

A STUDY IN REGULATORY GRANULARITY

Five battery categories. Seven data groups. One question: *what is actually mandatory?*

The Digital Battery Passport field matrix, rendered by obligation — and by who says so. Every cell is a count of fields a manufacturer must populate before a passport can be issued for that product class. The counts are not the same across categories. Neither is the legal authority behind them.

DATA: OROCON ESG CONNECTOR · GET_DPP_FIELDS_BY_CATEGORY

MODEL: BATTERYPASS-READY V1.0 · CC BY 4.0

RETRIEVED 26 JULY 2026

445 RECORDS · 7 CALLS

THE LEDE

On 18 February 2027, the Digital Battery Passport stops being a policy discussion and becomes a market-access condition. Every EV battery and every industrial battery above two kilowatt-hours placed on the EU market must carry one ^[2]. What almost nobody outside a standardisation working group can tell you is what a passport actually contains — not in the sense of four broad data domains, but field by field, and differently for each product class.

That granularity exists. It sits in the BatteryPass-Ready data model, whose per-category obligation arrays record, for each of a hundred defined fields, whether that field is mandatory, voluntary, or simply absent for a given battery type ^[1]. It is the difference between knowing you need a carbon footprint and knowing you need seven separate lifecycle-stage contributions, each in kilograms of CO₂-equivalent per kilowatt-hour, all of them public.

Five calls to the connector return 445 category-field records. Read together, they say something a summary cannot: that a stationary industrial battery carries sixteen more mandatory fields than an industrial battery

without a battery management system, that the gap sits almost entirely in performance telemetry, and that six fields in every category answer to a different law entirely.

This dashboard shows that matrix. Each cell is a count you can click into. The table at the foot is the whole EV passport, untruncated, because the depth is the product.

CATEGORY-FIELD RECORDS

445

Five calls, one per battery category

DISTINCT FIELDS DEFINED

100

De-duplicated across all categories

MANDATORY BY ANOTHER LAW

30

(x) records — JTC-24 / ESPR, not the Battery Reg

DAYS TO PASSPORT MANDATE

207

18 Feb 2027 · EV and industrial > 2 kWh

§ 01 / THE MATRIX

Mandatory field counts, by data group and battery category.

Each cell counts the fields the model marks mandatory for that group and category — solid x under the Battery Regulation, hatched (x) under the JTC-24 / ESPR route. The figure beneath is the total number of fields present, mandatory or not. Hover or tap any cell to list its fields. ^[1]

	EV Electric vehicle	LMT Light transport	INDUSTRIAL Without BMS	OTHER IND. > 2 kWh	STATIONARY > 2 kWh	ALL records
Performance And Durability	25 of 32	34 of 38	20 of 21	23 of 28	34 of 38	157
Identifiers And Product Data	19 of 20	20 of 20	18 of 18	19 of 20	20 of 20	98

Circularity And Resource Efficiency	15 of 15	15 of 15	15 of 15	15 of 15	15 of 15	75
Battery Carbon Footprint	7 of 8	7 of 8	7 of 8	7 of 8	7 of 8	40
Symbols Labels And Documentation Of Conformity	7 of 7	7 of 7	7 of 7	7 of 7	7 of 7	35
Battery Materials And Composition	5 of 5	5 of 5	5 of 5	5 of 5	5 of 5	25
Supply Chain Due Diligence	1 of 3	1 of 3	1 of 3	1 of 3	1 of 3	15
mandatory / present	79 / 90	89 / 96	73 / 77	77 / 86	89 / 96	445

x — mandatory, EU Battery Regulation 2023/1542
(x) — mandatory, JTC-24 / ESPR
o — voluntary

n.a. — no record returned

SUPPLY CHAIN DUE DILIGENCE · LMT — LIGHT TRANSPORT

1 mandatory (1 × x, 0 × (x)) · 2 voluntary · 0 not returned for this category · 3 records

InformationOfDueDiligenceReport
SupplyChainIndices
ThirdPartyAssurancesOfRecognisedSchemes

READING THE HEAVIEST CELL — PERFORMANCE & DURABILITY

LMT and stationary industrial batteries each carry 34 mandatory performance fields; an industrial battery without a BMS carries 20. The fourteen-field gap is telemetry that only exists if something is on board to measure it — self-discharge evolution, energy throughput, time spent charging outside the temperature boundary. This is not a stricter rule applied to one product; it is the same rule meeting different hardware. A manufacturer shipping both is running two data-collection programmes, not one with a subset.

