



## One year until the **EU Battery Passport**

From preparing for market access to securing a market asset

Roundtable Event Report



10 March 2026  
Brussels, Belgium

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## Key takeaways

- **EU Batteries Regulation implementation is progressing:** Despite uncertainty on evolving rules, timelines, reporting requirements and confidentiality, especially for SMEs, companies and several initiatives are working actively to prepare.
- **Pre-competitive trialling is central to EU regulation readiness:** The GBA Battery Passport is emerging as a practical tool to help industry comply with EU Batteries Regulation requirements (traceability, due diligence, carbon footprint) ahead of its 2027 rollout, generating lessons and feedback on solving the remaining challenges.
- **Interoperability and collaboration are critical:** Aligning standards, ensuring data-sharing systems work across technologies and global supply chains, and continuing multi-stakeholder collaboration are essential for scalable implementation.
- **Beyond compliance, market incentives and trust matter:** The Battery Passport can become a market differentiator and financing requirement, through building trust, clear certification standards, and demand from investors, policymakers, and downstream buyers.

## Context and objectives

On 10 March 2026, the [Global Battery Alliance](#) (GBA), [Centre for European Policy Studies](#) (CEPS), and [RECHARGE](#) hosted a multi-stakeholder roundtable in Brussels to discuss implementation readiness for the battery passport requirement of the EU Batteries Regulation (EUBR), which will apply from 2027. The discussion drew on a GBA [White Paper](#), which presents the GBA Battery Passport as a practical tool to facilitate compliance with the EU Batteries Regulation's requirements on due diligence, traceability, and carbon footprint.

During the roundtable, participants ranging from policymakers, automotive companies and industrial battery users, battery manufacturers, raw material and battery material suppliers, investors, industry associations and implementation partners, civil society and trade unions, shared perspectives on implementation readiness, explored opportunities, challenges and solutions using interoperable and scalable frameworks, and discussed incentives for turning compliance into a business case in the market.

The meeting was held under Chatham House rule. This event report has been anonymised except for the contributions of named keynote speakers. A list of participating organisations, agenda, and slides are [available here](#).

## Setting the Scene: EU Batteries Regulation and the GBA Battery Passport

**CEPS and GBA** welcomed participants, setting out the context of the roundtable: the battery industry needs to scale responsibly in light of the rapidly growing battery demand across mobility, power systems and data centres. This is why the GBA and the Battery Passport created: transparency and a common definition of responsible practices across the battery value chain are a prerequisite for managing the environmental and social impacts of this fast-growing industry. **Umicore, representing the GBA Board of Directors**, set out how it has been a priority for industry that the GBA Battery Passport aligns with the EU Batteries Regulation while supporting operations across global supply chains.

**The EU Commission** offered a timely update on the development status of the implementing texts, guidelines and technical standards related to the EU Batteries Regulation. Following the EU battery passport's entry into effect in February 2027, it will progressively include additional data required under the Regulation. A summary of the updates is below.

## EU Batteries Regulation implementing act and guidance status:

- **Battery performance, durability and safety:** Technical standards are under development with support from the Joint Research Centre.
- **Recycling efficiency:** A delegated act has been adopted.
- **Recycled content:** Calculation methodology is expected in 2026.
- **Waste export:** The revised list of waste in relation to batteries has been adopted
- **Due diligence:** Guidelines are expected for stakeholder consultation in the first half of 2026 via the Battery Expert Group. Alignment of those guidelines with the broader EU due diligence architecture is more challenging following the Omnibus decision to postpone CSDDD guidelines to 2027. A Delegated Act on approval criteria of recognised schemes is expected for consultation in 2026, following a consultation on the general approach in 2025.
- **Carbon footprint:** The delegated act is pending decision at the political level regarding the decision on electricity modelling methodology.
- **Battery passport / digital product passport:** Technical standards for data exchange are under development and expected to be adopted early 2026. Ecodesign for Sustainable Products Regulation (ESPR) forum and a battery-specific meeting on DPPs will provide more information in the coming weeks.
- **Access to data:** An Implementing Act is expected in 2026, defining persons of legitimate interest and other stakeholders.
- **Labelling:** An implementing act on labelling is expected later in 2027, while the battery passport requirement enters in effect in February 2027.

