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# ***A New Era for Batteries Within the EU: **Batteries and Waste Batteries Regulation 2023/1542*****

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# Table of Contents

A New Era for Batteries Within the EU: Batteries and Waste  
Batteries Regulation 2023/1542

- 01**      **About the Author**
- 02**      **Unlocking Market Access**
- 03**      **Introduction**
- 04**      **Scope**
- 05**      **Economic Operators**
- 06**      **Supply Chain Due Diligence Obligations**
- 07**      **CE Marking**
- 08**      **Circular Economy**
  - 8.1**      QR Code
  - 8.2**      Digital Battery Passport
    - 8.2.1      Responsibility for Fulfilling the Battery Passport Requirements
  - 8.3**      Replaceability of Batteries
- 09**      **What to Expect Next?**
- 10**      **Annex 1: Key Compliance Deadlines and Other Important Dates**

# 01. About The Author



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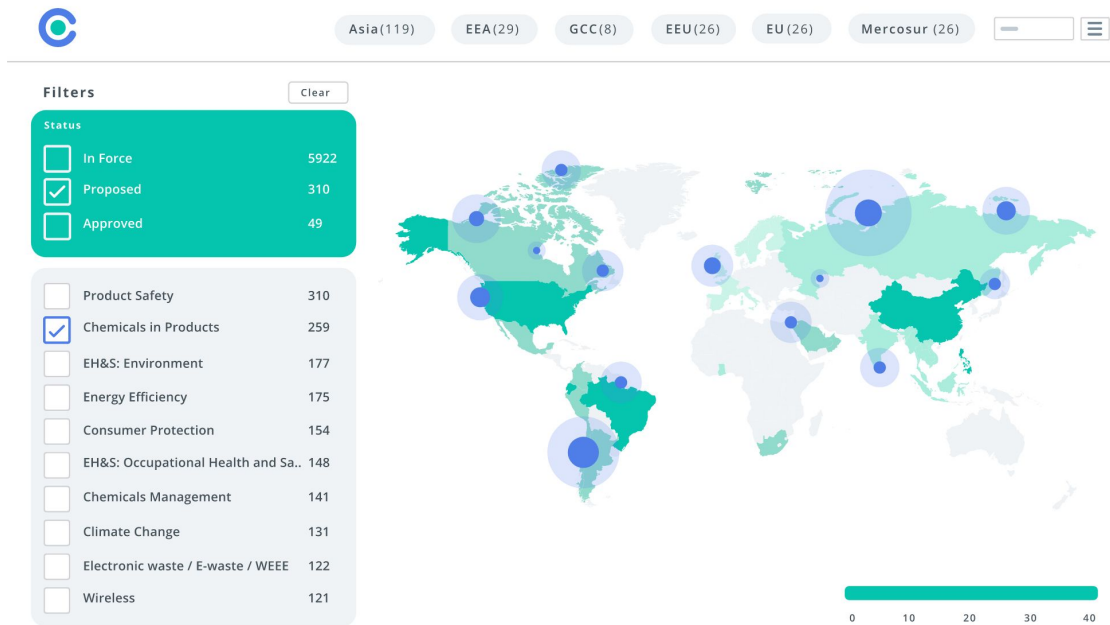
Dila Şen is a Global Regulatory & Requirements Compliance Specialist with the Global Regulatory Compliance team. She specializes in the topic of batteries.

As an experienced, extensively educated, and qualified lawyer, and a sworn translator (English to Turkish and vice versa) she has several years of expert experience and also has a strong legal academic background with a bachelor in law, bachelor of arts in communication, and a master in behavioral law & economics.

She has also been awarded with a triple master degree by each and every university in which she spent a term (Bologna, Ghent, and Haifa).

