport impacts
 <b>Economy</b>	<b>Profitability increase</b>	<b>Improved promotion of well-performing products</b> through comparison, insights to <b>refine performance via aggregated data</b> , and <b>increased asset utilisation for downstream businesses</b> through better battery inflow predictions <a href="#">↓</a> <a href="#">K</a>
	<b>Financial risk mitigation</b>	<b>Financial risk is mitigated via improved insights on battery material flows</b> enabling demand forecasts, <b>targeted policies reducing resource dependencies</b> , and better <b>balancing of policy objectives and market feasibility</b> <a href="#">↓</a> <a href="#">K</a> <a href="#">L</a>
 <b>Environment</b>	<b>Increased competition on sustainability</b>	<b>Increased competition on carbon-intensity of products and other metrics</b> through increased visibility of environmental performance in <b>comparison to the market</b> throughout the value chain <a href="#">↓</a> <a href="#">K</a>
	<b>Improved requirements for sustainability</b>	Insights on battery data such as performance and durability across thousands of batteries <b>enable policymakers to set minimum requirements</b> thereby e.g. increasing lifetime of batteries <a href="#">L</a>
 <b>Society</b>	<b>Social risks mitigation</b>	Transparency on battery model's social impact compared to the market <b>could incentivise producers to implement practices and standards</b> and allow policy-makers to improve basis for revising social requirements (e.g. recognition of specific supply chain due diligence schemes). <b>Fostered trust in the sustainability of the battery value chain</b> supports the just and green transition <a href="#">↓</a> <a href="#">K</a> <a href="#">L</a>






# Appendix - Use cases applicability


## Textiles results

### Use case applicability

High
  Medium
  Low
  N.A.

Use cases			Explanations	Criteria
	Batteries	Textiles		
Ⓐ Reliable communication of ESG data	High	High	Applicability potentially higher for textiles due to higher proximity to end-consumer than for batteries. Much higher frequency of purchasing decisions on textiles would significantly increase frequency of passport use with textiles. Note: DPP expected to be used in garments only, not in other textiles such as households or technical textiles. Social data may not be included.	<div><b>Economic benefit</b> Economic benefits, including cost savings, revenue generation, supply chain resilience, and access to funding</div>
Ⓑ Informed purchasing decisions	High	Medium	Garment purchasing decisions also driven by price and comfort / aesthetic, or function in case of sport. It is unclear how much ESG info will influence purchasing decision.	
Ⓒ Eased servicing	Medium	Medium	Could provide care and repair instructions, but these mostly already exist in physical labels. However, lack of circular design for better repair and lack of detailed spare parts (e.g. Zipper) could be addressed by DPPs.	
Ⓓ Precise risk assessment for transport	High	Low	N.A. due to lack of transportation risk with textiles and high volume of traded goods.	
Ⓔ More efficient recycling processes	High	High	DPPs with RFID chips could facilitate the sorting process with information on fiber composition.. Pressure on the sector to solve the waste issue is high and clear information on how to recycle will increase the value of textile waste streams.	<div><b>Environmental and social benefit</b> Environmental and social benefits, such as carbon footprint, GHG emissions, job creation, and social risk mitigation</div>
Ⓕ Simplified residual value determination	High	High	Very low applicability to textiles due to lack of dynamic data and thus measurability of value degradation. However, in the context of second-hand markets, a DPP could help determine garment value based on upstream data, facilitating take-back mechanisms.	
Ⓖ Streamlined trade of waste	High	Medium	DPP could facilitate the trade of textile waste by providing clear, standardised descriptions of waste material, aiding to match sellers with buyers in second-hand markets. Less relevant for textiles given generally lower unit value, less complex product specifications, and the lack of use phase data. Also, trade is more likely influenced by local demand and supply.	<div><b>Implementation feasibility</b> Financial and technological feasibility of implementing the use case</div>
Ⓗ Efficient data exchange and reporting	High	High	DPP would support improved supply chain transparency, making data exchange more efficient. This is valuable given the industries complex & opaque supply chains, aiding in reporting for sustainability and compliance. If DPP integrated with automated upstream data exchange, impact could be very high. Linking the DPP data to eco-modulation within EPR reporting is also promising.	
Ⓘ Increased end-of-life collection	High	Medium	DPPs may significantly improve the sorting process, therefore improve efficiency and profitability of sorting businesses which in turn increases collection of discarded textile waste	
Ⓙ Industry benchmarking	High	High	If data across all textile DPPs are aggregated in the EU and by the EU, these use cases can become very applicable, given the enablement to understand and benchmark sustainability trends across the industry, with better informed business strategies, procurement decisions, and policy design. Given likely lack of direct use phase data for a textiles DPP, there will likely be a fewer variety of insights available. However, textile companies may derive insights from data picked up in the downstream value chain, which can contribute to improved circular design. Feasibility slightly reduced given huge quantity of traded goods making data aggregation more challenging.	
Ⓚ Accurate market overview	High	Medium		
Ⓛ Informed policy design	High	High		

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# Appendix - Use cases applicability

## Electronics results

### Use case applicability

High
  Medium
  Low
  N.A.




