

EU Battery Regulation Data Pack — SAMPLE

欧盟电池法规数据包 — 样本

Prepared by 编制: WG SOLAR PTE. LTD. (Singapore, UEN 202343648G) | Date 日期: 2026-10-29 | Version 版本: DRAFT v0.1

SAMPLE / DRAFT — built only from one public datasheet (manufacturer and model anonymized). Not confirmed by the supplier. Not reviewed by a lawyer. Do not circulate externally before the CEO approves.
样本/草稿 — 仅基于一份公开数据表编制, 未经供应商确认, 未经律师审阅; CEO 批准前不得对外发送。

Disclaimer. We organize data only, we do not give legal opinions, and we work only by email and in writing. Regulatory references are provided for orientation; the legal text and the importer's own counsel prevail.
Responsibility: WG SOLAR organizes supplier data; we do not make a product compliant. Legal responsibility for the passport and for compliance stays with the EU economic operator placing the battery on the market, who may authorise another operator in writing to act on its behalf (Art. 77(4)).
免责声明: 我们只整理数据, 不提供法律意见, 仅通过电子邮件和书面方式工作。法规引用仅供参考, 以法律原文及进口商自己的法律顾问意见为准。**责任划分:** WG SOLAR 只整理供应商数据, 不负责“让产品合规”; 电池护照和合规的法律责任仍由在欧盟上市的经济经营者承担, 该经营者可书面授权其他经营者代为办理 (第 77(4) 条)。

1. Source and scope • 来源与范围

Item	Detail
Product 产品	Sample Manufacturer – Model X, high-voltage rack-mounted LiFePO4 battery module, 51.2 V / 314 Ah / 16,076 Wh
Source URL 来源网址	[public manufacturer datasheet; URL withheld in this anonymized sample]
Access date 访问日期	2026-10-29 (Asia/Singapore). PDF internal creation date: 2026-08-24.
Why this product 选择理由	A common 51.2 V / 314 Ah rack-type LFP module sold in the ESS market; datasheet is public and downloadable. Selection does not imply any assessment of the company or the product's compliance. 选择仅因其为常见的储能机架式磷酸铁锂模组, 数据表公开; 不代表该公司或产品合规性的任何评价。
Scope assumption 范围假设	ASSUMPTION, to be confirmed: the module weighs more than 5 kg, is rechargeable, and is used for stationary energy storage, so it would be an 'industrial battery' (Art. 3) with capacity > 2 kWh and in scope of Art. 77 from 2027-02-18. The datasheet does not state the intended use. 假设: 重量>5 kg、可充电、用于固定式储能, 因此属于容量>2 kWh 的“工业电池”(第 3 条), 自 2027-02-18 起适用第 77 条。数据表未说明预期用途, 需确认。
Legal text used 使用的法规原文	EUR-Lex, Regulation (EU) 2023/1542, CELEX:32023R1542 (text retrieved 2026-10-29); Regulation (EU) 2025/1561, CELEX:32025R1561. This is the original OJ text; check the latest consolidated version before use. 为 OJ 原始文本; 使用前请核对最新合并文本。

2. Key dates • 关键日期

Date	What applies 适用内容	Source 来源	Verification 核实情况
2023-08-17	Regulation in force 条例生效	Commission, Batteries page (environment.ec.europa.eu/topics/waste-and-recycling/batteries_en), accessed 2026-10-29	Verified
2024-02-18	Regulation applies generally 条例开始适用	Same Commission page	Verified

