

**GLOBAL
BATTERY
ALLIANCE**

BATTERIES POWERING
SUSTAINABLE DEVELOPMENT

THE GLOBAL BATTERY ALLIANCE

**Battery Benchmarks
Public Consultation
Feedback Report**

March 2026

Public Consultation Feedback Report - Contents

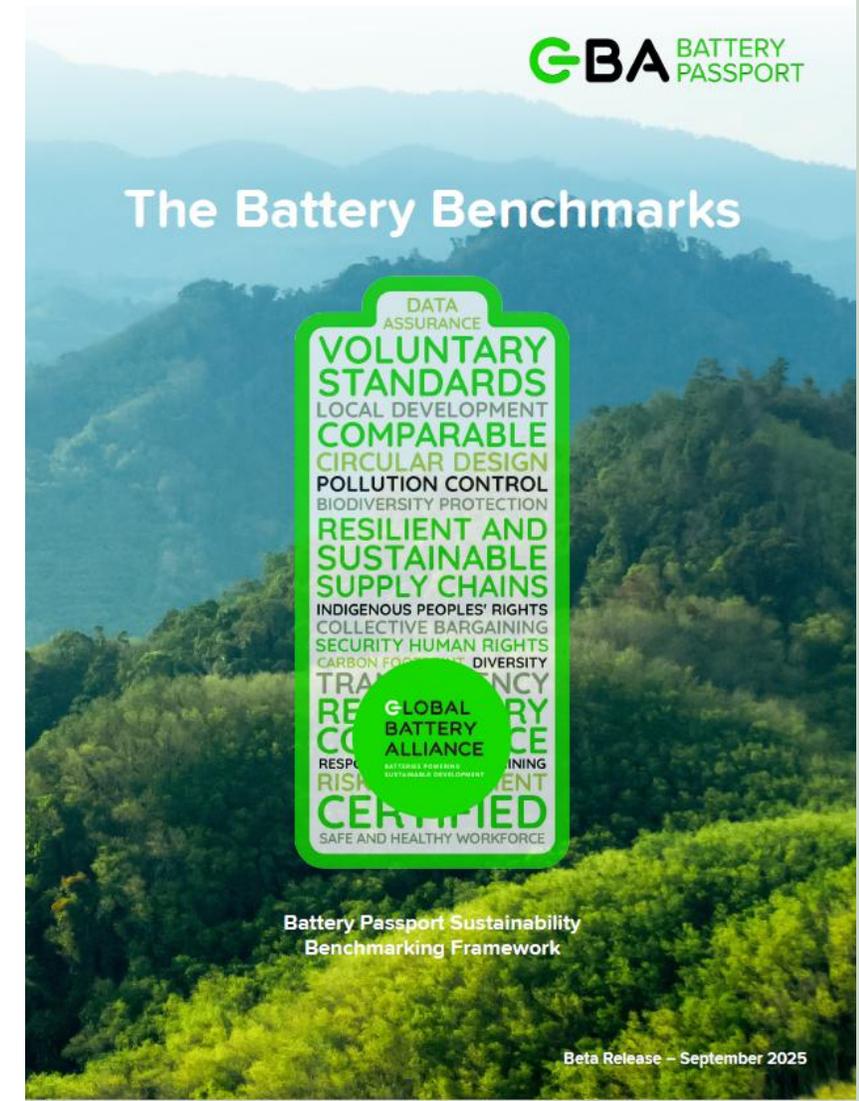
Introduction

- Purpose and scope of the GBA Battery Benchmarks of September 2025
- Public consultation of 2025: Process and objectives
- Respondent demographics

Feedback results by section

- Part I: Introduction
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 - Environmental modules
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- Greenhouse Gas Rulebook v2.1

Next steps and how to shape the Battery Passport



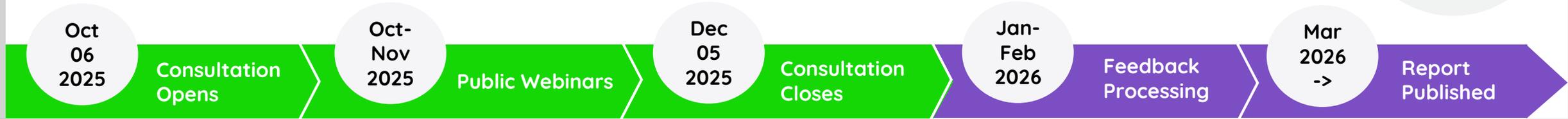
Purpose and Scope: Battery Benchmarks and GHG Rulebook v2.1

- Global Battery Alliance, along with its 150 members, through multi-stakeholder collaboration and consensus building, have come together to create an emerging sustainability certification scheme for batteries, implemented via the digital product passport: the [GBA Battery Passport](#)
- The GBA Battery Passport will establish a cohesive framework to collect and aggregate sustainability data across the battery supply chain and attach indicators and certificates to batteries in digital form.
- The consultation focused on the draft standards against which the GBA will certify batteries: the [Battery Benchmarks](#) and the GBA [Greenhouse Gas Rulebook v2.1](#). It also provided an overview of the Data Assurance Rulebook and Scoring principles, which will be subject to a more detailed consultation once fully developed.
- We asked interested stakeholders to comment on clarity, feasibility, and opportunities for improvement
- To support stakeholder engagement, the consultation process also included two [recorded public webinars](#) in October and November 2025, which provided an overview of the Battery Benchmarks framework and an opportunity for questions and discussion.
- The Battery Benchmarks were also made available through [Chinese](#), [French](#), and [Spanish](#) to support broader participation.
 - Please see a **QR code** to the English version to the right.





Consultation Process



- Public consultation launched on the Battery Benchmarks and GHG Rulebook v2.1
- Stakeholders invited to submit feedback, comments, questions and suggestions
- Feedback opened via online consultation survey

- Overview of the Battery Benchmarks and consultation scope
- Q&A to clarify methodology and expectations
- **Link to Recording of the Public Webinar can be found [here](#) and accompanying slides [here](#)**

- Consultation window closed
- Responses compiled across survey, email submissions and webinar inputs, and coded thematically
- Feedback prepared for review and reporting

- Categorisation and processing of the feedback by GBA Secretariat
- Analysis of types of feedback by module and section, drawing insights for Operational Trials and Benchmarks revision

- Consultation feedback report published summarizing key themes and input across sections/modules
- Integration of feedback into revised Battery Benchmarks, GHG rulebook and Battery Passport certification scheme design
- 2nd consultation round in 2026

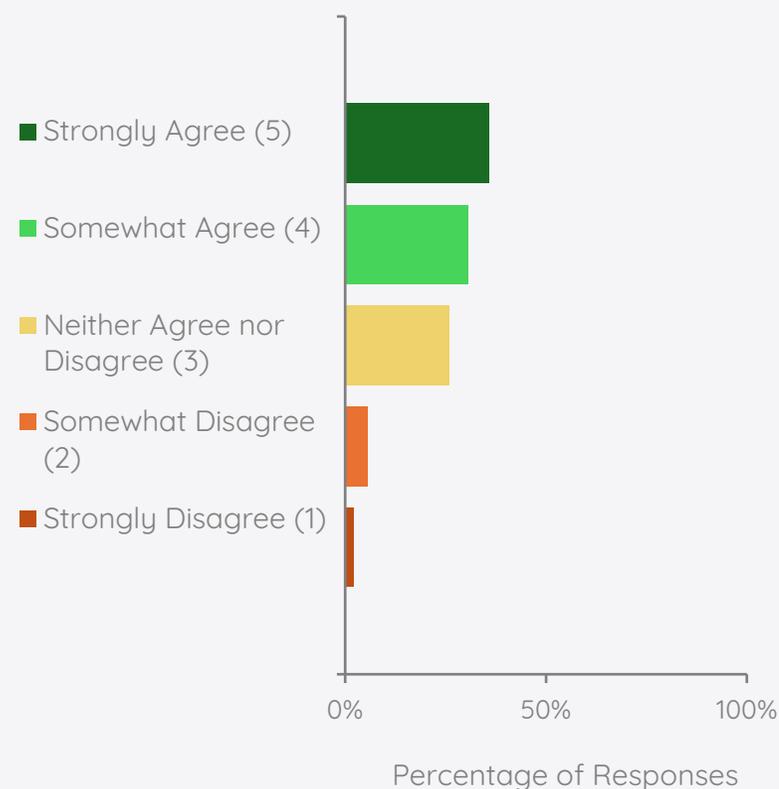
~100 individuals engaged through the feedback process on the Battery Benchmarks, generating 216 individual comments.*

* Please see the Annex of this report for full participation demographics.

Feedback results: Part I: Introduction

Overall, respondents recognised the GBA's contribution to harmonisation, while calling for operational details

Average satisfaction score across sections **3.92 / 5**



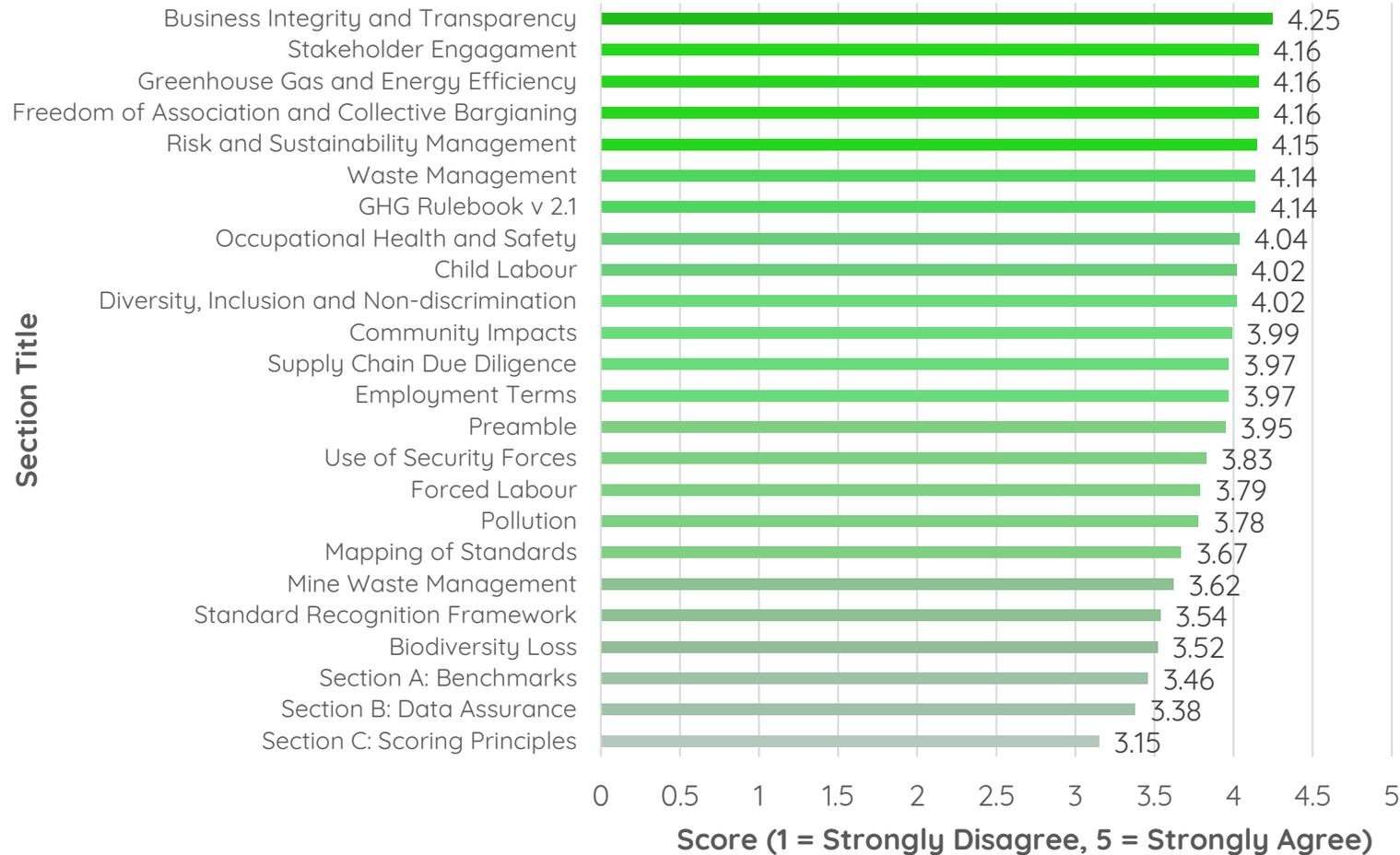
Overall, feedback was largely positive, recognising the strength of the Battery Benchmarks and the value of the consultation process, while showing a need for clearer operational guidance and continued evolution of module coverage and implementation support.