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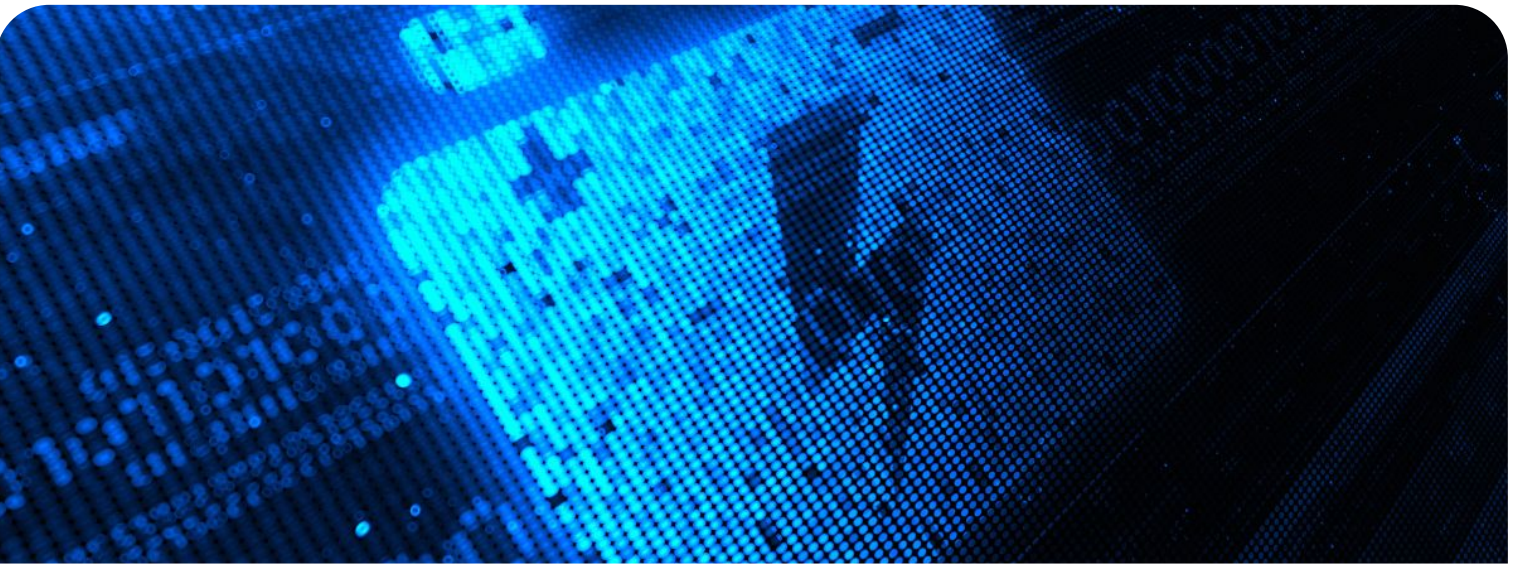
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## 03. Introduction

On **28 July 2023**, the eagerly anticipated Regulation (EU) [2023/1542](#) on Batteries and Waste Batteries (“Regulation”) was published in the Official Journal of the European Union and entered into force on **17 August 2023** as an integral part of the [Strategic Action Plan for Batteries](#) and the [EU Green Deal](#).

The Regulation constitutes a pioneering reform within the European Union's internal market, as it comprehensively addresses the entire life cycle of batteries and introduces a novel mandate for the implementation of digital product passports.

The objectives of the Regulation include:

- Promoting sustainability in battery production and minimizing environmental impact across their lifecycle,
- Encouraging circularity by providing data for second-life usage and enhancing recycling in terms of both quality and quantity,
- Ensuring safety by protecting human health and the environment,
- Improving transparency and providing consumers with information on the environmental and safety performance of batteries.

This Regulation is poised to replace the prevailing Battery Directive ([2006/66/EC](#)), the existing framework governing battery sustainability within the European Union.

It is noteworthy that upon its date of application on **18 February 2024**, no immediate deviations from the extant battery directive are anticipated.

Nevertheless, stakeholders should anticipate the gradual introduction of novel obligations and requirements as the regulation takes effect.

# 04. Scope

According to Article 1(3), the Regulation applies to all categories of batteries placed on the market or put into service within the EU, regardless of whether they were produced in the Union or imported and regardless of their shape, volume, weight, design, material composition, chemistry, use or purpose.

