

University of Maryland 6 June 2025

Battery material supply chain traceability – addressing gaps in the supply chain and achieving sustainable growth

Brian A. Engle Chairman, NAATBatt International Chief Safety Officer, NAATBatt International SAE Fellow Chair, SAE Battery Standards Steering Committee SAE International Director, Business Development, Amphenol +1 (248)978-5736 Brian.engle@amphenol-sensors.com



Current battery supply chains are highly vulnerable to disruption due to force majeure, geopolitical and economic issues. Tracing supply chain materials is required through the European Battery Directive for large format EV batteries sold in the EU. In the US, there is a voluntary effort guided by SAE to establish standard protocol for tracing critical battery materials in compliance with tariff and tax incentive purposes. This data may be highly confidential to battery manufacturers but with proper data security, could be highly informative of government industrial policy and support to ensure sufficient battery materials are available at scale to support industry growth at scale and can be informative to industrial strategy to provide appropriate levels of "onshoring" and "friendshoring" a complex supply chain to be robust against disruptions.

Global battery Initiatives to address Material needs



Relevant global policies

NORTH AMERICA

U.S. Securities and Exchange Commission draft proposal for Corporate Climate Disclosures

U.S. Dodd Frank 1502 - Form SD

California draft End-of-Life Policy for Lithium-Ion Batteries

Canada's Towards Sustainable Mining Guiding Principles

FSB Task Force on Climate-Related Financial Disclosures Revising U.S. Mining Law of 1872

HR 8187

EUROPE

European Union Battery Regulation Germany BMWk Battery Passport

Circular Economy Action Plan

OECD Critical and Conflict Minerals

OECD Due Diligence Act

Sustainable Products Initiative

EU Carbon Border Adjustment Mechanism

FSB Task Force on Climate-Related Financial Disclosures

APAC

China MIIT Measures for the Management of Traceability of Recycling and Utilization of NEV Batteries

Australia Environment Protection and Biodiversity Conservation Act (EPBC)

Canada's Towards Sustainable Mining Guiding Principles

Singapore Zero Waste Masterplan

Singapore Carbon Pricing Act

SAE Battery Traceability

EU Battery Regulation requires more from industry







Efficient & robust data collection



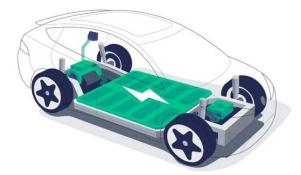
Reputational and financial risks



Increased time & resource required



System interoperability



On average, OEMs know only 10% of their Tier 2 suppliers.

So what is the European Battery Directive?

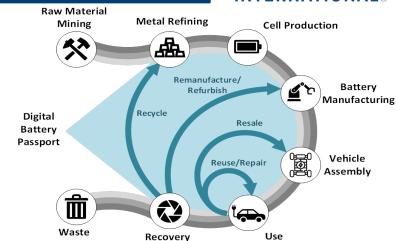
The Directive 2006/66/EC of the European Parliament and of the Council of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC, commonly known as the **Battery Directive**, regulates the manufacture and disposal of <u>batteries</u> in the <u>European Union</u> with the aim of "improving the environmental performance of batteries and accumulators"

It provides a legal framework for regulating battery technology, manufacturing, use, and recycling/disposal

...and what is the EU Battery Passport?

The <u>digital battery passport</u> will be a core tool to enable the sustainable scaling of battery value chains globally. While decarbonization and dematerialization are overarching goals of the European Green Deal, more ambitious action from both business and politics is required. Battery Passport is a lighthouse example of using innovation to achieve these goals, support legal implementation, and empower companies to take informed decisions on their supply chains and products.

...A tool for tracking battery materials from extraction through recycling





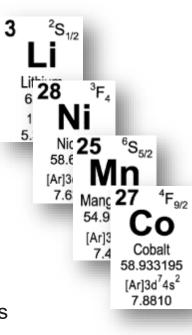
https://thebatterypass.eu/



...and why is it so important to the EU?

