Battery Pass Closing Event

25 February 2025, Brussels

During the Battery Pass closing event on 25 February 2025, participants in the room and online shared many more questions via Slido than we were able to answer during the three panel sessions. Here we share detailed responses to those questions.

Q & A





Table of contents

PANEL 1

Policy Pathways: What's Next for Digital Product Passports?

Regulatory Timelines & Implementation	3
Battery Passport Governance & Data	4
Interoperability & Integration	6
Security, Integrity & Transparency	7

PANEL 2

Collaboration and standardisation: Keys to success for battery passports

Standardization & Regulatory Alignment	8
Compliance & Market Readiness	10
Data & Lifecycle Management	11

PANEL 3

Taking the Lead: How Businesses Can Prepare for 2027

Econon	hic Impact & C	ost Considera	tions12
Data In	tegrity & Certif	ication	13

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Regulatory Timelines & Implementation

Question	Answer	
CO ₂ Footprint Delegated Act – What is the timeline? It was promised a year ago.	Final result pending, delayed due geopolitical priorities. No official sta delegated acts on CO ² Footprint for follow separately.	to Omnibus package and the latest atements are known. Important: Other r other battery categories than EV will
Battery Regulation Implementing Act – Expected in 02/25 to guide due diligence reports due in 08/25. When will it be available?	No public nomination date yet.	
Germany's Notifying Authority for Conformity Assessment – When will BMWK nominate the authority?	No communication can be expected	before new government is in place.
DPP for Portable Batteries – Will it become mandatory in the future? Currently, it only applies to EVs, LMTs, etc.	Currently it applies only to EV, LM ⁻ There are no indications that a full b for portable batteries in the fore information is also required for port to Art. 13 BattReg, but is much simpl	T, and industrial batteries over 2 kWh. battery passport will become mandatory bseeable future. Reporting on battery cable batteries via a QR-code according ler and requires less information.
Transition Period for Spare EV Batteries – Will there be one under the EU Battery Regulation?	The EU Battery Regulation does not spare EV batteries. Compliance is ex	explicitly provide a transition period for pected once the regulation is in force.





Battery Passport Governance & Data

Question

Answer

Data Update Frequency & Responsibility – How often is data updated in the battery passport, and who updates it? The regulation mandates "up-to-date" data in the battery passport. Update frequency in the battery passport should be viewed separately from update frequency in battery management system (Art. 14 BattReg). At status quo, specification of update frequency for the battery passport is not available, and, to our knowledge, unlikely. Economic operators may be able to define update frequency themselves based on 'proportionality', i.e. what is the use of the updated data, and the frequency compared to the effort. The economic operator placing the battery on the market is responsible for keeping the DBP up to date, while interactions with other actors handling the battery in the use phase require a closer look.

Defining Access Groups & Credential Issuers – What is the timeline for setting up access groups and assigning issuing authorities? How will "interested persons" gain additional access? Delegated and Implementing Acts will define access levels and issuing authorities. For the definition of legitimate interested persons, a Delegated Act is mentioned in the EUBR art. 77 (9): "By 18 August 2026, the Commission shall adopt implementing acts specifying which persons are to be considered persons with a legitimate interest". The economic operator must provide technical means to realize a selective disclosure of the battery pass data attributes depending on the access role. Technical details for that, like common identity and access management will be specified by EU standardisation organisation In CEN/CENELEC JTC 24. The results are expected in December 2025.

Carbon Footprint for Battery Production Equipment – Does it contribute to emissions in <u>battery</u> pass data? It's unclear whether emissions from production equipment will be included in battery footprint calculations. Methodology still pending.





Battery Passport Governance & Data

Question	Answer		L
Protection of Non-Mandatory Data – Will non-mandatory data in the DPP be accessible, and if not, how will it be protected?	Access to non-mandatory data operator providing the data. There regulations requiring access to be expressed per stakeholder group. Gaia-X Trust Framework.	will be determin may be legal bound restricted. And acc BP proposes ODRL	ed by the economic aries, e.g. data privacy ess policies should be policies following the
Accuracy of Dynamic Attributes – Can you provide a rough accuracy level for attributes like SoHc (State of Health for capacity)?	Accuracy of metrics like State of data and measurement methods, Standardization Process M/579 ma Commission Documents - C(2021)8	Health (SoH) depe with no standard a y consider accurac 3614).	ends on manufacturer ccuracy level defined. y levels (<u>Register of</u>
SME Participation – What is the plan to enable SME participation in Battery Passport while minimizing burdens?	The regulation acknowledges SME to reduce compliance burdens whi offers could be a measure to simpl	s and is expected t le ensuring particip y onboarding.	o introduce measures ation. Service provider
Handling of Unused/Dangling DPPs – What happens to batteries with dangling DPPs? How can they be traced if still in use or leaked?	No clear policy yet on how unclaim a tracking system may be required for the issue and update BPs. This dangling DPPs. The EU plans a cent no principle or technology defined on the registry for DPPs, which are non-conformity) But there is no de	ned or unused DPPs . Economic operato should be the leve ral registry for all D . EC thinks about fo in a problematic si ecision.	s will be managed, but ors will be responsible el of tracking unused/ PPs. Currently there is preseeing certain flags tuation (e.g. in case of





