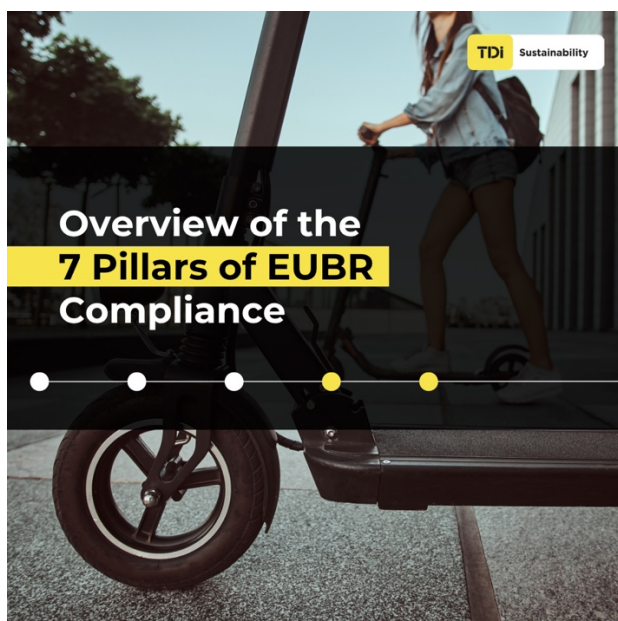




The EUBR continues to evolve alongside related EU circularity legislation. This overview reflects the legislation and implementation position as of October 2026; manufacturers should monitor subsequent delegated and implementing acts and related vehicle-circularity requirements

1. Carbon Footprint Declaration

Battery manufacturers must calculate and disclose the battery's life-cycle carbon footprint, covering stages from raw material acquisition through to end of life. The use phase is generally excluded, unless design choices made by the battery manufacturer can be demonstrated to make a non-negligible contribution to the impact. The methodology builds on the EU Product Environmental Footprint (PEF) method and requires battery-specific activity data for key components and processes, combined with relevant PEF-compliant secondary datasets.

Key Deliverable: *Carbon footprint declaration, performance class and compliance with applicable carbon footprint thresholds*

- *EV Batteries: Declaration from 18 Feb 2025*; performance class from 18 Aug 2026*; maximum carbon-footprint threshold from 18 Feb 2028*.*
- *LMT Batteries: Declaration from 18 Aug 2028*; performance class from 18 Feb 2030*; maximum carbon-footprint threshold from 18 Aug 2031*.*

**Application is subject to the relevant Commission delegated and implementing acts entering into force. Where the Regulation specifies a later period following those acts, that later date applies.*

2. Digital Battery Passport

Under the EUBR, every LMT battery, EV battery and industrial battery above 2 kWh must carry a unique digital identity accessible directly via an on-pack QR code. Battery manufacturers and other economic operators are developing digital systems to manage the data required for the passport, which covers 71 data points. The passport provides access to specified battery information according to defined access rights, supporting activities including repair, repurposing, remanufacturing and recycling.

- **Key Deliverable:** *A battery passport accessible by a QR code, containing the required data and information.*
- **EV Batteries:** 18 February 2027.
- **LMT Batteries:** 18 February 2027.

3. Supply Chain Due Diligence

The EUBR demands traceability far beyond direct vendors, rendering simple Tier-1 self-assessments obsolete. The framework mandates an OECD-aligned battery due diligence policy and risk management system, covering cobalt, natural graphite, lithium and nickel, with requirements to identify, assess and address risks across the relevant supply chains. Although the enforcement deadline for this pillar was extended to August 18, 2027, [leading industry players](#) are utilising the transition window to construct the complex data architecture required for comprehensive, audit-ready supply chain mapping.

- **Key Deliverable:** *A due diligence policy, verified by a notified body, and an annual due diligence report.*
- **EV Batteries:** 18 August 2027.
- **LMT Batteries:** 18 August 2027.

4. Performance & Durability Rules

The EUBR requires manufacturers to provide specified electrochemical performance and durability information and, for certain battery categories, to meet minimum performance and durability values. Moving forward, manufacturers must provide documentation proving that batteries meet specific performance and durability key performance indicators, including cycle life and capacity retention (minimum values to follow). The Battery Management System must contain up-to-date data for determining the battery's state of health and expected lifetime, with read-only access provided to authorised parties in accordance with the Regulation.

