**NEW OBLIGATIONS FOR BATTERIES AND ACCUMULATORS**

Requirements under Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 on batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC

Link to the regulation: here

## The Regulation introduces a new classification of batteries:

**"portable battery and accumulator"** means a battery and an accumulator, including a button cell or kit, that are sealed and can be carried in the hand and that are not an industrial battery and industrial accumulator or an automotive battery and automotive accumulator

**"car battery, car accumulator"** means a battery and accumulator that are used for starters, lighting or ignition initiation in vehicles

**"industrial battery, industrial accumulator"** means a battery and an accumulator that are intended exclusively for industrial, professional use or for use in electric vehicles

**"portable battery"** means a battery that is sealed, **weighs 5 kg or less**, is not specifically designed for industrial use, and is neither an electric vehicle battery, nor an LMT (light means of transport) battery, nor an SLI (ignition) battery

**"general-purpose portable battery"** means a rechargeable or non-rechargeable portable battery that is specifically designed to be interoperable and that has one of the following common formats: 4.5 volts (3R12), button cell, D, C, AA, AAA, AAAA, A23, 9 volts (PP3)

The study is for informational purposes and is not a source or interpretation of the law. Date of preparing the document: 27 January

**"Battery for light transportation means" or "LMT battery"** means a battery that is sealed, **weighs 25 kg or less,** and is specifically designed to provide electricity for traction in wheeled vehicles that can be driven by an electric motor alone or by a combination of motor and human power, including vehicles that are type-approved in category Lw under Regulation (EU) No 168/2013 of the European Parliament and of the Council, and that is not a battery for electric vehicles (L: two-wheeled or three-wheeled vehicles, some four-wheeled vehicles)

**"battery for electric vehicles"** means a battery specifically designed to provide electricity for traction in hybrid or electric vehicles of category L, as provided for in Regulation (EU) No. 168/2013 (L: two-wheel or three-wheel vehicles, some four-wheel vehicles), which **weighs more than 25 kg**, or a battery specifically designed to provide electricity for traction in hybrid or electric vehicles of category M, N or O, as provided for in Regulation (EU) 2018/858 (M: motor vehicles designed for passenger transport with at least four wheels; N: motor vehicles with at least four wheels and designed and built to carry cargo; O: trailers)

**"industrial battery"** means any battery that is specifically designed for industrial purposes, intended for industrial purposes after it has been prepared for use for other purposes or used for other purposes, or any other battery that **weighs more than 5 kg** and is not an electric vehicle battery, LMT battery or SLI battery

**"Starting, lighting and ignition battery" or "SLI battery"** means a battery that is specifically designed to provide electricity for starting, lighting or ignition and that can also be used as an auxiliary or back-up battery in vehicles, other means of transportation or machinery

**"stationary energy storage system"** means an industrial battery with internal storage designed specifically for storing electricity from the grid and transmitting electricity to the grid or storing electricity for and transmitting electricity to end users, regardless of where and by whom the battery is used

**Where batteries placed on the market can be considered to belong to more than one category, they are considered to belong to the category to which the most stringent requirements apply.**

| Requirement | Battery type | Requirement description | Effective date |
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| Carbon footprint declaration | Electric vehicle batteries, industrial rechargeable batteries with a capacity of more than 2 kWh and LMT batteries (for light means of transport). | Provide at least the following data:<br>a) administrative information on the manufacturer;<br>b) battery model information;<br>c) information on the geographical location of the plant manufacturing the batteries;<br>d) battery carbon footprint calculated as kg of carbon dioxide equivalent per kWh of total energy delivered by the battery over its expected lifetime;<br>e) the battery's carbon footprint differentiated by life cycle stage;<br>f) the identification number of the EU declaration of conformity for the battery in question;<br>g) a web link providing access to the public version of the study on the basis of which the carbon footprint values referred to in (d) and (e) were provided.<br><br>Electric vehicle batteries, | a) batteries for electric vehicles – from 18 February 2025, or after 12 months from the date of entry into force of the delegated or implementing act (application from the later date);<br>b) for industrial rechargeable batteries except for batteries equipped exclusively with external storage – from 18 February 2026 or after 18 months from the date of entry into force of either the delegated act or the implementing act (application from the later date);<br>c) for LMT batteries (for light means of transport – as of 18 August 2028, or after 18 months from the date of entry into force of the delegated or implementing act (application from the later date);<br>d) for industrial |