Six fields answer to *a different law*.

Across all 445 records, exactly thirty carry the **(x)** flag — the same six fields, repeated once per category. All six sit in IdentifiersAndProductData. None is made mandatory by the Battery Regulation. ^[1]

The (x) six.

Identical across all five battery categories · legal basis: JTC-24 standardisation drafts and/or ESPR

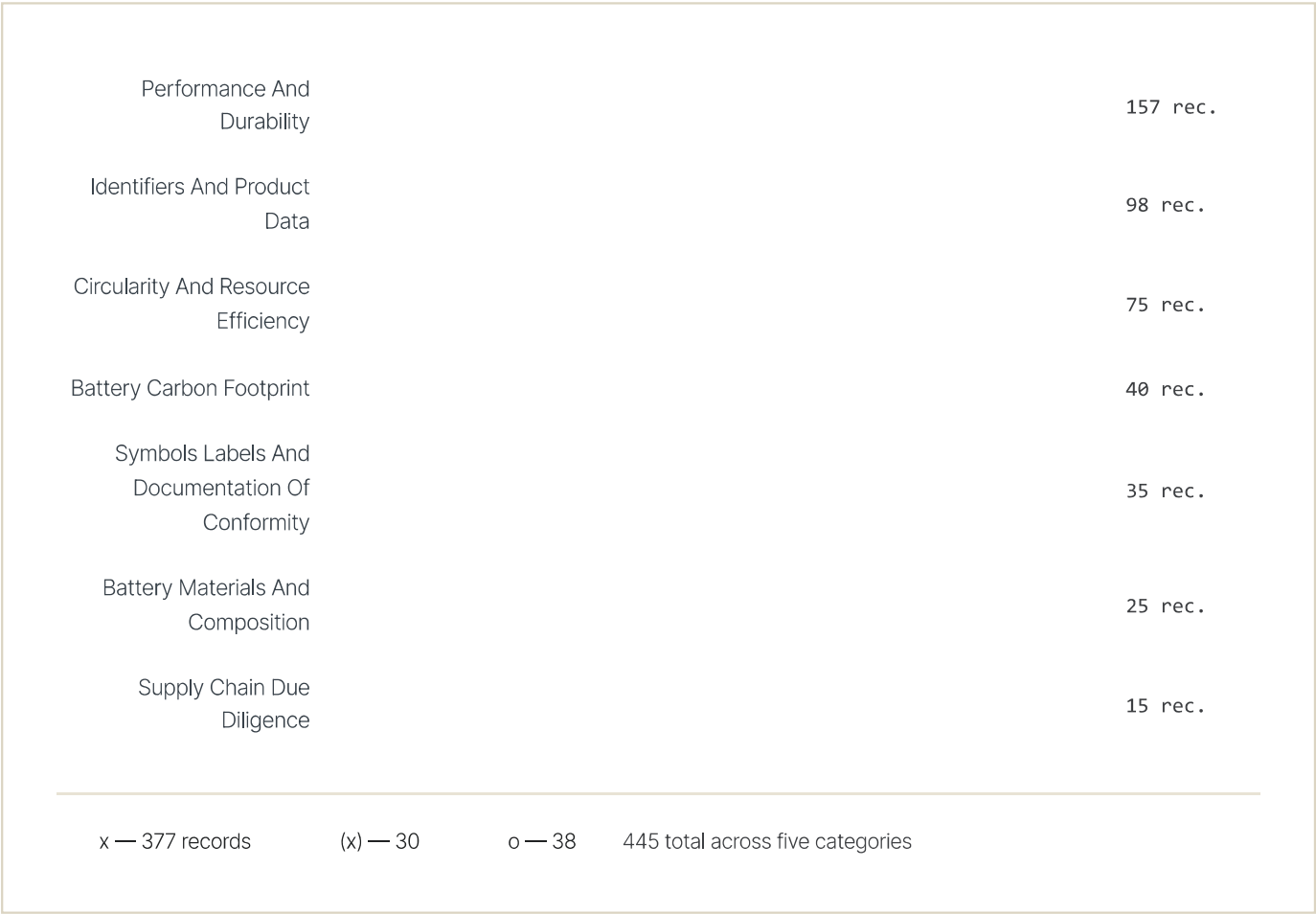
1	DPPGranularity string · read access: public	IDENTIFIERS AND PRODUCT DATA
2	DPPSchemaVersion string · read access: public	IDENTIFIERS AND PRODUCT DATA
3	DPPStatus coded · read access: public	IDENTIFIERS AND PRODUCT DATA
4	Date-timeOfLatestUpdateOfDPP dateTime · read access: public	IDENTIFIERS AND PRODUCT DATA
5	UniqueEconomicOperatorIdentifier string · read access: notified_bodies · authorities · commission	IDENTIFIERS AND PRODUCT DATA
6	UniqueFacilityIdentifier string · read access: notified_bodies · authorities · commission	IDENTIFIERS AND PRODUCT DATA