Date	What applies 适用内容	Source 来源	Verification 核实情况
2024-08-18	Art. 10(1) Annex IV performance document; Art. 14 BMS state-of-health data (stationary BESS); Art. 12(2) BESS safety documentation 第 10(1) 条性能文件；第 14 条 BMS 健康状态数据；第 12(2) 条储能安全文件	EUR-Lex, Reg. (EU) 2023/1542 Arts. 10(1), 12(2), 14(1) (CELEX:32023R1542)	Verified (original text)
2025-08-18	Art. 13(4) separate-collection symbol on all batteries 第 13(4) 条分类收集符号	EUR-Lex, Reg. 2023/1542 Art. 13(4)	Verified (original text)
2026-02-18 (nominal)	Art. 7(1) carbon footprint declaration, rechargeable industrial >2 kWh: 'or 18 months after entry into force of the later of the delegated and implementing acts, whichever is the latest' 第 7(1) 条碳足迹声明（可充电工业电池 >2 kWh）：名义日期，但以授权法案/实施法案生效后 18 个月的较晚者为准	EUR-Lex, Reg. 2023/1542 Art. 7(1). Status of the acts: secondary sources only – traceable.digital (as of 2026-09-26), Norruva; not seen in OJ	Date verified; status of delegated act NOT verified from an official source. Secondary sources say not yet adopted, so the obligation is not yet operative.
2026-08-18 (nominal)	Art. 13(1) general label (Annex VI Part A): 'or 18 months after entry into force of the Art. 13(10) implementing act, whichever is the latest' 第 13(1) 条通用标签：名义日期，以第 13(10) 条实施法案生效后 18 个月的较晚者为准	EUR-Lex, Reg. 2023/1542 Art. 13(1),(10). Commission draft Ares(2025)11169592 dated 2025-12-15 (eur-lex.europa.eu/legal-content/EN/PIN/?uri=intcom:Ares(2025)11169592); BatteryDays 2026-W36 says not yet adopted	Date verified; adoption status NOT verified from an official source.
2027-02-18	Art. 77(1) battery passport mandatory for LMT, industrial >2 kWh and EV batteries; Art. 13(6) QR code on all batteries 第 77(1) 条电池护照（LMT、工业 >2 kWh、电动汽车电池）；第 13(6) 条二维码	EUR-Lex, Reg. 2023/1542 Arts. 77(1), 13(6) (CELEX:32023R1542). Reg. 2025/1561 amended only Art. 48	Verified. Unchanged by Reg. 2025/1561.
2027-08-18	Art. 48(1) battery due diligence obligations (postponed from 2025-08-18); Art. 7(2) carbon-footprint performance class (industrial, nominal date); Art. 10(2) minimum performance values (nominal date) 第 48(1) 条尽职调查义务（原定 2025-08-18，已推迟）；第 7(2) 条碳足迹性能等级、第 10(2) 条最低性能值（均为名义日期）	EUR-Lex, Reg. (EU) 2025/1561, Art. 1 (CELEX:32025R1561): '18 August 2025' replaced by '18 August 2027'; guidelines date in Art. 48(5) replaced by '26 July 2026'. OJ publication 2025-07-30 and entry into force 2025-07-31 per European Parliament Legislative Train (secondary).	Art. 48 date verified. Art. 7(2)/10(2) dates are 'or later' dates, status of underlying acts not verified.

Date	What applies 适用内容	Source 来源	Verification 核实情况
2027-12-14	Forced Labour Regulation (EU) 2024/3015: prohibition on placing/making available/exporting products made with forced labour applies. It adds no new due-diligence obligations of its own (Art. 1(3)). 强迫劳动产品禁令 (EU) 2024/3015 开始适用; 本身不新增尽职调查义务 (第 1(3) 条)	EUR-Lex summary of Reg. 2024/3015 (eur-lex.europa.eu/EN/legal-content/summary/ban-on-forced-labour-products-on-the-eu-market.html) and Commission portal (single-market-economy.ec.europa.eu/single-market/goods/forced-labour-regulation_en), searched 2026-10-29; full text of Art. 1(3) seen via EUR-Lex search excerpt	Verified from official summaries; not part of Reg. 2023/1542 and not mapped in this pack
2028-08-18	Art. 8(1) recycled-content documentation (industrial >2 kWh), nominal date 第 8(1) 条再生材料含量文件 (名义日期)	EUR-Lex, Reg. 2023/1542 Art. 8(1)	Verified (original text); 'or later' clause applies

Note: Reg. (EU) 2025/1561 postponed only Art. 48(1) (due diligence). The battery passport date of 2027-02-18 in Art. 77(1) is unchanged in the text we retrieved. Several delegated and implementing acts (carbon footprint methodology, label format, minimum performance values) were reported as not yet adopted by secondary sources only; we could not confirm this on the Official Journal. 注: Reg. 2025/1561 仅推迟第 48(1) 条; 第 77(1) 条护照日期不变。碳足迹方法、标签格式等授权/实施方案是否已通过, 仅有二手来源, 未能在官方公报核实。

