



Methodology for the assessment of due diligence schemes applying for recognition under Regulation (EU) 2023/1542 concerning batteries and waste batteries

FINAL DELIVERABLE

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Introduction

This document sets out a methodology for the assessment of due diligence schemes applying for recognition under Regulation (EU) 2023/1542 concerning batteries and waste batteries (henceforth EU Batteries Regulation).

While economic operators are individually responsible for the fulfilment of the due diligence obligations laid down in the EU Batteries Regulation, due diligence schemes can support economic operators in fulfilling their battery due diligence obligations in line with the OECD Guidelines for Multinational Enterprises and the United Nations Guiding Principles on Business and Human Rights.

The assessment process for the recognition of standard schemes under the EU Batteries Regulation presented in this document directly builds on and adopts the methodology of the OECD alignment assessments, adapting it to the regulation's specific scope.¹ The OECD alignment assessments and the assessment of due diligence schemes under the EU Batteries Regulation aim at the consistency of due diligence systems and practices with international due diligence frameworks, especially the OECD Due Diligence Guidances for the operationalisation of due diligence systems and processes.

BOX 1. ABOUT OECD RBC DUE DILIGENCE GUIDANCE

The OECD Guidelines for Multinational Enterprises on RBC (OECD Guidelines) are the most comprehensive international government-backed instrument on responsible business conduct (RBC) and have been adopted by 51 governments and the European Union (EU). They set out recommendations addressed by governments to multinational enterprises on all key areas of business responsibility, including human rights, labour rights, environment, bribery and corruption, consumer interests, disclosure, science and technology, competition, and taxation. They also set out the expectation that enterprises conduct due diligence to identify, prevent or mitigate and account for how actual and potential adverse impacts are addressed.

The OECD's due diligence guidances provide government-backed recommendations and a practical framework for implementing RBC due diligence as foreseen in the OECD Guidelines. The OECD Due Diligence Guidance for Responsible Business Conduct, which was launched in 2018, is adopted by 51 governments and was negotiated with business, trade unions and civil society. The Due Diligence Guidance for RBC applies to all sectors and industries and builds on existing sector-specific due diligence guidance. The OECD has developed sector-specific due diligence guidance for the minerals, agriculture, garment and footwear sectors, and good practice papers for the extractives and financial sectors.

The OECD Guidelines and due diligence guidances are together referred to in this document as 'OECD RBC instruments'.

¹ For more information on the OECD's alignment assessments, see <https://mneguidelines.oecd.org/industry-initiatives-alignment-assessment.htm>.



This methodology document sets out the following:

1. **Purpose, focus and process** of recognition of due diligence schemes under the EU Batteries Regulation
2. **Assessment methodology** that will be followed to obtain the information necessary to evaluate a due diligence scheme against the assessment criteria
3. **Interpretation and ratings** of assessment criteria
4. **Publishing the results** of a completed assessment of equivalency

The aim of this document is to guide assessors in the determination of due diligence schemes' equivalency with the EU Batteries Regulation, consistent with the OECD's approach to the Alignment assessments. This document should be read together with and interpreted on the basis of the EU Batteries Regulation, its delegated and implementing acts for the recognition of standard schemes, and relevant OECD due diligence guidance, including any supplements and annexes. **The assessment criteria are not intended to modify or alter in any way the obligations of the EU Batteries Regulation, nor the recommendations contained in the OECD RBC due diligence guidance and OECD Minerals guidance.**



1. Purpose, focus and process of OECD alignment assessments

1.1 Purpose of the recognition of due diligence schemes under the Regulation (EU) 2023/1542

Assessments of due diligence schemes under the EU Batteries Regulation determine whether due diligence schemes are equivalent to the requirements in Articles 48, 49, 50 and 52 of the EU Batteries Regulation and thus enable economic operators to meet these requirements. A positive determination of equivalency leads to the recognition of a due diligence scheme under the EU Batteries Regulation. Enterprises certified under a recognised due diligence scheme can demonstrate an increased level of confidence that their due diligence systems and practices meet the requirements of the regulation. Assessments shall also, as appropriate, periodically verify that recognised due diligence schemes continue to fulfil the criteria that led to a decision to grant recognition of equivalence pursuant to paragraph 2 of Article 53 in the EU Batteries Regulation.

In line with OECD alignment assessments, the assessment and recognition of due diligence schemes under the EU Batteries Regulation seeks to strengthen and harmonise schemes' approaches to due diligence and provide important clarity to stakeholders on the scope and credibility of individual schemes. Importantly, they go beyond desk-based review and include an evaluation of how schemes operate in practice.

While the due diligence obligations in the EU Batteries Regulation and the recommendations set out in the OECD RBC instruments are addressed to enterprises, assessments of due diligence schemes focus on the standards, activities, processes and systems of due diligence schemes (also referred to as sustainability initiatives in the context of OECD alignment assessments). **As such, recognition assessments under the regulation do not evaluate or draw conclusions about the adequacy of due diligence conducted by individual enterprises that participate in or are members of the due diligence scheme under assessment.**

The OECD alignment assessment methodology is flexible and can be adapted to assess a variety of due diligence schemes. This includes schemes that carry out due diligence activities on behalf of companies, for example by carrying out complaints handling or site-level risk monitoring, or providing traceability or chain of custody mechanisms. The methodology can also be adapted to assess schemes with a narrow scope, for example, a specific supply chain focus, issue coverage or geographical remit, (see **Error! Reference source not found.**). **For the purpose of the EU Batteries Regulation, the process, scope and focus of the assessment have been adapted to be consistent with the regulation's due diligence obligations.**

In line with OECD alignment assessments, the recognition assessments are not designed as 'audits' and this methodology document is not an audit protocol or standard. Rather, the assessments take a more comprehensive and evaluative approach to analyse documents, implementation activities and management systems. The assessment includes a central role for stakeholder interviews and consultation as well as on-site shadow assessments. Due diligence schemes are assessed on the degree to which they incentivise and/or require dynamic, risk-based due diligence in line with recitals (83) and (84) of the EU Batteries Regulation and consistent with OECD due diligence guidance (both the OECD Minerals Guidance and RBC Guidance). Each recognition assessment needs to be adapted to the specific context of the due diligence scheme being evaluated: in each case, the assessment methodology, scope and findings are adapted to reflect the individual scope and activities of the due diligence scheme under assessment (see Section 0).