The following categories of batteries are explicitly listed:

- **Portable batteries** (a battery that is sealed, weighs 5 kg or less, is not designed specifically for industrial use and is neither an electric vehicle battery, an LMT battery, nor an SLI battery, Article 3(1)(9));
- **Starting, lighting and ignition batteries (SLI batteries)** used mostly for vehicles and machinery (a battery that is specifically designed to supply electric power for starting, lighting, or ignition and that can also be used for auxiliary or backup purposes in vehicles, other means of transport or machinery, Article 3(1)(12));
- **Light means of transport batteries (LMT batteries)** e.g. electric bikes, e-mopeds, e-scooters (a battery that is sealed, weighs 25 kg or less and is specifically designed to provide electric power for the traction of wheeled vehicles that can be powered by an electric motor alone or by a combination of motor and human power, including type-approved vehicles of category L within the meaning of Regulation (EU) No 168/2013 and that is not an electric vehicle battery, Article 3(1)(11));
- **Electric vehicle batteries** (a battery that is specifically designed to provide electric power for traction in hybrid or electric vehicles of category L as provided for in Regulation (EU) No 168/2013 and weighs more than 25 kg, or a battery that is specifically designed to provide electric power for traction in hybrid or electric vehicles of categories M, N or O as provided for in Regulation (EU) 2018/858), Article 3(1)(14));
- **Industrial batteries** (a battery that is specifically designed or intended for industrial use after being subject to preparation for repurposing or repurposing, or any other battery that weighs more than 5 kg and that is neither an electric vehicle battery, an LMT battery, nor an SLI battery, Article 3(1)(13)). Industrial uses include; industrial activities , communication infrastructure, agricultural activities, energy storage in private or domestic environments, generation and distribution of electric energy, traction in other transport vehicles incl. rail, waterborne, aviation or off-road machinery.



In addition, **battery packs** are also in scope as per Recital 13 which states that: *“Products placed on the market as **battery packs**, which are batteries or groups of cells that are connected or encapsulated within an outer casing to form a complete unit ready for use by end-users or in applications that the end-user is not intended to split up or open and which conform to the definition of batteries, or battery cells that conform to the definition of batteries, should be subject to requirements applicable to batteries.”*

It also applies to batteries that are **incorporated into or added to products or that are specifically designed to be incorporated into or added to products.**

The following are, however, excluded from scope:

- Batteries placed in stock in the Union by distributors, including retailers, wholesalers and sales divisions of manufacturers before the date of application of relevant requirements of this Regulation (Recital 11).
- Batteries incorporated into or specifically designed to be incorporated into:
  - Equipment connected with the protection of Member States' essential security interests, arms, munitions and war material, with the exclusion of products that are not intended for specifically military purposes; and
  - Equipment designed to be sent into space (Article 1(5)).

# 05. Economic Operators

This Regulation imposes obligations on economic operators placing batteries on the market or putting them into service.

**Economic operator** refers to the manufacturer, authorized representative, importer, distributor, fulfillment service provider, or any other natural or legal person with responsibilities related to the manufacture, preparation for re-use, preparation for repurposing, repurposing, or remanufacturing of batteries. This includes obligations regarding the introduction, distribution, or online availability, as well as the initiation of batteries into service.

**Placing on the market** is deemed to occur when a battery is initially made accessible on the Union market, supplied by the manufacturer or importer for distribution, consumption, or use in a commercial activity, whether through payment or free of charge.

**Putting into service** means the first use, for its intended purpose, in the Union, of a battery, without having been previously placed on the market.