- The EU lacks critical raw materials in region to support a regional supply chain for lithium-ion based battery technologies
- Historically, the EU has purchased products it cannot manufacture from sources abroad. The critical nature of electrification and energy storage and recent global events have shown the need for a level of independence.
- Materials such as those in batteries are historically aggregated and shipped outside EU for reclamation/recycling in regions where environmental law is less strict.
- This has driven the EU to develop a policy to capture and retain these critical materials "in region"
- The regulation will require battery manufacturers to begin using recycled materials beginning in a phase-in starting as early as 2027.
- The vision is to have circular supply chain similar to the 99.99% recyclability of conventional Pb-acid batteries
- The Battery Passport is also designed to place focus on material provenance, carbon footprint from manufacturing, and Environmental/Social Governance (ESG)

...it will take years to scale fully closed-loop li-ion battery recycling





1. Sustainability and safety requirements

Carbon footprint, recycled content, performance and safety

2. Labelling and information requirements

Sustainability information, battery state of health

3. End-of-life management provisions

Collection targets, recycling efficiencies, materials recovery

4. Product and due diligence requirements

• Enforcement of product requirements and supply chain due diligence

5. Electronic information exchange systems and battery passport

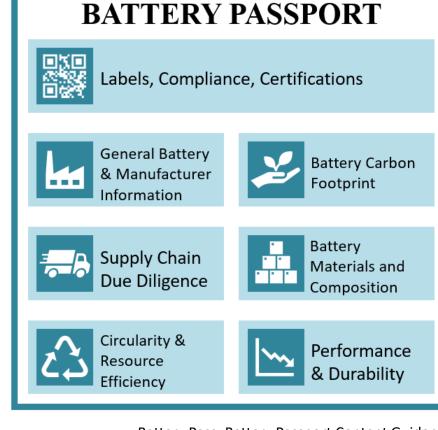
European Management System and digital battery passport

6. Mandatory green public procurement

Sustainable government procurement

7. Other provisions on conformity assessment

Notification of conformity, market surveillance



Battery Pass: Battery Passport Content Guidance https://thebatterypass.eu/resources/

INTERNATIONAL

Many of the detailed elements of the Battery passport are still being defined

EU Commission's European Electronic Exchange System



Creates "transparency along supply and value chains for all stakeholders"



European Electronic Exchange System



Carbon footprint

methodology

regulations

requirements

•

٠

Digital "Battery Passport"

Data to be made available to the public

declaration meeting EU

Proof of adhering to EU

supply chain due diligence

Proof of recycled content

in accordance w/ EU

Data Avail. to certain participants

General

- Battery manufacturer
- Battery type
- Model
- Date placed in market
- Manufacturing place and date
- Battery composition, incl. critical raw materials

Responsible Sourcing | Performance & Durability

- Rated capacity
- Capacity fade
- Minimal, nominal and maximum voltage, with temperature ranges
- Original power capability
 and limits
- Power fade
- ...and more...

Dismantling & Safety

- Detailed composition
- Dismantling information
- Safety measures
- Date placed in market
- Results of test results
- ...and more...

From Circulor

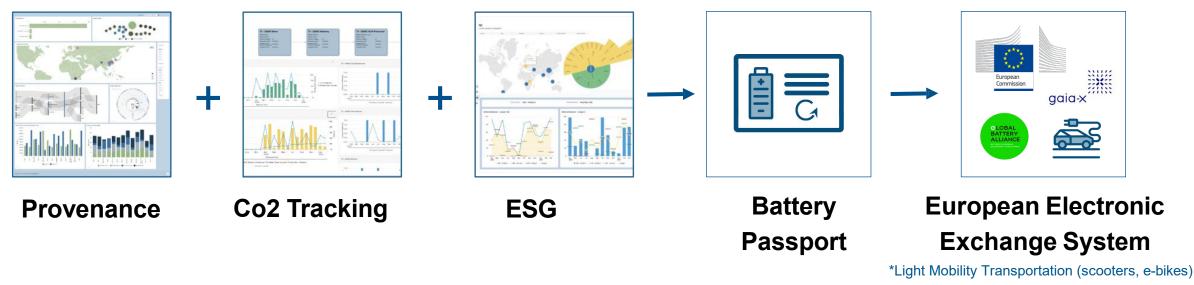
EU Battery Regulation requires:



As currently written, OEMs, pack manufacturers and cell manufacturers must prove:

- the product's CO2 through production as early as 2024,
- origin and compliance with OECD Due Diligence guidelines,
- amount of recycled content, as early as 2027.

And must provide a digital "Battery Passport" that stores this information as early as 2026.

