

EU Battery Passport Readiness Checklist

The data, identifier and access model every in-scope battery needs before Feb 18, 2027.

WHO MUST COMPLY

Producers and importers placing EV batteries, industrial batteries over 2 kWh, or light-means-of-transport (LMT) batteries on the EU market – the 'economic operator' accountable for the passport.

THE DEADLINE

From **18 February 2027**, every in-scope battery placed on the EU market must carry a battery passport, accessible via a QR code, under Reg. (EU) 2023/1542 (Article 77). The economic operator placing the battery on the market is responsible for the data being accurate, complete, accessible and up to date.

1 · Scope & responsibility

- ☐ Confirm your battery category (EV, industrial > 2 kWh, or LMT) is in scope.
- ☐ Identify the economic operator that places the battery on the market – that party owns the passport.
- ☐ Track the 18 Feb 2027 date together with the linked duties (carbon-footprint declaration, supply-chain due diligence).

2 · Assemble the passport data

- ☐ Battery identity: model, manufacturer, manufacturing date and place, category.
- ☐ Material composition, including critical raw materials and any hazardous substances.
- ☐ Carbon footprint declaration (and performance class as it phases in).
- ☐ Recycled-content declarations for cobalt, lithium, nickel and lead.
- ☐ Supply-chain due-diligence report.
- ☐ Performance & durability data, including state of health and expected lifetime.
- ☐ Dismantling and recycling information for waste operators.

3 • Identifier & carrier

- Assign a unique battery identifier and apply the QR code plus CE marking to the battery.
- Guarantee a resolvable link from the QR to the live passport record.

4 • Access & hosting

- Configure access tiers: public data vs. data restricted to authorities, notified bodies and those with a legitimate interest.
- Guarantee the passport stays available for the battery's lifetime (registrar / backup).

5 • Integrity & upkeep

- Bind the QR / identifier to the physical battery so it cannot be cloned onto another cell or pack.
- Keep state-of-health and lifecycle data current — that is an ongoing duty of the economic operator.

WHERE AEROZ FITS

A QR sticker can be photographed and reprinted; the passport is only trustworthy if it is provably attached to *this* battery. Aeroz bonds the identifier to the physical pack with a tamper-evident anchor and keeps a verifiable, updatable lifecycle record — so state-of-health and recycled-content claims can't be spoofed and stay current across the battery's life.

Book a fixed-fee, 14-day Aeroz compliance audit — a written gap analysis, no commitment to proceed. aeroz.io/contact

Sources: Reg. (EU) 2023/1542 (EU Batteries Regulation), Article 77 and Annex XIII.

This checklist is general information for planning, current as of August 2026, and is not legal or regulatory advice. Requirements change and vary by product, role and jurisdiction — confirm specifics against the current regulation and qualified counsel. © 2026 Aeroz · Lumi Enterprises Corporation.