- Strong recognition of the Benchmarking Framework as a useful contribution to transparency, alignment with the EU Batteries Regulation, and reduced duplication through recognition and mapping of existing standards.
- Reflections that most companies may initially cluster around Level A/AA, with questions on how to drive uptake, continuous improvement, and real-world sustainability impacts without excessive reporting burden at higher levels.
- Requests to strengthen practicality through clearer, more precise guidance that supports auditability, data quality, and consistent interpretation by stakeholders.
- Calls to prioritise development of under-specified areas such as Circular Design, with clearer scope and value-chain coverage, and to ensure important topics are covered across modules (e.g., human rights defenders, shared benefits,).

"We would like to acknowledge the impressive work behind the Beta Release of the Battery Passport Sustainability Benchmarking Framework. The effort invested in developing this framework—together with the inclusive consultation process and lessons learned from earlier pilots—demonstrates a strong commitment to transparency and collaboration."
— UNIDO's Global Alliance for Responsible and Green Minerals

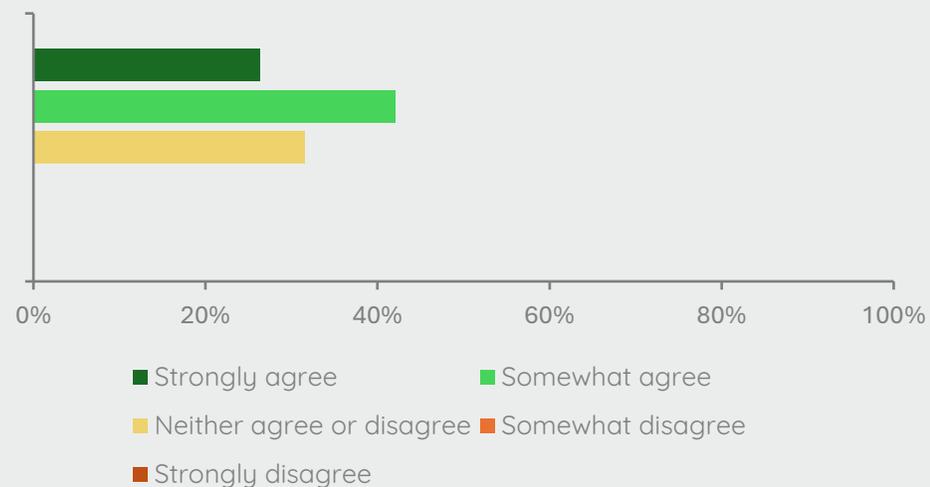
Satisfaction across sections ranged from very positive on the reporting modules, to above average, on the Battery Passport scheme components

To what extent does the module satisfy your expectations?



Feedback on the Preamble

SurveyMonkey Q8: Do the Preamble and its subsections meet your expectations?



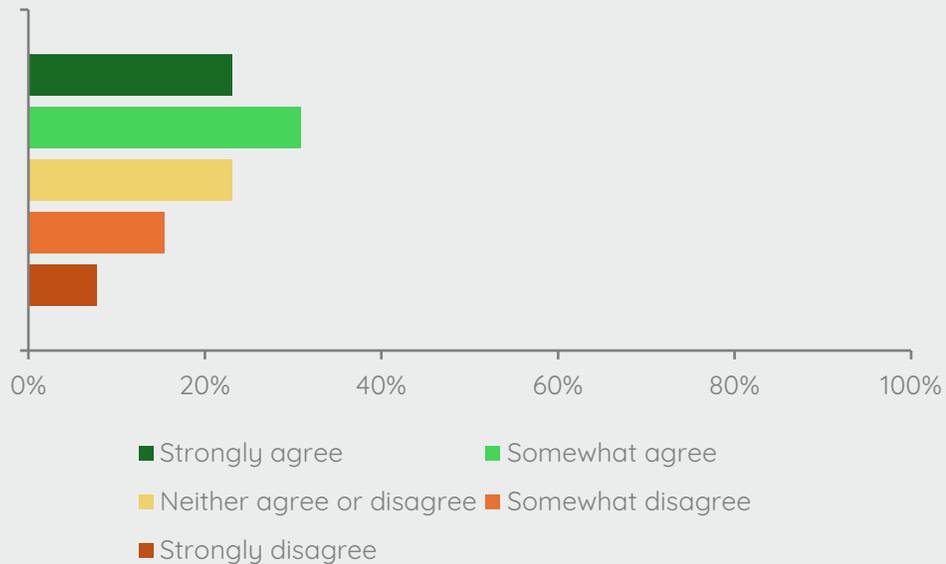
“While the Preamble outlines the vision and high-level purpose or the GBA Battery Passport, it lacks sufficient detail on how the framework aligns with regulatory requirements (EU, US, Asian markets), how it avoids fragmentation with other passport systems, and how it will ensure interoperability, data governance, and verifiability. The introduction would benefit from clearer articulation or implementation pathways and stakeholder responsibilities.” — Circularise, Serena Gariboldi

Overall, feedback on the Preamble was mixed-to-positive, with many respondents agreeing it is clear at a high level, and a notable share expressing neutral views and requesting more specificity on implementation and regulatory alignment.

- Requests for clearer regulatory alignment and harmonisation (e.g., how the Battery Passport framework aligns with and avoids duplication/fragmentation across EU and other jurisdictions, and how overlaps/gaps will be handled).
- Need for more detail on implementation pathways and governance, including clearer articulation of stakeholder responsibilities, how interoperability will work in practice, and how verifiability/data governance expectations will be ensured.
- Clarify the voluntary nature / reach of the Battery Passport, including expected uptake (e.g., whether members are committed to certification, what share of production this represents) and how trust/enforcement issues are managed through the framework.
- Scope and emphasis suggestions, including calls to better reflect circularity and due diligence requirements in the Preamble, and to clarify how mineral scope will be reviewed over time

Feedback on Section A – Battery Benchmarks

SurveyMonkey Q10: Does Section A: About the GBA Battery Benchmarks meet your expectations?



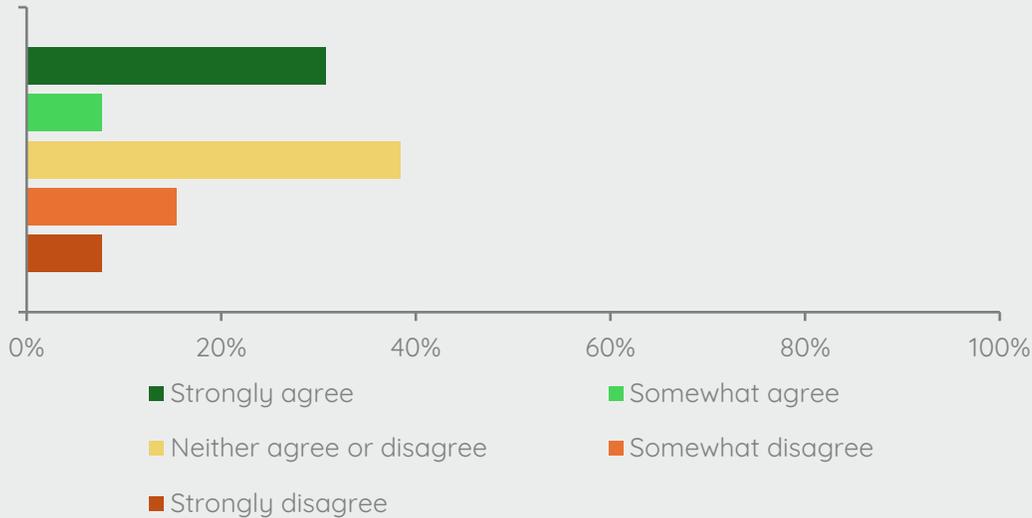
“Section A is a good conceptual introduction, but does not meet expectations for a robust benchmarking framework in terms of depth. It lacks: methodological depth, regulatory clarity, practical applicability, [and] conflict resolution mechanisms.” — Anonymous

Overall, feedback on this section was mixed-to-positive: many found the structure/mapping helpful, while others asked for more depth and clearer implementation guidance.

- Clarify framing: benchmarks assess management systems (proxy for sustainability performance), not a complete due diligence scheme; suggested wording refinements (e.g., “supporting” vs “reflecting” due diligence).
- Requests for clearer implementation and interoperability guidance (digital data flows, stakeholder responsibilities, how tiering will work in practice).
- More explicit regulatory alignment / added value beyond EUBR minimum requirements and other frameworks.
- Improve transparency on VSS recognition/scoring (how schemes are assessed, inclusivity for additional standards, equivalence and implementation quality).

Feedback on Section B – Data Assurance

SurveyMonkey Q12: Does Section B: Data Assurance Rulebook meet your expectations?



“Strengths: The basic structure of the assurance escalator (levels 1-3) is clear. Recognition of the need for external verifiers (ISO 17029/17065). Transparent description of the three assurance areas (data veracity, data exchange, scoring). Weaknesses: Very vague in terms of practical implementation, costs, audit scope and depth of control.”

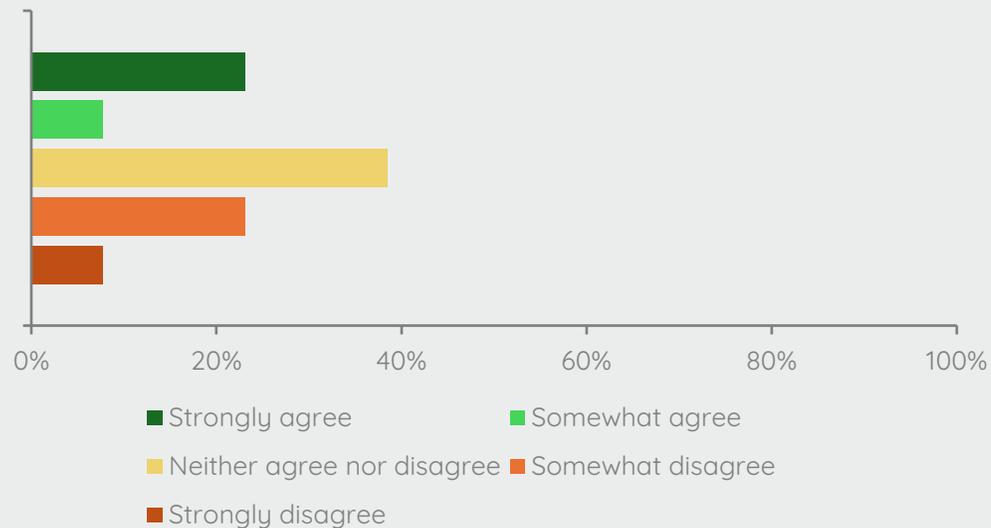
— Anonymous

Overall, feedback on this section was mixed-to-positive, with several positive responses and neutral feedback commonly requesting additional operational clarity.

- More operational guidance needed (verification workflow, audit scope/depth, and how digital evidence should be handled/structured).
- Clarify sampling and control points (risk-based sampling criteria, and how inconsistencies, contradictions, or misconduct would be handled).
- Regulatory alignment / duplication (how this maps to EU assurance expectations and whether additional EU verification would still be required). Cost and feasibility concerns (model perceived as potentially heavy/expensive for broad global adoption, especially for SMEs; suggestions to prioritise data coverage/usability during trialling phase).
- Clarify roles and confidentiality (expectations around use/sharing of supplier assessments and what can be verified when data is commercially sensitive)

Feedback on Section C – Scoring Principles

SurveyMonkey Q14: Does Section C: Scoring Principles meet your expectations?



“Concept solid, but still too schematic and unfinished. Strengths: Simple, transparent scoring system (A/AA/AAA)... Weaknesses: Many critical parameters left open (multipliers, weighting, display)... [and] risk of misguided incentives (‘score inflation’, focus on documentation rather than substance).” — Anonymous

Overall, feedback on this section was mixed, with several respondents agreeing in principle but frequently requesting clearer detail on how scoring will work in practice.