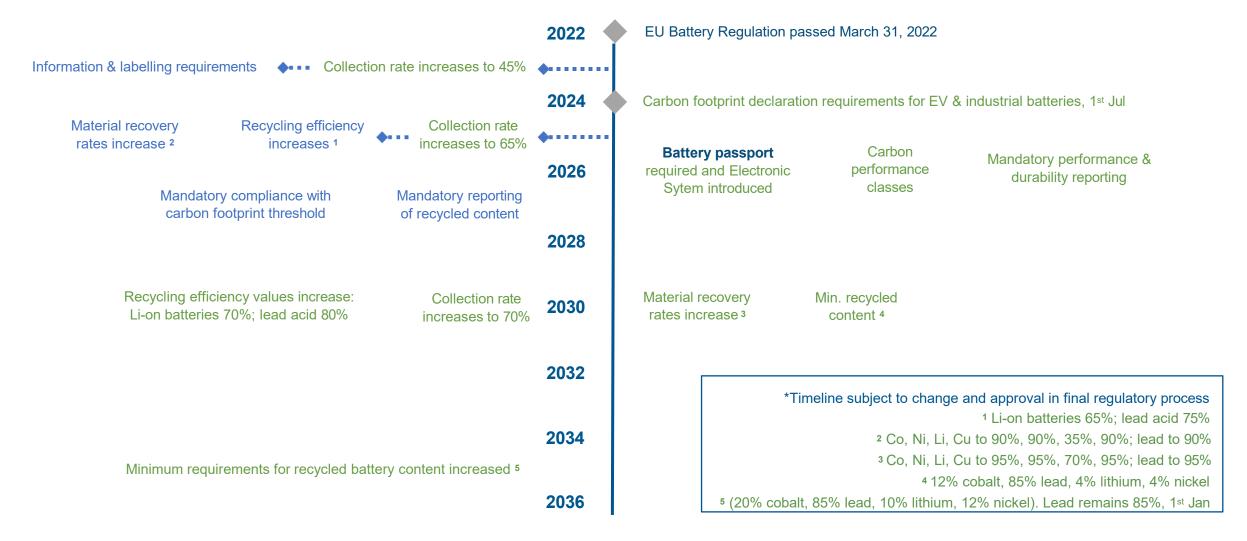


... EVERYTHING that is part of a "battery pack" is required to be tracked

From Circulor

EU Regulation Requirement Timeline*





German government launched pilot "Battery Pass"

In consortium with:



- Bundesministerium für Wirtschaft und Klimaschutz
- German government selected eleven companies to design content, technical, and cross-industry standards for battery passport.



Circulor leads "Battery Pass Demonstrator" work package, using content and technical standards to simulate data flows and system transactions.



Demonstrator is to standardize dataspace to manage passports and has high potential for global adoption.

DIN Spec 99100:

- □ A comprehensive specification for the data to be included in the EU DPP for batteries
- □ Based on German Battery Pass
- □ 100% overlap with the key data points identified by industry
- Goes much further into areas beyond our scope, however (e.g. carbon footprinting, recycling)
- □ Requirements include:
 - Materials used in cathode, anode and electrolyte
 - a) The battery passport must contain information on the detailed composition of the battery.
 - b) Information on the detailed composition must include materials used in the cathode, anode and electrolyte.
 - c) Information on the detailed composition must relate to the battery model.
 - d) Information on the detailed composition must be accessible to persons with legitimate interest and the commission



INTERNATIONAL

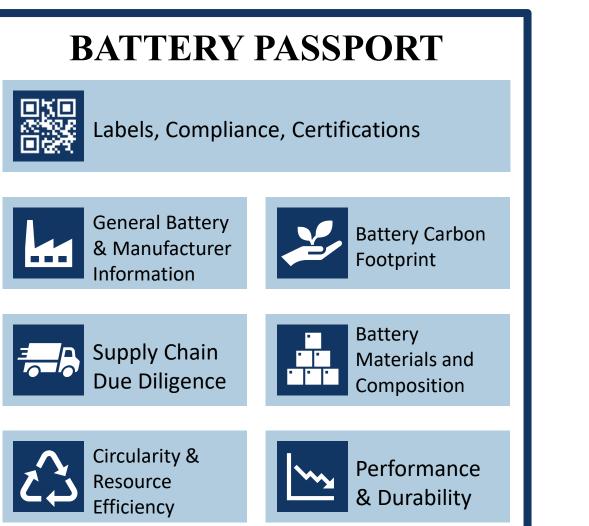
In harmonization with:



Information to be displayed on the label	Subclause	BattReg reference
The carbon footprint and the carbon footprint	6.2.4 Carbon footprint label;	Article 7(2) via Annex XIII
performance class ^a	6.3 Battery carbon footprint	(1c)
Information identifying the manufacturer:	6.1.2.4 Manufacturer identifier and information	Article 13(1) via Annex VI
— name;	and information	PartA (1)
 registered trade name or registered trademark; 		
 postal address, indicating a single contact point; 		
 web address, if available; 		
 e-mail address, if available. 		
Information identifying the battery:	6.1.2.2 Battery identifier	Article 13(1) via Annex VI Part A (2)
 model identification; 		Turch (2)
 batch or serial number; OR 		
 product number; OR 		
 element allowing identification. 		
Battery category	6.1.3.5 Battery category	Article 13(1) via Annex VI Part A (2)
Place of manufacture	6.1.3.1 Manufacturing place	Article 13(1) via Annex VI
geographical location		Part A (3)
Date of manufacture	6.1.3.2 Manufacturing date	Article 13(1) via Annex VI
month and year		Part A (4)
Battery mass	6.1.3.6 Battery mass	Article 13(1) via Annex VI,
Conse o altre	6.7.2.2 Rated capacity	Part A(5) Article 13(1) via Annex VI.
Capacity	6.7.2.2 Rated capacity	Part A(6)
Chemistry	6.5.2 Battery chemistry	Article 13(1) via Annex VI,
		Part A(7)
Hazardous substances present in the battery, other than mercury, cadmium or lead	6.5.5 Hazardous substances	Article 13(1) via Annex VI, Part A(8)
Critical raw materials present in the battery in a concentration of more than 0,1 % weight by weight	6.5.3 Critical raw materials	Article 13(1) via Annex VI, Part A(10)
Usable extinguishing agent	6.2.5 Extinguishing agent	Article 13(1) via Annex VI, Part A(9)
Symbol for separate collection	6.2.2 Separate collection symbol	Article 13(4) via Annex VI, Part B, Annex XIII (1q)
Symbol for elements	6.2.3 Symbols for cadmium and lead	Article 13(5)
QR-Code	5.2.1 Access to battery	Article 13(6)
	passport information	Annex VI, Part C
CE-Marking ^b	6.2.7 EU declaration of conformity	Article 20(1)
NOTE 1 all information on label is accessible to th	e public	
NOTE 2 for further information on data points see	Clause 6	
a Detailed timeline can be found in 6.3.7.		
b Subject to the general principles set out in Regulation	(EC) No 765/2008, Article 30.	

Challenges Identified (So Far)







Safeguarding Trade Secrets and Ensuring Confidentiality



Authentication Technology and Combating Counterfeits





Responsibility and Liability

Trust

How to solve for US needs?

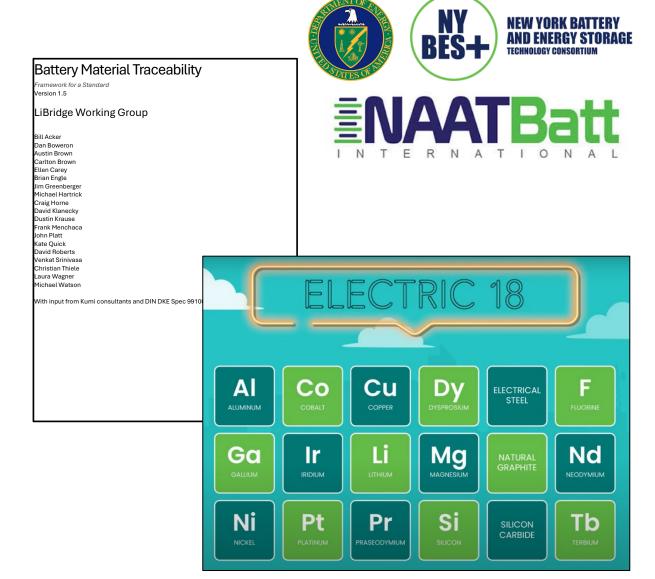
Li-BRIDGE



SAE International and LiBridge

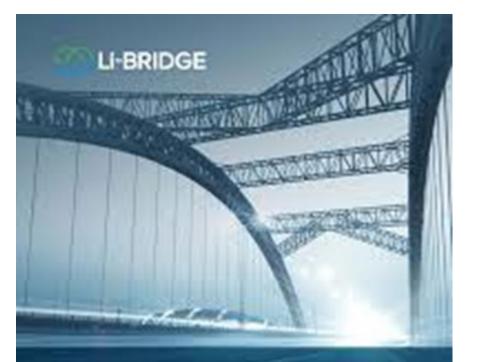
Assembled a working group to write a framework that focuses on key data points for traceability:

- 1. Battery capacity
- 2. Date of Service
- 3. Identification and proportions of critical minerals with a focus on "the electric eighteen."
- 4. Producer information, especially identifying FEOC
- 5. Battery components (e.g. cells)
- Objective is to hand this off to an SAE committee for standardization.



