A FIELD SPEC, A WORKED EXAMPLE, AND SUPPLIER QUESTIONS

The battery provenance record

The fields a DoD prime or auditor will expect, what a complete record looks like, and the questions to put to your cell supplier. For drone and pack programs facing NDAA Sections 154 and 842.

WHY THIS RECORD EXISTS

Two DoD provisions now restrict where battery cells can come from. Section 154 of the FY2024 NDAA bars the Department of Defense from buying batteries produced by six named Chinese manufacturers, effective October 1, 2027. Section 842 of the FY2026 NDAA, signed in December 2025, goes further: it bars advanced batteries, their cells, and key components that are owned, sourced, refined, or produced by a foreign entity of concern, meaning a company located in or controlled by China, Russia, Iran, or North Korea. Its restrictions phase in from January 1, 2028, and reach upstream past final assembly. Origin and ownership, not the label on the pack, decide compliance.

If you sell batteries or packs into DoD programs, directly or as a subcontractor at any tier, you will have to show your cells are clean. The implementing DFARS clauses are still being written, so the exact certification language is not final. The way to be ready regardless is to hold a per-lot record tying every cell to its manufacturer, its plant and country, its ownership, and your own test evidence. The spec below is that record. Carve-outs exist for some commercial off-the-shelf items and through a narrow waiver, so confirm how the rules apply to your contracts.

THE RECORD, FIELD BY FIELD

For each cell lot you receive, a record that survives scrutiny carries these fields. Most teams capture the identity fields and stop. The origin, ownership, and evidence fields are what turn a claim into proof.

IDENTITY	
Cell manufacturer (legal entity)	The company that actually made the cell, not the broker, trading house, or distributor you bought it from. Both Section 154 and Section 842 key on who produced it.
Cell part number / model	The manufacturer’s part number, not your internal SKU alone.
Lot or batch ID	The manufacturer’s lot number. This is your unit of traceability; everything else hangs off it.
Production date	When the lot was manufactured, taken from the lot record.
ORIGIN AND OWNERSHIP	
Manufacturing plant	Name, city, and country of the plant that made the lot. Section 842 looks upstream, so the location of final assembly is not enough.
Parent / ultimate owner	The parent entity and its country of control. Section 842 turns on ownership and control by a country of concern, so a US-registered seller owned abroad still counts.
Restricted-list check	Whether the manufacturer, parent, or owner appears on the DoD 1260H list, among the six Section 154 names, or otherwise meets the Section 842 foreign-entity-of-concern test.
RECEIPT	
Quantity and receipt date	How many cells, received when.
PO / shipment reference	Ties the lot to your purchasing record and the supplier’s shipment.
YOUR TEST EVIDENCE	
Incoming results	Capacity (Ah), DC-IR (mΩ), and OCV at stated conditions for the sampled cells. This is your proof, not the supplier’s datasheet.
Sample size and result	How many cells were tested, and accept or reject. A statement that a lot “passed” with no sample size is not evidence.
Spec revision	The named, versioned spec the verdict was measured against (for example, rev 3.2), so the pass or fail is anchored to a standard.

CHAIN OF CUSTODY	
Installed-in	The pack serials and unit or tail numbers these cells went into. Lets you answer “what is in unit 0231” and scope a bad lot in both directions.

A WORKED EXAMPLE

One lot recorded to that standard. Every field is answerable, and every claim is backed.

LOT RECORD · `CN-2026-0417`

Cell manufacturer (legal entity)	**[Manufacturer legal entity]**
Part number / model	**`ABC-21700-50G`**
Lot ID / production date	**`CN-2026-0417` · 2026-03-30**
Manufacturing plant	**[City], [Country]**
Parent / ultimate owner	**[Parent entity], [Country of control]**
Restricted-list check	**Clear — not on 1260H, not a Section 154 named entity, not FEOC under Section 842**
Received	**500 cells · 2026-04-17 · PO 4501-22**
Incoming test: **capacity 4.98–5.02 Ah (spec ≥ 4.95), DC-IR 18–21 mΩ (spec ≤ 25), OCV 3.62–3.64 V at receipt**	
Sample / result	**32 of 500 tested · 0 rejects**
Spec revision	**rev 3.2**
Installed in	**packs `P-1001 – P-1042`**

> The same lot without the origin, ownership, and test fields reads as “500 cells, supplier X, looks fine.” That is an assertion. A prime cannot accept an assertion, and you cannot prove Section 842 compliance with one.

QUESTIONS TO PUT TO YOUR CELL SUPPLIER

Copy these into your supplier questionnaire or your next purchase order. The answers populate the record above, and the gaps show you where your exposure is.

1. At which plants, and in which countries, are the cells for our orders manufactured?
2. What legal entity manufactures them, and who is its parent or ultimate owner?
3. Will you provide per-lot country-of-origin documentation with every shipment?
4. Can you give cell-level lot traceability tied to each shipment, including lot IDs and production dates?
5. Will you notify us in writing before moving production to a different plant or country?
6. Are any of your manufacturing entities or owners on the DoD 1260H list, among the six manufacturers named in NDAA Section 154, or otherwise a foreign entity of concern under Section 842?

Where Micantis fits

Micantis is where this record lives and stays current. We turn the cycler data you already generate into a per-lot record like the one above, tied to its supplier and to your own test verdicts, and keep it exportable as lots and suppliers change. The proof stays yours, in formats you own. **micantis.io**

Sources: FY2024 NDAA Section 154; FY2026 NDAA Section 842 (P.L. 119-60, signed December 18, 2025). Implementing DFARS regulations were not yet finalized as of mid-2026.