- Need more detail on scoring mechanics (e.g., assurance multipliers, weighting/materiality choices, and whether scoring is absolute vs. relative).
- Clarify treatment of incomplete / missing / partially met data, including how “continual improvement” will be reflected and how “not applicable” modules affect outcomes.
- Add worked examples to make the scoring principles easier to understand and reduce interpretation risk.
- Clarify how scoring translates into product-level implications, including how results will be displayed in the Battery Passport and what the score signals to users/buyers.
- Concerns about incentives and buyer interpretation, including potential “score inflation” or documentation-over-substance behavior, and whether A/AA/AAA labelling could be misleading.

Summary: What we take forward

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What we heard most clearly:

- Clearer regulatory alignment, governance, voluntary reach, and inclusivity in the Preamble.
- Clearer Benchmark framing (management systems vs due diligence), terminology, and interoperability guidance.
- More operational clarity on verification scope, sampling, audit expectations, and confidentiality.
- More detail on scoring mechanics, missing data treatment, and interpretation of labels/results.

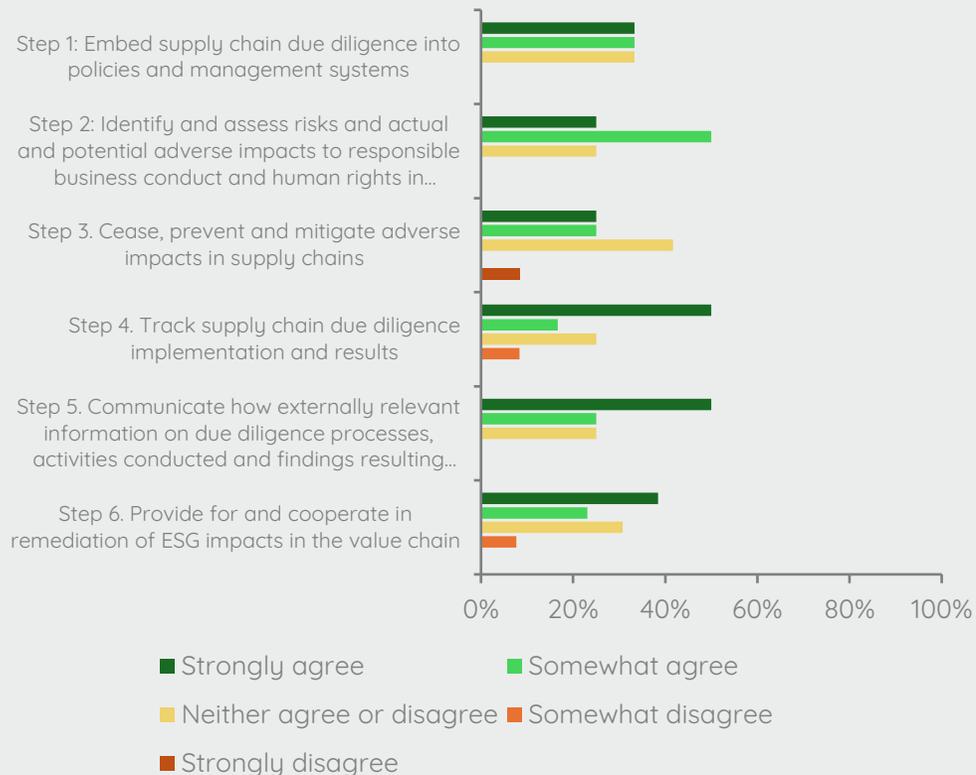
What this means for the framework:

- Continued alignment the Battery Benchmarks and GHG rulebook with relevant regulations on batteries and digital product passports. In 2026, a [White Paper](#) detailing alignment with the EU Batteries Regulation was published, with guidance on reporting provided for the Operational Trials. Generating more guidance on alignment with other key regulations in the EU and other key jurisdictions.
- Implementation guidance for the standard benchmarking and recognition has been developed and is being trialled as part of the Operational Trials in 2026. This includes operationalising and automating the standard recognition in the reporting tools and trialling digital data exchange between standard audits.
- Details on the assurance framework, verification, roles and responsibilities of GBA as a scheme owner and approved verification and certification bodies, scoring (incl. facility-to-product aggregation, standard multipliers, mineral scope beyond the four regulated battery minerals, treatment of missing data), as well as data confidentiality, are also being developed and trialled.
- The Battery Passport provides voluntary certification. Driving uptake via finance and procurement demand alongside regulatory preparedness and integrating trust and credibility expectations of stakeholders, including developing a grievance mechanism, are core components of the GBA's work in 2026. These components will be subject to a second public consultation in late 2026 / early 2027, ahead of the launch of the certification scheme.
- The GBA will create training resources and requirements for companies and verifiers.

Feedback results: Part II: Battery Benchmarks modules

Feedback on Core Module – Supply Chain Due Diligence

SurveyMonkey Q16: Does the Core Module: Supply Chain Due Diligence (pp. 21-25) meet your expectations for measuring performance related to this topic?



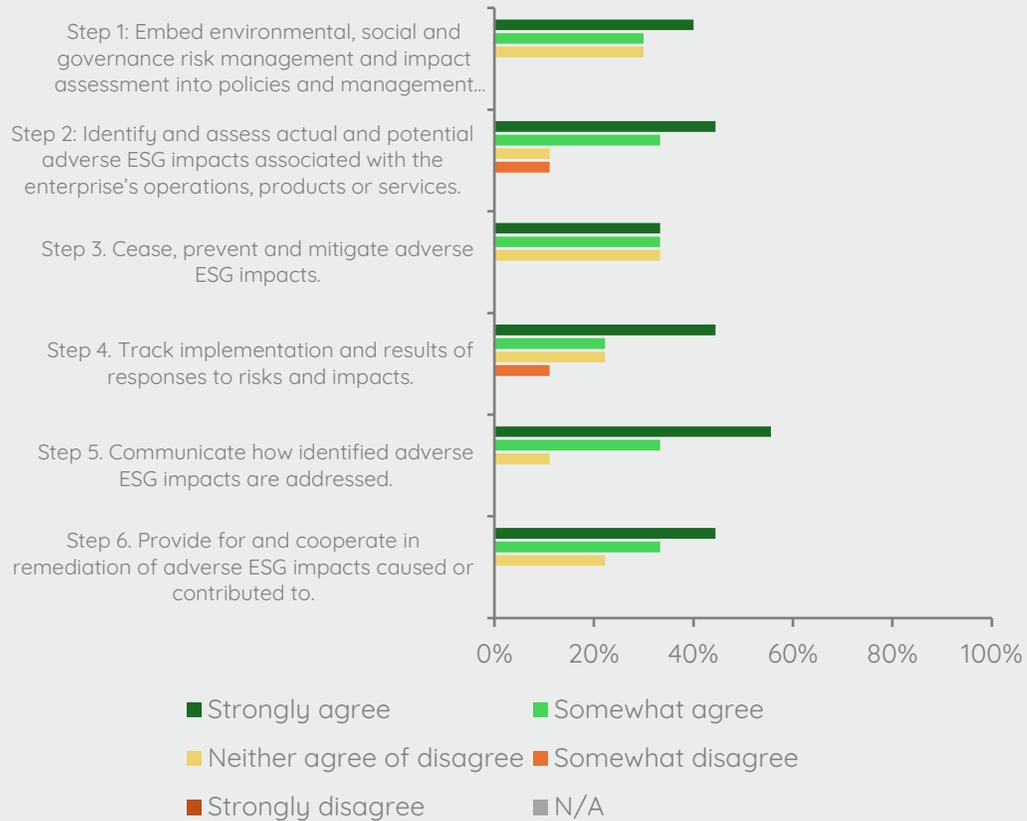
Overall, the response to the Module is mostly positive, with some neutral and a few disagreements.

- Requests for more specific / measurable monitoring expectations, including examples of quantitative indicators.
- Requests for clearer guidance on what counts as evidence (e.g., what adequate record-keeping looks like, acceptable evidence formats, and clearer definitions of terms like “regular” monitoring).
- Calls for more implementation guidance across Steps 1–6, including operationalising traceability/chain-of-custody, interoperability with emerging DPP frameworks, balancing transparency with confidentiality, and accessibility considerations (e.g., local-language deployment).

“Level A – ‘report risk assessment results to senior management, with at least one member of staff responsible for maintaining records to demonstrate regulatory compliance’ is too vague. Clearer guidance is needed on what constitutes adequate record-keeping, what evidence formats are acceptable, and how digital documentation should be structured for verification.” – Circularise, Serena Gariboldi

Feedback on Core Module — Risk and Sustainability Management

SurveyMonkey Q18: Does the Core Module: Risk and Sustainability Management (pp. 26-28) meet your expectations for measuring performance related to this topic?



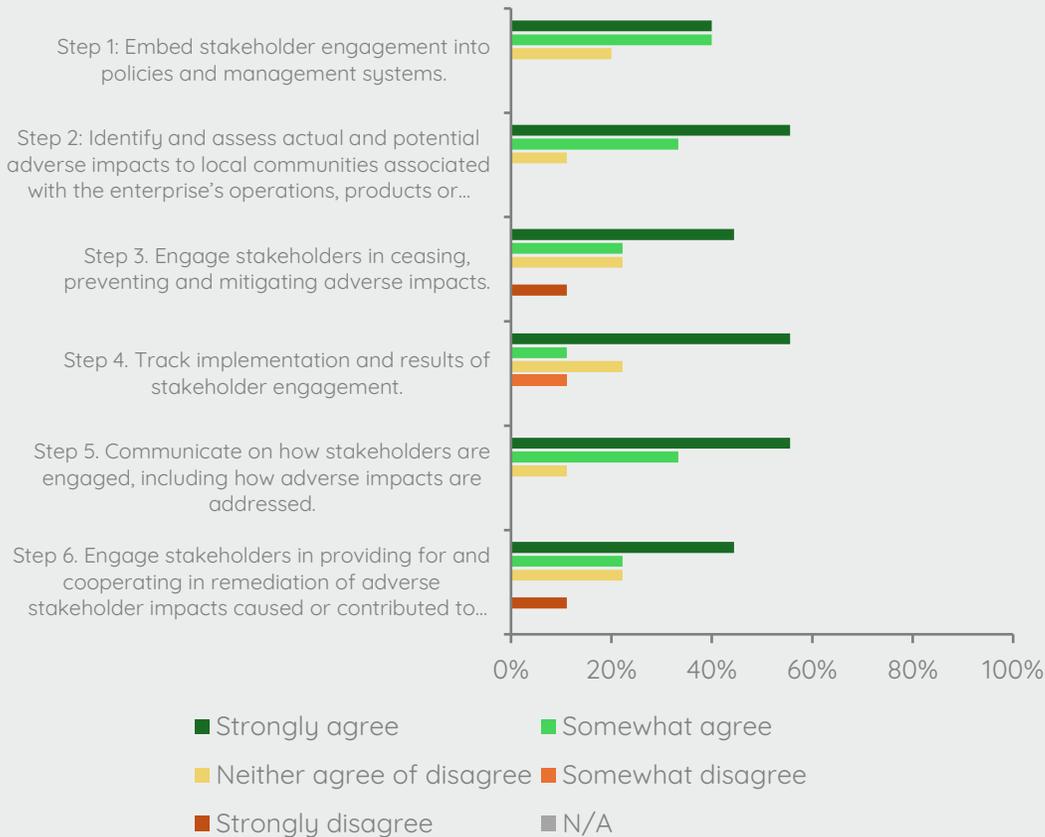
Overall, the response to the Module is mostly positive, with several neutral comments and requests for greater operational clarity.

- Need for clearer minimum expectations and baseline process requirements across Steps 1–4 (risk assessment depth, ESIA scope, mitigation hierarchy application, and monitoring indicators).
- Requests to clarify risk prioritisation, refresh frequency of impact assessments, and how quantitative/qualitative indicators should be applied in practice.
- Strong alignment with UNGP/OECD standards acknowledged, but repeated concern that AA/AAA requirements are too abstract and not sufficiently auditable.
- Clarification requested on interaction with EU regulatory due diligence obligations and how remediation responsibilities (cause/contribute vs. directly linked) should be distinguished.

“Good structure and strong alignment with international standards, but often formulated in too abstract terms, poorly operationalised and, in our view, not fully auditable in some cases, particularly at AA/AAA level.”
— Anonymous

Feedback on Core Module – Stakeholder Engagement

SurveyMonkey Q20: Does the Core Module: Stakeholder Engagement (pp. 29-30) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was broadly positive, with specific requests for clearer role definition and more concrete guidance on meaningful stakeholder engagement.