Interoperability & Integration

Question	Answer		
Interoperability with Other Regions & Value Chains – How will this be managed?	EU entities encourage industry to processes, e.g. ISO/IEC, UNCEFAC Ouranos, CN Battery ID. BP Technical Guidance recommer generic sub models that also enabl be a good approach to enable inter	engage in interna T; engage with reg nds a generic met es co-existence of roperability.	tional standardization ional activities like JP a model in RDF, with standards. This should
Compatibility with UNTP – Will the EU system be able to verify value chain data outside the EU?	The EU system aims to be comp verification outside the EU remain Current UNTP specification is to so BR and in some aspects compleme	atible with global ns a challenge. UN ⁻ ome extent in cont entary.	value chain data, but TP is not finished yet. radiction to ESPR and
Integration of ISO 59040	PCDS is not listed as compulsory	element of DPP, ho	wever the information
PCDS – Will Product	content of PCDS vastly overlaps	with the informa	tion in a DPP, hence
Circularity Data Sheets be	alignment would make sense. It i	may be possible b	ut requires alignment
incorporated into the DPP?	between ISO and EU regulators reg	arding content.	
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Security, Integrity & Transparency

Question	Answer
Detecting Unauthorized	The battery passport on its own cannot do it. Potential detection mechanisms
Battery Modifications – Can	may be included, but no specific process has been defined yet. Options
the battery passport detect	could include reporting of changes by BMS to the economic operator or a
unauthorized modifications,	physical seal that is broken when the battery is tinkered with. If the data
e.g. replacing cells in a	modifications are not actively updated into the BP (to be expected with
module?	unauthorized modifications) there is no way of detecting from the BP.
Data Integrity & Anti- Tampering Measures – Are blockchain or Verifiable Credentials being used to ensure integrity?	Blockchain and verifiable credentials are being considered to ensure secure and tamper-proof data. However, data integrity means are subject of specification in the CEN/CENELEC JTC24 (Security modules). Blockchain is not a mandatory requirement. Details will come at the end of Dec. 2025.
Identification &	The DPP does not currently use EU-wide digital identity frameworks, despite
Authentication via EU	their existence.
Regulation – Why isn't it	The Technical guidance recommends using Gaia-X Trust Framework, which
being used, despite existing	can use eIDAS. The means of identity and access management are subject of
regulatory frameworks?	selected standards by CEN/CENELEC JTC24.
Call for advice from DPP	Further guidance and sources for DPP implementation are yet to be publicly
Service Providers – Where	available. The entire issue of service providers (requirements, procedures
can more information be	etc.) is the subject of a delegated act, prepared by the EC. After the first call
found?	for contribution last, it is promised to have the first version in April 2025.
Who are the DPP Service Providers? – What are their key responsibilities?	The list of service providers and their exact roles are not yet fully disclosed. Before the work of JTC24 is not finished and published, there can't be any compliant service providers. There might be different service offers. But especially at the early stages, full-service providers offering API or web access are likely to be dominant.





Standardization & Regulatory Alignment

Question	Answer		
JTC24 Standardization – How can we get early insights into the preliminary results of the JTC24 standardization work?	Official content out of JTC 24 will JTC 25 can be achieved by being an Body (NSB) or by Liaisons.	come at the end of expert, sent by a Na	2025. Participation in tional Standardization
DIN-SPEC 99100 Adoption – Will DIN/DKE SPEC 99100 be adopted by CEN/CENELEC as a harmonized European standard and by ISO/IEC as an international standard?	No confirmation yet on adoption approval process is required. More to the pending delegated acts.	by CEN/CENELEC over, DS99100 need	or ISO/IEC. A formal s amendment subject
DPP vs. Battery Passport – Is the Battery Passport the same as the Digital Product Passport (DPP) in terms of standardization?	The Battery Passport has a specific and its components are the same a groups.	: DPP data specifica s the EU-DPP syster	tion. The DPP-System n for all other product
Impact of Delayed Standards – If measurement standards are not ready before Feb 2027, how should economic operators (EOs) report the technical indicators?	EOs may need to use interim ind finalized; otherwise enter procedur	lustry guidelines un res followed in free	ntil EU standards are field entries.





Standardization & Regulatory Alignment

Question

Answer

Defining Interoperability

- Everyone talks about interoperability, but what exactly does it mean? Is it interoperability between DPP service providers, and why is this necessary? What: Interoperability is the ability of two or more different systems for information exchange and to be able to work with that information. The notion of interoperability is to avoid any effort for realizing that exchange (definition,implementation, operation, update).