WHY THE DISTINCTION IS COMMERCIAL, NOT ACADEMIC

An (x) field becomes mandatory on a different legal timetable, through a standardisation and ESPR route, and is enforced by a different authority than an x field made mandatory by the Battery Regulation itself — so the two cannot share a single readiness date or a single owner. A programme that treats all thirty as Battery Regulation obligations is over-building against a February 2027 deadline that does not apply to them; a programme that ignores them because they are absent from Articles 77–86 is exposed on the ESPR side with no plan and nobody accountable. ^[2]

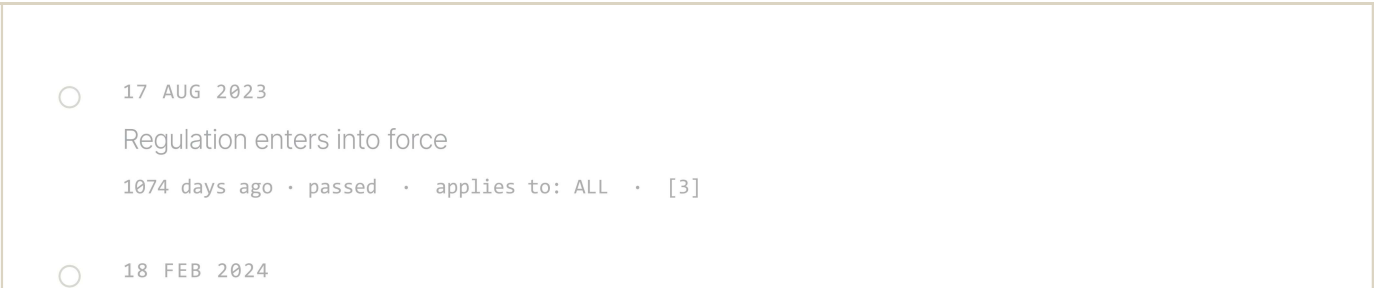
Where the weight sits.

All 445 records split by obligation flag within each data group, ordered by total record count. Two groups carry 57% of the model between them. [1]



When the matrix becomes enforceable.

EU Battery Regulation deadlines as returned by the connector, placed against the retrieval date. [3] The data-group badges are an OROCON editorial mapping from each deadline's obligation_type to the matrix above — our reading, not a field the tool returns.



Regulation begins to apply (coexists with Battery Directive)

889 days ago · passed · applies to: ALL · [3]

○ 18 FEB 2025 · Article 7

Carbon footprint declaration required — third-party verified, publicly accessible online

523 days ago · passed · applies to: EV · [3]

BATTERY CARBON FOOTPRINT

○ 18 AUG 2025 · Article 96

Battery Regulation fully replaces Battery Directive 2006/66/EC. All batteries must carry separate collection symbol.