- **Key Deliverable:** Technical documentation demonstrating conformity, including the required performance and durability data and supporting measurement/calculation methodology.
- **EV Batteries:** 18 August 2024 (Requirement to provide documentation containing electrochemical performance and durability values).
- **LMT Batteries:** 18 August 2024 for the initial documentation of performance and durability values. Minimum mandatory performance thresholds will apply from 18 August 2028 or 18 months after the relevant delegated act enters into force, whichever is later

5. Removability & Replaceability (LMT Specific)

The EUBR introduces hardware requirements for light vehicles such as e-bikes and e-scooters. From 18 February 2027, LMT batteries must be designed so that the battery, as well as individual battery cells within the battery pack, can be readily removed and replaced by an independent professional throughout the product's lifetime. Manufacturers must also make the battery available as a spare part for at least five years after the last unit of the equipment model is placed on the market - at a reasonable and non-discriminatory price for independent professionals and end users.

Industry initiatives such as the [Swappable Batteries Motorcycle Consortium \(SBMC\)](#) are also exploring standardised approaches to battery interchangeability.

- **Key Deliverable:** Technical documentation demonstrating removability and replaceability, together with provision for required spare parts.
- **EV Batteries:** N/A – applies only to portable and LMT batteries.
- **LMT Batteries:** 18 February 2027 (Must be replaceable by an independent professional).

6. Recycled Content Targets

The rules for calculating and verifying recycled content will be set by a Commission delegated act. Starting in 2031, EV batteries must contain at least 16% recycled cobalt, 85% recycled lead, 6% recycled lithium and 6% recycled nickel. LMT batteries benefit from an extended timeline: their mandatory minimums start in 2036, when they must meet the higher 2036 levels of 26% cobalt, 85% lead, 12% lithium and 15% nickel.

- **Key Deliverable:** Documentation demonstrating the recycled-content percentages, supported by the required calculation and verification methodology

- **EV Batteries** Documentation of recycled content applies from 18 August 2028 or 24 months after the relevant delegated act enters into force, whichever is later. The mandatory minimum percentage targets take effect on **18 August 2031** (16% cobalt, 85% lead, 6% lithium, 6% nickel). Stricter targets apply from **18 August 2036** (26% cobalt, 85% lead, 12% lithium, 15% nickel).
- **LMT Batteries:** Documentation of recycled content is required starting **18 August 2033**. The mandatory minimum percentage targets take effect on **18 August 2036**.

7. Collection & Recovery Efficiency

Producers – including importers placing batteries on the EU market – must organise and finance take-back schemes, directly or through a producer responsibility organisation. Separately, recyclers must meet material recovery targets for critical metals such as lithium, cobalt and nickel, so that they are returned to the production cycle.

- **Key Deliverable:** Records and reports demonstrating compliance with applicable collection, treatment and material-recovery obligations, including required reporting to national authorities.
- **LMT Battery Collection:** Mandatory collection targets are 51% by 31 December 2028, and 61% by 31 December 2031.
- **Material Recovery (applies to recyclers processing waste batteries, including EV and LMT batteries):** Specific material recovery targets must be met by 31 December 2027 (e.g., 90% for cobalt, copper, lead, and nickel; 50% for lithium). These targets increase on 31 December 2031 (e.g., 95% for cobalt, copper, lead, and nickel; 80% for lithium).



TDi Sustainability

Carbon Footprint Requirements

Battery manufacturers must calculate and disclose the battery's lifecycle carbon footprint, and meet additional requirements relating to carbon-footprint performance classification and maximum life-cycle carbon-footprint thresholds.

The calculation must follow the methodology established by the European Commission, based on the **EU Product Environmental Footprint (PEF) methodology**.

KEY DELIVERABLES:



DEADLINE

Carbon footprint declaration, performance class & threshold compliance.

EV Batteries: Declaration 2025* | Class 2026* | Threshold 2028*

LMT Batteries: Declaration 2028* | Class 2030* | Threshold 2031*.

*Application is subject to the relevant Commission delegated and implementing acts entering into force. Where the Regulation specifies a later period following those acts, that later date applies.



TDi Sustainability

Digital Battery Passport

Under the EUBR, every LMT, EV and industrial battery above 2 kWh must carry a **unique digital identity** accessible directly via an **on-pack QR code**. Battery manufacturers and other economic operators are developing digital systems to manage the data required for the passport, which covers **71 data points**

The passport provides access to specified battery information according to defined access rights, supporting activities including repair, repurposing, remanufacturing and recycling.

KEY DELIVERABLES:



A battery passport accessible by a QR code, containing the required data

EV Batteries 18 February 2027

LMT Batteries: 18 February 2027 **DEADLINE**



Supply Chain Due Diligence

The EUBR demands traceability far beyond direct vendors, rendering simple Tier-1 self-assessments obsolete. The framework mandates an **OECD-aligned battery due diligence policy and risk management system**, covering **cobalt, natural graphite, lithium and nickel**, with requirements to identify, assess and address risks across the relevant supply chains. Although this pillar's application date has been postponed to 18 August 2027, leading industry players are utilising the transition window to construct the complex **data architecture** required for **comprehensive, audit-ready supply chain mapping**.

