Joint industry position paper on Battery Passport data access and safety information

Enabling safe, circular and efficient battery management throughout the value chain

16 November 2026
Brussels

Summary

The undersigned organisations support the successful implementation of the Battery Passport under Batteries Regulation (EU) 2023/1542 as a key tool to improve transparency, traceability, sustainability and circularity throughout the battery value chain. To achieve these objectives, the Battery Passport must provide authorised actors with access to the information necessary to fulfil their respective operational responsibilities, including relevant safety information to prevent incidents during collection, storage, transport, repair and recycling. The success of the Battery Passport will therefore depend not only on the information it contains, but also on whether relevant information is available to authorised actors when and where it is needed.

Implementation must also clearly allocate responsibilities when batteries become waste and ensure that Battery Passport updating obligations are technically feasible, appropriately funded and proportionate to their practical benefits for safe and circular battery management.

1. The Battery Passport should support the entire battery lifecycle

The Battery Passport is intended to facilitate information sharing throughout the battery lifecycle, from manufacturing and placing batteries on the market through to repair, preparation for reuse, reuse, repurposing, collection, transport, recycling and material recovery, as well as compliance and enforcement activities. To fulfil its objectives, the Battery Passport should be implemented as a practical tool that supports all relevant stages of the battery lifecycle, enables cooperation between authorised actors and avoids information silos.

2. Information access should reflect operational responsibilities

Different actors require access to different information in order to perform their functions safely, efficiently and in compliance with applicable legislation. The Battery Passport should therefore be based on a role-based access approach that provides authorised actors with access to information relevant to their legitimate operational responsibilities, while protecting commercially sensitive information.

3. Essential information for safe collection, transport and treatment

Actors responsible for end-of-life battery management, including Producer Responsibility Organisations (PROs), collection operators, transport providers, operators carrying out preparation for reuse, waste management companies and recyclers, require access to key operational information in order to perform their tasks effectively. At a minimum, authorised end-of-life operators should have access to:

- Battery identification: e.g. Battery Passport identifier, product identifier, battery category, manufacturer or producer information, date and place of manufacturing.
- Physical characteristics: e.g. weight, dimensions, capacity, battery format and configuration.
- Battery chemistry: e.g. chemistry type, detailed material composition including materials used in the cathode, anode and electrolyte, presence of critical raw materials including lithium where applicable, presence of substances of concern, and information relevant to treatment and recycling processes, including dismantling instructions, substances and metals covered by material recovery targets, and substances preventing the recycling of batteries.
- Safety information: e.g. safe handling instructions, usable extinguishing agents, storage requirements, transport requirements, information concerning damaged or defective batteries, safety alerts and recalls where applicable, relevant fire-prevention information, and State of Charge where available.

For professional WEEE recyclers, access to information on batteries embedded in electrical and electronic equipment is particularly important. Where applicable, information on battery location, chemistry, accessibility and safe removal should be made available to support safe and appropriate treatment.

Access to the information listed above is essential for safe collection, logistics planning, packaging, transport, sorting and treatment, as collection and recycling operators often do not know in advance which batteries enter their systems. It enables responsible organisations to provide appropriate instructions and direct batteries to the most suitable treatment pathways.

4. Supporting battery safety and fire prevention

Battery safety should be recognised as an important enabling function of the Battery Passport. As growing volumes of batteries enter collection systems, transport networks and recycling facilities, making the safety information listed above available to authorised operators in advance can help prevent incidents and protect workers, infrastructure and the environment.

State of Charge (SoC) should also be considered an important safety parameter. For example, a damaged battery presenting a short-circuit risk may represent a significantly greater hazard when maintained at a high state of charge than when substantially discharged. Access to SoC information, where available, can therefore support risk assessment and safer handling, storage, transport and treatment. This does not require real-time updating: recording the last known SoC, with date and source, at key lifecycle events such as end of use or removal from the vehicle or equipment would already provide valuable information.

5. Information supporting circular business models

The Battery Passport may also create significant value for circular economy activities such as repair, remanufacturing, repurposing, reuse and recycling. Depending on the actor and use case, relevant information may include State of Health (SoH), State of Charge (SoC), cycle count, remaining capacity, performance history, diagnostic information and degradation indicators.

Such information can support operations and decisions on repair, second-life applications and recycling. Access requirements for these data should be considered within a role-based framework that balances operational value, data governance and protection of commercially sensitive information.

6. Battery status at waste stage: clear responsibilities and proportionate obligations

Article 77(7) of the Batteries Regulation provides that, when a battery becomes waste, responsibility for updating the information in the Battery Passport transfers to the producer, the appointed Producer Responsibility Organisation or the waste management operator selected in accordance with Article 57(8).

The practical allocation of these responsibilities requires clarification, particularly regarding which actor must record the change of status to 'waste', at which stage and through which technical procedure. Responsibility for maintaining Battery Passport information should not be confused with access to it, and waste management operators should not be expected to verify or reconstruct information supplied by upstream actors. Any updating tasks assigned to PROs or waste management operators must be accompanied by the necessary editing rights, interoperable tools and clear arrangements for covering the associated costs.

Updating obligations should be proportionate to their benefits for traceability, safety and recycling, particularly where batteries are destined directly for recycling, while ensuring that safety-relevant information remains available until treatment is completed. Practical guidance should be developed with waste management operators and PROs, prioritising automated or batch updating procedures that preserve the link to individual batteries and avoid duplicating existing waste reporting.

Recommendations

The undersigned organisations call on policymakers and implementing authorities to:

- **Ensure access to essential operational information:** provide authorised actors involved in collection, transport, compliance, waste management, preparation for reuse and recycling with access to the information necessary to perform their operational responsibilities.
- **Strengthen battery safety:** recognise safety and fire prevention as important objectives of Battery Passport implementation and ensure that appropriate safety information is available to authorised actors.

- **Support circular economy activities:** facilitate access to information that can support repair, remanufacturing, repurposing and reuse activities, where justified by operational needs.
- **Implement role-based data governance:** develop clear and practical access rights that balance operational requirements, data protection and confidentiality considerations.
- **Involve recyclers:** consult professional recycling operators when developing practical access arrangements to ensure that the information provided is relevant and usable during end-of-life treatment.
- **Promote harmonisation:** ensure consistent implementation across Member States and alignment with wider Digital Product Passport developments.
- **Clarify responsibilities for battery status updates:** specify who must record a battery's transition to waste, and ensure that operators assigned updating tasks have the necessary editing rights, interoperable tools and funding, without disproportionate manual processing or duplicate reporting.

The Battery Passport has the potential to become a cornerstone of Europe's battery ecosystem and a key enabler of battery circularity. A Battery Passport that combines practical operational value, role-based access, safety functionality, support for circular business models and clearly allocated, proportionate responsibilities at the waste stage will deliver the greatest benefit for industry, public authorities, consumers and society as a whole.

Signatories

EERA
European Electronics Recyclers Association

EUCOBAT
European Compliance Organisation for Batteries

FEAD
European Waste Management Association

Recycling Europe

WEEE Forum

WEEELABEX