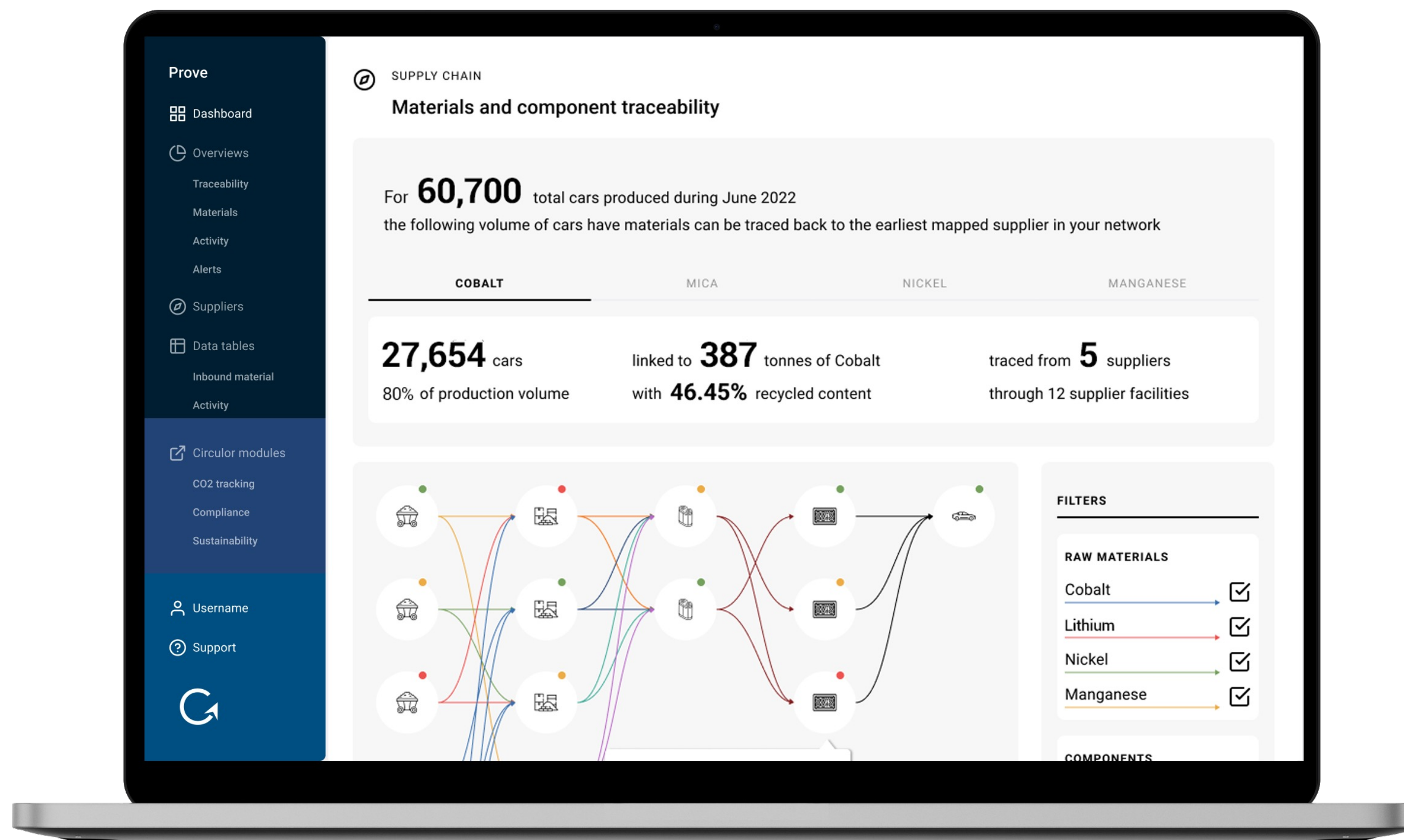


EU Battery Regulation: Due Diligence Requires Traceability

Map, digitalize and trace your cobalt, graphite, lithium and nickel supply chains to establish control and compliance with the EU Battery Regulation's due diligence requirements by August 2025.



With over 150 battery value chain providers participating on our platform, Circular's Material Traceability is already being used at production scale by some of the largest electric vehicle makers.

How we help

Economic operators – those placing batteries on the market – cannot comply with the EU Battery Regulation without establishing and operating a system of controls and transparency including a traceability system for cobalt, natural graphite, lithium, nickel supply chains as required in Article 49 point (e) by August 2025.

The operational impact of non-compliance with Articles 48 and 49, requires ceasing activities in these supply chains.

Circular's Material Traceability enables transparency and gives customers visibility of their upstream activities as well as the controls they need to hold their supply chains to higher standards.

Meeting due diligence obligations requires traceability

Circular's Material Traceability solution provides verifiable and auditable proof of supply chain activities and compliance that will satisfy regulators.

- 1 Map supply chains end-to-end and onboard the upstream actors, enabling two-way communication and building transparency
- 2 Prove provenance, material flows and quantities – identify risks by setting rules for what's expected
- 3 Combine traceability with internal management and reporting systems to improve accuracy and efficiency
- 4 Attach upstream due diligence and compliance to material flows and store reports for 10 years after the last battery has been placed on the market
- 5 Prove risk mitigation efforts by monitoring anomalies and acting on alerts detected

Circular's Guidance for Economic Operators

Verifiable and auditable proof

Traceability data and documentation must provide verifiable and auditable proof of the provenance and material flow of these materials, as well as inherited upstream risks.

Ongoing surveillance to monitor risks

Given critical mineral supply chains change on average 3-5 times a year, traceability needs to be continuous and granular in order to strengthen a company's management systems and identify the root cause of supply chain risks.

Long-term document storage

Proof of traceability documentation must be maintained for 10 years after the last battery covered by the due diligence policies has been placed on the market – as required by Article 48.

Integration with Battery Passports

The battery passport must include a due diligence report, including proof of implementing due diligence policies, proof of a supply chain traceability and a summary of third-party verifications.