Why: Inclusivity – because most of the technologies for implementing DPP is already in industrial application. To avoid extra effort, we need to have compatibility with different existing technologies (e.g. different data carriers). DPPs will exist not only for Batteries as well for other sectors and product groups (e.g. cars). But for having a car DPP we must incorporate Battery DPP. Therefore, the data exchange between batteries and cars must be established by considering different technologies. Further on it is important to avoid any system-lock-in caused by any provider.

Extendibility: we expect technological progress, for that we need the ability to foresee innovation and its application in advance to avoid lock-ins which prevent us from the benefit of innovation.

Interoperability must play on all levels. Rules, Processes, Data Exchange Protocols and API, Data Carrier and Data (including Unique Identifier), even Security Infrastructure. This is described in the Standard Stack, can be found in the technical guidance of Battery Pass Project.





Compliance & Market Readiness

Question	Answer		
EU Registry for Compliance – When is the EU registry or regulatory system	No official date, but a testing phase in mid of 2026.	is expected to have	e the registry available
expected to be available for responsible economic			
operators to connect and test with the authority system?			
Battery Supply Risk – Europe is not self-sufficient in battery production. Is there a risk that after Feb 18, 2027, non-EU batteries will not comply with regulations, leading to a supply shortage?	There is an oversupply of batter, EU market as vital off-take sink. compliant. Risks are minor.	y cells on global a	markets, seeking the rs are on track to be
OEM Non-Compliance Consequences – What are the consequences if an	Battery Pass is a market access real include fines, restricted market acc	quirement. Risks of cess, or recalls for r	non-compliance may non-compliant OEMs.
OEM is not compliant with regulations after Feb 2027?			
Battery Passport & Homologation – How does compliance with the battery passport connect to car homologation requirements?	No direct connection.		





Data & Lifecycle Management

Question	Answer		
DBP Status Management – Can we clarify the different statuses of the Digital Battery Passport (DBP), when to update them, and who is responsible?	For a discussion of transfer of respon chapter in the Content Guidance.	nsibility for the DBP,	see the corresponding
Managing Dynamic Data – Battery aging tests are inconsistent across the industry. What is the strategy for easing implementation, including for older battery types?	Topic is covered partly in standard and durability data <u>Register of</u> Meanwhile, apply good and reasona	dization mandate M Commission Docur able practice and d	I/579 on performance nents - C(2021)8614. ocument approach.
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PANEL 3 Taking the Lead: How Businesses Can Prepare for 2027

Economic Impact & Cost Considerations

Question	Answer		
Value for Economic Operators – What are the actual benefits of the battery	See "Value Assessment" Study on	www.thebatterypas	<u>s.eu</u>
passport for economic operators?			
Cost of Implementation –	The battery pass is the first DPP m	ade available on the	e market. EV batteries

The last estimate was \$10 per product, which may be too high for LMTs. Are there alternative pricing models? were in focus because of the higher commercial value of EV batteries. Cost estimates are inherently difficult given the early stage of the technological development. Future ramp-up and volumes should consolidate pricing substantially, reaching marginal costs even for smaller batteries. Pricing models like volume-based or pay-per-use would allow for the reduction of necessary CAPEX and coverage of costs on product pricing. Since the EUBR permits different ways of organizing battery passports including third-party providers or collaborative offers (e.g. via PRO), low-cost options for SME are likely to emerge. The possibility to add optional data points for extra added value may off-set costs for "premium" solutions. Refer to Battery Pass "Value Assessment".

Cost Distribution – How will the costs be split between one-time installation and ongoing operational expenses? See "Value Assessment" Study on <u>www.thebatterypass.eu</u>

Back to Table of Contents





PANEL 3 Taking the Lead: How Businesses Can Prepare for 2027s

Data Integrity & Certification

Question		Answer		I
Ensuring Data Ac How will data ac battery passport and guaranteed?	curacy – curacy in the be verified	Automated validation, audits, third can ensure data integrity, validity a standards by JTC24. Accuracy is m procedures for determination of ba a different standardisation activity (Register of Commission Document the end of this year.	I-party checks, and and security, which ore related to stand attery KPIs like SoH requested by the E t <u>s - C(2021)8614</u>). Re	Verifiable Credentials is subject of selected dardised methods and This is the subject of J, called Mandate/579 esults are expected by
Certification of F – Will battery pa parameters requ	Parameters ssport ire	Some parameters (carbon footpri party certification for regulatory ap	nt, recycled conter oproval.	t) may require third-
certification to e compliance?	nsure	As the battery passport is needed to need to be proven. There're some to pass project, we successfully in Credentials that allow independen verified claims that are cryptograp	for compliance, its o echnical candidates vestigated W3C st ent digital data vali hically sealed for ta	completeness etc. will for this. In the battery andardized Verifiable dation by third-party amper-evidence.
		However, besides the technical SMEs are considered, hence the sophistication and economically fe	capability also equivalence of the selected solution we have been associated as the selected solution of the selected sol	conomic interests of will balance technical ion.



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