1.2 Eligible due diligence schemes

In line with OECD alignment assessments, the Commission distinguishes between the following types of due diligence schemes for the purposes of recognition under the EU Batteries Regulation:

- (1) facilitate or support the due diligence process of an enterprise, including by carrying out due diligence activities on behalf of companies, but which do not assess or certify business practices, sites or products against requirements (**'facilitation schemes'**²); and
- (2) set requirements for and assess or certify individual business practices, sites or products (**'verification schemes'**³).

Many due diligence schemes carry out a mix of facilitation and verification activities.

For the purpose of the EU Batteries Regulation, the recognition of due diligence schemes is confined to verification schemes that must include certification or another form of approval decision against requirements under the due diligence scheme. In cases where a verification scheme also offers facilitation activities, the scoping exercise at the beginning of the assessment is to determine the extent to which these activities are to be included or to be out-scoped in the assessment.

See Sections 0 and 0 on how verification activities and facilitation activities are assessed, based on their nature and purpose.

A number of factors are to be considered during application and scoping of due diligence schemes:

- **Scope and focus:**
 - Raw materials: due diligence schemes must cover one or more of the raw materials listed in Annex X.1 of the EU Batteries Regulation,
 - Geographical scope: if any, the geographical scope of a due diligence scheme must be clearly specified during the application process. The geographical scope may be determined by design of the scheme or resulting from the scope of its members.
 - Entity scope, including type, number and supply chain stages of participating or assessed enterprises: due diligence schemes must cover one or more of the supply chain stages from primary and secondary raw material extraction up to and including the production of the battery active materials and the electrolyte.
 - Risk focus: due diligence schemes must cover one or more risk areas referenced under the three risk categories listed in Annex X.2 of the EU Batteries Regulation.
- **Due diligence integration:** whether the due diligence scheme includes due diligence-related requirements in its standards and activities, and publicly claims to integrate due diligence components;
- **Lifespan of the due diligence scheme:** Due diligence schemes need to demonstrate that they are operational for a sufficient time period in order to allow for the adequate assessment of the scheme's implementation. While there is no minimum time period, due diligence schemes need to provide

² The OECD uses the term "facilitation initiative". Facilitation initiatives refer to initiatives that facilitate or inform enterprises' risk management and broader due diligence responsibilities, but do not monitor, assess, assure, verify, or certify enterprise performance. They may, for example, provide information (e.g. country-level updates, sector-, product- or site-specific information, such as product or material life cycle assessment data, or chain of custody or other traceability information), tools (e.g. reporting templates, living wage assessment ladders, supplier assessment tools) and guidance (e.g. guidance on chemical management best practice, establishing grievance mechanisms, improving purchasing practices or supplier assessments) or set environmental or social targets or metrics for enterprises.

³ The OECD uses the term "verification initiative". Verification initiatives refer to initiatives that set written requirements for enterprises or products and monitor, assess, verify, certify, assure, or benchmark enterprises, sites, products, suppliers, or other business partners against those requirements.



documentation on the dates when they have been established and the roll-out of its operationalisation (e.g. start of first member certification process, date of first certified members and their recertification).

- **Status of policies, standards and implementation activities:** whether the due diligence scheme has clearly communicated its policies, standards and implementation activities to participating companies and whether they are up to date and accessible. For the Implementation Assessment, the due diligence scheme must have carried out relevant implementation activities for at least six months; and
- **Terms and Conditions:** The due diligence scheme accepts the Terms and Conditions governing the recognition of due diligence schemes (see Delegated and Implementing Acts).

1.3 Assessment components

A full recognition assessment requires **three** parts:

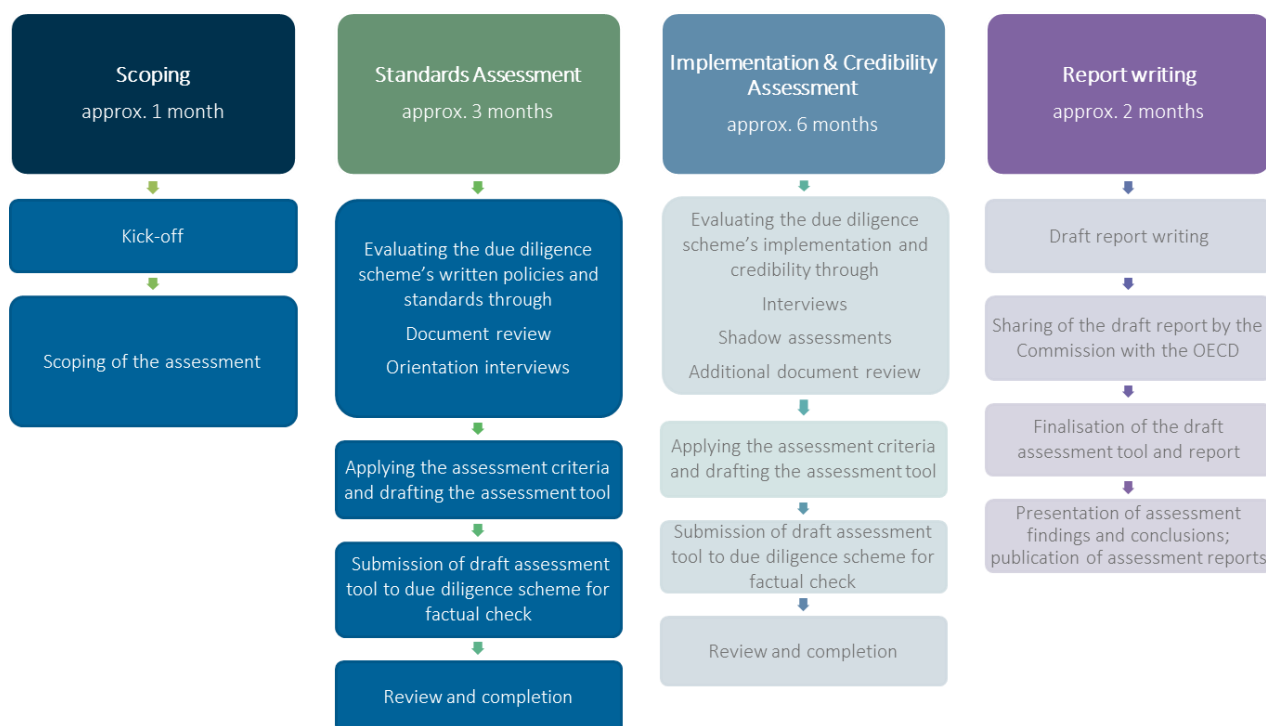
- **Standards assessment:** evaluates whether the due diligence scheme's written policies, standards, and other documents participating companies commit to under the scheme are equivalent with the due diligence obligations in the EU Batteries Regulation and consistent with the relevant OECD due diligence guidances (see Section 0) This also includes any due diligence activities the due diligence scheme itself conducts.
- **Implementation assessment:** evaluates the adequacy of the due diligence scheme's implementation of its written policies, standards and other relevant documents for participating companies under the scheme and, where relevant, the scheme's own due diligence activities. This can include, where relevant, evaluating the adequacy of the due diligence's monitoring and oversight systems including its annual performance checks or other assessments of enterprises, or the adequacy of a grievance mechanism or traceability system that a due diligence scheme provides (see Section 0); and
- **Credibility assessment:** evaluates the extent to which the due diligence's systems meet credibility criteria, including in relation to governance, assurance mechanisms (where relevant), claims rules, stakeholder engagement, transparency, conflicts of interest and cross-recognition (see Section 0).