The Commission reiterated its willingness to engage with stakeholders and receive feedback on implementation. GBA Battery Passport Operational Trials and other initiatives provide valuable evidence on data exchange, verification, traceability, reporting and emerging legal challenges, while the legal framework is being finalised.

**The GBA Secretariat presented how the Battery Passport supports implementation of the EUBR,** building a common understanding of how the GBA's Battery Passport offers an opportunity to start preparing for the EU Batteries Regulation. The Battery Passport aggregates supply chain data into comparable battery-level information for regulators, companies and other stakeholders. Its data requirements are aligned with the EUBR in traceability, due diligence and ESG risk assessment, carbon footprint calculation, recycled content, and data governance. To test the Battery Passport in practice, Operational Trials involving 15+ supply chain consortia, led by leading battery, automotive and energy storage companies are testing data exchange, verification and reporting processes, with EU Batteries Regulation compliance as a key driver.

## Around the table: Implementation Status - Industry Perspectives and Policy Feedback

**Representing the European battery industry, remarks from RECHARGE** confirmed that preparation for the EU Batteries Regulation is well underway by automotive and battery OEMs, in line with OECD due diligence guidance and harmonised lifecycle assessment methodologies. However, implementation, reporting burden and digital capability requirements place a burden on smaller companies and newer battery segments, particularly for dynamic data, where standards are still developing. Several OEMs have already piloted battery passports internally, and testing the GBA Battery Passport, closely aligned with EU Batteries Regulation, is a prime opportunity to prepare.

Across the board, industry representatives highlighted a handful of remaining challenges. **Shifting regulatory timelines and incomplete guidance** create challenges for production planning, resource allocation and system design. As implementation guidance remains unresolved such as the carbon footprint methodology, or is postponed, as for the due diligence requirements, uncertainty and costs are compounded through the battery value chain. Automotive and battery manufacturers emphasised that production cycles require long lead times, and changes linked to battery passport requirements must be incorporated several months before the application date. The lead times are even longer for material and mineral producers.

**Building implementation on existing standards** is critical. Speakers called for continued use of established lifecycle assessment and ISO-based methodologies for carbon footprint and warned against multiplying certification schemes. Lack of harmonised reference data for the environmental footprint is another source of uncertainty.

**Data access and confidentiality are concerns**, particularly for battery manufacturers positioned between upstream suppliers and downstream OEMs. Companies pointed to the sensitivity of certain battery passport data, including cell chemistry and supplier relationships, which they consider too commercially sensitive to share beyond a strict need-to-know basis. Expectations are high for forthcoming implementing act defining “persons with legitimate interest” and for practical testing of tiered access to data.

**Traceability across multi-tier supply chains** remains resource intensive, and visibility in some upstream segments is still incomplete. Examples from parallel industries demonstrate the need for a strong demand signal from downstream clients and investors for traceability.

**Building implementation on existing standards** is critical. Speakers called for continued use of established lifecycle assessment and ISO-based methodologies for carbon footprint and warned against multiplying certification schemes. Lack of harmonised reference data for the environmental footprint is another source of uncertainty. Companies called for a single audit framework that could serve multiple reporting purposes. Auditor capacity was also described as a bottleneck.

**Interoperability across digital systems** to support supply chain transparency. Data ecosystems such as Catena-X were cited as examples of initiatives designed to enable data exchange across the automotive value chain and potentially support the implementation of the battery passport. Innovative approaches to supply-chain risk mapping such as AI-based analysis to identify transactions, supplier links and risk exposure across multiple tiers were also discussed.

