

BATTERY PASSPORT DATA CHECKLIST

12-Step Compliance Checklist — EU Regulation 2023/1542

Complete all 12 steps before 18 February 2027 to ensure your batteries can enter the EU market.

CRITICAL DEADLINE

**18 FEBRUARY
2027**

Digital Battery Passport mandatory for all EV and industrial batteries (above 2 kWh) on the EU market. No QR code = no market access.

THE FOUR GATES FRAMEWORK

GATE 1	KYC Entity Anchor	kycregistry.co.za	Complete before Gate 3
GATE 2	Carbon Footprint Declaration	carbonborderadjustment.co.za	Complete before Gate 3
GATE 3	Battery Passport Data Preparation	batterypassport.co.za	← YOU ARE HERE
GATE 4	Digital Product Passport Minting	digitalproductpassports.co.za	Complete after Gate 3

12-STEP BATTERY PASSPORT COMPLIANCE CHECKLIST

01	Complete KYC Entity Anchor	PREREQUISITE
	Register your legal entity at kycregistry.co.za . Provide CIPC registration number, director biometrics, and company documents. This creates your verified entity record for all four gates.	Deadline: Before Gate 3
02	Complete Carbon Footprint Declaration	PREREQUISITE
	Calculate and declare your battery's carbon footprint per kWh at carbonborderadjustment.co.za . Break down by lifecycle stage: raw material extraction, manufacturing, use, end-of-life. Industrial battery CFD was due 18 Feb 2026.	Deadline: PAST DUE (Industrial) / Done (EV)
03	Identify Battery Category	GATE 3
	Confirm your battery category: EV traction battery, industrial battery (above 2 kWh), LMT battery (e-bike, e-scooter), or portable battery. Different categories have different data requirements and deadlines.	Deadline: Now
04	Collect General Battery Information	GATE 3
	Manufacturer name and address, battery model identifier, unique battery identifier (UID), cell chemistry, nominal capacity (Ah), nominal voltage (V), battery weight (kg), dimensions, operating temperature range.	Deadline: Now

05	Collect Recycled Content Data Determine recycled content (% by weight of active material) for: Cobalt (target: 16% from 2031), Lithium (target: 6% from 2031), Nickel (target: 6% from 2031), Lead (target: 85% from 2031). Engage recycling partners for verified data.	GATE 3
06	Conduct Supply Chain Due Diligence Map your supply chain for cobalt, lithium, nickel, and lead. Conduct risk assessment per OECD Due Diligence Guidance. Implement risk mitigation plan. Prepare annual due diligence report. Engage third-party auditor for verification.	GATE 3
07	Prepare Material Composition Declaration List all hazardous substances present above the declaration threshold. Include CAS numbers, concentration ranges, and location in the battery. Prepare safety data sheets (SDS) for all hazardous substances.	GATE 3
08	Collect Performance and Durability Data (EV/Industrial) For EV and industrial batteries: state of health (SoH), state of charge (SoC), remaining useful life (RUL), capacity fade, power fade, round-trip energy efficiency, expected lifetime in cycles and calendar years.	GATE 3
09	Prepare Removal and Dismantling Instructions Document the procedure for safe removal and dismantling of the battery, including required tools, safety precautions, and step-by-step instructions. For portable batteries, document the removability and replaceability procedure.	GATE 3
10	Engage Third-Party Verification Body Appoint an accredited third-party verification body (e.g., SGS, Bureau Veritas, TÜV Rheinland) to verify your carbon footprint declaration, recycled content data, and supply chain due diligence documentation.	GATE 3
11	Compile and Verify All Battery Passport Data Compile all Annex XIII data fields into a structured data package. Verify completeness and accuracy with your third-party verification body. Ensure all data is in the required format for Gate 4 submission.	GATE 3
12	Mint Battery Passport at Gate 4 Submit all verified data to digitalproductpassports.co.za (Gate 4). Gate 4 generates the SHA-256 hash, creates the Battery Passport record, and issues the QR code for physical labelling. Affix QR code to battery or packaging before EU market placement.	GATE 4

2031 RECYCLED CONTENT TARGETS

MINERAL	2031 TARGET	2036 TARGET	BATTERY TYPES
Cobalt	16%	26%	EV, Industrial, LMT
Lithium	6%	12%	EV, Industrial, LMT
Nickel	6%	15%	EV, Industrial, LMT

Lead	85%	85%	All batteries containing lead
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KEY COMPLIANCE DEADLINES

18 Feb 2025	Carbon Footprint Declaration	EV batteries	DONE
18 Feb 2026	Carbon Footprint Declaration	Industrial batteries (>2 kWh)	PAST DUE
18 Aug 2026	Performance Class labelling	EV batteries	UPCOMING
18 Feb 2027	Digital Battery Passport (QR code)	EV + Industrial (>2 kWh)	CRITICAL
18 Aug 2027	Performance Class labelling	Industrial batteries (>2 kWh)	UPCOMING
18 Feb 2028	Max carbon threshold enforcement	EV batteries	UPCOMING
18 Aug 2031	Recycled content targets	All categories	UPCOMING