LiBridge process & progress





Building a Robust and Resilient U.S. Lithium Battery Supply Chain

LiBridge

A public-private alliance committed to accelerating the development of a robust and secure domestic supply chain for lithium-based batteries

Argonne National Laboratory

Leads coordination of Li-Bridge by serving as the facilitator between private industry and the Federal Consortium for Advanced Batteries

Met in August 2024 with 75+ companies

Purpose was to understand the landscape of traceability

Key Takeaways

Landscape is fragmented. Some companies complying with the EU Digital Product Passport (DPP). Some not engaged in traceability. No consistent practice or reporting. Supply chain is disorganized and inefficient.

>100 SAE EV, Hybrid, and Fuel Cell Vehicle Published Documents



Fuel Cell Fueling: J2600, J2601, J2601/1. J2601/2, J2601/3,J2601/4, J2601/5, J2719, J2719/1, J2799, J1766, J2578, J2579

Fuel Cell Testing: J2615, J2616, J2617, J3219

Fuel Cell Systems: J2579, J2594, J3089

EV Battery Recycling/Secondary Use: J2984, J2974, J3071, J2997

Energy Transfer Systems: J2293, J2293/1, J3072 **EV, Hybrid, Fuel Cell Vehicle Terminology:** J1715, J1715/2 J2574, J2760

<u>https://standardsworks.sae.org/standards-committees/hybrid-ev-committee</u> <u>https://standardsworks.sae.org/standards-committees/fuel-cell-standards-committee</u> <u>ttps://standardsworks.sae.org/standards-committees/vehicle-battery-standards-steering-committee</u>

EV, Hybrid, Fuel Cell Vehicle Safety: J1766, J2344, J2910, J2578, 3108, J3108/1, J3235, J2950, J3325, J2929, J2464 EV, Hybrid, Fuel Cell Vehicle Crash Safety: J3040, J1766, J2990, J2990/2

Battery Testing: J1798, J1798/1, 1798/2, J2288, J2289, J2380, J2758, J3220, J3277, J3277/1

> **EV Charging Safety:** J1718, J2953/1, J2953/3

EV, Hybrid, Fuel Cell Vehicle Economy, Range / Power: J2991, J1798, J2758, J2946, J2572, J2907, J2908, J1634, J1711, J2711

> EV Charging & Grid Communications:

INTERNATIONAL®

J1772, J1773, J2293, J2836, J2841, J2847, J2894, J2931, J2954, J3068, J3105, J3105-1, J3105-2, J3105-3, J2799, J3271, J3400, J3400/1





Committee Membership Individual Participants

Represented Employers (OEM's, Suppliers, Government, and 171 Academia)

32

Subcommittees

4*U*

Published Documents





BSSC COMMITTEES: Q1 2025

BC1 Battery Safety Standards Committee BC2 Battery Standards Testing Committee BC3 Battery Standards Label & Tape Committee BC4 Battery Transportation Committee BC5 Battery Size Standardization Committee BC6 Starter Battery Committee BC7 Truck Battery Systems Committee BC8 Battery Standards Fuel Economy & Range Committee BC9 Battery Standards Advanced Battery Concepts Committee BC10 Battery Standards Recycling Committee-BC11 Battery Global Traceability Committee BC12 Battery Test Equipment Committee BC13 Battery Terminology Committee BC14 Battery Materials Testing Committee BC15 Secondary Battery Use Committee

To Join a Committee:

Brian Engle: <u>Brian.engle@amphenol-sensors.com</u> Alyssia Bostrom: <u>alyssia.bostrom@dolav-usa.com</u> Dante Rahdar: <u>dante.rahdar@sae.org</u> **BC16 Start-Stop Battery Committee BC17 Battery Diagnostics BC18 Battery Field Discharge and Disconnect Committee BC19 Battery Systems Connection Committee BC20** Battery Management Systems **BC 21 Battery Thermal Management Committee BC22 Bus Battery System Committee BC23 Battery Systems Adhesives-Sealants-Heat Transfer Materials BC24 Battery Sensors Committee BC25** Construction Agricultural and Off Road Rechargeable ESS Committee **BC26 Micro mobility Battery Standards Committee BC27 Truck Battery Systems BC29 Battery Swapping Committee BC30 Battery Pack Venting Committee BC31** Insurance **BC32 Vehicle Platform Power Management Committ**