The regulation comprises six sections impacting various actors within the battery value chain. These are:

- **Manufacturer** (any natural or legal person who manufactures a battery or has a battery designed or manufactured, and markets that battery under its own name or trademark or puts it into service for its own purposes, Article 3(1)(33));
- **Supplier of battery cells and battery modules** (supplier of the basic functional unit in a battery, composed of electrodes, electrolyte, container, terminals and, if applicable, separators, and containing the active materials the reaction of which generates electrical energy (Article 3(1)(4) and any set of battery cells that are connected together or encapsulated within an outer casing to protect the cells against external impact, and which is meant to be used either alone or in combination with other modules, Article 3(1)(3));
- **Authorized representative** (any natural or legal person established in the Union who has received a written mandate from a manufacturer to act on its behalf in relation to specified tasks with regard to the manufacturer's obligations under Chapters IV and VI, Article 3(1)(63));
- **Importer** (any natural or legal person established within the Union who places on the market a battery from a third country, Article 3(1)(64));
- **Distributor** (any natural or legal person in the supply chain, other than the manufacturer or the importer, who makes a battery available on the market, Article 3(1)(65));
- **Fulfillment service provider** (any natural or legal person offering, in the course of commercial activity, at least two of the following services: warehousing, packaging, addressing and dispatching, without having ownership of the products involved, excluding postal services as defined in point 1 of Article 2 of Directive 97/67/EC, parcel delivery services as defined in point 2 of Article 2 of Regulation (EU) 2018/644 and any other postal services or freight transport services).



# 06. Supply Chain Due Diligence Obligations

The production of batteries heavily relies on the import of critical raw materials, including cobalt, lithium, nickel, and manganese, which exert a substantial impact on the environment and society.

The objective of the Regulation is to minimize environmental and social impacts across the entire life cycle of batteries. In pursuit of this goal, the Regulation imposes stringent due diligence rules on operators, mandating the verification of the source of raw materials used in batteries introduced to the market.

The Regulation imposes a due diligence obligation on battery manufacturers who must comply with requirements that address social and environmental risks related to the sourcing, processing, and trading of both primary and secondary raw materials. All economic operators introducing batteries to the EU market, **excluding small and medium-sized enterprises (SMEs) with a net turnover of less than 40 million EUR in the financial year preceding the last financial year**, must establish and implement this due diligence policy. Compliance may be audited by notified bodies.

According to Article 3(1)(42); **“battery due diligence”** means the obligations of an economic operator in relation to its management system, risk management, third-party verifications and surveillance by notified bodies and disclosure of information, for the purpose of identifying, preventing and addressing actual and potential social and environmental risks linked to the sourcing, processing and trading of the raw materials and secondary raw materials required for battery manufacturing, including by suppliers in the chain and their subsidiaries or subcontractors”.

These obligations follow a risk-based approach outlined in OECD Guidelines, such as the [Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas](#). The Regulation requires the adoption of supply chain due diligence policies specifically for critical raw minerals listed in Annex X namely **cobalt, natural graphite, lithium, nickel, and their chemical compounds**. Environmental and social risks associated with these materials must be identified and meticulously assessed as part of a comprehensive risk management plan. Economic operators are also required to establish and maintain a system of controls and transparency throughout their supply chains.

The due diligence obligations are scheduled to take effect on **18 August 2025**.

# 07. CE Marking

Commencing on **18 August 2024**, manufacturers are required to apply the CE marking prior to releasing the battery into the market or initiating its use. The Regulation's implementation timeline has a few very confusing discrepancies.

C&R has received confirmation from EPBA (*European Portable Battery Association*) who confirmed this information with the European Commission that CE marking will be mandatory from August 18, 2024 onwards, together with the conformity assessment procedure in Article 17:

*"The actual obligation to do CE marking is in Article 38 (in Chapter VI), which applies from 18 August 2024."*

The CE marking must be affixed to each individual battery before the battery is placed on the market or put into service. In cases where direct application to the battery is not practical due to its nature, the marking may be placed on the packaging and accompanying documents of the battery. The CE marking should also be visibly, legibly, and indelibly affixed to the battery according to Article 20(1).

If deemed necessary according to Annex VIII, the marking is conferred by a notified certification body. Notified body involvement is specifically mandated for Articles 7 and 8 concerning LMT, EV, SLI, and industrial batteries with a capacity exceeding 2 kWh.

According to Annex VIII, Part A(4), the manufacturer has to create an EU declaration of conformity for each battery model, as outlined in Article 18. Both this declaration and the technical documentation, must be available to national authorities for a **period of 10 years** from the date when the last battery of the relevant model is placed on the market. The EU declaration of conformity should clearly specify the associated battery model.