3. Datasheet fields as published • 数据表原始字段

Field 字段	Value 数值 (as published 原文)
Model 型号	Model X
Battery type 类型	LiFePO4
Nominal voltage 标称电压	51.2 V
Nominal capacity 额定容量	314 Ah
Energy 能量	16,076 Wh
Charge cut-off voltage 充电截止电压	57.6 V
Discharge cut-off voltage 放电截止电压	41.6 V
Max charge / discharge current 最大充/放电电流	200 A / 200 A
Recommended discharge current / depth 推荐放电电流/深度	150 A / 80 %
Cycle life 循环寿命	>8000 cycles (25 °C, 0.5C, 80 % DOD)
Communication 通讯	CAN
Charge temperature 充电温度	0–55 °C
Discharge temperature 放电温度	–20–55 °C
Optimal storage temperature 最佳存储温度	5–35 °C
Storage humidity 存储湿度	40–80 %
Dimensions W×H×D 尺寸	490 × 740 × 230 mm
Weight 重量	130 ± 5 kg
Certificates 证书	UN38.3, MSDS
IP class 防护等级	IP21
Series configurations 串联配置	2s–6s listed (102.4–307.2 V); max 14 packs in series per feature list

Not on the datasheet 数据表中没有: manufacturer legal name/address, factory location, CE mark, EU declaration of conformity, material declaration, carbon footprint, warranty, internal resistance, round-trip efficiency, power in W, label images.

4. Requirement mapping • 法规要求对照

AVAILABLE 已提供 7	MISSING 缺失 49	N/A 不适用 3
--------------------	------------------	--------------

Rule: AVAILABLE means a value is on the datasheet. Where only part of a field is given, it is marked MISSING and the note says what is given. We do not derive or estimate values. 规则：数据表上有数值才算“已提供”；只有部分内容的字段标为“缺失”并在备注说明；我们不推算或估计任何数值。

A. General label information – Annex VI Part A (Art. 13(1), Art. 38(6)-(7))

A. 通用标签信息 – 附件 VI 第 A 部分（第 13(1)、38(6)-(7) 条）

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
AnnexVI-A(1); Art 38(7)	Manufacturer identity: name/trade name, postal address, single contact point, web/email 制造商身份：名称/商号、邮政地址、单一联系点、网址/邮箱	MISSING – request 缺失 – 须索取	Brand name, website and a generic email address (footer only)	Legal entity name and postal address are not on the datasheet. Web and email alone do not satisfy Art. 38(7). 数据表只有品牌、网址和邮箱，没有法定公司名称和邮政地址；仅有网址/邮箱不满足第 38(7) 条。
AnnexVI-A(2); Art 38(6)	Battery category + model identification + batch/serial number 电池类别 + 型号标识 + 批次/序列号	MISSING – request 缺失 – 须索取	Model: Model X	Model name is given. Batch/serial numbering scheme and category declaration are missing. 仅有型号 Model X；批次/序列号规则和类别声明缺失。
AnnexVI-A(3)	Place of manufacture (plant location) 制造地点（工厂所在地）	MISSING – request 缺失 – 须索取	—	Not stated on datasheet. 数据表未注明。
AnnexVI-A(4)	Date of manufacture (month, year) 制造日期（年月）	MISSING – request 缺失 – 须索取	—	Per-unit data; supplier must state how it is marked. 按单台电池记录；需供应商说明标注方式。
AnnexVI-A(5)	Weight 重量	AVAILABLE 已提供	130 ± 5 kg (module)	Datasheet value is a nominal ±5 kg tolerance; label needs actual or declared weight. 数据表为标称值 ±5 kg；标签需实际/声明重量。
AnnexVI-A(6)	Capacity 容量	AVAILABLE 已提供	314 Ah; 16,076 Wh; 51.2 V nominal	— —
AnnexVI-A(7)	Chemistry 化学体系	AVAILABLE 已提供	LiFePO4 (prismatic cells, per datasheet text)	— —
AnnexVI-A(8)	Hazardous substances other than Hg, Cd, Pb 除汞、镉、铅外的有害物质	MISSING – request 缺失 – 须索取	—	Request substance declaration (REACH SVHC / full material declaration). 需供应商提供物质声明（REACH SVHC / 完整材料声明）。
AnnexVI-A(9)	Usable extinguishing agent 适用的灭火剂	MISSING – request 缺失 – 须索取	—	Not stated for this model. 该型号数据表未说明。
AnnexVI-A(10)	Critical raw materials > 0.1 % w/w 关键原材料（含量 > 0.1% 重量比）	MISSING – request 缺失 – 须索取	—	Request CRM content by weight. 需提供关键原材料含量。
Art 13(4)	Separate-collection (crossed-out bin) symbol 分类收集符号（打叉垃圾桶）	MISSING – request 缺失 – 须索取	—	Applies from 18 Aug 2025. Datasheet shows no label images; request photos of the actual label. 自 2025-08-18 起适用。数据表无标签图片，需索取实物标签照片。