1.4 Assessment process

Recognition assessments follow the process set out in Figure 1. The timeframes for the assessment steps are indicative and depend on the cooperation by the assessed due diligence scheme.

Figure 1. Steps of a typical full OECD alignment assessment



Note: This is a typical timeline. However, the duration, number of interviews and shadow assessments varies according to the due diligence scheme.

Due diligence schemes which have been notified about unsuccessful recognition may revise their written policies and standards, and/or update their processes and submit a repeat application based on their revised standards and requirements, the earliest 12 months after notification ([see Article XXX of the Delegated Act](#)). The scope and type of re-assessment, e.g. whether a full standard and/or implementation re-assessment is required, will be decided case by case basis by the Commission in consultation with the OECD, based on the gaps found during the previous assessment. In cases where an improved rating of less than 10 percent is sufficient to meet the conditions for recognition, a repeat application may be made within 3 months after notification (see *ibid.*).

1.5 Assessment criteria

The equivalency of due diligence schemes with the due diligence obligations in the EU Batteries Regulation, are assessed against pre-determined assessment criteria that are based on and adapted from the OECD alignment



assessment tools⁴ for the OECD due diligence guidances. The assessment tool includes assessment criteria and references to the relevant due diligence guidances.

The assessment encompasses the following criteria:

- **Due diligence criteria:** These include (a) due diligence criteria based on the expectations in the relevant OECD Minerals and RBC due diligence guidances, and (b) overarching criteria based on the key characteristics of due diligence set out in the OECD RBC guidance.
- **Credibility criteria:** These build on earlier OECD governance criteria and the examples of good governance for due diligence schemes set out in the OECD RBC guidance⁵.

The alignment assessment criteria include 143 criteria.

⁴ The alignment assessment tool for the minerals sector is available on <https://mneguidelines.oecd.org/industry-initiatives-alignment-assessment-minerals.htm>.

⁵ OECD Due Diligence Guidance for RBC, Box 3, p.52.



2. Assessment methodology

This chapter outlines the procedures and methodologies for each component of the assessment. Depending on the component, evidence is gathered and evaluated through the following activities:

- orientation interviews with the due diligence schemes;
- desktop review of relevant documents;
- on-site shadow assessments of relevant activities carried out by the due diligence scheme, such as audits or other assessments of enterprise performance; and
- interviews with internal and external stakeholders;

2.1 Scoping

As mentioned above, due diligence schemes vary significantly in their design, focus and core activities. They may be active at different points in the supply chain, in different geographies, or designed to cover some, but not all risks of Annex X in the EU Batteries Regulation. They also adopt very different governance and assurance systems and approaches to stakeholder engagement and transparency. The scoping phase is crucial as it determines the focus of the assessment based on an understanding of the specificities of the due diligence scheme. It is important to take time at the scoping process to understand the objectives and breadth of activities carried out by the due diligence scheme, the full list of relevant standards and other documentation, and the due diligence scheme's public claims. While scoping can be subjective, assessors will seek to take as informed a view as possible, as it can have a significant bearing on the duration, focus and quality of the assessment.

The scoping and planning phase includes the activities and methods set out below to collect information.

2.1.1 DETERMINE THE SCOPE OF ASSESSMENT

Due diligence schemes submit their application including complete information requirements (see Implementing Act and Article 3 of the Delegated Act) which the assessor uses to assess the eligibility of the application (see section 1.2 on eligible due diligence schemes). After successful application, this information also informs the scoping of the assessment, together with orientation interviews and documentation review. The scoping of the assessment is based on the due diligence scheme's public claims regarding its own scope and activities. For example, where a due diligence scheme claims publicly to cover the full supply chain but in practice focuses its requirements and oversight systems on a specific segment (e.g. manufacturers or processors), the due diligence scheme will be assessed against its wider public claims (i.e. full supply chain scope). The assessment would also highlight differences between what the scheme claims to do and what it does in practice.

Based on the information received during application and a scoping discussion with staff of the due diligence scheme, the evaluator decides on which:

- segments of the supply chain are in scope
- risk categories of Annex X in the regulation are in scope
- raw materials are in scope
- geographies are in scope
- levels, tiers or types of certification are in scope (if applicable)
- policies, standards and other documents are in scope (without limiting the ability of the assessor to seek appropriate evidence once the assessment is underway)



- activities of the due diligence scheme are in scope

For determining the assessment scope, the following important principles apply:

- **Due diligence steps:** The full set of due diligence obligations listed in chapter VII of the EU Batteries Regulation apply without exception. Entire steps or segments from the applicable OECD due diligence guidances may not be out-scoped even if they are not covered by the due diligence scheme's publicly claimed scope. For example, if a due diligence does not require and monitor an enterprises' public reporting or communications on due diligence, this requirement would still be assessed. If a due diligence scheme only provides a grievance mechanism, the remaining requirements in the regulation and applicable OECD due diligence steps would still be considered.
- **Individual criteria within steps:** Individual criteria within a step cannot be out-scoped (apart from supply chain-specific criteria, if applicable).
- **Supply chain scope:** A due diligence scheme will be evaluated against its publicly claimed scope. If the due diligence scheme claims to cover the full supply chain in a specific sector, it will be scoped accordingly even if in practice its standards and activities apply only to a specific supply chain segment. If it is clear in its public claims and communications that the due diligence scheme only covers a specific supply chain segment (e.g. mining or processing facilities), then it will be assessed against that narrower scope.⁶ The due diligence scheme is not penalised if it does not cover the entire supply chain and the report will clearly indicate the scope of the assessment. This principle applies equally to the geographic scope.
- **Risk categories of Annex X:** Risk categories can be out-scoped if they are not covered by the due diligence's publicly claimed scope. For example, a due diligence scheme that focuses on labour rights and working conditions would not be assessed on environmental risk issues. If the due diligence scheme's standards are unclear on its risk scope (e.g. human rights or labour rights scope), the due diligence scheme will be evaluated against the broader scope.
- **Raw materials:** A due diligence scheme will be evaluated against its publicly claimed scope of raw materials. For example, a due diligence scheme that focuses on lithium will be assessed against the extent to which it fulfils the assessment criteria with regard to lithium only. If the due diligence scheme publicly commits to the full scope or does not clearly specify the raw materials scope, it will be evaluated against the full scope of raw materials listed in Annex X of the EU Batteries Regulation. Any requirements of a due diligence scheme that concern raw materials other than those listed in Annex X of the regulation will be out-scoped.
- **Level and tier systems:** If due diligence schemes offer different types, levels or any other form of tiered certification that differ in the scope of requirements, the schemes must declare during application which type(s) of certification are to be evaluated for recognition. For example, if a due diligence scheme distinguishes between gold, silver and bronze certifications that differ in supply chain coverage, risk scope, required management systems or other, the scheme needs to state which level(s) it seeks recognition for. The due diligence scheme may only achieve recognition for those certification types, levels or tiers it applied for. For more information see section 2.6.

The scoping phase has important implications for each component of the recognition assessment. It determines the documents that are in scope for the standards assessment as well as the nature and focus of the implementation assessment and credibility assessment. For example, identifying in-scope documents for due diligence schemes will tend to involve identifying those documents that have binding character in terms of (a) the extent to which assessed or certified entities are expected to comply with the provisions in the document, and (b) the extent to which assessors or certification bodies are required to include the document in their assessment.

⁶ This can also mean that specific criteria are out-scoped according to the supply chain scope of the due diligence scheme.



Scoping decisions can also involve reflecting different criteria set by the due diligence scheme according to pre-defined performance levels.

Critically, scoping outcomes also impact the conclusions that can be drawn from the assessment and how companies should (and should not) use the due diligence scheme in their own due diligence. For example, an assessment of an upstream due diligence scheme whose core activities are site-level risk monitoring and traceability allows for conclusions about the adequacy of only those in-scope activities. If the due diligence scheme does not provide oversight or assurance of supplier conduct, downstream buyers and other stakeholders cannot use the scheme to draw conclusions about the quality of suppliers' due diligence. Clear and accurate communications on the scope and findings of assessments is therefore key. See Chapter 0 below.

2.1.2 DUE DILIGENCE SCHEME PROVIDES ALL RELEVANT DOCUMENTATION

After successful application by and completed scoping of the due diligence scheme, the scheme provides a list of all available documents and shares with the evaluator all documents that the evaluator deems relevant. The requested documentation typically exceeds the documents provided during the application in order to conduct a detailed assessment of the due diligence scheme against the criteria catalogue (see next step). The Commission and assessors treat all provided documentation with due regard of commercial interests. The due diligence scheme needs to ensure in good faith that relevant stakeholders, such as participating companies in the scheme, engage with the assessment. It must also be ensured that the assessment process and the need to share information between evaluators, the European Commission, EU Member States authorities (National Competent Authorities, Market Surveillance Authorities, Notifying Authorities), and the OECD are not being undermined by the scheme's processes, participating companies, or non-disclosure and other agreements.

2.2 Standards assessment

The standards assessment includes the following activities and methods to collect information:

2.2.1 IN-DEPTH REVIEW OF THE DUE DILIGENCE SCHEME'S DOCUMENTS AGAINST THE ASSESSMENT CRITERIA

The evaluator will apply the assessment criteria and review the due diligence scheme's documentation against them. If deemed necessary, the scope of the assessment can be altered. During the document review the evaluator analyses thoroughly:

- the written policies and standards that the scheme sets for enterprises; and/or
- the written policies and standards relevant to the scheme's own activities within scope of the assessment.

The purpose of the document review is to:

- further adjust the scope of the assessment as necessary;
- evaluate the alignment of the scheme's written policies and standards with the assessment criteria based on the EU Batteries Regulation and the international frameworks listed in Annex X, point 4.

It is not necessary for written policies and standards to repeat the assessment criteria word-for-word to be rated as aligned, but the most relevant detail and central purpose, spirit and intent of the criteria must be incorporated – based on the evaluator's professional judgement.

Relevant documentation for the standards assessment can include the following:

**Table 1. Documentation relevant to the standards assessment**

Types of documentation	Indicative examples of documents
Due diligence scheme policies and standards for enterprises These are the policies and standards that due diligence schemes set for member or participating enterprises relating to RBC due diligence.	▪ Requirements, criteria, policies or standards applicable to member or participating enterprises ▪ The due diligence scheme's RBC due diligence policies and codes of conduct ▪ Country-, commodity-, product- or risk-specific policies that enterprises are expected to adhere to or implement ▪ Risk-specific assessment or prevention and mitigation tools ▪ Risk assessment protocols, tools or standards for enterprises (e.g., how audits or training are to be commissioned and performed, guidance or tools for carrying out in-house audits or evaluating third-party audits) ▪ Action plan criteria or templates ▪ Reporting criteria or templates
Guidance and capacity-building documents	▪ Guidance (e.g., for enterprises on how to integrate the due diligence scheme's requirements into business processes and activities or technical guidance on specific risks relevant to enterprises) ▪ Guidance on audits or other assessments (e.g., how audits or training are to be commissioned and performed, guidance or tools for carrying out in-house audits or evaluating third party audits) ▪ Capacity building material for enterprises, their suppliers/business partners or assessors
Due diligence scheme standards and policies relevant to its own due diligence activities, as relevant	▪ Assessment protocols and guidance relevant to the scheme's staff ▪ Risk- or country-specific guidance and tools for the scheme's staff ▪ Training and other guidance materials for staff
Performance reports and/or training reports	▪ Performance and training report templates, examples of audit reports or risk assessment reports of enterprises ▪ Training material, protocols, or reports
Communication materials provided to participants of the due diligence scheme and other stakeholders This can include information relating to the scheme's requirements, assessment process, core activities, updates on the development and implementation of the scheme, or performance information that benefits enterprises and stakeholders.	▪ Communication material that introduces and explains the due diligence scheme and its objectives and core activities

2.3 Implementation assessment

The implementation assessment includes the following activities and methods to collect information:

2.3.1 REVIEW OF DOCUMENTS RELATED TO IMPLEMENTATION AND CREDIBILITY

The implementation assessment starts with a review of documents concerning (a) the implementation of the due diligence's policies and standards for enterprises, including the adequacy of the scheme's monitoring, oversight and accountability mechanisms to ensure criteria are met; and (b) the implementation of its own due diligence activities, where relevant. These will inform the focus of the interviews and shadow assessments.