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| | | rechargeable batteries with a capacity of more than 2 kWh and LMT batteries (for light means of transport) are marked with a visible, clearly legible and an indelible label indicating the battery's carbon footprint, and stating the efficiency class in terms of carbon footprint to which the corresponding battery model has been assigned per the manufacturing plant. | rechargeable batteries equipped with external storage – as of 18 August 2030, or after 18 months from the date of entry into force of either the delegated act or the implementing act (application from the later date); |
| Ensuring recycled content | Industrial batteries with a capacity of more than 2 kWh, except for batteries equipped only with external storage, electric vehicle batteries, SLI (ignition) batteries, LMT (light means of transport) batteries<br>- containing cobalt, lead, lithium or nickel in the active material. | Attaching documentation containing information on the percentage of cobalt, lithium or nickel present in the active materials and recovered from battery generation waste or post-consumer waste, and the percentage of lead present in the battery and recovered from waste – for each battery model produced in a given year by a given manufacturing plant.<br><br>Required recycled content levels from 18 August 2031: | a) for industrial batteries with a capacity of more than 2 kWh, except for batteries equipped with external storage only, batteries for electric vehicles, SLI batteries (ignition batteries – from 18 August 2028 or after 24 months from the date of entry into force of the delegated act (application from the later date);<br>b) for LMT batteries (for light means of transport) – as of 18 August 2033. |

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| | | a) 16% cobalt;<br>b) 85% lead;<br>c) 6% lithium;<br>d) 6% nickel.<br><br>Required recycled content levels from 18 August 2036:<br>a) 26% cobalt;<br>b) 85% lead;<br>c) 12% lithium;<br>d) 15% nickel. | |
| Achievement of minimum values of electrochemical and durability performance parameters | Portable batteries for general use, excluding button cells | Parameters of non-rechargeable batteries<br>1. Minimum average operating time: minimum average time of discharge for a sample of batteries used under certain conditions, such as temperature and relative humidity.<br>2. Characteristics of delayed discharge: relative reduction in minimum average operating time at initially measured minimum average operating time as a value of reference, after the specified | Date of entry after 18 August 2028, or after 24 months from the entry into force of the delegated act (application from the later date). |

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| | | time and under certain conditions, such as (temperature and relative humidity).<br>3. Spill resistance: resistance to unplanned leakage of electrolyte, gas or other material.<br><br>Parameters of rechargeable batteries<br>1. Rated capacity: the value of the battery's capacity under specified conditions, such as temperature and relative humidity and declared by the manufacturer.<br>2. Load (capacity) retention: capacity that the battery can deliver after storage, in specific conditions such as temperature and relative humidity, for a certain period of time without subsequent charging and expressed as a percentage of rated capacity.<br>3. Load (capacity) recovery: capacity | |

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| | | that the battery can deliver with subsequent charging after storage, in specific conditions such as temperature and relative humidity, for a specified period of time and expressed as a percentage of rated capacity.<br>4. Durability in cycles, number of charging and discharging cycles that the battery can perform under certain conditions, such as temperature and relative humidity before the capacity falls below a certain percentage of the rated capacity.<br>5. Spill resistance: resistance to unplanned leakage of electrolyte, gas or other material. | |
| Attaching a document informing about the values of electrochemical and durability performance parameters | Industrial batteries that are rechargeable with a capacity of more than 2 kWh, LMT batteries (for light means of transport) and batteries for electric vehicles | Parameters to be indicated in the document:<br>1. Rated capacity (in Ah) and capacity drop (in %).<br>2. Power (in W) and power drop (in %). | As of 18 August 2024. |

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| | | 3. Internal resistance (in Ω) and increase in internal resistance (in %).<br>4. Where applicable, the total energy efficiency and its drop (in %).<br>5. The expected life cycle of the battery under the reference conditions for which it was designed, expressed in cycles, except for non-cyclic applications and calendar years. | |
| Ensure that batteries can be removed and replaced by the consumer | Portable batteries and LMT batteries (for light means of transport) built into products, except for batteries installed in the following types of devices:<br>a) special devices designed to operate primarily in environments regularly exposed to water splashing, water jets or immersion in water and intended for being washed or rinsed;<br>b) professional products for diagnostic imaging and radiation therapy defined in | Batteries must be easy to remove and replace by the end user at any time in the product life cycle. The obligation applies only to the entire battery, not to the individual cells or other parts included in such batteries.<br><br>A portable battery is considered to be easily removable by the end user, where it can be removed from the product using commercially available tools without | As of 18 February 2027. |