- Clarify who is expected to engage directly with affected communities vs when engagement may be indirect through upstream partners or collective platforms.
- Strengthen requirements on rightsholder identification and mapping, and how gaps in selection are addressed.
- Define what constitutes “meaningful engagement”, including processes for evaluating stakeholder needs (AA).
- Provide guidance on how engagement activities (dialogue, grievances, community inputs) can be reflected in digital reporting and assurance; questions also raised on alignment with EU due diligence.

“The module would benefit from clearer guidance on which actors are expected to engage directly with affected communities... and how stakeholder engagement processes should interoperate with digital reporting and assurance mechanisms.” – Circularise, Serena Gariboldi

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What we heard most clearly:

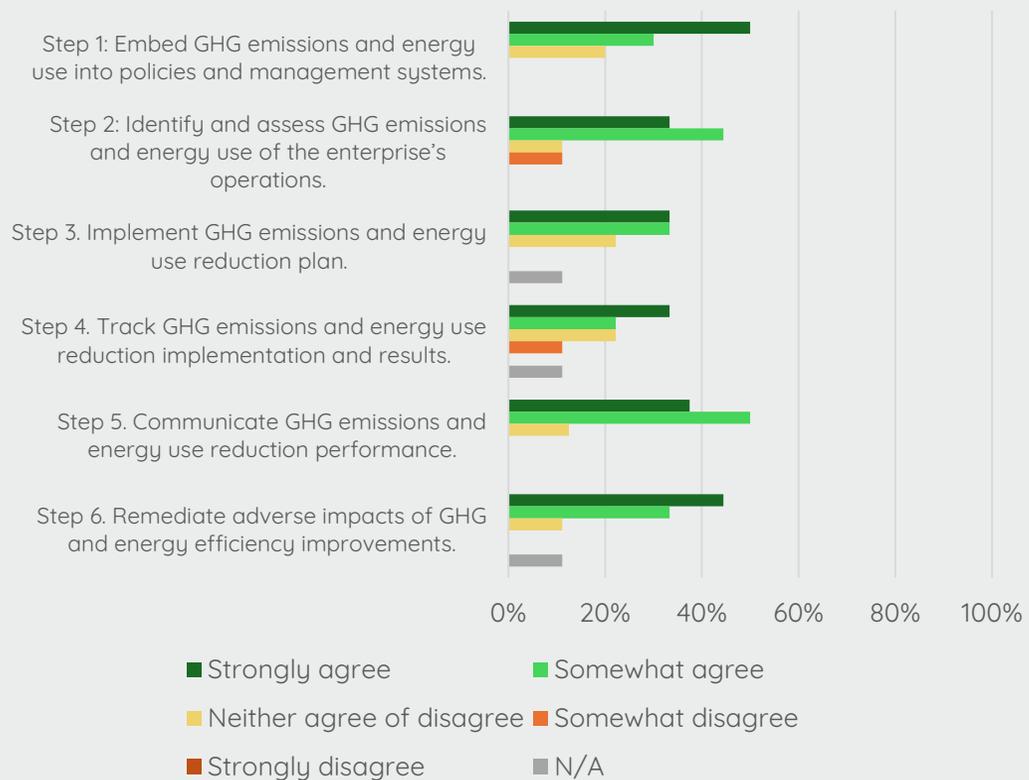
- Anchoring of Battery Passport to existing due diligence architecture
- Clarifying EU Batteries Regulation –aligned due diligence and verification requirements
- Clearer distinguishment between modules applicable to downstream and upstream actors
- Measurability of monitoring efforts
- Difference between reporting and management systems, and impact
- Clarification on the chain of custody and traceability model

What this means for the framework:

- Guidance for Operational Trials on module applicability and relevance assessment has been developed for the Operational Trials and is being tested. A workflow and clearer communication on downstream and upstream roles and responsibilities on reporting as well as particular benchmarks (such as stakeholder engagement) will be developed.
- Revision of terminology and benchmarks with regard to alignment with underlying frameworks and especially with a view of auditability/verifiability where precision is sought.
- Improving measurability of benchmarks requirements where Operational Trials indicate room for clarity, including through refining the guidance and provision of lists of types of acceptable evidence.
- A mass balance-based data exchange, traceability and chain of custody model is trialled and will be published, with possibilities to extend to physical segregation models being explored.
- Verification requirements are aligned with and support preparing for verification by notified bodies under the EU Batteries Regulation but do not replace it, with the GBA recognition of existing schemes acting as an opportunity to trial future approved recognised schemes.

Feedback on Issue Module – Greenhouse Gas Emissions and Energy Efficiency

SurveyMonkey Q22: Does the Issue Module: Greenhouse Gas Emissions and Energy Efficiency (pp. 31-32) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mostly positive, with specific requests for stronger methodological guidance and more realistic expectations at higher assurance levels.

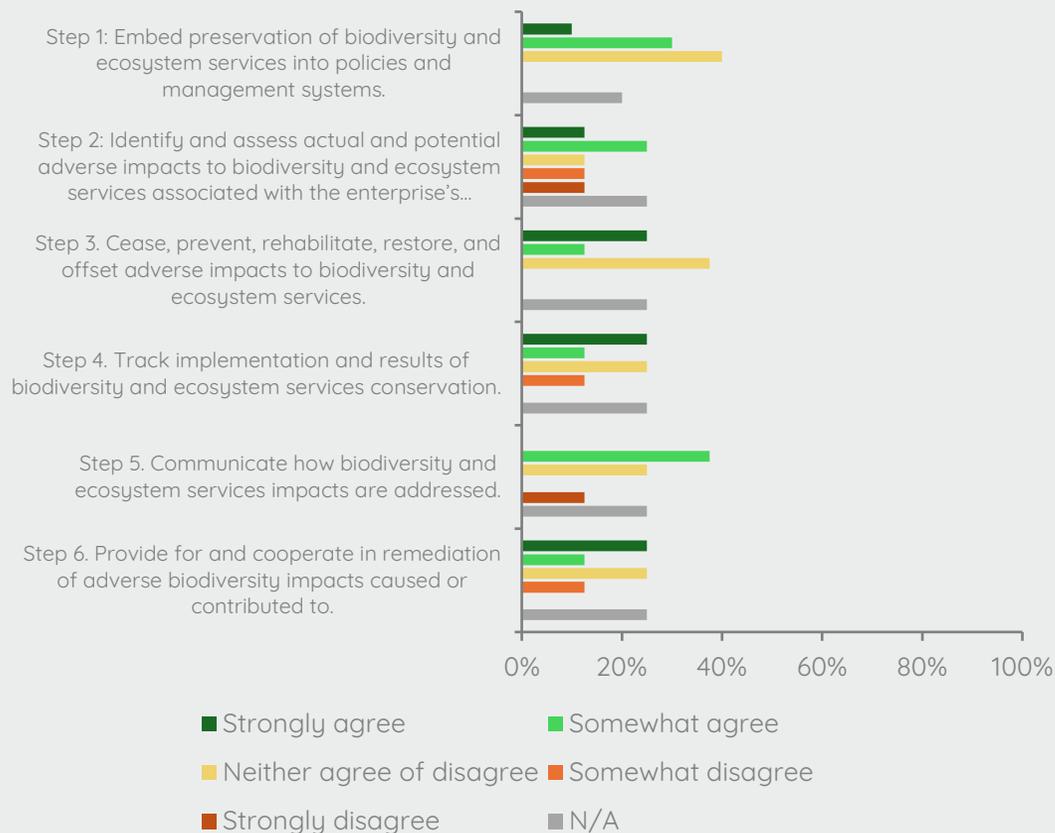
- Need for clearer minimum requirements on data quality, measurement methods, and evidence expectations for Scope 1-2 and relevant Scope 3 reporting.
- Requests to strengthen guidance on interoperability with regulatory carbon-footprint reporting, digital data exchange, and assurance procedures.
- Concerns that Scope 3 and lifetime energy quantification requirements at AA/AAA may be ambitious and resource intensive, particularly for smaller or mid-tier facilities.
- Suggestions to clarify reduction planning (Paris alignment, “best available technologies”) and cross-reference remediation where decarbonisation actions create local impacts.

“Level A is clear; however, there are no guidelines for data quality, measurement methods, and minimum requirements for data sources. Scope 3 requirements (AA) are very demanding without assistance.”

– Anonymous

Feedback on Issue Module – Biodiversity Loss

SurveyMonkey Q24: Does the Issue Module: Biodiversity Loss (pp. 33-35) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mostly positive, with requests to clarify who is responsible for key actions and to refine expectations on offsets and net gain commitments.

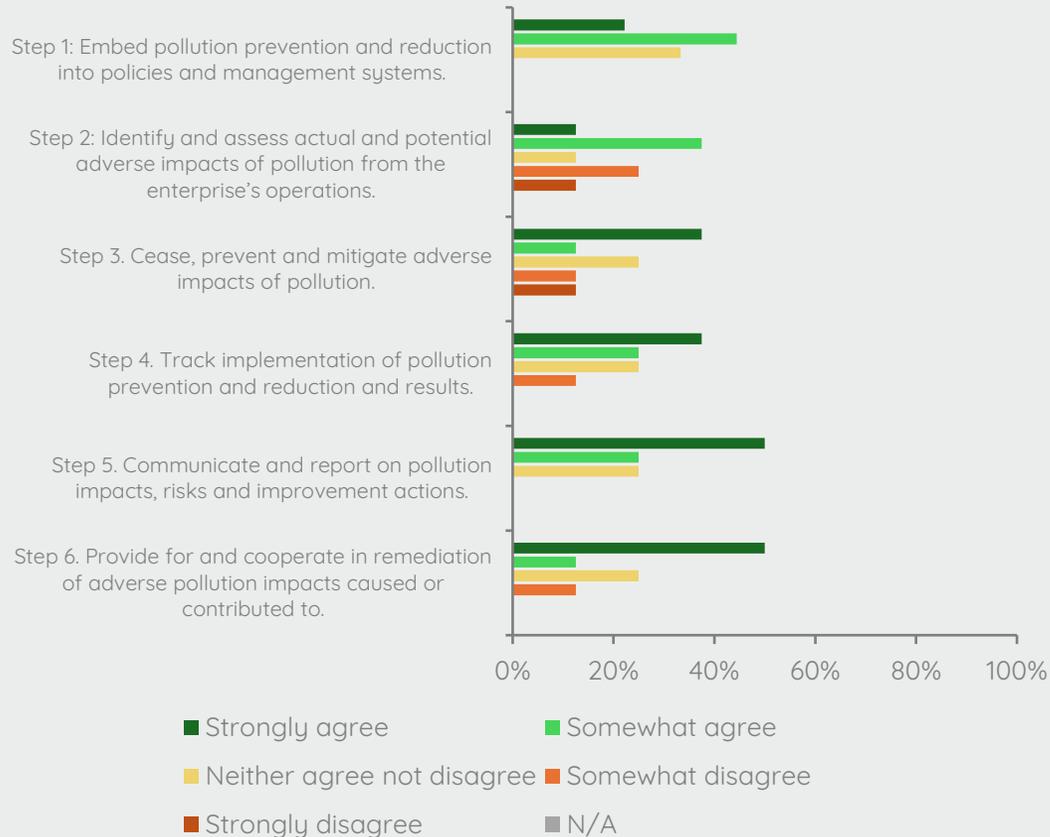
- Clarify scope and proportionality, including which actors are expected to carry out prevention, mitigation, and remediation actions, including where expectations differ by facility type/risk.
- Refine AA/AAA ambition: shift “net gain” expectations toward a progressive pathway (e.g., “no net loss” first, then net gain at higher levels).
- Increase transparency on biodiversity offsets, including disclosure of offset accreditation source and type where used.
- Explicitly include after-mine restoration/biodiversity considerations in the assessment.
- Clarify how this module aligns with EU due diligence expectations and avoids duplication.

“Publicly committing to achieve net gain may not be realistic at this stage—consider this for AAA and a progressive improvement step on this for AA; for example, publicly commit to no net loss and identify/design approach to achieve net gain.”

– Responsible Minerals Initiative, Maggie Gabos

Feedback on Issue Module – Pollution

SurveyMonkey Q26: Does the Issue Module: Pollution (pp. 36-37) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mixed-to-positive, with repeated requests for stronger transparency requirements on hazardous materials and clearer guidance on what pollution information should be disclosed.