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
Art 13(5)	Cd / Pb chemical-symbol marking (only if >0.002 % Cd or >0.004 % Pb) Cd/Pb 标识（仅当镉>0.002% 或铅>0.004%）	MISSING – request 缺失 – 须索取	—	Need Cd and Pb content to know whether it applies. 需先知道镉、铅含量才能判断是否适用。
Art 13(6); Annex VI-C	QR code linking to battery passport 二维码（链接电池护照）	MISSING – request 缺失 – 须索取	—	Required from 18 Feb 2027. Request supplier plan for QR/unique identifier (ISO/IEC 15459 series per Art. 77(3)). 自 2027-02-18 起必须。需供应商提供二维码及唯一标识符方案（Art. 77(3) 要求 ISO/IEC 15459 系列）。
Art 13(2),(3)	Capacity label for portable/LMT/SLI; 'non-rechargeable' label 便携/LMT/SLI 电池容量标签；“不可充电” 标签	N/A 不适用	—	Not applicable: this is a rechargeable industrial-type module (see scope assumption). 不适用：该产品为可充电工业类电池模块（见范围假设）。

B. Battery passport – Art. 77 / Annex XIII, point 1 (public, model-level)
B. 电池护照 – 第 77 条 / 附件 XIII 第 1 点（公开，型号级）

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
XIII-1(a)	Annex VI Part A label info 附件 VI-A 标签信息	MISSING – request 缺失 – 须索取	see Section A	See Section A above. 见上方 A 部分。
XIII-1(b)	Material composition incl. chemistry, hazardous substances (excl. Hg/Cd/Pb), critical raw materials 材料组成（含化学体系、有害物质、关键原材料）	MISSING – request 缺失 – 须索取	Chemistry only: LiFePO4	Full composition missing. 仅知化学体系，完整成分缺失。
XIII-1(c); Art 7(1),(2)	Carbon footprint information 碳足迹信息	MISSING – request 缺失 – 须索取	—	See Section D. 见 D 部分。
XIII-1(d); Art 52(3)	Responsible sourcing (due diligence policy report) 负责任采购（尽职调查政策报告）	MISSING – request 缺失 – 须索取	—	See Section E. Conditional on Art. 47 turnover threshold. 见 E 部分；取决于第 47 条营业额门槛。
XIII-1(e); Art 8(1)	Recycled content information 再生材料含量信息	N/A 不适用	—	Not yet applicable: Art. 8(1) documentation applies from 18 Aug 2028 or 24 months after the delegated act, whichever is latest (for industrial >2 kWh). 暂不适用：第 8(1) 条文件自 2028-08-18 或相关授权法案生效后 24 个月（以较晚者为准）起适用。
XIII-1(f)	Share of renewable content 可再生含量占比	MISSING – request 缺失 – 须索取	—	Listed in Annex XIII; no calculation method verified by us. Request from supplier or mark pending Commission guidance. 附件 XIII 列出此项；我们未核实计算方法。需向供应商索取，或待欧委会指引。
XIII-1(g)	Rated capacity (Ah) 额定容量 (Ah)	AVAILABLE 已提供	314 Ah	— —