Relevant documentation to review at this stage can include the following:

**Table 2. Documentation relevant to the implementation assessment**

Types of documentation	Indicative examples of documents
Due diligence scheme requirements for assessors/trainers/staff These can include documents on how the due diligence scheme seeks to implement its requirements and/or facilitation activities.	▪ Scheme's assessment process and protocols (e.g., certification programme) or training programmes ▪ Guidance (e.g., how audits or training are to be commissioned and performed, alongside any guidance that schemes provide to assessors to inform their work)
Performance, assessment and/or training reports These can include documents relating to the assessment, monitoring and oversight of participating or member enterprises and the assurance system, where relevant.	▪ Performance or assessment reports of enterprises or audit reports and protocols, as relevant ▪ Training material, protocols, or reports
Due diligence scheme's internal processes and policies These can include documents related to the credibility of the due diligence scheme such as its governance structure, disclosure, oversight on assessors and enterprises, assurance processes and information on how the scheme itself is managed.	▪ Internal policies and procedures (e.g., on governance, independence, oversight, and objectivity, including conflicts of interest) ▪ Assessor/auditor acceptance processes and performance monitoring ▪ Bylaws or equivalent ▪ Terms of reference of relevant committees ▪ Minutes of decision-making meetings ▪ Documents from the oversight system (monitoring tables, emails, records) ▪ Annual reports
Monitoring and evaluation and impact assessments These can include documents relating to the due diligence scheme's internal monitoring and evaluation systems, risks that could impact the scheme or members, and internal impact assessments.	▪ Scheme's monitoring, data collection and evaluation systems ▪ Third-party assessments of the scheme or a specific aspect of the scheme, such as a review of the scheme's risk assessment or grievance mechanism ▪ Performance or impact assessments of the scheme (internal, by a third-party or a formal regulatory or oversight body)
Guidance and capacity-building documents	▪ Evidence of training or other capacity building, events and roundtables for participating companies or their suppliers ▪ Evidence of training delivered to auditors or other assessors ▪ Evidence of training delivered to the scheme's staff on assessments and quality control
Due diligence scheme standards and policies relevant to its own due diligence activities, as relevant	▪ Assessment guidance relevant to the scheme's staff or evidence of capacity building or other internal communications and meetings on relevant topics ▪ Risk- or country-specific capacity building or other internal communications and meetings ▪ Evidence of trainings other activities being carried out by the scheme's staff
Consultations, reports, or investigations with and/or by external stakeholders External stakeholders may conduct investigations that critique the due diligence scheme or its participants and may highlight risks in the supply chain or provide evidence of positive impacts and performance.	▪ Reports by international organisations, academic institutions, industry, governments, civil society, monitoring organization or other stakeholders ▪ Media reports ▪ Opinions expressed in public or closed-door consultations on the scheme's activities
Communication with participating or member enterprises These can include evidence of communication with enterprises to evaluate how due diligence schemes inter-act with enterprises, incentivize and encourage progressive improvement, and identify and follow-up on red flags.	▪ Evidence of communications with member or participating enterprises ▪ Call or meeting notes and agendas ▪ Data management and communication tools

2.3.2 SEMI-STRUCTURED INTERVIEWS

Interviews form a key input into implementation assessments for the recognition of due diligence schemes under the EU Batteries Regulation. They will be conducted with:

- members of a scheme's board or other oversight mechanism, senior management and key staff;
- participating or member enterprises;



- auditors or other assessors and reviewers;
- relevant stakeholders that are affected by the due diligence scheme (e.g. downstream buyers that use or rely on the scheme, suppliers to participating or member enterprises that are impacted by the scheme, customers, workers and trade unions, government and civil society).

The evaluator conducts qualitative, semi-structured interviews with a representative sample of internal and external stakeholders. Assessments of due diligence schemes that are active at more than one point in the supply chain (e.g. which assess the performance of downstream enterprises and carry out assessments, risk monitoring or stakeholder engagement at suppliers) and have a broad geographic scope tend to require a greater number of interviews than schemes with a more limited scope.

Factors to consider when determining the sample size for semi-structured interviews include:

- the complexity of the due diligence scheme's activities in-scope of the assessment;
- the number and diversity of staff members of the scheme that are involved in reviewing member enterprises or conducting activities on behalf of member enterprises;
- the number of countries in which the due diligence scheme operates and the location of members;
- the number of stakeholders affected by the due diligence scheme.

As the assessment is an evaluation, not an audit, there is flexibility in the sample size for interviews, but the rationale for the chosen sample needs to be clearly stated and explained in the final report and in stakeholder consultations. Any relevant limitations to the interviews conducted will be stated in the final alignment assessment report.

2.3.3 SHADOW ASSESSMENTS

The assessor will conduct a representative sample of on-site shadow assessments to observe the implementation activities of the due diligence scheme.

- Shadow assessments of due diligence schemes involve shadowing audits or other assessments of participating or member enterprises. The purpose of shadow assessments is to observe how the assessor or auditor evaluates participating enterprises against the due diligence scheme's requirements or standards, and the adequacy of the scheme's oversight and accountability mechanisms. Where the due diligence scheme also carries out due diligence activities (e.g. chain of custody, risk monitoring, capacity building or complaints handling), additional shadow assessments can be undertaken to evaluate their alignment with the relevant criteria.

The assessor will determine for the shadow assessments (a) an appropriate sample size, and (b) a representative selection of activities to shadow.

The **appropriate size** of the sample will be determined using a risk-based approach and depending on the core activities of the due diligence scheme being evaluated. The sample will be sufficient to provide an informed understanding of how the due diligence scheme's standards are being applied in practice.

Factors to consider when determining the appropriate sample size for shadow assessments include:

- where relevant, the number of participating or assessed enterprises over a period of 12 months;
- frequency of the in-scope activities, such as audits or trainings (where relevant);
- complexity of the in-scope activities of the due diligence scheme that are being assessed;
- the number of geographies in which the due diligence scheme operates and location of participating or assessed enterprises, where relevant; and
- the number of stakeholders affected by the due diligence scheme's activities.



The evaluator then selects a **representative sample** of activities to shadow, with the aim of covering a sufficient variety of activities. The evaluator participates in the shadow assessment as a silent observer and does not interfere.