- Calls for clearer disclosure of pollutants and hazardous substances used in battery production, and stronger “community right to know” transparency on air, water, and soil risks.
- Suggestions to strengthen alignment with international frameworks on toxic substances.
- Requests to clarify scope across Levels A/AA, including whether AA covers secondary impacts and how emergency pollution scenarios are treated.
- Recommendations to improve safety communication, including accessible hazard information and multilingual disclosure expectations.
- Concerns that transparency requirements may conflict with confidentiality or existing regulatory reporting obligations.

“Transparency requirements are sensible; however, potential conflicts with regulatory reporting obligations or confidential information are not addressed.” — Anonymous

Feedback on Issue Module — Waste Management

SurveyMonkey Q28: Does the Issue Module: Waste Management (pp. 38-39) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mostly positive, with support for its alignment with waste-hierarchy principles but repeated calls to broaden the scope beyond recycling and strengthen transparency requirements.

- Clarify that waste management includes prevention, reduction, and design for circularity — not only recycling — and explicitly reference the waste hierarchy.
- Provide clearer definitions of what constitutes an acceptable waste management system, including minimum documentation and evidence expectations.
- Strengthen methodology guidance for identifying waste-reduction opportunities and evaluating recycling performance.
- Increase transparency on waste outcomes, including disclosure of materials recovered (quantity/quality), downcycled, or sent to landfill.

“Waste reduction starts with more responsible reduced production levels and design for repurposing. The terminology in this module seems to equate waste management with recycling, which is misleading.”

— Anonymous

Feedback on Issue Module— Mine Waste Management

SurveyMonkey Q30: Does the Issue Module: Mine Waste Management (pp. 40-42) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mixed, with respondents noting it is highly relevant for mine operators but unclear in how expectations apply to non-upstream actors.

- Strong support for the module’s relevance for upstream operators, but repeated requests to clarify applicability to midstream/downstream facilities.
- Calls for clearer role differentiation so expectations like impact assessments, mitigation/reclamation actions, and tailings-performance tracking are not placed on actors without operational control or visibility.
- Requests for clearer proportionality guidance and minimum evidence requirements to improve consistency and auditability across the value chain.
- Questions raised on how this module aligns with EU due diligence expectations and avoids duplication.

“The module would benefit from clearer role differentiation, proportionality guidance, and minimum evidence requirements to avoid placing obligations on entities without operational control...”

— Circularise, Serena Gariboldi

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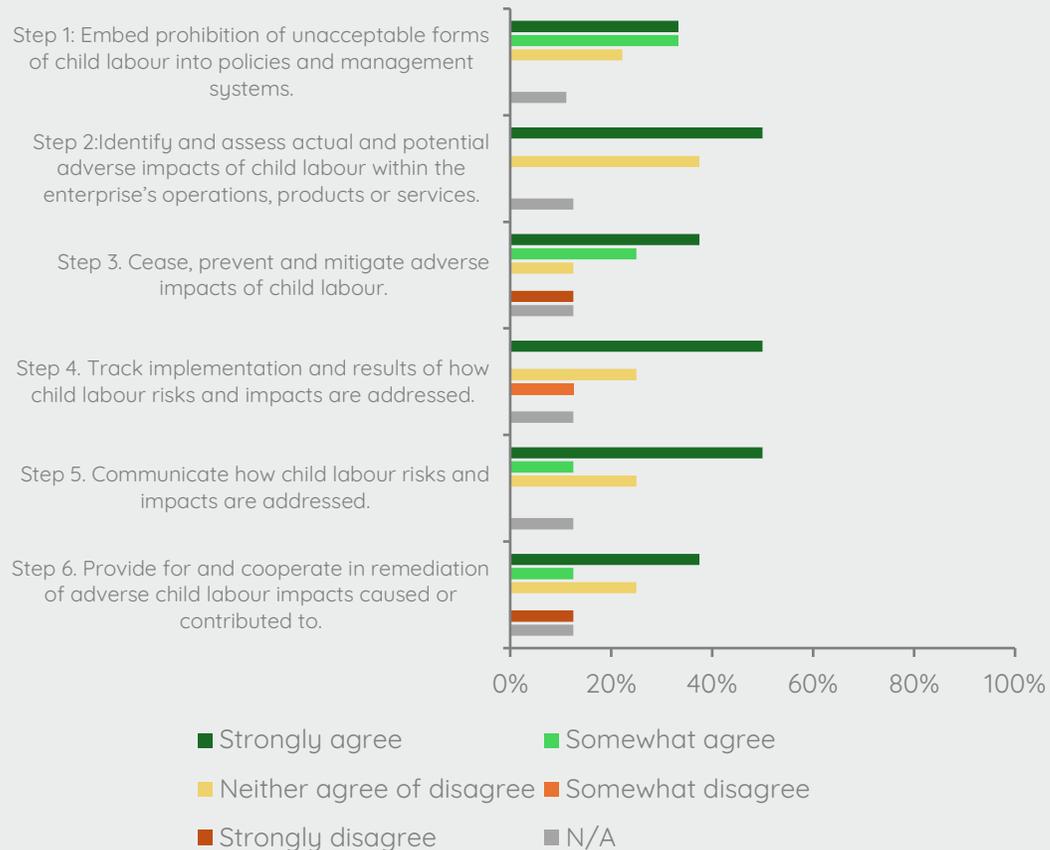
- Clearer minimum expectations for measurement and evidence
- More guidance on module applicability across the value chain
- Stronger transparency on pollution, waste, and biodiversity impacts
- Concerns that AA/AAA ambition may be difficult to implement
- Inclusion and advancement on the Circular Design module

What this means for the framework:

- Trialling reporting during Operational Trials on environmental modules, especially measurability and verifiability of level AA and AAA benchmarks, and improving precision and/or guidance where necessary
- Refinement of terminology, scope, and proportionality expectations
- Define clearer expectations, data quality requirements and assurance expectations, especially for Scope 3 reporting
- Thematic standard integration on specific modules where specificity is requested (ISO standard coverage across GHG reporting and Biodiversity, for example)
- Clarification of scope and coverage, including in cooperation with applicable standards, of the Mine Waste / Tailings Management module
- Integration of the waste management hierarchy into the Waste Management module and recommencing dialogue on the Circular Design expectations
- Improved alignment with regulatory reporting and due diligence as regulatory guidelines from the EU and elsewhere are released

Feedback on Issue Module — Child Labour

SurveyMonkey Q32: Does the Issue Module: Child Labour (pp. 43-44) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mostly positive, but with requests to reduce unnecessary reporting burden and to sharpen what “good practice” looks like in implementation.

- Clarify evidence expectations where child labour is not present, to avoid requiring “proof of absence” and unnecessary reporting on remediation/collaboration.
- Tighten policy specificity at Level A, including explicit work-hour limitations for young workers.
- Improve auditability/benchmark precision, so the module is not “conceptually sound but too broad” as a benchmarking tool.
- Clarify how this module aligns with EU due diligence expectations and avoids duplication.
- Recognise concerns that weak proxy identifiers could allow child labour risks to remain hidden.

“In scenarios where the company does not employ young workers, does it need to provide proof that it does not communicate on any instances of violations or remedial actions or multistakeholder collaboration, as child labour did not exist. This creates a reporting burden on a company.” — Anonymous

Feedback on Issue Module — Forced Labour

SurveyMonkey Q34: Does the Issue Module: Forced Labour (pp. 45-46) meet your expectations for measuring performance related to this topic?



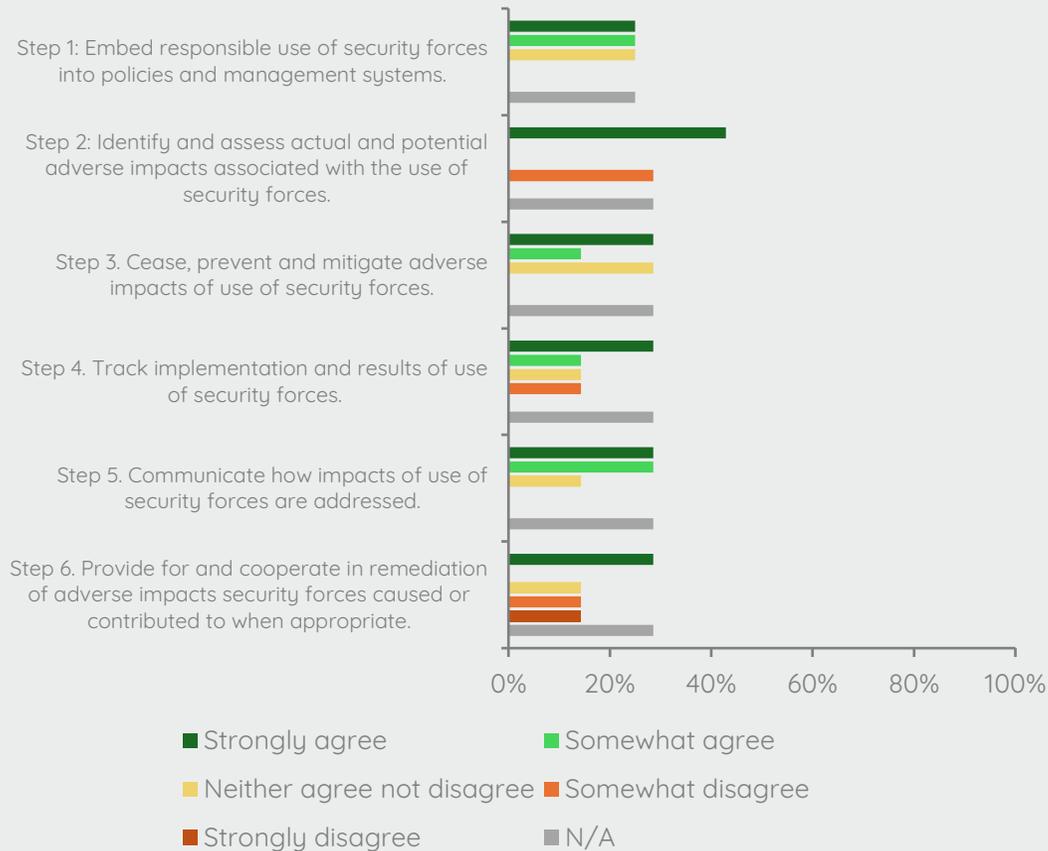
Overall, the response to the Module was mostly positive, with requests for clearer baseline requirements on worker documentation, coercion safeguards, and remediation expectations.

- Strengthen Level A expectations that workers receive employment agreements in a language they understand, and can retain their own identity documents.
- Specify minimum safeguards at AA (e.g., valid work permits, no restriction of movement, no retention of wages or documents), to make requirements more auditable.
- Add clearer remediation expectations, including a documented procedure/process where forced labour risks are identified.
- Clarify how this module interacts with local labour/human-rights laws where requirements conflict, including which standard takes precedence.

“If there is a conflict with local labor or human rights regulations, which regulation takes precedence?” — SineFine Technology, Candy Jiang

Feedback on Issue Module — Use of Security Forces

SurveyMonkey Q36: Does the Issue Module: Use of Security Forces (pp. 47-48) meet your expectations for measuring performance related to this topic?



