

Compliance Checklist – Carbon Footprint

This is a compliance checklist for the carbon footprint declaration under the EU Battery Regulation (EU) 2023/1542, Article 7.

The checklist is intended for direct use by manufacturers, importers and first placers on the market.

Quick Overview

Is the battery an EV, LMT or industrial battery >2 kWh?

- Yes → Carbon footprint declaration required
- No → Document exemption

Are we past the relevant entry into force date?

- Yes → Declaration + verification is a market access requirement

1. Determine Whether Your Batteries Are in Scope

- Classify each battery into one of the following categories:
 - Electric vehicle battery (EV)
 - Rechargeable industrial battery >2 kWh
 - Light means of transport battery (LMT)
- Confirm that the battery is placed on the EU market
- Document any out-of-scope batteries (e.g. portable batteries, SLI) so this can be demonstrated at inspection

2. Establish the Relevant Entry into Force Date

- Identify which deadline applies to your battery type:
 - EV batteries → 18 February 2025
 - Industrial batteries >2 kWh (without external storage) → 18 February 2026
 - LMT batteries → 18 August 2028
 - Industrial batteries with external storage → 18 August 2030
- Confirm whether a later date applies due to delegated/implementing acts

3. Assign Internal Responsibility

- Designate responsibility for:
 - LCA/CO₂ calculation
 - Data collection from suppliers
 - Third-party verification
 - Regulatory documentation
- Ensure management buy-in (compliance cannot be delegated away)

4. Collect Required Base Data

- Battery model and chemistry
- Production site (geographic location)
- Nominal energy capacity (kWh)
- Expected lifetime and use scenario
- Raw material data (Li, Ni, Co, Mn, etc.)
- Energy mix in production

5. Calculate the Carbon Footprint (PEF Method)

- Carry out a Product Environmental Footprint (PEF)-based calculation
- Calculate kg CO₂eq per kWh over the expected lifetime
- Allocate the footprint across the following life-cycle phases:
 - Raw material extraction and pre-processing
 - Production
 - Distribution
 - End-of-life and recycling
- Document calculation method and assumptions

6. Prepare the Carbon Footprint Declaration

- Include at minimum the following information:
 - Manufacturer identity
 - Battery model
 - Production site
 - Total carbon footprint (kg CO₂eq/kWh)
 - Life-cycle breakdown
 - ID number of EU declaration of conformity
 - Link to public version of documentation
- Use the format established by the European Commission

7. Have the Declaration Verified

- Designate a notified body
- Complete third-party verification (module D1)
- Retain verification report and certificates
- Handle any deviations or corrective actions

8. Ensure Correct Publication

- Ensure that the declaration:
 - Accompanies the battery when marketed, or
 - Is accessible digitally (QR code)
- Prepare for integration into the digital battery passport (mandatory from 2027)

9. Archive and Maintain Documentation

- Retain all documentation for at least 10 years
- Establish versioning per battery model and production site
- Update the calculation when:
 - Design changes
 - Changes to suppliers/energy mix
 - New production sites

10. Prepare for Future Phases (Not Required Yet – But Coming)

- Monitor upcoming requirements on:
 - CO₂ footprint performance class
 - Maximum CO₂ thresholds
- Use current data for strategic reduction of CO₂ footprint