The assessor selects the audits or other assessments they wish to shadow from a list of upcoming and planned assessments during the assessment period. Relevant factors to ensure sufficient variety and a representative sample can include:

- auditing company and auditors;
- size of entities (small, large);
- type of entities (e.g. in terms of products, business model, position in the supply chain);
- location of entities (e.g. country, region, circumstances such as export processing zones or free trade zones);
- type of assessment (e.g. first assessment vs. re-assessment/re-certification audit, if relevant);
- sectors or sub-sectors (if relevant);
- past results (e.g. diverse levels of certification or corrective actions in the past, if relevant); and
- number and locations of assessed enterprises.

As for interviews, there is flexibility in the sample size for shadow assessments, provided the sampling allows for an informed understanding about how the due diligence scheme's relevant standards and activities are being applied in practice. In all cases, the rationale for the chosen sample will be explained in the final public report and in stakeholder consultations.

Shadow assessments are an integral part of the assessment without which the recognition process cannot be completed. Due diligence schemes are therefore encouraged to support their organisation in order to avoid delays. It must be ensured that assessors are free to choose from available audits without interference from due diligence schemes. The selection of audits is to be approved by the Commission. Due diligence schemes must support the assessor's organisation of the shadow audits as needed.

2.3.4 ENHANCED CHECKS

Where assessors identify red flags relating to the due diligence scheme's own processes and systems, such as indicators of systemic issues that could impact the credible functioning of the scheme or its ability to meet in-scope due diligence-related criteria (e.g. evidence of systemic conflicts of interest, of credible public allegations of systemic fraud), assessors are expected to carry out additional and proportionate checks, and commensurate with the nature, severity and likelihood of the issue. These can include, for example, requests for adequate additional evidence from the due diligence scheme, additional interviews with the scheme's staff and stakeholders, including relevant EU and national authorities, and additional site visits.

It is important that, should such circumstances arise, the organisation applying for recognition provides sufficient flexibility and required resources to allow such additional checks to be undertaken.

2.4 Credibility assessment

The credibility assessment evaluates the extent to which the due diligence scheme's internal management systems meet credibility criteria in the assessment criteria catalogue, including in relation to governance, assurance, claims rules, stakeholder engagement, transparency, conflicts of interest and cross-recognition. The credibility assessment is informed by:

- the evidence collected during the standards assessment and implementation assessment;
- additional data collection, as necessary, to evaluate the credibility criteria;



- follow-up interviews with staff of the due diligence scheme and external stakeholders.

2.5 Cross-recognition and third-party schemes

Many due diligence schemes recognise or rely on other schemes to carry out activities or provide tools or information to participating enterprises (e.g. supplier audits, capacity building, complaints handling, site-level risk information, chain of custody systems). Some due diligence schemes allow participating enterprises to use information or tools from third-party schemes to demonstrate compliance with specific requirements (e.g. supplier audits or certifications). This type of recognition between schemes can be particularly relevant to avoid duplicative efforts or where an due diligence scheme does not have the expertise or resources to carry out the relevant activity.

Where due diligence schemes recognise or rely on third-party schemes, or allow enterprises to use third-party schemes as part of their due diligence, the recognition assessment will evaluate whether the scheme has adequate governance and quality assurance in place to avoid undermining its own due diligence standards and their implementation. This is part of the credibility assessment but will also be considered during all other components of the recognition assessment as relevant. While the assessment does not incorporate a full assessment of cross-recognised schemes, where relevant the evaluator will assess how the due diligence scheme's standards and policies address cross-recognition of third-party schemes and use of third-party tools or activities (e.g. third-party audits), including:

- whether the due diligence scheme requires enterprises to check the credibility of the relevant third-party tool, activity or scheme;
- whether the due diligence scheme sets clear expectations on how enterprises should use the third-party tool, activity or scheme as part of their own due diligence;
- the scope of due diligence activities carried out by the third-party scheme;
- the adequacy of the due diligence's oversight processes, such as whether it evaluates how participating enterprises use and checks the credibility of third-party scheme; and
- the adequacy of the due diligence scheme's cross-recognition mechanism for evaluating and cross-recognising third-party schemes and the tools, activities or information they may provide.

Recognition of due diligence schemes does not lead to recognition of third-party schemes cross-recognised under the recognised due diligence scheme. The recognition assessment must evaluate whether enterprises certified under a recognised scheme must and do declare publicly whether and for which of the scheme's aspects or requirements they use third-party schemes, including the schemes' names. Aspects and requirements for which enterprises use cross-recognised third-party schemes are not recognised under the EU Batteries Regulation and are not to be considered certified under a recognised scheme.

2.6 Due diligence schemes with more than one performance level

Due diligence schemes that work as verification schemes increasingly reward different levels of performance to participating enterprises (e.g. bronze, silver, gold, or level 1, 2, 3). Level systems may consider factors such as supply chain coverage (tier 1 to tier n), risk scope, required management systems and processes, etc. Typically, yet not necessarily, level systems require their members to progress over time to maintain membership/certification, but mandated timeframes and scale of improvement vary significantly across due diligence schemes. Level systems may range from simple linear level progression (e.g. bronze, silver, gold) to more complex and granular setups. The rewarded performance level may be based on fulfilling all mandatory criteria, meeting specific thresholds or scoring



points from a mix of criteria. Some due diligence schemes do not reward any levels but only overall points or percentages.

In principle, level systems and similar approaches can have positive effects on enterprises' due diligence performance because they incentivise improvement and acknowledge that no system is perfect. However, several factors will be considered during the assessment of such schemes to ensure their standard system does not undermine due diligence as required by the EU Batteries Regulation and the international frameworks listed therein, for example:

- Does the due diligence scheme require or incentivise meaningful improvement? For example, are enterprises aiming for significant improvement within appropriate timeframes rather than incremental changes or a focus on the lowest common denominator?
- Does the level system facilitate risk-based due diligence or can enterprises choose which criteria to achieve a certain level? Risk-based due diligence requires enterprises to focus primarily on identifying, understanding and reducing risks in the supply chain and not to focus on management policies and systems.
- How are audit results published and do reports and labels unambiguously indicate achieved performance levels?

Overall, the assessment evaluates what claim an enterprise certified under a certain level of a due diligence scheme can make and how this claim enables economic operators to conduct due diligence in line with the EU Battery Regulation's requirements. If a due diligence scheme does not reward any levels or thresholds but only an overall percentage or score, recognition can only be achieved for a 100 per cent achievement level or full score.