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
XIII-1(h)	Minimum, nominal, maximum voltage, with temperature ranges 最小/标称/最大电压及温度范围	AVAILABLE 已提供	Nominal 51.2 V; charge cut-off 57.6 V; discharge cut-off 41.6 V; charge 0–55 °C, discharge –20–55 °C	Cut-off voltages are used as max/min; supplier should confirm they are the declared max/min voltages. 以截止电压作为最大/最小电压；需供应商确认。
XIII-1(i)	Original power capability (W) and limits, with temperature range 初始功率能力 (W) 及限值（含温度范围）	MISSING – request 缺失 – 须索取	Current limits only: max charge/discharge 200 A; recommended 150 A	Power in W is not stated. We do not derive it; supplier must state the value and test conditions. 数据表未给出功率 (W)。我们不自行推算，需供应商给出数值和测试条件。
XIII-1(j)	Expected lifetime in cycles and reference test 预期寿命（循环次数）及参考测试	AVAILABLE 已提供	>8000 cycles (25 °C, 0.5C, 80 % DOD)	End-of-life criterion (e.g. % of rated capacity) is missing; request it. 缺少寿命终止判据（如剩余容量百分比），需补充。
XIII-1(k)	Capacity threshold for exhaustion 容量耗尽阈值	N/A 不适用	—	Applies to electric vehicle batteries only. 仅适用于电动汽车电池。
XIII-1(l)	Temperature range the battery can withstand when not in use (reference test) 非使用状态可承受的温度范围（参考测试）	MISSING – request 缺失 – 须索取	'Optimal storage' 5–35 °C only	'Optimal storage' is not the withstand range; request the tested range. 数据表只给“最佳存储温度”，不是可承受范围，需索取测试范围。
XIII-1(m)	Period of commercial warranty for calendar life 日历寿命商业质保期限	MISSING – request 缺失 – 须索取	—	Not stated. 未说明。
XIII-1(n)	Initial round-trip energy efficiency and at 50 % of cycle life 初始及 50% 循环寿命时的往返能量效率	MISSING – request 缺失 – 须索取	—	Not stated. 未说明。
XIII-1(o)	Internal resistance of cell and pack 电芯及电池包内阻	MISSING – request 缺失 – 须索取	—	Not stated. 未说明。
XIII-1(p)	C-rate of the cycle-life test 循环寿命测试的倍率	AVAILABLE 已提供	0.5C	— —
XIII-1(q); Art 13(3),(4)	Marking requirements as shown in passport 标识要求（护照内记录）	MISSING – request 缺失 – 须索取	—	See Section A (symbol, Cd/Pb marking). 见 A 部分。
XIII-1(r); Art 18	EU declaration of conformity 欧盟符合性声明	MISSING – request 缺失 – 须索取	—	See Section F. 见 F 部分。
XIII-1(s); Art 74(1)(a)-(f)	Information on prevention and management of waste batteries 废旧电池预防与管理信息	MISSING – request 缺失 – 须索取	—	Content is produced by the producer / PRO, not the cell maker; confirm who owns it. 该信息由生产者/生产者责任组织提供，需确认由谁负责。

C. Passport points 2–4, performance (Art. 10 / Annex IV), safety (Art. 12) and BMS data (Art. 14 / Annex VII)

C. 护照第 2–4 点、性能（第 10 条/附件 IV）、安全（第 12 条）和 BMS 数据（第 14 条/附件 VII）

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
XIII-2(a)	Detailed composition: cathode, anode, electrolyte 详细成分：正极、负极、电解液	MISSING – request 缺失 – 须索取	—	Legitimate-interest access tier. 仅对有正当利益者开放。
XIII-2(b)	Part numbers of components; spare-part source contacts 部件编号及备件来源联系方式	MISSING – request 缺失 – 须索取	—	
XIII-2(c)	Dismantling information (exploded diagrams, sequence, fasteners, tools, warnings, cell count/layout) 拆解信息（爆炸图、拆解顺序、紧固件、工具、警告、电芯数量与布局）	MISSING – request 缺失 – 须索取	—	
XIII-2(d)	Safety measures 安全措施	MISSING – request 缺失 – 须索取	—	
XIII-3	Test reports proving compliance (notified bodies / authorities only) 合规测试报告（仅公告机构/监管机构可见）	MISSING – request 缺失 – 须索取	Datasheet lists 'UN38.3, MSDS' as certificates	Reports themselves are not provided. UN 38.3 is a transport test, not proof of EU Battery Regulation compliance. 仅列出 UN38.3、MSDS，没有报告本身；UN 38.3 是运输测试，不能证明符合欧盟电池法规。
XIII-4(a)-(d)	Individual-battery data: performance values at placing on market, state of health, status, usage data 单体电池数据：上市时性能值、健康状况、状态、使用数据	MISSING – request 缺失 – 须索取	CAN communication (Model X); no BMS data fields listed	Per-unit data stream; supplier BMS capability must be confirmed. 按单台电池生成；需确认供应商 BMS 能力。
Art 10(1); Annex IV-A(1)	Rated capacity and capacity fade (%) 额定容量与容量衰减 (%)	MISSING – request 缺失 – 须索取	Rated 314 Ah; fade not stated	Document with Annex IV values required from 18 Aug 2024 for rechargeable industrial >2 kWh. 可充电工业电池 >2 kWh 自 2024-08-18 起需附 Annex IV 参数文件。
Annex IV-A(2)	Power (W) and power fade (%) 功率 (W) 与功率衰减 (%)	MISSING – request 缺失 – 须索取	—	
Annex IV-A(3)	Internal resistance (Ω) and increase (%) 内阻 (Ω) 与增幅 (%)	MISSING – request 缺失 – 须索取	—	
Annex IV-A(4)	Energy round-trip efficiency and fade 往返能量效率及衰减	MISSING – request 缺失 – 须索取	—	