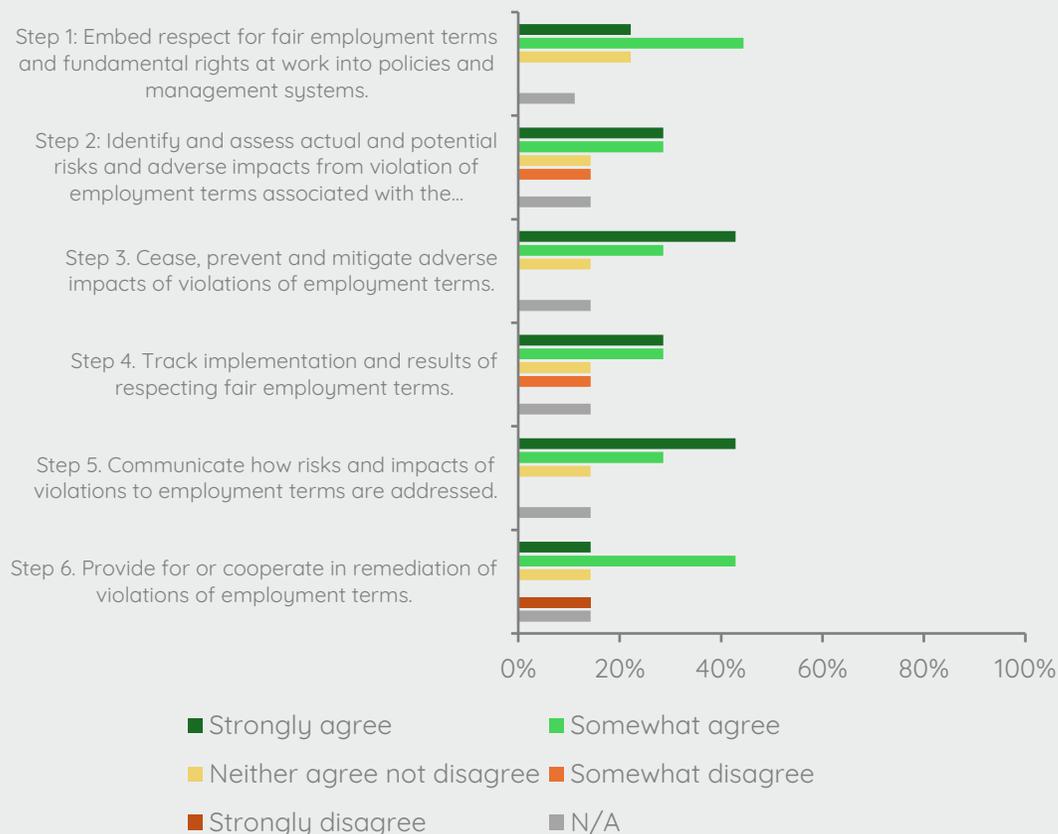
Overall, the response to the Module was largely neutral-to-positive, with one strong concern raised about the integrity risk of certifying “conflict-free” claims without an irrefutable physical link.

- Concern that “conflict-free” certification could be undermined if proxy identifiers (tags/bags) can be swapped, enabling misattribution of mineral origin.
- Risk that weak linkage could conceal security-force abuses (e.g., extortion/illegal taxation, sexual violence, forced labour) behind “clean” documentation.
- Request to strengthen assurance expectations so minerals extracted under coercion cannot enter the market as “ethical.”

“A Battery Passport may certify a mine as ‘conflict-free,’ but without an irrefutable physical link, it can inadvertently act as a cover for militarized extortion. In many resource-rich zones, public or private security forces impose illegal taxes, commit sexual violence, and enforce forced labor, all while the official ‘paperwork’ for the minerals remains spotless. If we rely on proxy identifiers like tags or bags that can be swapped, we risk allowing minerals extracted under the barrel or a gun to enter the market as ‘ethical,’ effectively financing the very armed groups the passport was designed to starve.” — Anonymous

Feedback on Issue Module – Employment Terms

SurveyMonkey Q38: Does the Issue Module: Employment Terms (pp. 49-50) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module was mostly positive, with specific requests to strengthen minimum expectations on wages/benefits and ensure employment terms cannot be misrepresented without facility-level traceability.

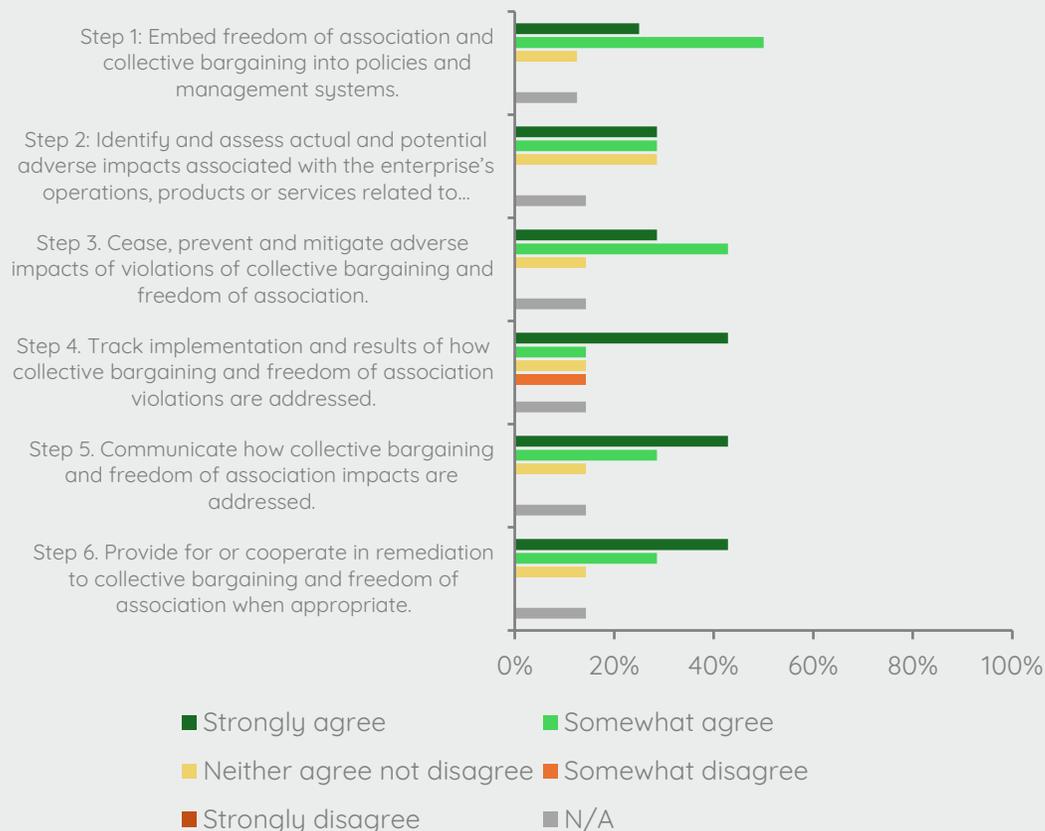
- Requests to strengthen minimum expectations on wages and benefits, including whether living wage should be a baseline requirement rather than a higher-level ambition.
- Calls for clearer guidance on how employment terms should account for country-specific labour systems, social security structures, and local market conditions.
- Suggestions to specify expectations beyond legal minimum compliance, so benchmarks remain comparable across jurisdictions.
- Concerns that employment commitments must be credible at the facility level, and not undermined by weak traceability between working conditions and the final battery product.

“Employment terms are meaningless if the product cannot be traced to the specific facility covered by the collective bargaining agreement... This disconnect undermines the power of organized labor.” – Anonymous



Feedback on Issue Module — Freedom of Association and Collective Bargaining

SurveyMonkey Q40: Does the Issue Module: Freedom of Association and Collective Bargaining (pp. 51-52) meet your expectations for measuring performance related to this topic?



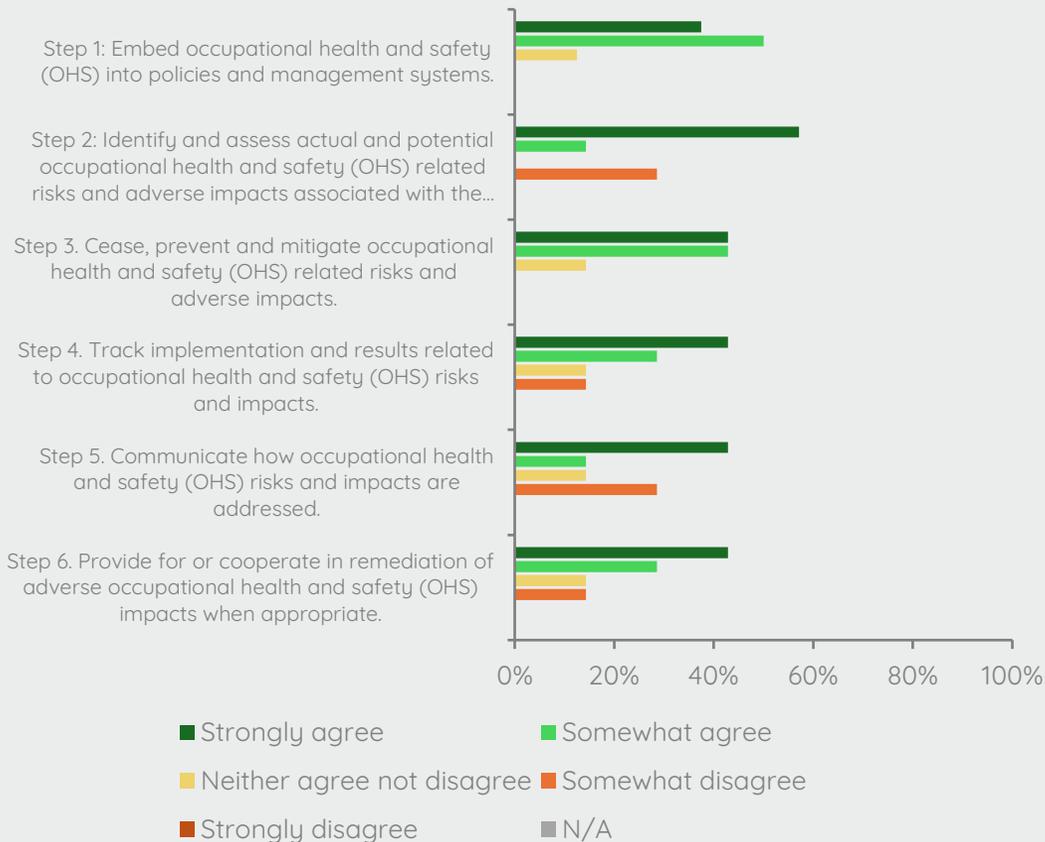
Overall, the response to the Module was largely positive, with targeted requests to clarify consultation expectations at higher levels and reinforce credibility where collective bargaining rights are exercised.

- Clarify what “consultation” entails at AA level, including which stakeholder groups must be engaged and which elements of risk analysis go beyond consultation.
- Define minimum expectations for meaningful engagement with worker representatives during risk identification and mitigation.
- Address concerns that opaque supply chains or weak asset traceability could undermine the practical exercise of collective bargaining rights.

In regards to Level AA: “Suggestion to define extent or consultation expected with named groups on risk analysis and clarify which elements or risk analysis are to be done beyond the consultations.”
 — Responsible Minerals Initiative, Maggie Gabos

Feedback on Issue Module— Occupational Health and Safety

SurveyMonkey Q42: Does the Issue Module: Occupational Health and Safety (pp. 53-54) meet your expectations for measuring performance related to this topic?



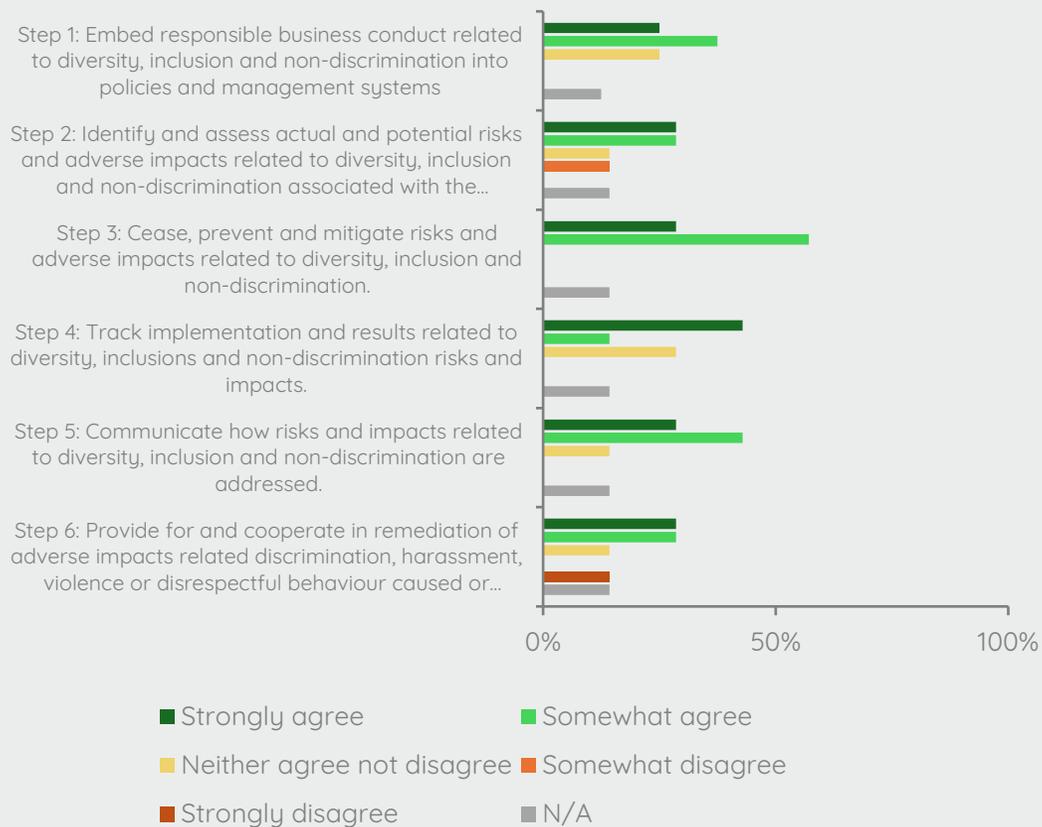
Overall, the response to the Module was mostly positive, with repeated requests to strengthen the specificity of OHS expectations, particularly around hazard coverage, proactive controls verification, and worker/contractor inclusion.