3. Interpretation and ratings

3.1 Interpreting assessment criteria

The evaluator will interpret all elements of the assessment criteria and guidance literally, to the extent possible, and refer to the relevant provisions of the EU Batteries Regulation and OECD guidances. The evaluator may also refer to completed alignment assessments as available, other OECD documents and reports related to interpretation and implementation of the OECD Guidance and, where necessary, consult with the OECD.

3.2 Documenting analysis and conclusions

The evaluator completes the assessment tool by analysing the information collected against each assessment criterion. The evaluator:

- assigns two separate ratings for each criterion in scope against (a) written policies and standards; and (b) implementation;
- justifies each rating by briefly describing the observations and reasoning for the ratings.

The observation will contain concise but sufficiently detailed analysis to explain each rating. It includes the necessary and most relevant evidence such as listing the relevant document and providing a precise extract from or clear references to relevant parts/sections (including page numbers or interviews/shadow assessment observations from the implementation assessment). The aim is that relevant stakeholders and the due diligence schemes being assessed can understand why the evaluator has reached a particular conclusion. Commercial confidentiality concerns and concerns around stakeholder anonymity may mean that in some instances it is appropriate that the evaluator anonymises certain information, but not at the expense of removing meaning from the evaluator's observation of why a criterion has been rated in a particular way.

In the course of a recognition assessment, the evaluator may find that one piece of evidence provides the information necessary to rate multiple criteria. This is acceptable; however, the evaluator will make it clear that each criterion has been individually considered and how or why the evidence justified the rating given. Criteria will not be rated without an explanation.

3.3 Evaluating and Rating

3.3.1 RATING PER CRITERION

All criteria can be rated as “not aligned,” “partially aligned,” “fully aligned” or “out of scope” for each of the standards assessment and the implementation assessment.⁷

Due diligence criteria are distinguished into overarching criteria and the criteria for each of the OECD's six due diligence steps. Overarching criteria (criteria A in the criteria catalogue) capture the general principles of due diligence (e.g. risk-based due diligence, progressive improvement, stakeholder engagement, etc.). They are being assessed against the overall performance of the due diligence scheme under each of the steps and must be 100% fully aligned..

⁷ Fully aligned criteria can also receive a “with recommendation” in cases where minor observations should be noted. The recommendation does not affect the overall rating, but is set out clearly in the tool and final report.



Although assessments are adapted on a case-by-case basis, general principles for rating due diligence criteria apply. The Table below sets out an indicative guide to how individual criteria will be assessed and rated. In all cases, the detailed methodology used by the evaluator will be explained in the final assessment report.

Table 3. Rating due diligence criteria (examples)

Rating per criterion (due diligence criteria)	Rating for policies and standards	Rating for implementation
Fully Aligned	- The criterion is fully addressed in the scheme's policies, standards, or other formal documentation; - Corresponding definitions of key terms and concepts are clearly articulated; and - Language and the degree of obligation, where relevant, is clear and consistent in key standards documents. The standard sets clear and consistent requirements for enterprises.	There is sufficient evidence to conclude that the criterion is adequately assessed and/or implemented by the scheme and/or that it has adequate monitoring, oversight and accountability mechanisms relating to enterprises' performance against the criterion. Note that the IA focuses on the adequacy of the scheme's audit/assessment in relation to the content of the criterion, not only on the quality of the audit/assessment against the scheme's own requirements.
Partially Aligned	- The criterion is only partially addressed in the scheme's policies, standards, procedures, or other formal documentation (i.e. some aspects are not addressed); or - The criterion is addressed in one document but inconsistently or without clear language and degree of obligation, or not addressed across other key standards documents; or - The policy, standard or other documentation lacks definitions of key concepts relevant to the criterion; or - For verification schemes: The criterion is only addressed through recommendations (e.g. "should", "can" or "may") in at least one key standards document even though another document formulates a requirement.	There is sufficient evidence to conclude that the criterion is adequately assessed and/or partially implemented by the scheme. The scheme undertakes some monitoring and oversight and has put in place accountability mechanisms relating to enterprises' performance, but these are inadequate or partially adequate.
Not Aligned	- The criterion and its key definitions are not, only marginally or vaguely addressed in the scheme's policies, standards, procedures, or other formal documentation; or - The criterion is partially addressed in one document, but very inconsistently or not addressed in other key standards documents; or - The standard sets incentives that conflict with the core meaning and intention of the criterion and due diligence more broadly.	There is sufficient evidence to conclude that the criterion is not or only marginally assessed or implemented by the scheme. The scheme undertakes inadequate or extremely limited implementation measures and/or has inadequate monitoring, oversight and accountability mechanisms relating to enterprises' performance.
Out of scope	A particular set of criteria/steps is not relevant for the scheme. For example, if the scheme only covers upstream enterprises and the criterion is only applicable to downstream enterprises, or if the criterion is only applicable for certain minerals outside the scope of the regulation.	

Each 'Fully Aligned' criterion scores two points, while a 'Partially Aligned' criterion scores one point. 'Not Aligned' criteria score zero points.

3.3.2 EVALUATING AND RATING DUE DILIGENCE CRITERIA

Given the breadth and variety of due diligence schemes that recognition assessments may assess, the approach to evaluating and rating criteria depends on the due diligence scheme's scope and core activities, including whether it only sets requirements for and evaluates companies' due diligence performance, or also facilitates due diligence through tools, guidance or other activities. For example:



For **verification activities**:

- The standards assessment focuses on the extent to which the due diligence scheme sets clear and consistent requirements for enterprises aligned with the content in the recognition assessment criterion.
- The implementation assessment and credibility assessment focus on the adequacy of the due diligence scheme's monitoring and oversight systems. This includes, for example, using shadow assessments, document review and interviews to evaluate the adequacy of any audits or other performance assessments against the criterion and overall assessment oversight and assurance mechanisms, where relevant.

For **facilitation activities**:

- The standards assessment focuses on whether standards, policies, tools, guidance or other formal documentation relating to the activities carried out by the due diligence scheme, such as complaints handling or traceability, are sufficiently clear and consistent and align with the content in the assessment criterion. Section 1.2 eligible schemes.
- The implementation assessment and credibility assessment focus on the due diligence scheme's implementation of the in-scope activities. This includes, for example, using shadow assessments, document review and interviews to evaluate whether the implementation of a complaints handling or traceability system, as relevant, is aligned with the criterion.