Use cases	Batteries	Electronics	Explanations	Criteria
Ⓐ Reliable communication of ESG data	Low	High	High proximity to end-consumers makes ESG communication crucial in electronics. Although the sustainability impact of electronics is lower than large batteries, the high volume of products in this sector offsets this. Large electronics companies seek transparent ESG performance to differentiate their products, such as through an EPREL label. A DPP can help streamline compliance with regulations like REACH and WEEE, ensuring consistent ESG communication across products.	 <b>Economic benefit</b> Economic benefits, including cost savings, revenue generation, supply chain resilience, and access to funding
Ⓑ Informed purchasing decisions	Low	High		
Ⓒ Eased servicing	Medium	Medium	Passport can provide useful information on repair, incl. e.g. source for spare parts. However, this would likely be a limited value add for licensed servicing providers, who already have access to repair information. Self- or independent repair could benefit, but face risk of damaged or missing data carriers.	
Ⓓ Precise risk assessment for transport	Low	N.A.	N.A. – Passport unlikely to be used for transport risk assessment.	 <b>Environmental and social benefit</b> Environmental and social benefits, such as carbon footprint, GHG emissions, job creation, and social risk mitigation
Ⓔ More efficient recycling processes	High	Low	High variance in devices that are recycled make sampling and dismantling play a much smaller role, with most waste being shredded in the recycling process. The passport could facilitate the process of spare parts harvesting.	
Ⓕ Simplified residual value determination	High	Medium	Resale is often based on grades (A, B, C) which could be aided by the passport. However, given much lower unit value this use case has a less significant role to play for electronics.	
Ⓖ Streamlined trade of waste	Low	Medium	Significant market for second-hand electronic devices could benefit from easily accessible information such as CE labels, to efficiently match buyers and sellers.	 <b>Implementation feasibility</b> Financial and technological feasibility of implementing the use case
Ⓗ Efficient data exchange and reporting	Low	Low	DPP could provide a digital medium to establish supply chain transparency, thereby facilitating the reporting process.	
Ⓘ Increased end-of-life collection	High	Low	DPP could encourage consumers to return devices, promoting a circular economy. While there are incentives to retain materials within the EU, the social drawback vs benefit of devices reaching lower-income regions remain uncertain. Also, integration of electronics DPP in export control is unlikely.	
Ⓙ Industry benchmarking	High	High		
Ⓚ Accurate market overview	Low	Low	Similar applicable to batteries if data aggregation is enabled. Feasibility is lower given the high number of electronics devices and thus DPPs requiring storage and aggregation. On the flip-side, insights across this huge market could be extremely valuable. Electronics DPPs would likely only contain static data (no BMS) – number of different insights would thus be slightly lower.	
Ⓛ Informed policy design	High	High		

# Appendix - Use cases applicability

## Vehicles results

### Use case applicability

High
  Medium
  Low
  N.A.

Use cases	Batteries	Vehicles	Explanations	Criteria
Ⓐ Reliable communication of ESG data			Potentially higher applicability for vehicles than for batteries due to closer proximity to end-consumers. Given the significant environmental impact of vehicles, and the significance of the purchasing decision overall, a DPP could play an important role in ESG communication and informed purchasing decisions.	 <b>Economic benefit</b> Economic benefits, including cost savings, revenue generation, supply chain resilience, and access to funding
Ⓑ Informed purchasing decisions				
Ⓒ Eased servicing			Very similar use case applicability to the battery passport, but with additional repair functionalities related to other parts of the vehicle.	
Ⓓ Precise risk assessment for transport			For electric vehicles, the vehicle passport could give reference to transport risks of end-of-life vehicles similarly to how the battery passport does for batteries.	 <b>Environmental and social benefit</b> Environmental and social benefits, such as carbon footprint, GHG emissions, job creation, and social risk mitigation
Ⓔ More efficient recycling processes			For electric vehicles, the vehicle passport can provide sampling and dismantling information of the battery and beyond. However, information of the vehicle beyond the battery will be limited in usefulness.	
Ⓕ Simplified residual value determination			Residual value assessment will be extensively aided by a DPP for vehicles, both in determining resale value and to inform the decision of choosing the right R-strategy at vehicle end-of-life.	
Ⓖ Streamlined trade of waste			Similar to batteries, a DPP for vehicles would facilitate the efficient matching of buyers and sellers in marketplaces through the provision of additional information	 <b>Implementation feasibility</b> Financial and technological feasibility of implementing the use case
Ⓗ Efficient data exchange and reporting			Similar to batteries, a DPP for vehicles would improve reporting and reduce costs, as well as enhance supplier selection, data integrity, and carbon and linear economy hotspot identification	
Ⓘ Increased end-of-life collection			Inclusion of vehicles in export control as explained for battery passport. Additional relevance for vehicles, due to material availability beyond the battery such as steel.	
Ⓙ Industry benchmarking				
Ⓚ Accurate market overview			Aggregated industry data on vehicles similarly relevant as for batteries. A vehicle passport encompassing the battery passport could capitalise on the aggregated data insights of batteries and beyond.	
Ⓛ Informed policy design				

# Appendix - Use cases applicability

## Steel and iron results




Use case applicability

High

Medium

Low

N.A.