**Global perspective:** Whilst the EU Batteries Regulation was the focus of the discussion and a key impetus for battery passport development and supply chain transparency, digital product passports are being proposed at the international level and in other jurisdictions, such as China. Preparing for multiple requirements at once is costly for industry, and calls for a harmonised approach.

*“August 2027 is actually tomorrow. It's the moment that rubber needs to hit the road. It will not be perfect, there will be things we regret that we did not think through. But the maturity of what's presented and discussed today shows that we should move ahead.”*

**Opportunities and solutions: Participants and industry involved in trialling called for:**

- **Supply side solutions to data provision:** Practical testing of pseudonymisation, verification and third-party data aggregation, and avoiding unnecessary, duplicated data requests from the downstream can mitigate data confidentiality concerns. Establishing clear and defined data access rules enables data sharing while protecting commercially sensitive information. Innovative AI solutions can triangulate publicly available trade and customs records to improve traceability and risk mapping. Chain of custody approaches that do not expect 100% traceability on day one, but reward on progress can help.
- **Ecosystem approach:** Joint pilots with other initiatives such as Catena-X, IMDS automotive data system, BATRO, Battery Pass, other standards using the United Nations Transparency Protocol (UNTP), and other supporting initiatives—including those funded by the European Union—are critical. Streamlined approaches and lowering digital and technological barriers are particularly important for SMEs.
- **Doubling down on interoperability:** Building on cross-recognition of schemes e.g. through incorporating battery passports in integrated solar-battery installations, and aligning methodologies, such as PEF rules and ISO standards in the carbon footprint methodology, can help further drive further efficiencies.
- **Meeting multiple regulatory objectives:** Future uses of the Battery Passport can include recycled content, circularity, due diligence in line with other European regulations such as the CSDDD and EU ban on imports of products made with forced labour, Union Content rules in line with the proposed Industrial Accelerator Act; and globally, on digital product passports, traceability and carbon footprint.
- **Feedback loops and learning between industry and regulators** can mitigate implementation challenges and uncertainty in the external environment, help balance ambitious regulation with commercial realities, and apply a lower-barrier, staged approach for adoption for smaller companies, types of batteries, and developing data requirements.

## Around the table: Beyond compliance, toward Market Incentives and Stakeholder Trust

The Battery Passport was discussed not only in the context of compliance, but also as a tool for **comparable data to create market, finance and procurement demand for responsible batteries**. Market demand is necessary to counter the tailwinds on corporate priorities and budgets on sustainability, and to create a carrot alongside the stick for meeting the requirements to access the European market. Industry stated that moving beyond a minimum market access requirement, to a market differentiator may generate demand and financing for battery passport implementation. The product-level format is useful for aggregating facility information into comparable battery-level information for regulators, buyers, investors and other decision-makers.

From **a finance perspective, a trusted certification is useful for compliance screening and for broader market differentiation**. Development Finance Institutions (DFIs) and public finance play a crucial role in setting requirements for the battery industry, especially in the energy storage segment linked to public utilities. Unlike sectors such as forestry, there is not yet an established sustainability benchmark that can easily communicate whether risks are being managed. The GBA certification for batteries could become a mandatory requirement for financing in the future.

**Where policy remains unsettled, pre-competitive work moves practice forward.** Carbon footprint methodology was the clearest example, with the methodology on the treatment of grid electricity under the delegated act pending a political decision. While perspectives varied on whether the GBA should implement carbon thresholds as part of the certification to move industry ahead, there was agreement that industry action, trialling and using comparable declarations, e.g. using the GBA's dual reporting methodology, could help deblock the regulatory process and demonstrate industry progress.