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
Annex IV-A(5)	Expected lifetime in cycles and in calendar years 预期寿命（循环次数和日历年）	MISSING – request 缺失 – 须索取	>8000 cycles; calendar years not stated	'15+ years' on the datasheet refers to the PDU, not the battery module; do not use it. 数据表中“15+ 年”针对配电单元 (PDU)，不是电池模块，不可引用。
Annex IV-B(1)-(5)	Test explanation: charge/discharge rate, power/energy ratio, DOD, power at 80%/20% SOC, calculations 测试说明：充放电倍率、功率/能量比、放电深度、80%/20% SOC 功率、计算	MISSING – request 缺失 – 须索取	0.5C and 80 % DOD only	Remaining elements missing. 其余项缺失。
Art 12; Annex V	Stationary BESS safety: technical documentation and tests 固定式储能系统安全：技术文件与测试	MISSING – request 缺失 – 须索取	Protections listed (over-charge, over-discharge, over-temperature, low-temperature, over-current, short circuit)	Protection functions are listed, but no test reports against Annex V. 仅列出保护功能，无按附件 V 的测试报告。
Art 14; Annex VII	State-of-health / expected-lifetime parameters in BMS, read-only access BMS 中的健康状态/预期寿命参数及只读访问	MISSING – request 缺失 – 须索取	—	Applies to stationary BESS from 18 Aug 2024. Request BMS parameter list and access method. 固定式储能自 2024-08-18 起适用。需索取 BMS 参数清单及访问方式。

D. Carbon footprint – Art. 7

D. 碳足迹 – 第 7 条

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
Art 7(1)(a)-(c)	Declaration: manufacturer info, battery model, plant location 声明：制造商信息、型号、工厂所在地	MISSING – request 缺失 – 须索取	—	
Art 7(1)(d)	Carbon footprint, kg CO2e per kWh of total energy over service life 碳足迹，kg CO2e/kWh（全寿命总输出能量）	MISSING – request 缺失 – 须索取	—	Must follow the Commission delegated-act methodology (not yet adopted per secondary sources, see Section 2). 须按欧委会授权法案方法计算（据二手来源尚未通过，见第 2 节）。
Art 7(1)(e)	Footprint by life-cycle stage (Annex II point 4) 按生命周期阶段分列的碳足迹	MISSING – request 缺失 – 须索取	—	
Art 7(1)(f)	Identification number of the EU DoC 欧盟符合性声明编号	MISSING – request 缺失 – 须索取	—	
Art 7(1)(g)	Web link to public version of supporting study 支持研究的公开版本网址	MISSING – request 缺失 – 须索取	—	
Art 7(2)	Carbon footprint label + performance class 碳足迹标签与性能等级	MISSING – request 缺失 – 须索取	—	Applies later (see Section 2). 适用时间较晚（见第 2 节）。