First Responders Task Force



US Battery Traceability Needs

Addressing Needs:

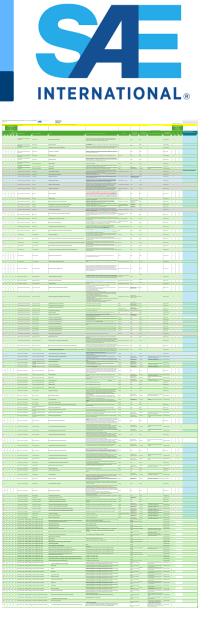
- Compliance with provisions of 45X (Producer Incentive)
- FEOC sourcing restrictions (China, Russia, North Korea)
- CBP and tariffs
- HR 8187 Critical Material Transparency and Reporting in Advanced Clean Energy (TRACE) Introducedno action
- Identification of critical minerals for recycling
- Modeling supply chain gaps and informing policy

Goals for Standards Team:

- Serves industry's needs for efficiency and consistency and integrity
- Supports growth of U.S. battery manufacturing and recycling
- Enables companies to take advantage of available incentives in the U.S.
- Allows US to take a leadership position with EU in traceability (2/1/27)
- Lowers the cost of US providers to comply with EU battery regulations
- Can be completed in <12 months
- Syncs with DoE Supply Chain Database

Reporting/verification needs to be inexpensive, but accurate, trustworthy

[4(C)O-01-p] This document is scheduled to be published in the Schedul Regime on 055555224 and available colors at Ampullinearing transmission and available colors at Ampullinearing transmission and 0512444004, and on Impullinearing parts		
DEPARTMENT OF THE TREASURY		
Internal Revenue Service		
26 CFR Parts 1 and 301		
[TD 9995]		
RIN 1545-BQ52; RIN 1545-BQ86; RIN 1545-BQ99		
Clean Vehicle Credits under Sections 25E and 30D; Transfer of Credits; Critical Minerals and Battery Components; Foreign Entities of Concern		
AGENCY: Internal Revenue Service (IRS), Treasury.		
ACTION: Final regulations.		
SUMMARY: This document contains final regulations regarding Federal income tax		
credits under the inflation Reduction Act of 2022 (IRA) for the purchase of qualifying		
new and previously-owned clean vehicles, including new and previously-owned plug-in		
electric vehicles powered by an electric battery meeting certain requirements and new		
qualified fuel cell motor vehicles. In addition, the final regulations provide guidance for		
taxpayers who purchase qualifying vehicles and intend to transfer the amount of any		
previously-owned clean vehicle credit or new clean vehicle credit to dealers that are		
entities eligible to receive advance payments of either credit. The final regulations also		
provide guidance for dealers to become eligible entities to receive advance payments of		
previously-owned clean vehicle credits or new clean vehicle credits, and rules regarding		
recapture of the credits. Finally, the final regulations provide guidance on the meaning		
of three new definitions added to the exclusive list of mathematical or clerical errors		
relating to certain assessments of tax without a notice of deficiency.		
DATES: Effective date: These regulations are effective on [INSERT DATE 60 DAYS		
AFTER DATE OF PUBLICATION IN THE FEDERAL REGISTER].		
Applicability dates: For dates of applicability, see §§1.25E-1(h), 1.25E-2(i),		



Battery Traceability – SAE J3327

Enabling a Sustainable and Compliant Battery Value Chain

1. SCOPE

The initial scope of this standard is focused on a broadly-supported set of priorities. Notwithstanding, the committee recognizes the need for standardization in other, important areas. These include:

- battery recycling and second life use, with particular emphasis on safe handling of materials
- state of health
- repair and maintenance

Suppliers need Standard Practice for identifying, documenting, and reporting provenance of materials

- Complementary to EU Passport and similar provenance requirements
- Focus on cell contents (Anode, Cathode, etc)
- Carbon footprint and ESG not planned for J3327 TIR Initial release

• Voluntary Standards ilo Compulsory Regulation







How it works:

- Convenes suppliers, OEMs, traceability experts, standardization experts (66 members, 42 voting members)
- Leverages and harmonizes existing sources
 - Available U.S. incentives
 - Traceability data for the EU Battery Passport
 - SAE AS9100
 - ISO 22095, chain of custody models
 - E,g. mass balance models
 - ISO 23664, traceability of rare earth materials from mine to separated products
 - ASTM F49 digital communications within the supply chain

One common vocabulary, one way of identifying minerals, that protects competitive advantage and supports security.