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| | article 2(1) of Regulation (EU) 2017/745 and in vitro diagnostic medical devices as defined in Article 2(2) of Regulation (EU) 2017/746. Exemption applies only when necessary to ensure safety of the user and device. | the need to use specialised tools, unless they are provided free of charge with the product, or also proprietary tools, heat energy or solvents to disassemble the product. | |
| Ensuring that batteries can be removed and replaced by independent specialist | LMT batteries (for light means of transport) built into the products | Batteries, as well as the individual battery cells included in the battery pack, must be easy to remove and replace by an independent specialist at any time in the product life cycle.<br><br>A battery is considered to be easily replaceable if, when removed from a means of transport, it can be replaced by another compatible battery, without affecting the operation, performance or safety of the lightweight means of transport. | As of 18 February 2027. |
| Provision of batteries as spare parts | Portable batteries and LMT batteries (for light means of transport) built into products | Batteries must be available as spare parts of the power equipment, **for at least** | As of 18 February 2027. |

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| | | **five years from the launch of the last piece of equipment model**, at a reasonable and non-discriminatory price to independent professionals and end users. | |
| Attaching an instruction manual | Portable batteries built into devices | The document must contain information on safety when using, removing and replacing batteries. Safety instructions and information must be made permanently available on the Internet on a publicly accessible website in a manner that is easily understood by the end users. | As of 18 February 2027. |
| Ban on obstructing battery replacement | Portable batteries and LMT batteries (for light means of transport) built into products | Software cannot be used to make it difficult to replace a portable battery or LMT battery or its key components with another compatible battery or key components. | As of 18 February 2027. |
| Marking with the selective collection symbol  | All batteries | The selective collection symbol occupies at least 3% of the largest side surface of the battery, reaching a maximum size of 5 × 5 cm. For cylindrical battery cells, the selective collection symbol | As of 18 August 2025. |

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| | | occupies at least 1.5% of the battery area, reaching 5 × 5 cm maximum dimensions.<br>If, due to the size of the batteries, the symbol for separate collection would be less than 0.47 × 0.47 cm, the battery does not need to be marked with this symbol. Instead, the selective collection symbol is printed on the package, with a minimum size of 1 × 1 cm. | |
| Marking with the chemical symbol | All batteries containing more than 0.002% cadmium or more than 0.004% lead | The corresponding chemical symbol indicating heavy metal content to be printed below the selective collection symbol and to occupy an area of at least one-quarter of the size of this symbol. | As of February 18, 2024. |
| QR code labelling | All batteries | The QR code provides access to the following:<br>a) for LMT batteries (for light means of transport), industrial batteries with a capacity of more than 2 kWh and batteries for electric vehicles – battery passport;<br>b) in the case of other batteries – among other things, a declaration of conformity and information on | As of 18 February 2027. |

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| | | prevention of waste batteries and managing them;<br>c) for SLI batteries (starter, lighting and ignition) – amount of cobalt, lead, lithium or nickel recovered from waste and present in the active materials in the battery.<br><br>The QR code must have a high contrast to the background colour and be of a size that can be easily read by commonly available QR readers, such as those integrated into portable communication devices.<br><br>The information in the QR code must be complete, up-to-date and accurate.<br><br>The QR code is engraved on the battery in a visible, legible and permanent manner.<br>In case it is not possible or justified due to the nature and size of the battery, the QR code is placed on the packaging and in the documents accompanying the battery. | |

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| Placing labels with general battery information | All batteries | The data on the battery label includes the following battery information:<br>1. manufacturer's identification data;<br>2. the category of the battery and its identification data;<br>3. place of manufacture (geographical location of the plant manufacturing the batteries);<br>4. date of manufacture (month and year);<br>5. mass;<br>6. capacity;<br>7. chemical composition;<br>8. hazardous substances contained in batteries, other than mercury, cadmium or lead;<br>9. extinguishing agent that can be used;<br>10. critical raw materials present in the battery, whose concentration %m is above 0.1%.<br><br>The labels are printed or engraved on the battery in a visible, legible and permanent manner. Where this is not possible or not justified due to the nature and size of the battery, labels | As of 18 August 2026, or after 18 months from the effective date of the implementing act (application from the later date). |