E. Supply-chain due diligence – Art. 48 (and Arts. 47, 49-52)

E. 供应链尽职调查 – 第 48 条（及第 47、49-52 条）

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
Art 47	Is the economic operator above the EUR 40 million net-turnover threshold (or in a group above it)? 经营者净营业额是否超过 4000 万欧元（或所在集团超过）？	MISSING – request 缺失 – 须索取	—	Chapter does not apply below the threshold. Importer must confirm; supplier turnover is not the test for the importer. 低于门槛则本章不适用。需进口商确认。
Art 48(1)-(3)	Battery due diligence policy, third-party verification by notified body, 10-year records 电池尽职调查政策、公告机构第三方核查、10 年记录保存	MISSING – request 缺失 – 须索取	—	Applies from 18 Aug 2027 (Reg. 2025/1561). 自 2027-08-18 起适用（Reg. 2025/1561）。
Art 52(3); Annex XIII-1(d)	Report on due diligence policy (raw materials: cobalt, natural graphite, lithium, nickel) 尽职调查政策报告（钴、天然石墨、锂、镍）	MISSING – request 缺失 – 须索取	—	Need supplier's raw-material origin and smelter/refiner information for LFP (lithium, natural graphite where used). 需供应商提供原料来源及冶炼/精炼商信息（锂；如使用则含天然石墨）。

F. CE marking and EU declaration of conformity – Arts. 17-20, 38

F. CE 标志与欧盟符合性声明 – 第 17-20、38 条

Ref.	Field 字段	Status 状态	Datasheet value 数据表数值	Notes 备注
Art 18; Annex IX	EU declaration of conformity (signed, current, translated) 欧盟符合性声明（签署、有效、已翻译）	MISSING – request 缺失 – 须索取	—	Datasheet certificates: only 'UN38.3, MSDS'. No EU DoC referenced. 数据表证书仅有 UN38.3、MSDS，未提及欧盟符合性声明。
Art 19-20	CE marking on battery (and notified-body number where required) 电池上的 CE 标志（需要时附公告机构编号）	MISSING – request 缺失 – 须索取	No CE mark shown on datasheet	Request photo of nameplate and CE evidence. 需索取铭牌照片和 CE 证据。
Art 17; Annex VIII	Conformity assessment module used; notified-body certificate (if applicable); technical documentation 采用的合格评定模块；公告机构证书（如适用）；技术文件	MISSING – request 缺失 – 须索取	—	Manufacturer keeps technical documentation 10 years (Art. 38(4)). 制造商须保存技术文件 10 年（第 38(4) 条）。

5. Supplier data-request checklist • 供应商资料索取清单

To: [Supplier contact placeholder] Product: Sample Manufacturer – Model X (example) — please send documents by email in PDF/Excel. 请通过电子邮件以 PDF/Excel 提供。

#	Request 索取内容	Basis 依据	Done
1	Legal name and postal address of the manufacturer; single contact point; web/email 制造商法定名称、邮政地址、单一联系点、网址/邮箱	Art 38(7)	☐
2	Battery category, model, batch/serial number scheme 电池类别、型号、批次/序列号规则	Art 38(6)	☐
3	Intended use: stationary energy storage? Internal or external storage? 预期用途：是否固定式储能？内置还是外置储能？	Art 3 definitions	☐
4	Place of manufacture (plant name, address); manufacture date marking 制造地点（工厂名称、地址）；制造日期标注方式	Annex VI-A(3),(4)	☐
5	Photos of actual label and nameplate (front, rear, packaging), incl. separate-collection symbol, Cd/Pb mark, CE mark 实物标签与铭牌照片（正面、背面、包装），含分类收集符号、Cd/Pb 标识、CE 标志	Art 13, 19-20	☐