- Specify key OHS hazard areas and baseline controls (e.g., fire safety, hazardous energy, chemicals, hot work, work at height).
- Clarify when risk assessments must be refreshed and ensure routine/non-routine contractor work is covered across operations.
- Go beyond monitoring to require regular testing/verification of controls and clearer indicator expectations (incl. dashboards/analytics).
- Strengthen worker participation and communication (targeted training, effectiveness checks, and joint OHS committees).
- Align more clearly with recognised systems (e.g., ISO 45001-style elements and oversight expectations).

“This should go beyond monitoring to include proactive testing and verification or controls on a regular basis” — Responsible Minerals Initiative, Maggie Gabos

Feedback on Issue Module – Diversity, Inclusion and Non-discrimination

SurveyMonkey Q44: Does the Issue Module: Diversity, Inclusion and Non-discrimination (pp. 55-56) meet your expectations for measuring performance related to this topic?



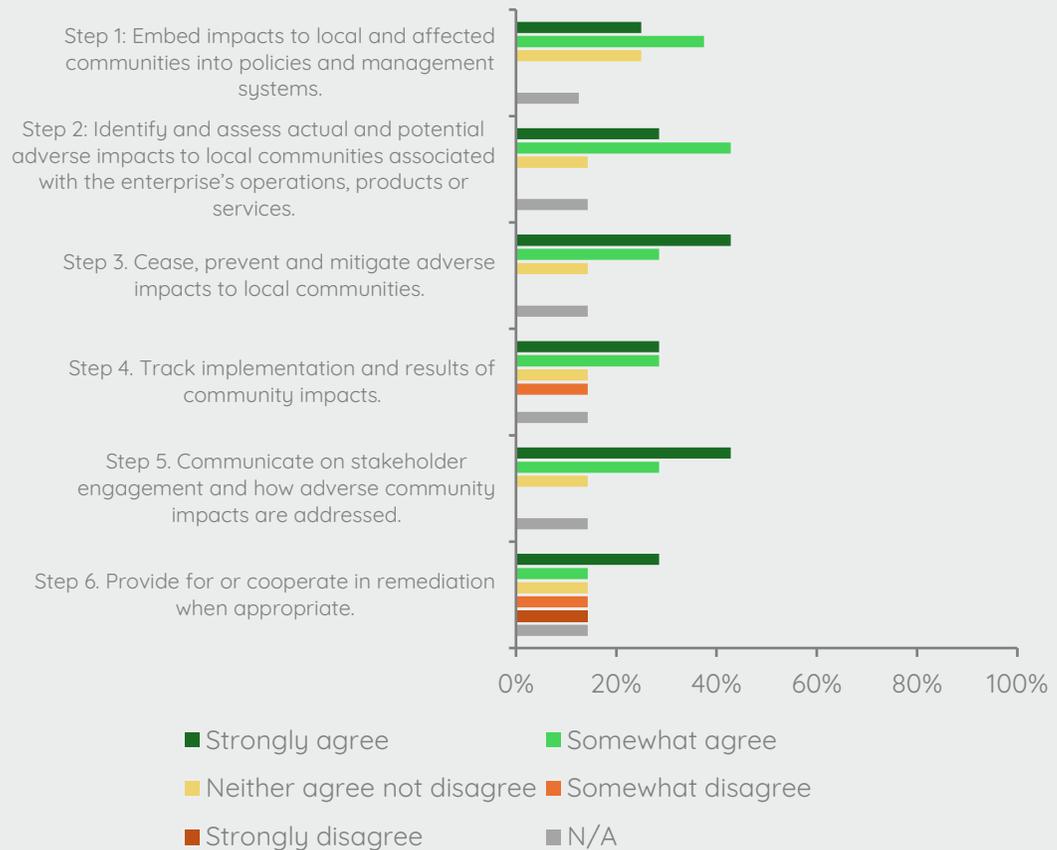
Overall, the response to the Module is mostly positive, with one strong concern that supplier diversity expectations could be undermined if verification systems allow fraudulent relabelling or misrepresentation.

- Strong support for integrating diversity, inclusion, and non-discrimination expectations into responsible business conduct frameworks.
- Concern that supplier diversity claims may be vulnerable to fraud if identity and traceability controls are weak.
- Requests to ensure that minority- and women-owned suppliers are protected from “identity theft” through clearer verification and assurance mechanisms.
- Emphasis on aligning reporting with credible validation so diversity programs genuinely uplift legitimate enterprises.

“Supplier diversity programs are a prime target for fraud without physical authentication. Corporations allocate billions to source from minority-owned or women-owned businesses, relying on digital certifications to verify the spend. But if the physical link is weak, bad actors can buy cheap batteries from non-diverse, discriminatory suppliers and relabel them...” — Anonymous

Feedback on Issue Module— Community Impacts

SurveyMonkey Q46: Does the Issue Module: Community Impacts (pp. 57-58) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module is mostly positive, with requests to broaden applicability beyond mine sites and to strengthen expectations on baselines, community benefits, and protections for affected groups.

- Requests to broaden the module so it applies beyond mine sites to other facilities and contexts (manufacturing, recycling/repurposing, and formal/informal waste sites).
- Suggestions to add clearer baseline expectations up front (community needs, livelihoods, legal rights, etc.).
- Calls to include explicit commitments on protecting human rights and environmental defenders.
- Recommendations to strengthen expectations on community development outcomes (local hiring, apprenticeships, and community initiatives).

“This section is seemingly written to apply to impacts at a mine site, but it should be rewritten to also apply to community and worker impacts or other facilities such as battery manufacturing, battery repurposing, battery recycling, formal and informal e-waste dumps.”

— Anonymous

Feedback on Issue Module – Business Integrity and Transparency

SurveyMonkey Q49: Does the Issue Module: Business Integrity and Transparency (pp. 60-61) meet your expectations for measuring performance related to this topic?



Overall, the response to the Module is mostly positive, with requests to strengthen clarity on risk scope, integrity controls, and advanced (AAA) expectations.

- Requests to clarify and expand the risk scope, including more explicit reference to Annex II risks and OECD minerals guidance on bribery and corruption.
- Suggestions to broaden coverage to include data privacy, anti-competitive behaviour, and AI oversight.
- Calls to strengthen operational clarity (e.g., training requirements, gifts/payments thresholds, approvals, and record-keeping guidance).
- Recommendations to define stronger AAA expectations, including independent risk assessments, analytics/transaction monitoring, and integrity KPIs integrated into enterprise dashboards.

“You may want to consider rendering language on Annex II risks more explicit to ensure better awareness or individual risks and the ultimate risk scope or the BPs. You could also reference the OECD Minerals Guidance, as well as the OECD FAQ on how to address bribery and corruption risks in mineral supply chains.” – Anonymous

Feedback on Issue Module— Indigenous People's Rights

Overall, feedback on the Indigenous Peoples' Rights module emphasized its importance for the credibility of the Battery Passport.

- Requests to clearly frame Indigenous Peoples as rights-holders, not only stakeholders, reflecting international law and global standards.
- Strong emphasis on including Free, Prior and Informed Consent (FPIC) as a non-negotiable expectation for credibility.
- Calls for the module to move beyond general human rights language toward clear, enforceable, and verifiable requirements aligned with recognised frameworks (e.g., UNDRIP, UNGPs, OECD, IFC PS7).

“The concept of FPIC (participation in decision-making, and Free, Prior and Informed consent) should be included into the module for Indigenous People's rights to be fully credible.”

— Transitions, Celia Palluau

Summary: What we take forward

- Part II: Introduction
 - Preamble
 - A: Battery Benchmarks
 - B: Data Assurance
 - C: Scoring rules
- Part II: Benchmarks reporting modules
 - Core modules
 - Environmental modules
 - Social & governance modules
- Annex II: Standard mapping framework
- Annex III: Standard recognition framework
- GHG Rulebook v2.1

What we heard most clearly:

- Strong support for strengthening clarity and specificity across social and governance expectations.
- Reduce unnecessary reporting burden while sharpening what “good practice” looks like in implementation.
- Requests for clearer baseline requirements and more auditable expectations across levels.
- Ensure benchmarks remain credible through alignment with recognised frameworks and consistent application.
- Clarification of expectations between meeting GBA benchmarks on management systems vs. elimination of risks in supply chains.

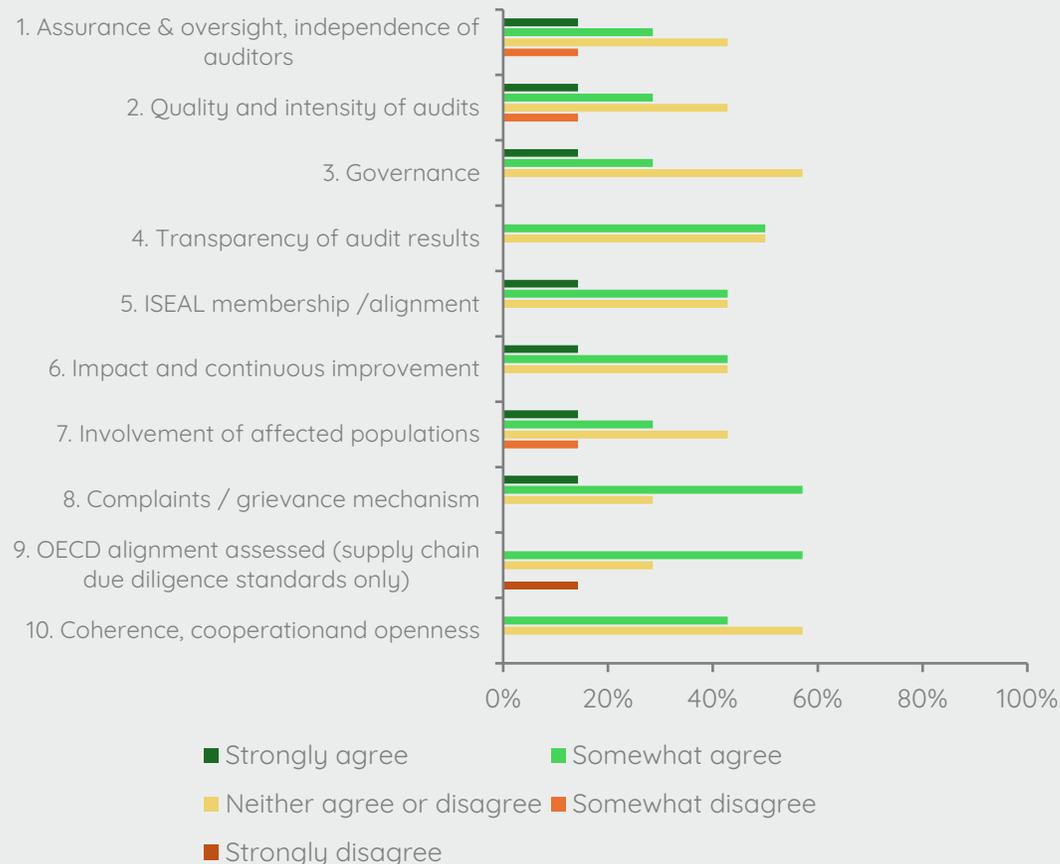
What this means for the framework:

- Guidance for Operational Trials on module relevance, legitimate situations where facilities do not need to report on particular risks, and evidence expectations.
- Revision of terminology and benchmark requirements where greater precision is sought.
- Improving measurability and auditability of benchmarks where Operational Trials indicate room for clarity, and testing and adjusting for applicability to non-mining and refining sites.
- Clarification on applicability of national legal requirements and international standards where there may be gaps, for labour modules in particular.
- Align with additional thematic standards and good practice guidance, especially on labour rights modules.
- Assess integration of data governance, privacy and cybersecurity considerations.
- Two-step development of the Indigenous Peoples’ rights module,
 - Trialling a transparency-only reporting format in 2026: acknowledging assurance against recognised standards, without benchmarking or scoring.
 - Development of a full Indigenous Peoples’ rights module in engagement with Indigenous Peoples’ representative organisations and other stakeholders.
- Assess opportunities to accelerate development of the Local Economic Development module

Feedback results: Annexes: Standard mapping

Feedback on Standard Recognition Framework

SurveyMonkey Q51: Does the Standard recognition framework (pp. 73) meet your expectations for assessing the robustness of Voluntary Sustainability Standards?