342 days ago · passed · applies to: ALL · [3]

SYMBOLS LABELS AND DOCUMENTATION OF CONFORMITY

BATTERY CARBON FOOTPRINT

○ 18 FEB 2026 · Article 7

Carbon footprint declaration + labelling required for industrial batteries >2kWh

158 days ago · passed · applies to: INDUSTRIAL_GT2KWH · [3]

BATTERY CARBON FOOTPRINT

TODAY — 26 JULY 2026 · RETRIEVAL DATE

○ 18 FEB 2027 · Articles 77-86 · CRITICAL

DIGITAL BATTERY PASSPORT MANDATORY — QR code required, full lifecycle data. Applies to all EV and industrial batteries >2kWh placed on EU market.

207 days remaining · applies to: EV · INDUSTRIAL_GT2KWH · [3]

IDENTIFIERS AND PRODUCT DATA

PERFORMANCE AND DURABILITY

CIRCULARITY AND RESOURCE EFFICIENCY

BATTERY CARBON FOOTPRINT

SYMBOLS LABELS AND DOCUMENTATION OF CONFORMITY

BATTERY MATERIALS AND COMPOSITION

SUPPLY CHAIN DUE DILIGENCE

○ 18 AUG 2027 · Articles 47-59

Supply chain due diligence policy required for companies >€40M turnover — covers cobalt, lithium, nickel, natural graphite

388 days remaining · applies to: ALL · [3]

SUPPLY CHAIN DUE DILIGENCE

○ 18 AUG 2027 · Article 10

Performance class labelling (A/B/C based on carbon intensity) for industrial batteries >2kWh

388 days remaining · applies to: INDUSTRIAL_GT2KWH · [3]

SYMBOLS LABELS AND DOCUMENTATION OF CONFORMITY

BATTERY CARBON FOOTPRINT

○ 18 AUG 2027 · Articles 47-59

Due diligence for battery supply chain (postponed from 2025-08-18 by Reg EU 2025/1561)

388 days remaining · applies to: ALL · [3]

SUPPLY CHAIN DUE DILIGENCE

18 FEB 2028 · Article 8

Recycled content documentation required — Co 16%, Li 6%, Ni 6%, Pb 85% minimum targets (phased to 2031)

572 days remaining · applies to: EV · INDUSTRIAL_GT2KWH · SLI · [3]

CIRCULARITY AND RESOURCE EFFICIENCY

18 AUG 2028 · Article 77

Digital Battery Passport mandatory for LMT (light means of transport) batteries

754 days remaining · applies to: LMT · [3]

IDENTIFIERS AND PRODUCT DATA

PERFORMANCE AND DURABILITY

CIRCULARITY AND RESOURCE EFFICIENCY

BATTERY CARBON FOOTPRINT

SYMBOLS LABELS AND DOCUMENTATION OF CONFORMITY

BATTERY MATERIALS AND COMPOSITION

SUPPLY CHAIN DUE DILIGENCE

§ 05 / FULL DATA TABLE

Every field in the EV passport.

All 90 field records returned for battery_category = EV. Untruncated, unsummarised. Sort by group, field name, or obligation flag. [1]

SORT BY

Group

Field name

Obligation flag

 90 records · battery_category = EV

GROUP	FIELD	TYPE / UNIT	FLAG	LEGAL BASIS	READ ACCESS
Battery Carbon Footprint	AbsoluteBatteryCarbonFootprint	integer · kgCO2-eq	o	none returned	public
Battery Carbon Footprint	BatteryCarbonFootprintPerFunctionalUnit	decimal · kgCO2-eq/kWh	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public
Battery Carbon Footprint	CarbonFootprintPerformanceClass	string	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public

GROUP	FIELD	TYPE / UNIT	FLAG	LEGAL BASIS	READ ACCESS
Battery Carbon Footprint	ContributionOfDistributionLifecycleStage	decimal · kgCO2-eq/kWh	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public
Battery Carbon Footprint	ContributionOfEndOfLifeAndRecyclingLifecycleStage	decimal · kgCO2-eq/kWh	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public
Battery Carbon Footprint	ContributionOfMainProductProductionLifecycleStage	decimal · kgCO2-eq/kWh	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public
Battery Carbon Footprint	ContributionOfRawMaterialAcquisitionAndProcessing	decimal · kgCO2-eq/kWh	x	EU Battery Regulation 2023/1542 and/or related secondary legislation	public

§ 06 / READ THIS BEFORE YOU USE IT

What this dashboard is not.