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| | | to be placed on the package and in the documents accompanying the battery. | |
| Placing labels with capacity information | Portable rechargeable batteries, LMT batteries (for light transport) and SLI batteries (starting, lighting and ignition) | The labels are printed or engraved on the battery in a visible, legible and permanent manner. Where this is not possible or not justified due to the nature and size of the battery, labels to be placed on the packaging and documents accompanying the battery. | As of 18 August 2026, or after 18 months from the effective date of the implementing act (application from the later date). |
| Placing labels containing information concerning the minimum average period of use for specific applications and labels with information: non-rechargeable | Non-rechargeable portable batteries | The labels are printed or engraved on the battery in a visible, legible and permanent manner. Where this is not possible or not justified due to the nature and size of the battery, labels to be placed on the packaging and documents accompanying the battery. | As of 18 August 2026, or after 18 months from the effective date of the implementing act (application from the later date). |
| Providing information on health status and expected battery life through the battery management system<br><br>"battery health" means measuring the overall condition of a rechargeable battery and its ability to provide a specific | Stationary energy storage systems, LMT batteries (for light means of transport), batteries for electric vehicles | Parameters for determining health status:<br><br>For electric vehicle batteries:<br>1. energy level compared to the energy specified during certification (State of Certified Energy – SOCE). | As of 18 August 2024. |

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| performance in relation to the initial state<br><br>"battery life" means the period that begins when the battery is manufactured and ends when the battery becomes waste<br><br>"battery management system" means an electronic device that controls or manages the electrical and thermal functions of a battery to ensure the safety, performance and lifetime of the battery, which manages data on parameters for determining the battery's health and expected life and stores this data, and which communicates with the vehicle, light means of transport or device into which the battery is built, or with a public or private charging infrastructure | | For stationary energy storage systems and for LMT batteries:<br>1. remaining capacity;<br>2. if possible, the remaining actual capacity;<br>3. as far as possible, the remaining total energy efficiency;<br>4. changes in the self-discharge rate;<br>5. if possible, resistance in ohms.<br><br>Parameters for determining the expected life of stationary energy storage systems and LMT batteries (for light means of transport):<br>1. the date the battery was manufactured and, if applicable, the date it was put into service;<br>2. energy efficiency;<br>3. capacity performance;<br>4. tracking harmful events, such as the number of cases of deep discharge, time spent in | |

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| | | extreme temperatures, time spent charging during extreme temperatures;<br>5. number of full equivalent cycles of charge-discharge. | |
| Conducting a conformity assessment | All batteries | Records and correspondence related to battery conformity assessment procedures to be maintained in the official language or languages of the country member State in which the entity has head office, the notified body carrying out conformity assessment procedures or in the language or languages accepted by that body. | As of February 18, 2024. |
| Preparing the EU declaration of conformity | All batteries | The declaration of conformity contains the following data:<br>1. Battery model (product, category and lot or serial number);<br>2. Full name or name and address of the manufacturer and, if applicable, its authorised representative; | As of February 18, 2024. |

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| | | 3. "This declaration of conformity is issued to the exclusive liability of the manufacturer.";<br>4. The subject of the declaration (a description of the battery and identification that allows its history to be reconstructed, possibly including a photo of the battery, if applicable);<br>5. The subject of the declaration, described in item 4, is in accordance with the relevant EU harmonisation legislation: ... (reference to other EU acts applied);<br>6. References to relevant harmonised standards or common specifications that have been applied, or to other technical specifications based on which compliance is declared;<br>7. Notified body ... (name, address, number) ... | |

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| | | conducted ... (description of intervention) ... and issued certificate(s): ... (detailed information, including date and, in relevant cases, information on the period and conditions of its validity);<br>8. Additional information: Signed on behalf of (place and date of issue). | |
| Placement of CE marking | All batteries | The CE marking to be affixed to the battery in a visible, legible and permanent manner. Where this is not possible or is not justified by the nature of the battery, it is placed on the packaging and documents accompanying the battery. | As of February 18, 2024. |
| Fulfilment of due diligence obligations<br><br>"battery due diligence" means the obligations of an operator regarding its system of management, risk management, external verification and oversight by the notified bodies and | All batteries **introduced for the first time into the EU by operators whose net sales revenue in the fiscal year preceding the last financial year were less than EUR 40 million and which do not belong to any group consisting of parent companies and subsidiaries that** | The policy refers to raw materials and risk categories (it is intended to ensure that in the manufacture of batteries, the environmental and social needs were taken into account).<br><br>Raw materials: cobalt, natural graphite, lithium, nickel, chemical compounds based on the above raw materials. | As of 18 August 2025. |