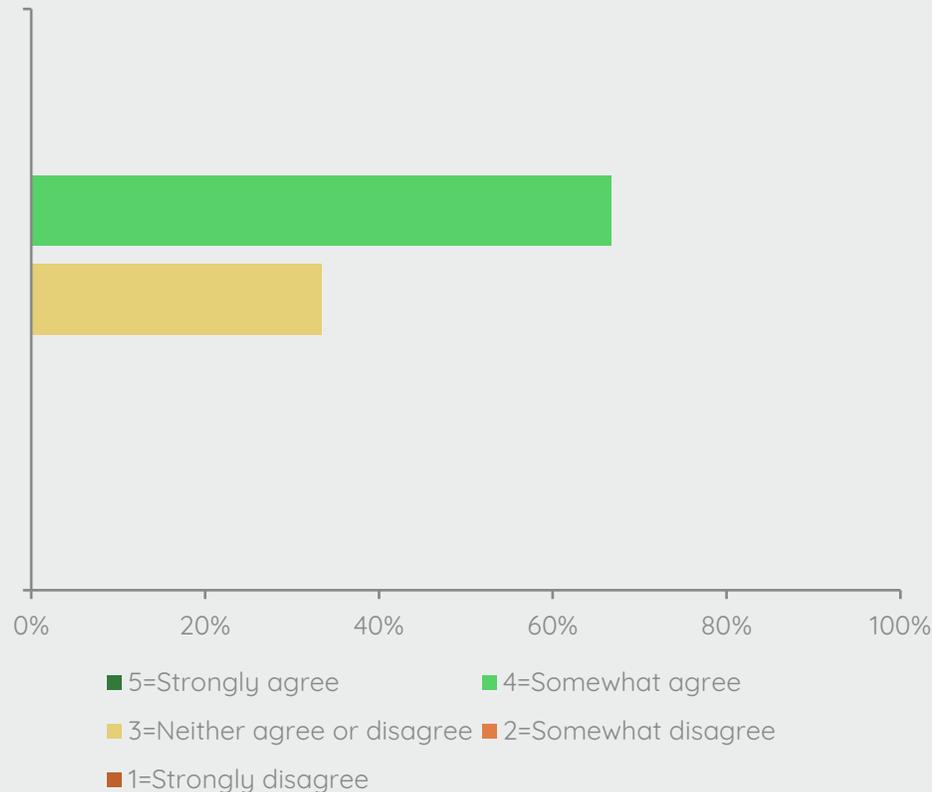
Overall, the response to the Standard Recognition Framework was mixed-to-positive, with broad support for the direction of travel and repeated requests to increase clarity, measurability, and transparency of the recognition process.

- Calls to clarify the recognition pathway, including how Annex II listings relate to formal recognition and how additional VSS can enter the framework.
- Requests for clearer minimum criteria, particularly on auditor independence, audit quality, and governance expectations.
- Emphasis on ensuring recognised schemes are equivalent in due diligence and transparency requirements, with stronger alignment to OECD standards.
- Suggestions to improve transparency and accuracy in how standards are assessed, described, and kept up to date.
- Support for making impact, stakeholder engagement, and coherence criteria more operational and verifiable in practice.

“The framework sets the right priorities, but remains too abstract overall. Reliable and comparable assessments require clearer minimum requirements, measurable criteria and a stronger focus on audit quality and OECD standards.” — Anonymous

Feedback on Summary Mapping of Standards

SurveyMonkey Q53: Does the Summary Mapping of Standards (pp. 75-91) meet your expectations?



Overall, the response to the Summary Mapping of Standards was positive, with respondents finding the mapping useful and clearly presented, alongside suggestions to strengthen comparability with other methodologies.

- Positive feedback that the mapping is a helpful tool for comparing Battery Passport modules with other standards and frameworks.
- Recognition that the mapping relationships are clearly presented and easy to interpret.
- Suggestions to strengthen alignment by cross-checking coverage against evolving external methodologies (e.g., Lead the Charge indicators).
- Some concerns raised about ensuring the mapping supports credibility in implementation, not only reporting.

"It was helpful to determine how does a module compare with other standards and frameworks." — Anonymous

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What we heard most clearly:

- Clarification on details on standard governance scoring and methodology
- Clarify process for benchmarking of additional standards
- Greater transparency in how standards are recognised, compared, and described

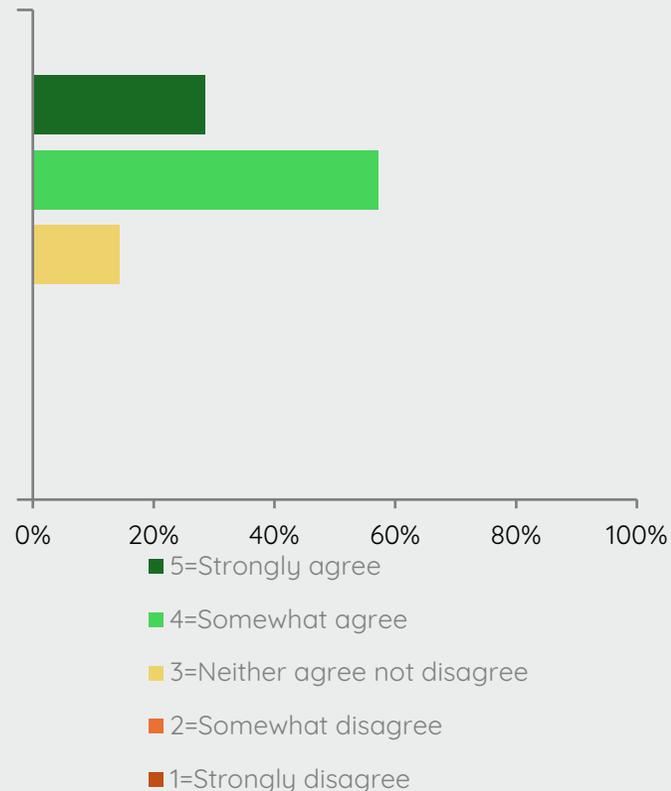
What this means for the framework:

- Digitising and providing a clearer visual overview/navigation tools for the benchmarking methodology, which combines thematic and standard governance benchmarking.
- Outlining a standard revision process and intervals.
- Review of the standard benchmarking in cooperation with standard setters after consultation and Operational Trials feedback.
- Revision and adjustment to the standard recognition criteria where greater differentiation is required.
- Alignment of the entire recognition and benchmarking framework and/or recognition criteria, with emerging sector-wide credibility criteria of the OECD.
- Continued alignment of the Battery Passport framework, including cross-recognition of standards, with emerging EU Batteries Regulation criteria for recognised schemes.
- Defining an approach to partial equivalency and scoring, in particular where standards' due diligence scope is limited to OECD Annex II risks.
- Increasing coverage of downstream / manufacturing standards in the benchmarking framework, where commonly used in battery value chains.

Feedback results: Greenhouse Gas Rulebook

Feedback on Greenhouse Gas Rulebook v2.1

SurveyMonkey Q55: To what extent do the Greenhouse Gas Rulebook v2.1 meet your expectations?



Overall, feedback on the GHG Rulebook v2.1 was mixed-to-positive, with strong recognition of improvements and alignment with established climate standards, alongside targeted requests to tighten wording, improve consistency, and strengthen operational usability for audits and global applicability.

- Requests to resolve internal inconsistencies and tighten wording across definitions, chapter references, cluster naming, and system boundary/allocation rules.
- Suggestions to improve usability and auditability through clearer guidance and examples (e.g., cut-off calculations, installed capacity, reference flow alignment).
- Calls to ensure global applicability and fairness in secondary data and electricity requirements while maintaining transparency.
- Recommendations to strengthen operationalisation in Version 3.0 and better address upstream data access and just transition considerations in emissions reduction planning.

“Rulebook v2.1 shows clear improvements over version 1.0 and is well aligned with established climate standards (in particular the GHG Protocol, PCF guidelines and SBTi). At the same time, in some areas it remains too technically immature and not yet sufficiently operationalised to fully meet the expectations or a robust, auditable set of rules. The planned version 3.0 should close these gaps.” — Anonymous

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What we heard most clearly:

- Stronger operational clarity to support auditability and real-world usability of the GHG rulebook
- Continued alignment with international norms, while ensuring global applicability
- Resolve methodological questions related to EU regulatory requirements and beyond

What this means for the framework:

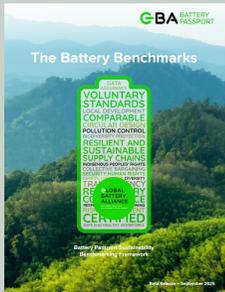
- Strengthen measurability and auditability across benchmarks and the GHG Rulebook.
- Continue improving auditability and assess recognising 3rd party verified data for GHG Rulebook.
- Maintain alignment with recognised frameworks while ensuring fairness and practical implementation.
- Continue trialling the GBA GHG rulebook and its dual reporting methodology as a multistakeholder-led response to providing transparency to decarbonization efforts.
- Align with EU Batteries Regulation methodology and other global regulatory requirements, when available.

How the GBA will integrate consultation feedback and how you can continue to contribute

Incorporating consultation feedback into the Battery Passport together with lessons from Operational Trials will enable finalization of the scheme ahead of planned launch in 2027.

2025

Battery Benchmarks launch



UN Transparency Protocol extension and ITC Partnership

Q1/2026

Operational trials

Wave 1 trials:

- Supply chain mapping and responsible sourcing
- Sustainability dashboarding
- Automated recognition of standards
- Digital credentials with United Nations Transparency Protocol
- Digital tools with ITC and commercial providers
- EU Batteries Regulation preparation and readiness assessment

Q2-Q4 2026

Op. trials - continued

Wave 2 trials:

- Procurement and investor due diligence
- Prototype product-level certification
- Third-party assurance

Verification and certification

- Certification parameters
- Verification handbook

2027

Launch!

Fully fledged Battery Passport and certification scheme rolled out.



Joining the GBA is your main opportunity to contribute to the final development phase of the Battery Passport!

Interested in Joining?

GBA membership is open to organisations from the private, public, and civil society sector with a link to the battery value chain.

GBA members commit to the GBA Guiding Principles, comply with due diligence measures, and agree to the GBA Charter.

Download GBA Application [here](#)

To indicate interest, find out more, or submit an application, please contact:

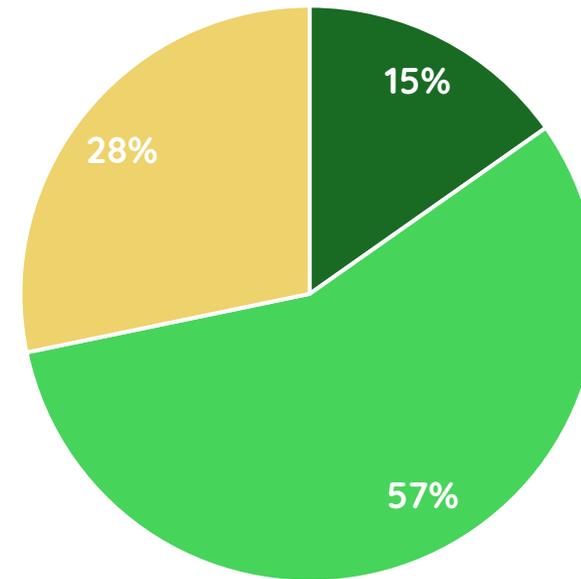
secretariat@globalbattery.org

Annex: Feedback participation

The consultation generated a total of 216 comments through email, survey responses and public webinars

- ~100 individuals engaged during the feedback process
- With 46 individual submissions through:
 - Email
 - Survey
 - Public Webinar Comment
- For a total of 216 unique comments regarding the battery benchmarks and GHG rulebook.

Feedback Breakdown



■ Email Responses ■ Survey Responses ■ Webinar Comments

The consultation captured views from public and private stakeholders, as well as across the value chain