#	Request 索取内容	Basis 依据	Done
6	EU declaration of conformity (signed, dated) and its identification number; list of other EU acts covered 欧盟符合性声明（签字、日期）及编号；涵盖的其他欧盟法规清单	Art 18; Art 7(1)(f)	☐
7	Conformity assessment module used; notified-body certificate and number (if any); technical documentation index 采用的合格评定模块；公告机构证书及编号（如有）；技术文件目录	Art 17; Annex VIII	☐
8	Test reports: UN 38.3, safety tests per Annex V, other applicable tests 测试报告：UN 38.3、附件 V 安全测试及其他适用测试	Art 12; Annex V; XIII-3	☐
9	Material composition: cathode, anode, electrolyte; hazardous substances (excl. Hg/Cd/Pb); critical raw materials >0.1 % w/w; Cd and Pb content 材料成分：正极、负极、电解液；有害物质（不含汞镉铅）；关键原材料 >0.1%；镉、铅含量	Annex VI-A(8),(10); XIII-1(b), XIII-2(a)	☐
10	Usable extinguishing agent 适用灭火剂	Annex VI-A(9)	☐
11	Carbon footprint declaration for this model and plant (kg CO2e/kWh, by life-cycle stage, public study link) – or written statement of status/plan 该型号及工厂的碳足迹声明（kg CO2e/kWh、分阶段、公开研究链接）；或书面说明进度/计划	Art 7(1)	☐
12	Annex IV performance values: capacity fade, power (W) and fade, internal resistance and increase, round-trip efficiency; expected life in cycles AND calendar years; end-of-life criterion; test conditions 附件 IV 性能参数：容量衰减、功率 (W) 及衰减、内阻及增幅、往返效率；循环与日历寿命；寿命终止判据；测试条件	Art 10(1); XIII-1(i), (j),(n),(o)	☐
13	Warranty period (calendar life); temperature range the battery can withstand when not in use (tested) 质保期限（日历寿命）；非使用状态可承受温度范围（测试值）	XIII-1(l),(m)	☐
14	Share of renewable content (if supplier calculates it) 可再生含量占比（如供应商有计算）	XIII-1(f)	☐
15	Dismantling information: exploded diagram, disassembly sequence, fasteners, tools, warnings, cell count/layout; spare-part numbers and contacts; safety measures 拆解信息：爆炸图、拆解顺序、紧固件、工具、警告、电芯数量与布局；备件编号与联系人；安全措施	XIII-2(b)-(d)	☐
16	BMS: parameters stored (Annex VII), read-only access method, ability to output per-unit data for the passport (unique ID, SoH, cycles, events) BMS：存储的参数（附件 VII）、只读访问方式、能否输出单台电池护照数据（唯一标识、健康状态、循环次数、事件）	Art 14; XIII-4	☐
17	QR code / unique identifier plan (ISO/IEC 15459 series) and who hosts the passport 二维码/唯一标识符方案（ISO/IEC 15459 系列）及护照托管方	Art 13(6); Art 77(3)	☐
18	Supply-chain due diligence: origin of lithium, cobalt, nickel, natural graphite; smelters/refiners; existing due-diligence policy or audit 供应链尽职调查：锂、钴、镍、天然石墨的来源；冶炼/精炼商；现有尽职调查政策或审计	Art 48-52; XIII-1(d)	☐
19	Confirm whether supplier is the 'manufacturer' or a module supplier to another manufacturer (Art. 39) 确认供应商是“制造商”还是向其他制造商供应的模组供应商（第 39 条）	Art 38-39	☐

6. What we did not verify • 未核实事项

- Datasheet content was not confirmed with the supplier; values are as published on 2026-10-29. 数据表内容未经供应商确认。
- Whether the product is in fact placed on the EU market, who the 'manufacturer' and 'economic operator' are, and the intended use. 产品是否在欧盟上市、谁是制造商/经营者、预期用途，均未确认。

- Adoption status of the carbon-footprint delegated/implementing acts and the Art. 13(10) label implementing act (secondary sources only). 碳足迹及标签相关法案的通过状态（仅有二手来源）。
- Later amendments or consolidated versions of Reg. 2023/1542 beyond Reg. 2025/1561. 除 Reg. 2025/1561 外是否有其他修订，未核实。
- Any national requirements, other EU product laws (EMC, low-voltage, transport/ADR) and the importer's own obligations. 成员国要求、其他欧盟产品法规及进口商自身义务，均不在本包范围内。

Sources 来源: [1] [public manufacturer datasheet; URL withheld in this anonymized sample] (accessed 2026-10-29). [2] EUR-Lex Reg. (EU) 2023/1542, <https://eur-lex.europa.eu/eli/reg/2023/1542/oj>. [3] EUR-Lex Reg. (EU) 2025/1561, <https://eur-lex.europa.eu/eli/reg/2025/1561/oj>. [4] European Commission, Batteries, https://environment.ec.europa.eu/topics/waste-and-recycling/batteries_en. [5] Commission draft implementing regulation Ares(2025)11169592. [6] Secondary: traceable.digital (carbon footprint, 2026-09), BatteryDays Briefing #8 (2026-W36), European Parliament Legislative Train (Omnibus IV batteries). [7] EUR-Lex summary of Reg. (EU) 2024/3015 and Commission Forced Labour Regulation portal.