Moreover, as mentioned in Article 20(4), the CE marking must incorporate the identification number of the certifying body where required under Annex VIII.

Also, if necessary, it has to be accompanied by pictograms or other markings relating to the safe storage, use, transport, and treatment of the battery.

Guidelines for affixing the CE marking to products, including portable batteries, are detailed in the Commission's [Blue Guide](#).

# 08. Circular Economy

The Regulation is designed to advance a circular economy by encompassing the entire life cycle of batteries. To be able to achieve this, the Regulation outlines end-of-life requirements, collection targets, obligations, and objectives for material recovery, and extended producer responsibility.

The Regulation establishes **collection targets for producers**, requiring them to collect:

- **63%** of waste portable batteries by the end of 2027
- **73%** by the end of 2030.

Additionally, it introduces a specific collection target for **waste batteries from light means of transport**, mandating a collection rate of;

- **51%** by the end of 2028, and
- **61%** by the end of 2031.

The **lithium recovery target from waste batteries** are:

- **50%** until 2028 and
- **80%** until 2032.

These targets may face possible adjustments in the future according to market trends, lithium availability, and technological advancements.

**Mandatory minimum levels of recycled content** are specified for industrial, SLI batteries, and EV batteries for each battery model per year and per manufacturing plant:

- **16%** for cobalt,
- **85%** for lead,
- **6%** for lithium, and
- **6%** for nickel.

**For nickel-cadmium batteries**, recycling efficiency target is set at 80% by the end of 2025 and **for other waste batteries** 50% by the end of 2025.

## 8.1. QR Code

All batteries must be marked with a QR code from **18 February 2027**. According to Article 13(6), the QR code shall provide access to the following:

*“(a) for LMT batteries, industrial batteries with a capacity greater than 2 kWh and electric vehicles batteries, the battery passport in accordance with Article 77;*

*“(b) for other batteries, the applicable information referred to in paragraphs 1 to 5 of this Article, the declaration of conformity referred to in Article 18, the report referred to in Article 52(3) and the information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f);*

*“(c) for SLI batteries, the amount of cobalt, lead, lithium or nickel recovered from waste and present in active materials in the battery, calculated in accordance with Article 8.”*

In order to attain a sustainable battery life cycle, the utilization of electronic battery passports and QR codes will furnish us with more transparent labeling and information.

## 8.2. Digital Battery Passport

The Digital Battery Passport (DBP) is an electronic dossier or a digital record system for a battery, carrying all information gathered throughout the battery's life cycle and facilitating the exchange of this information among various parties in the value chain with the aim is to increasing transparency relating to the battery's supply chain.

Specifically designed for industrial batteries, the DBP guarantees that recovery organizations can assess the optimal disposal approach for waste batteries by considering their chemical composition and usage history.

According to **Article 77** of the Regulation:

*"1. **From 18 February 2027** each LMT battery, each industrial battery with a capacity greater than 2 kWh and each electric vehicle battery placed on the market or put into service shall have an electronic record ('battery passport').*

*2. The battery passport shall contain information relating to the battery model and information specific to the individual battery, including resulting from the use of that battery, as set out in Annex XIII."*

Per Article 77, only LMT, EV or industrial batteries (with a capacity greater than 2 kWh) will need a battery passport.

- If it is placed on the market offline or if online but the online seller is established in the EU and it is placed on the market from inside the EU, the manufacturer is responsible for fulfilling the battery passport requirements.
- If the battery placed on market is from outside the EU, then the importer is responsible for fulfilling the battery passport requirements.
- If the online seller is not established in the EU and the battery is marketed to EU customers, the manufacturer or importer will be responsible for fulfilling the battery passport requirements depending on who is targeting the EU consumers.
- If the online seller is not established in the EU and the battery is marketed to non-EU customers, the battery passport requirement does not apply.

The battery passport is the first implementation of a Digital Product Passport (DPP) within the EU and is recognized as a key instrument in the European Twin Transition which is designed to address two challenges: the first one is the green transition towards a sustainable and low-carbon economy and the second one is the digital transformation of society. The EU has indicated that there are plans for the extension of the DPP into other product categories such as textiles, construction, consumer electronics, plastics, chemicals, and the automotive sector.