**Trust in sustainability claims and certification frameworks** emerged as an important theme, for example on labour and Indigenous Peoples perspectives. Trade union, civil society and mining industry representatives stressed that sustainability frameworks must be credible not only for companies and regulators, but also for workers, communities and rightsholders affected by mining activities. In mining contexts especially, benchmarks and scorecards are valuable because they provide an objective reference point for evaluating company performance, instead of relying solely on corporate claims.

At the same time, speakers cautioned against one-size-fits-all approaches, which do not reflect labour conditions, Indigenous Peoples' rights and local industry realities.

**Solutions and opportunities:** Industry and stakeholders stressed the following:

- **Creating a broad-based signal across public and private finance and procurement** to de-risk investments and set common expectations and scale certification demand.
- **Engagement with governments to adopt certifications in policies and guidelines**, including potential EU Commission adoption of GBA frameworks as a reference.
- **Differentiated performance and progressive improvement** support a welcome trend across financing institutions away from blacklisting in investment and procurement.
- Continuing **multi-stakeholder definition of sustainability, involving impacted rights holders** for critical impact areas, such Indigenous Peoples' rights.
- Building on existing tools and frameworks created by GBA and others, to scale solutions, support voluntary action, and demonstrate real progress to consumers.

*“Did anyone ever question your identity card when traveling? No, everyone trusts what is in it. We aim for that level of credibility with the Battery Passport.”*

## Closing remarks and next steps

The European Bank for Reconstruction and Development closed the roundtable by emphasising the importance of a **credible battery supply chain traceability certification**, developed through a **multistakeholder initiative**, as a trusted reference point for IFI Boards and Investment Committees. A robust and ambitious framework, grounded in emerging EU requirements, enables institutions such as the EBRD to better assess supply chain risks through suppliers' certification and to incentivise a “race to the top” among market participants. Despite ongoing regulatory uncertainty, investors, including the EBRD, are already engaging suppliers on their level of preparedness, creating strong incentives for early adoption. From an investor perspective, **efficiency, avoidance of duplicate audits, reliable verification mechanisms, balanced checks and assurances, open access to comparable data, and broad stakeholder participation** are critical drivers of credibility and trust.

As implementation of the EU Batteries Regulation progresses and the battery passport requirement approaches, the roundtable highlighted priorities for several stakeholders:

- **Policymakers can provide greater regulatory clarity** on timelines of delegated acts and technical rules even as they shift—to allow companies sufficient lead time for production planning and system development.
- **Industry and multi-stakeholder platforms should work seamlessly together** and build implementation on existing methodologies and standards, including lifecycle assessment and recognised audits, to avoid duplication and reduce reporting burden across the value chain.
- **OEMs and the downstream should signal demand and engage with suppliers**, to drive battery passport uptake and support preparation in supply chains.
- **Broader supply chain stakeholders must participate** to ensure Battery Passport data is trustable, supports market and consumer confidence, and drives continuous improvement and on-the-ground impact, including by using Battery Passport with other data sources.

Continued collaboration between regulators, industry, finance and civil society is needed to ensure that implementation of the battery passport is both credible in principle and workable in practice. To accomplish this, **GBA, CEPS and RECHARGE** - invite stakeholders to:

- **Join their platforms for learning by doing** via pre-competitive collaboration, including through the 2026 GBA Operational Trials
- **Broaden policy and stakeholder dialogue** on the lessons of the Operational Trials and cross-value-chain engagement, including with automotive OEMs, traders and battery users, to apply lessons ahead of the 2027 battery passport requirement.
- **Convene the battery ecosystem in the room** on a regular basis, virtually or in person, to follow up on implementation progress and to foster an ongoing information exchange between stakeholders and including regulators.
- **Generate and disseminate research findings** to support implementation and generate insights on emerging questions.

*“This can be a trusted standard which will help reduce environmental, social, and reputational risk for lenders and investors, and for operators and businesses. The multi-stakeholder base provides a good, comparable benchmark, increasing trust.”*

**ANNEX:** Access the agenda, list of participating organisations and presentation [here](#).

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