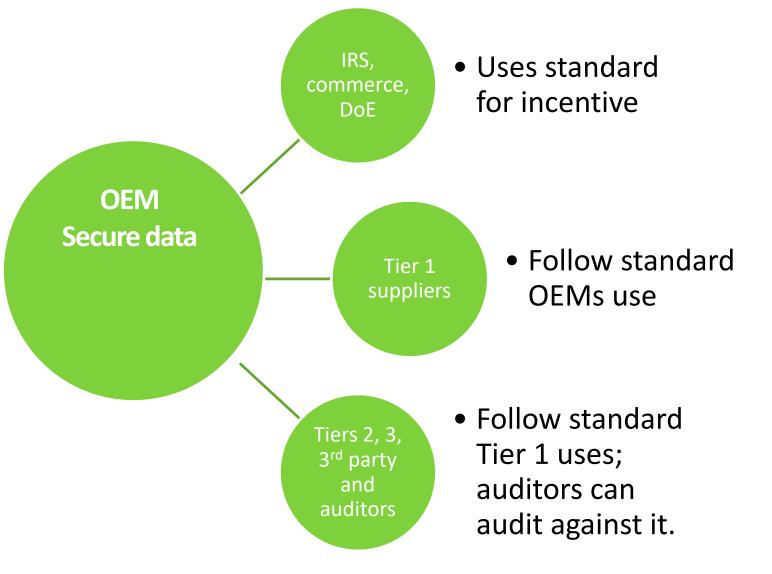
How?



Once standard proliferates in the supply chain consistency and benchmarking promote efficiency.

Producer information can establish a chain of custody that can be audited for mistakes/inconsistencies.

First step in enabling the tracking of products and ingredients throughout the supply chain, allowing for quick identification of issues and efficient recalls, thus fostering trust and identifying anomalies that occur in counterfeits and adulterated products. SAE is responsible for AS9100 which calls for supplier verification via auditing/NADCAP accreditation.



Example: guidance on which critical minerals to track



- a. The standard shall include disclosure of the critical minerals constituting the battery and their percentage of contribution to the battery. The standard shall focus on the minerals defined as critical by statute. Battery minerals highlighted.
 - i. According to Section) 45X C (6 of the US tax code, they include: aluminum, antimony, arsenic, barite, beryllium, bismuth, cerium, cesium, chromium, cobalt, dysprosium, erbium, europium, fluorspar, gadolinium, gallium, germanium, graphite, hafnium, holmium, indium, iridium, lanthanum, lithium, lutetium, magnesium, manganese, neodymium, nickel, niobium, palladium, platinum, praseodymium, rhodium, rubidium, ruthenium, samarium, scandium, tantalum, tellurium, terbium, thulium, tin, titanium, tungsten, vanadium, ytterbium, yttrium, zinc, and zirconium.
 - ii. Copper (based on recent executive order)
 - iii. Section 33 of the European Union's 2023 Battery Regulation cites the following as critical minerals: cobalt, lead, lithium and nickel.
- b. Producer Information/Chain of custody. Leveraging article 3 of the EUBP, which identifies battery's producer(s) and chain of custody, the standard shall include location information and producer of the critical minerals.
- c. Can be updated as list changes.

Typical time frame is 18-36 months

Goal is to create a standard that makes it possible to take advantage of incentives and comply with requirements through a common data scheme and nomenclature with recommended practice for OEMs and their suppliers. Also works for third party traceability companies and recyclers.

- ✓ 8/24 LiBridge stakeholder meeting at Argonne National labs
- ✓ 11/24 Initial traceability framework completed
- ✓ 12/24 Re-formation of SAE J3327
- ✓ 1/25 SAE GIM / Call for experts
- ✓ 3/25 Initial Draft
- ✓ 4/25
- ✓ 5/25 Public comment
- ✓ 6/25 Ballot
- □ 7/25 Revision and voting
- □ 8/25 Finalization and publication



Battery SOH, RUL, Reporting & Diagnostics Challenge



Every Traction Battery will need to comply with the European Battery regulations, beginning to come into force in mid-2023.