## 8.2.1. Responsibility for Fulfilling the Battery Passport Requirements

Each battery is required to have a unique battery passport, and it is the responsibility of the economic operator who introduced the battery to the EU market to guarantee the accuracy, completeness, and currency of the data contained in the battery passport.

There are two cases where the Regulation shifts the battery passport responsibility from one economic operator to another:

- Per Article 77(7), if a battery undergoes preparation for re-use, repurposing, or remanufacturing, the obligation to maintain accurate, complete, and up-to-date information in the battery passport shifts to the economic operator responsible for placing or using that battery. In such instances, a new battery passport will be generated, but it will remain linked to the original battery.
- Per Article 77(7) second paragraph, if a battery transitions from active use to a waste battery, the responsibility for ensuring the accuracy, completeness, and currency of information is transferred to either the producer, the producer responsibility organization, or the waste management operator. In such instances, a new battery passport will not be required.

**A Producer responsibility organization** is defined as; *“a legal entity that financially or financially and operationally organizes the fulfilment of extended producer responsibility obligations on behalf of several producers”*, whilst a **waste management operator** is defined as: *“any natural or legal person dealing on a professional basis with the separate collection or treatment of waste batteries”*.

A battery passport will cease once the battery undergoes recycling in accordance with Article 77(8).

The battery passport must allow for public access to data contained therein with some specific details restricted to regulatory authorities and designated entities due to the sensitive commercial information.

Access rights differ between access groups:

- **General public** will have access to the battery model “information about batteries placed on the market and their sustainability requirements” in accordance with point 1 of Annex XIII, Recital 123;
- **Notified bodies, market surveillance authorities, and the EU Commission** will have access to the battery model in accordance with points 2 and 3 of Annex XIII;
- **Interested persons** (any natural or legal person with a legitimate interest) will have access in accordance with Points 2 and 4 of Annex XIII. According to Article 77(9), by **18 August 2026**, the Commission shall adopt implementing acts specifying which persons are to be considered persons with a legitimate interest.

## 8.3. Replaceability of Batteries

The Regulation states that, beginning from **18 February 2027**, portable batteries integrated into appliances should be removable and replaceable **by the end-user** at any time during the lifetime of the device. Article 11(2) contains two exceptions to this whereby the following products incorporating portable batteries must be designed in such a way as to make the battery removable and replaceable **only by independent professionals**:

- *“(a) appliances specifically designed to operate primarily in an environment that is regularly subject to **splashing water, water streams or water immersion, and that are intended to be washable or rinseable**;*
- *“(b) **professional medical imaging and radiotherapy devices**, as defined in Article 2, point (1), of Regulation (EU) 2017/745, and **in vitro diagnostic medical devices**, as defined in Article 2, point (2), of Regulation (EU) 2017/746.”*
- Recital 38 provides further that: “A portable battery should be considered to be removable by the end-user when it can be removed with the use of commercially available tools and without requiring the use of specialized tools, unless they are provided free of charge, or proprietary tools, thermal energy or solvents to disassemble it.”

Furthermore, **batteries for light means of transport** must be replaceable **by an independent professional**.



## 09. What to Expect Next?

The Battery Regulation instructs the European Commission to develop delegated acts, guidance, or clarifications for numerous articles and chapters. Secondary legislation is anticipated for various aspects, including recycling efficiency, removability, replaceability, material recovery calculation methodologies, carbon footprint calculation methodologies and more.

Stakeholders in the battery supply chain need these secondary acts to gain a clearer understanding and ensure compliance with the regulatory requirements.