(A) TIER 4 — DRAFT, NOT LAW

The BatteryPass-Ready data model is a consortium reading of the Regulation, not the Regulation. Its authority chain runs EU Battery Regulation 2023/1542 → DPP delegated act → DIN DKE SPEC 99100 → BatteryPass-Ready Data Attribute Longlist v1.3 → this model. No field here should be presented as settled law. The legal basis column is where the law actually lives; the field name is not.

(B) RECORD COUNTS AND GAPS

445 records across five calls: EV 90, LMT 96, Industrial without BMS 77, Other industrial >2 kWh 86, Stationary industrial >2 kWh 96. Every record carried a group — none were unplaceable. De-duplicated by field name the model defines 100 distinct fields; the difference between 445 and 500 is category non-applicability.

(C) N.A. IS AN ABSENCE, NOT A ZERO

The tool returns only fields present for a category. No returned record carried an n.a. flag — non-applicability is expressed by the field simply not being there. Absent fields against the 100-field union: EV 10, LMT 4, Industrial without BMS 23, Other industrial 14, Stationary 4. Rendered as outline chips, never as zeros.

(D) AN UNEXPECTED FILTER RESULT

get_compliance_deadlines was called with include_passed = false, yet returned eleven deadlines of which five are already past as of 26 July 2026. They are rendered at reduced opacity and labelled as passed rather than silently dropped. This should be checked against the tool's filter logic before the view is published.

(E) THE GROUP BADGES ARE OURS

Panel 4 maps each deadline to data groups via its obligation_type. That mapping is OROCON editorial judgement layered on tool output, not something the connector returns. Scope should be confirmed against Articles 77–86 directly rather than against our badges.

(F) MANDATORY IS NOT THE SAME AS PUBLIC

Each field carries a read-access list — public, legitimate_interest, notified_bodies, authorities, commission. The passport framework makes some mandatory fields visible only to authorities, so a field being mandatory says nothing about whether it sits behind the QR code. See the read-access column in §05.

§ 07 / SOURCES

Every claim, traced.

[1] Field matrix — all panels and the full data table.

Source: BatteryPass-Ready Consortium (2026), BatteryPass-Ready Data Model v1.0, CC BY 4.0. Tier 4 (draft / work-in-progress; not legal advice). Authority chain: EU Battery Regulation 2023/1542 → DPP delegated act → DIN DKE SPEC 99100 → BatteryPass-Ready Data Attribute Longlist v1.3 → this model.

[2] Passport scope, access tiers, mandatory-from date.

Source: [EU Battery Regulation 2023/1542, Articles 77-86](#) · Primary EU Legislation · European Parliament and Council of the EU, 2023

[3] All deadlines in § 04.

Source: [EU Battery Regulation 2023/1542](#) · Primary EU Legislation · European Parliament and Council of the EU, 2023

[4] Carbon footprint methodology — supporting.

[Commission Delegated Reg. — CFP Methodology Feb 2025](#) · Official EU Guidance · European Commission, 2025

[5] DPP implementation context — supporting.

[CEPS In-Depth Analysis — EU DPP 2024](#) · Independent Expert Analysis · Centre for European Policy Studies (CEPS), 2024 — date approximated, month unconfirmed; reviewed against primary legislation.

[6] Amendment interpretation — supporting.

[CMS Law EU Battery Regulation Update Nov 2025](#) · Independent Expert Analysis · CMS Law, 2025 · [DEKRA EU Battery Regulation Key Updates Feb 2026](#) · Independent Expert Analysis · DEKRA, 2026

Source: OROCON ESG Regulatory Intelligence connector (mcp.orocon.com) — get_dpp_fields_by_category (×5 categories), get_dpp_requirements (access_tiers), get_compliance_deadlines (EU_BATTERY_REG). Retrieved 26 July 2026. Built with Claude Code.

Underlying data model: BatteryPass-Ready Consortium, BatteryPass-Ready Data Model v1.0, licensed CC BY 4.0.

Field-level obligations shown here are a draft reading of the Regulation, classified Tier 4. OROCON GmbH does not provide legal advice. Days-remaining figures are computed against the retrieval date and go stale.

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