Regulation (EU) No 2019/1020 requires certain data be made available

Remaining capacity	The dates of manufacturing of the battery and putting into service
Overall capacity fade	Energy throughput
Remaining power capability and power fade	Capacity throughput
Remaining round trip efficiency	Tracking of harmful events, such as the number of deep discharge events, time spent in extreme temperatures, time spent charging during extreme temperatures
Actual cooling demand	Number of full charge-discharge cycles
Evolution of self-discharging rates	
Ohmic resistance and/or electrochemical impedance	

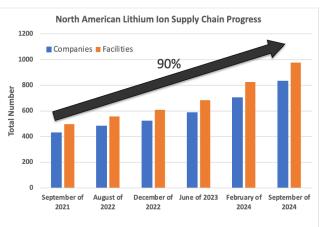
- SAE has developed Standards for SOC/SOH reporting
- Legacy OBD-2 format not required for EV's
 - Some EV's do not even have diagnostic connector
- Mandatory and Voluntary data / diagnostics reporting standard needed

More work needed on State of Safety, Remaining Useful Life, reporting diagnostics and critical events

- In April 2021, NAATBatt commissioned NREL to develop a database (DB) of companies that supply goods, equipment, and services to process, manufacture, or recycle high voltage lithium-ion materials, cells, battery packs, etc. in North America
- NREL released the first version of the DB on its <u>website</u> in September 2021 and since then every six months with updates to the DB and improvements to website.
 - More than 5000 Excel downloads of various versions
 - Released an easy to use and easy to search online version in February 2024
 - 2300 registrants to the version release in September 2024.
 - The Database shows almost **doubling** of companies & facilities between Sep 2021 to Sep 2024
 - A new update is expected to release Aug, 2025





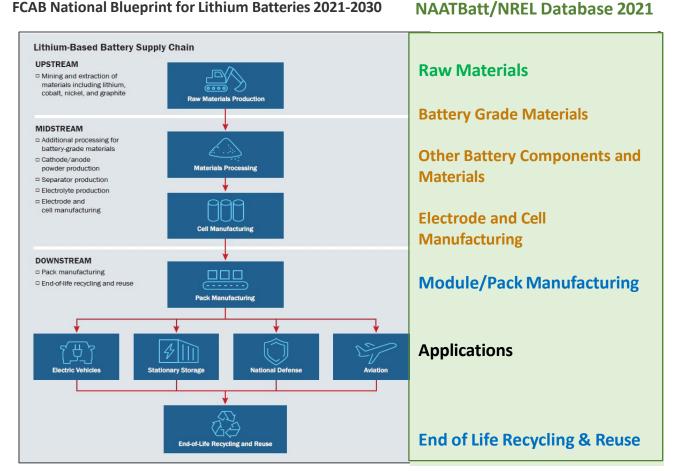


INTERNATIONAL

NAATBatt / DoE Battery Supply Chain Modeling



FCAB National Blueprint for Lithium Batteries 2021-2030



Manufacturing Supply Chain

- Raw Materials Minin
- Battery Grade Materials
- Other Battery Components and Materials
- Electrode and Cell Manufacturing
- Module/Pack Manufacturing

EOL Supply Chain Other Segment Supply Chains

- Equipment
- Service/Consulting
- R&D
- Modeling and Software
- Distributors

The public-facing data will provide a foundation for compartmentalized data interface within DoE

- -Manufacturers provide traceability information under NDA with DoE
- *DoE (VTO/NREL)-only: Fully mapped supply chain with critical information to:*
 - -Source of government audit information
 - -Allows "macro view" of full supply chain
 - Identify gaps/critical weaknesses in supply chain
 - *Inform policy to support robust, vertically-integrated and adaptable industry*
 - -Data evolves with diverse electrochemstries & markets
 - -Forward-looking: long-term view at growing industry at "the right pace"
 - -Apolitical, data-driven policymaking support
 - Allows US to compete with "near peer" industrial supply chain modeling and policymaking
 - -Reduces exposure to "export controls" and supply chain disruption

NTERNATIONAL





SAE is supporting standards to provide for safe electrification. We invite partners to help craft standards that support healthy growth of the EV and battery industry



Brian A. Engle Chairman, NAATBatt International Chief Safety Officer, NAATBatt International SAE Fellow Chair, SAE Battery Standards Steering Committee SAE International Director, Business Development, Amphenol +1 (248)978-5736 Brian.engle@amphenol-sensors.com