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| information disclosure to identify existing and potential social and environmental risks associated with the acquisition and processing of raw and secondary materials necessary for the manufacture of batteries and with the trade in them, as well as the prevention and elimination of such risks; this also means the responsibilities of the suppliers in the chain and their subsidiaries or subcontractors | **exceed the EUR 40 m limit in consolidated form.** | Social and environmental risk categories:<br>a) the environment, climate and human health, taking into account direct, induced, indirect and cumulative effects,<br>b) human rights, labour rights and labour relations included,<br>c) social life, including the social life of the indigenous population. | |
| Establishing a battery management system | All batteries for which compliance with due diligence obligations is required | The system is supported by documentation that includes the following information as a minimum:<br>a) a description of the raw material, including its trade name and type;<br>b) the name and address of the supplier who supplied the raw material used in the batteries to the entity that markets batteries containing the raw material in question;<br>c) country of origin of the raw material and market transactions from the raw material extraction stage to the stage of direct | As of 18 August 2025. |

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| | | supplier of the economic entity that markets the battery;<br>d) the amount of raw material used in the battery placed on the market, expressed as a percentage or as a mass;<br>e) external verification reports prepared by the notified body;<br>f) if the reports referred to in item e) are not available, and where the raw material comes from a conflict-affected and high-risk area – additional information in accordance with the specific recommendations for the top-tier business entities specified in the OECD guidelines for due diligence with regard to responsible supply chains, | |

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| | | conflict minerals and high-risk areas, where applicable, such as the mine of origin, places where the raw material is consolidated, sold and processed, and where taxes, fees and royalties are paid. | |
| Achievement of collection levels for used batteries | Portable batteries | Manufacturers of portable batteries or producer responsibility organisations achieve and sustainably maintain at least the following collection targets for used portable batteries:<br>a) 63% by 31 December 2027;<br>b) 73% by 31 December 2030. | As of 18 August 2025. |
| Achievement of collection levels for used batteries | LMT batteries (for light means of transport) | LMT battery manufacturers or producer responsibility organisations provide selective collection of all used LMT batteries – regardless of their nature, | As of 18 August 2025. |

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| | | chemical composition, condition, brand or origin – in the territory of the member state where they first make batteries available on the market.<br><br>Required collection levels:<br>a) 51% by 31 December 2028;<br>b) 61% by 31 December 2031. | |
| Collection of used batteries | SLI batteries (starter, lighting and ignition), industrial batteries and batteries for electric vehicles | Manufacturers of SLI batteries, industrial batteries and batteries for electric vehicles or producer responsibility organisations to collect all used SLI batteries, used industrial batteries and batteries for electric vehicles of the relevant categories, regardless of their nature, chemical composition, condition, brand or origin, which they made available for the first time on the market in the territory of the member country in question, and provide selective collection of all used SLI batteries.<br><br>This collection is free of charge, it does not oblige the | As of 18 August 2025. |

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| | | end user to purchase a new battery, nor the battery being returned to have been purchased from these manufacturers. | |
| Information on waste prevention and waste battery management | All batteries | Manufacturers or manufacturer responsibility organisations make available to end users and distributors the following information on prevention of waste and waste battery management for categories of batteries supplied by producers within the member state's territory:<br><br>a) the role of end users in contributing to waste prevention, including information on good practices and recommendations on battery use to extend battery life, and on opportunities for their reuse, preparation for reuse, | As of 18 August 2025. |

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| | | preparation for use for other purposes, use for other purposes, and refurbishment;<br>b) the role of end users in contributing to the selective collection of used batteries, enabling processing of these batteries;<br>c) separate collection systems, collection points and collection, preparation for reuse, preparation for<br>d) use for other purposes and processing available for used batteries;<br>e) essential instructions safety regulations regarding the handling of used batteries, including in relation to the risks associated with lithium-containing batteries and their handling;<br>f) the meaning of the labels and symbols placed on | |

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| | | batteries or printed on their packaging or in the documents attached to the batteries;<br>g) the impact of substances, especially hazardous substances contained in batteries, on the environment and on human health<br><br>h) or the safety of individuals, including impacts resulting from improper disposal of used batteries such as littering or disposing of them as unsorted municipal waste. | |
| Development and use of a battery passport | LMT batteries (for light means of transport), industrial batteries with a capacity of more than 2 kWh and batteries for electric vehicles | The passport includes, among other things:<br>a) material composition of the battery, including chemical substances, hazardous substances present in batteries other than mercury, cadmium or lead and critical raw materials present in the battery;<br>b) carbon footprint information; | As of 18 February 2027. |

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| | | c) information on recycled content;<br>d) share of renewable materials;<br>e) expected battery life expressed in cycles and the comparison test used. | |