Use cases	Batteries	Steel & Iron	Explanations	Criteria
Ⓐ Reliable communication of ESG data			DPP offers limited added value due to lower likelihood of end-consumer accessing the DPP (finished steel product e.g. within concrete or below layers of paint). However, steel users such as automotive companies may use steel DPPs to inform their purchasing decisions, while steel producers can use it to communicate to users relevant dynamic information, e.g., The Steel Climate Standard.	<div><b>Economic benefit</b> Economic benefits, including cost savings, revenue generation, supply chain resilience, and access to funding</div>
Ⓑ Informed purchasing decisions				
Ⓒ Eased servicing			N.A. because DPP of steel in end-product mostly not accessible	
Ⓓ Precise risk assessment for transport			N.A. because limited risk of steel transport	
Ⓔ More efficient recycling processes			While steel grades would be a valuable piece of information for recyclers, in most cases accessing this information or integrating it into a scalable recycling process is not feasible, due to the multitude of different possible steel products and grades and the high likelihood that data carriers of batches may no longer be accessible.	<div><b>Environmental and social benefit</b> Environmental and social benefits, such as carbon footprint, GHG emissions, job creation, and social risk mitigation</div>
Ⓕ Simplified residual value determination				
Ⓖ Streamlined trade of waste			N.A. – DPP with no useful information on residual value determination	
Ⓗ Efficient data exchange and reporting			N.A. – more efficient matching of buyers and sellers on a waste steel marketplace unlikely.	
Ⓘ Increased end-of-life collection			Applicable and useful for easing compliance reporting and increasing the credibility of shared information. Value chain is currently dispersed making traceability difficult but needed if instruments like the SBTi Climate Bonds are used for a project.	<div><b>Implementation feasibility</b> Financial and technological feasibility of implementing the use case</div>
Ⓙ Industry benchmarking				
Ⓚ Accurate market overview			N.A. – steel DPPs would be unlikely to be integrated in export controls.	
Ⓛ Informed policy design			Each product declaration has a different format. Standardising and digitalising this information in a public ledger is highly interesting for aggregation to inform policies, industry strategies, and consumer choices.	

# Appendix - Use cases applicability

## Hydrogen results




Use case applicability

High


Medium

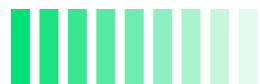
Low

N.A.

Use cases	Bat	Hyd	Explanations	Criteria
Ⓐ Reliable communication of ESG data			Communication to end-consumers via a DPP is unlikely, but a DPP for Hydrogen can standardize and enhance communication between producers and off-takers, providing transparency on hydrogen sustainability and reliable ESG data, including verifiable GHG emissions reduction and compliance with DNSH rules.	<div><b>Economic benefit</b> Economic benefits, including cost savings, revenue generation, supply chain resilience, and access to funding</div>
Ⓑ Informed purchasing decisions				
Ⓒ Eased servicing			N.A. because hydrogen is not serviced.	
Ⓓ Precise risk assessment for transport			N.A. because DPP no impact on hydrogen transport risk assessment.	
Ⓔ More efficient recycling processes			N.A. because hydrogen only consumed, with no ensuing circularity or trade.	<div><b>Environmental and social benefit</b> Environmental and social benefits, such as carbon footprint, GHG emissions, job creation, and social risk mitigation</div>
Ⓕ Simplified residual value determination				
Ⓖ Streamlined trade of waste			Applicability is very low because hydrogen projects bank on few, very large off-takers – with one-off information shared via contracts and a DPP adding only incremental value.	
Ⓗ Efficient data exchange and reporting			N.A. because hydrogen not collected at end-of-life.	<div><b>Implementation feasibility</b> Financial and technological feasibility of implementing the use case</div>
Ⓙ Industry benchmarking			The DPP for Hydrogen provides value in centralised data aggregation across various production types, aiding industry benchmarking, market overviews, and informed policy design. However, the limited number of projects reduces its advantage over manual data collection	
Ⓚ Accurate market overview				
Ⓛ Informed policy design				

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# Thank you!

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This project receives funding from the [German Federal Ministry for Economic Affairs and Climate Action](#) by resolution of the German Bundestag under grant agreement No 16BZF335.