KEY DELIVERABLES:

A due diligence policy, verified by a notified body, and an annual due diligence report



EV Batteries: 18 August 2027.

LMT Batteries: 18 August 2027.

DEADLINE



Performance & Durability Rules

The EUBR requires manufacturers to provide **specified electrochemical performance and durability information** and, for certain battery categories, to meet minimum performance and durability values. Moving forward, manufacturers must provide documentation proving that batteries meet specific performance and durability key performance indicators, including cycle life and capacity retention (minimum values to follow).

The **Battery Management System** must contain up-to-date data for determining the battery's state of health and expected lifetime, with read-only access provided to authorised parties in accordance with the Regulation.

KEY DELIVERABLES:

DEADLINE Technical documentation demonstrating conformity

- **EV Batteries:** 18 August 2024 (Requirement to provide documentation containing electrochemical performance and durability values).
- **LMT Batteries:** 18 August 2024 for the initial documentation of performance and durability values. Minimum thresholds from 18 August 2028 at the earliest.





Removability & Replaceability (LMT Specific)

From February 2027, LMT batteries must be designed so that the battery, as well as individual battery cells within the battery pack, can be readily removed and replaced by an **independent professional** throughout the product's lifetime. Manufacturers must also make the battery available as a **spare part** for at least five years after the last unit of the equipment model is placed on the market.

Some **Industry initiatives** are already exploring standardised, approaches to battery interchangeability.

KEY DELIVERABLES:

DEADLINE Hardware Design Specifications and physical verification during inspection.

- **EV Batteries:** N/A - only applies to portable and LMT batteries.
- **LMT Batteries:** 18 February 2027 (Must be replaceable by an independent professional).



Recycled Content Targets

The rules for calculating and verifying recycled content will be set by a Commission delegated act. Starting in 2031, EV batteries must contain at least 16% recycled cobalt, 85% recycled lead, 6% recycled lithium and 6% recycled nickel. LMT batteries benefit from an extended timeline: their mandatory minimums start in 2036, when they must meet the higher 2036 levels of 26% cobalt, 85% lead, 12% lithium and 15% nickel.

KEY DELIVERABLES:

DEADLINE Recycled-content documentation, calculated and verified using the prescribed methodology.

- **EV Batteries:** Documentation from 18 Aug 2028*; minimum recycled content from 18 Aug 2031. Stricter targets apply from 18 August 2036.
- **LMT Batteries:** Documentation from 18 Aug 2033; minimum recycled-content targets from 18 Aug 2036.

*Or 24 months after the relevant delegated act enters into force, whichever is later.





7 Collection & Recovery Efficiency

The EUBR introduces stringent take-back and material recovery mandates designed to **close the loop** on battery lifecycles.

Producers – including importers placing batteries on the EU market – must organise and finance **take-back schemes**, directly or through a producer responsibility organisation. Separately, recyclers must meet material recovery targets for critical metals such as lithium, cobalt and nickel, so that they are returned to the production cycle.

KEY DELIVERABLES:

DEADLINE

Collection and recycling compliance records.

- **LMT Battery Collection:** Mandatory collection targets are 51% by 31 December 2028, and 61% by 31 December 2031.
- **Material Recovery** (Applies to the recycling process of collected EV and LMT batteries): Specific material recovery targets must be met by 31 December 2027. These targets increase on 31 December 2031.

Turn EUBR Compliance into a Supply Chain Advantage

Navigating EUBR mandates, from generating verified carbon footprint declarations to launching digital battery passports, requires a degree of supply chain visibility that most manufacturers are actively developing.

TDi Sustainability supports companies in developing the strategic frameworks and technical tools required to manage complex compliance demands. Our team can help your organisation with:

- **Regulatory tracking:** The **TDi Standards and Regulations Tool**, supports you in tracking how voluntary sustainability standards complement due diligence and reporting requirements for current and upcoming regulations, alongside updates concerning evolving 2026 and 2027 deadlines.
- **Digital traceability:** Through the **TDi Digital Platform**, commodity risk screening and deep-tier supplier mapping identify immediate supply chain vulnerabilities. Our country and commodity risk assessment tools pinpoint risk origins to guide mitigation procedures.

- **Systems development and implementation:** TDi's expert consultants support organisations in building and operationalising the Due Diligence Management Systems required to support EUBR compliance and third-party verification. Read our [case study](#) on how we supported a major European electronic company in the development of their DDMS. Our team can also support you with preparation for upcoming second-party and third-party audits, which includes establishing robust policies and internal verification frameworks.

Get ahead of your compliance timelines.

[Get in touch](#) to assess your risk exposure and build your EUBR roadmap.