# 10. Annex 1: Key Compliance Deadlines and other Important Dates

Date	Description	Related Article
28 July 2023	Publication date.	EU Official Journal
17 August 2023	Date of entry into force.	Article 96(1)
31 December 2023	Deadline for producers of portable batteries to ensure collection rate of 45% for waste portable batteries.	Article 59(3)(a)
18 February 2024	Date of application.	Article 96(2)
17 August 2024	Date of application for Article 17 on conformity assessment procedures and Chapter VI on obligations of economic operators.	Article 96(2)(b)
18 August 2024	Compliance deadline: portable batteries shall not contain more than 0,01% of lead.	Annex I (3)(1)
18 August 2024	Compliance deadline: rechargeable industrial batteries with a capacity >2 kWh, LMT batteries and electric vehicle batteries shall be accompanied by a document containing values for the electrochemical performance and durability parameters per Annex IV, Part A.	Article 10(1)
18 August 2024	Compliance deadline: up-to-date data for parameters for determining state of health and expected lifetime of batteries per Annex VII to be contained in battery management system of stationary battery energy storage systems, LMT batteries and electric vehicle batteries.	Article 14(1)
18 August 2024	Compliance deadline: manufacturers to draw up EU declaration of conformity per Article 18 and affix CE marking per Articles 19 and 20.	Article 38 (3)
18 February 2025 or 12 months from entry into force of the delegated act or implementing act whichever is the latest	Date of application for carbon footprint declaration requirement for electric vehicle batteries.	Article 7(1)(a)



# 10. Annex 1: Key Compliance Deadlines and other Important Dates

Date	Description	Related Article
18 August 2025	Compliance deadline : batteries to be labelled with the symbol indicating 'separate collection' per Annex VI Part B.	Article 13(4)
18 August 2025	Date of application for Chapter VIII on Management of waste batteries.	Article 96(2)(c)
18 August 2025	Compliance deadline: all batteries shall be marked with the symbol for separate collection of batteries per Annex VI, Part B.	Article 13(4)
18 August 2025	Compliance deadline: economic operators that place batteries on the market or put them into service shall fulfil the due diligence obligations per Articles 49, 50 and 52 and set up and implement battery due diligence policies.	Article 48(1)
From 18 August 2026 or 18 months from entry into force of implementing act whichever is the latest	Compliance deadline : non-rechargeable portable batteries, rechargeable portable batteries, LMT batteries and SLI batteries shall bear a label containing information on their capacity.	Article 13(2) and (3)
18 February 2026 or 18 months from entry into force of either the delegated act or implementing act whichever is the latest	Date of application for the requirement for a maximum life cycle carbon footprint threshold for rechargeable industrial batteries except those with exclusively external storage.	Article 7(1)(b)
31 December 2025	Recycling shall achieve following minimum recycling efficiencies: (a) 75 % by average weight of lead-acid batteries; (b) 65 % by average weight of lithium-based batteries; (b) 80 % by average weight of nickel-cadmium batteries; (c) 50 % by average weight of other waste batteries	Annex XII, Part B
18 August 2026 or 18 months from entry into force of implementing act whichever is the latest	Compliance deadline: batteries shall bear a label containing the general information on batteries per Part A of Annex VI.	Article 13(1)
18 February 2027	Compliance deadline: all batteries shall be marked with a QR code as described in Part C of Annex VI	Article 13(6)

# 10. Annex 1: Key Compliance Deadlines and other Important Dates

Date	Description	Related Article
18 February 2027	Compliance deadline: anyone that places products incorporating portable batteries on the market shall ensure they are readily removable and replaceable by the end-user at any time during the lifetime of the product.	Article 96(2)(a)
18 February 2027	Compliance deadline: LMT batteries, industrial batteries with a capacity > 2 kWh and electric vehicle batteries placed on the market or put into service shall have an electronic record ('battery passport').	Article 77(1)
18 August 2027 or 18 months from entry into force of either the delegated act or implementing act whichever is the latest	Date of application for the requirement for a maximum life cycle carbon footprint threshold for rechargeable industrial batteries except those with exclusively external storage.	Article 7(3)(b)
31 December 2027	Compliance deadline: producers to comply with collection rate of 63% for waste portable batteries.	Article 59(3)(b)
31 December 2027	All recycling shall achieve following minimum levels of materials recovery: (a) 90 % for cobalt; (b) 90 % for copper; (c) 90 % for lead; (d) 50 % for lithium; (e) 90 % for nickel	Annex XII, Part C(1)
18 August 2028	Compliance deadline: portable zinc-air button cells whether or not incorporated into appliances, shall not contain more than 0,01 % of lead.	Annex I(3)(2)
From 18 August 2028 or 24 months from entry into force of delegated act whichever is the latest	Compliance deadline: industrial batteries, with a capacity above 2 kWh (except those with exclusively external storage), electric vehicle batteries and SLI batteries that contain cobalt, lead, lithium or nickel in active materials shall be accompanied by documentation. This documentation will contain information about the percentage share of cobalt, lithium or nickel that is present in active materials and that has been recovered from battery manufacturing waste or post-consumer waste, and the percentage share of lead that is present in the battery and that has been recovered from waste, for each battery model per year and per manufacturing plant.	Article 8(1)