As mentioned in section 1.2 on eligible due diligence schemes, only verification schemes may become recognised under the EU Batteries Regulation, may they include facilitation activities or not. If a verification scheme includes facilitation activities, the Commission will decide during application and scoping on the extent to which these activities are to be included in the assessment. Due diligence schemes that exclusively offer facilitation activities without any certification or approval decision against requirements are not eligible for recognition.

3.3.3 KEY CONSIDERATIONS FOR EVALUATING DUE DILIGENCE SCHEMES

Assessing a due diligence scheme for recognition under the EU Batteries Regulation involves translating the mandatory requirements for economic operators in the EU Batteries Regulation into mandatory requirements for the due diligence scheme's systems and operations.

Assessments of due diligence schemes focus on the extent to which the requirements of the due diligence schemes are sufficiently clear and aligned with the regulation and international frameworks listed therein, and the adequacy of the due diligence scheme's assessment and oversight mechanisms to ensure that those requirements are met.

It is important to consider the precise language in order to ensure the mandatory character of requirements (see **Error! Reference source not found.**).

BOX 2. ASSESSING MANDATORY AND ASPIRATIONAL CRITERIA

Due diligence schemes often use language that varies in its degree of obligation. Mandatory criteria can use terms such as "shall" or "must," while aspirational criteria tend to use terms such as "could," "may" or "should" to express recommendations or other optional criteria. These differences in language are important because they determine what verification schemes expect from their participating or member enterprises for a certain performance level or in order to issue a product or facility certificate and the degree of oversight they have. While the exact wording varies according to each due diligence scheme, it is important that any requirements are set out in clear language for stakeholders. Vague, aspirational, or inconsistent language between documents can result in core due diligence elements being entirely outside the scope of what the due diligence scheme requires and checks. Recommendations are in practice outside the scope of verification activities. As a result, the recognition assessments do not consider recommendations to be at the same level or have the same weight as requirements



as they do not inform whether a company is certified or not, or the claims that a company can make as a result. The assessment otherwise risks allowing for “Fully Aligned” results for verification schemes where the due diligence scheme does not, in practice, expect companies to fulfil the criterion.

The final assessment report must clarify any scoping decisions taken, including if aspirational criteria were included in the analysis to inform external stakeholders what the assessment result means and what conclusions can (and, importantly, cannot) be drawn from the findings.

3.3.4 CREDIBILITY CRITERIA

Credibility criteria are rated as ‘Fully Aligned’, ‘Partially Aligned’ or ‘Not Aligned’. The corresponding conclusions, analysis and recommendations on the due diligence scheme’s credibility will be included in the final assessment report. Similar to the due diligence criteria, each ‘Fully Aligned’ criterion scores two points, while ‘Partially Aligned’ criteria score one point.

3.4 Feedback loop and factual check

After the assessor has evaluated and rated a due diligence scheme against the assessment criteria and completed the assessment tool (standard, implementation and credibility assessment), the draft tool will be shared with the due diligence scheme for factual checking only. The scheme owner can request factual corrections based on presenting additional and sufficient evidence. Additional evidence cannot include newly drafted documents or new activities, but must pre-date the start of the assessment component for which it is presented. It is the prerogative of the assessor to decide if the evidence is sufficient to lead to a rating change.

3.5 After having received the feedback from the scheme owner, the assessor finalises the draft tool

The assessor updates the assessment tool as needed and calculates the results of the assessment. After finalisation of the draft tool, the overall result of the assessment will be calculated and reported as follows:

Table 4. Calculation of overall results

Overall result	Score
Fully Aligned	(overarching criteria = 100% of criteria 'Fully Aligned') + (each step + credibility criteria = 80% or more criteria 'Fully Aligned') + + (no 'Not Aligned' criteria)
Partially Aligned	All other combinations between 'Fully Aligned' and 'Not Aligned' category thresholds. In practice, this means: (overarching criteria = 50% or more criteria at minimum 'Fully Aligned') + (each step + credibility criteria = under 20% criteria 'Not Aligned')
Not Aligned	(overarching criteria = less than 50% of criteria 'Fully Aligned') OR (each step + credibility criteria = 20% or more criteria 'Not Aligned')



4. Stakeholder consultation and publishing assessment results

4.1 Report and publication

The conclusions of recognition assessment are captured in a final assessment report after the finalisation of the assessment tool (see section 3.5). A draft of this report is to be shared by the assessor with the Commission which shall share the draft report with the OECD to receive its opinion before finalisation of the report (see Article 8 of the Delegated Act). The assessor will finalise the assessment tool and report, presenting the findings and conclusions to the Commission.

The Commission will publish the final assessment report if a due diligence scheme achieves recognition (see Delegated Act Article 12.1).

4.1.1 COMPONENTS OF THE REPORT

The report describes the assessment results and key findings, consistent with the analysis and rating in the assessment tool. It is recommended that the report includes contextual information alongside details of the assessment results, to assist readers in understanding the findings and any associated recommendations resulting from the assessment.

The report will include:

- a clear and accurate summary of the assessed due diligence scheme and its scope, including a summary of the scheme's approach to and system for monitoring, oversight and accountability of participating enterprises and any other in-scope activities;
- Information on the scope and methodology of the assessment, including:
 - any limitations or interpretations of EU Batteries Regulation, its delegated and implementing acts on the recognition of due diligence schemes, and the international frameworks listed in Annex X, point 4, of the regulation;
- a list of out-scoped criteria and the reason why they were out-scoped;
- sampling methodologies;
- the number of interviews conducted and categories of stakeholders interviewed and consulted;
- the number and type of shadow assessments conducted and the geographical focus of those assessments;
- a detailed summary of the analysis and conclusions, including the main strengths and opportunities per due diligence step, for the over-arching criteria and the credibility assessment;
- ratings for each criteria in-scope (for each of the standards assessment, implementation assessment and credibility assessment); and
- annexes (assessment tool with rating and justification of the rating per criterion; list of documents assessed; number of interviewees by stakeholder group; number and type of shadow assessments; additional methodological considerations).

Prior to publication, the due diligence can review and react to the findings and recommendations of the draft report and raise any final factual concerns, however, it remains the prerogative of the assessor to decide if the evidence is



sufficient to lead to any revisions to the conclusions. Changes in the rating and evidence resulting from a potential re-assessment will be noted in the results report.

Note that care is taken to protect sources and any confidential commercial information that may have relevance to findings or recommendations, including through anonymising all analyses and evidence in the assessment tools and final reports. The due diligence scheme under assessment is provided with the anonymised tools and report. For further information see also Delegated Act Article 12.



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