# 10. Annex 1: Key Compliance Deadlines and other Important Dates

Date	Description	Related Article
18 August 2028 or 18 months from entry into force of delegated act or implementing act whichever is the latest	Date of application for carbon footprint declaration requirement for LMT batteries.	Article 7(1)(c)
From 18 August 2028 or 24 months after entry into force of delegated act whichever is the latest	Compliance deadline: portable batteries of general use to meet the values for the electrochemical performance and durability parameters set out in Annex III.	Article 9(1)
18 February 2030 or 18 months from entry into force of either the delegated act or implementing act whichever is the latest	Date of application for the requirement for a maximum life cycle carbon footprint threshold for LMT batteries.	Article 7(2)(c)
18 August 2030 or 18 months from entry into force of either the delegated act or the implementing act whichever is the latest	Date of application for carbon footprint declaration requirement for rechargeable industrial batteries with external storage.	Article 7(1)(d)
31 December 2030	Compliance deadline: producers to comply with collection rate of 73% for waste portable batteries	Article 59(3)(c)
31 December 2030	Recycling shall achieve following minimum recycling efficiencies: (a) 80 % by average weight of lead-acid batteries; (b) 70 % by average weight of lithium-based batteries	Annex XII, Part B(2)

# 10. Annex 1: Key Compliance Deadlines and other Important Dates

Date	Description	Related Article
18 August 2031	<p>Compliance deadline: technical documentation per Annex VIII for industrial batteries with a capacity &gt; 2 kWh (except those with exclusively external storage, electric vehicle batteries and SLI batteries that contain cobalt, lead, lithium or nickel in active materials) to demonstrate that batteries contain the following minimum % of cobalt, lithium or nickel recovered from battery manufacturing waste or post-consumer waste for each battery model per year and per manufacturing plant:</p> <ul style="list-style-type: none"> <li>(a) 16 % cobalt;</li> <li>(b) 85 % lead;</li> <li>(c) 6 % lithium;</li> <li>(d) 6 % nickel.</li> </ul>	Article 8(2)
31 December 2031	<p>Recycling shall achieve following minimum levels of materials recovery:</p> <ul style="list-style-type: none"> <li>(a) 95 % for cobalt;</li> <li>(b) 95 % for copper;</li> <li>(c) 95 % for lead;</li> <li>(d) 80 % for lithium;</li> <li>(e) 95 % for nickel.</li> </ul>	Annex XII, Part C(2)
18 February 2032 or 18 months from entry into force of either the delegated act or the implementing act whichever is the latest	Date of application for the requirement for a maximum life cycle carbon footprint threshold for rechargeable industrial batteries with external storage.	Article 7(2)(d)
17 August 2033	Date of application for light means of transport batteries that contain cobalt, lead, lithium or nickel in active materials.	Article 8(1)
18 August 2036	<p>Compliance deadline: technical documentation per Annex VIII for industrial batteries with a capacity &gt;2 kWh (except those with exclusively external storage, electric vehicle batteries, LMT batteries and SLI batteries that contain cobalt, lead, lithium or nickel in active materials) to demonstrate that batteries contain the following minimum % of cobalt, lithium or nickel recovered from battery manufacturing waste or post-consumer waste for each battery model per year and per manufacturing plant:</p> <ul style="list-style-type: none"> <li>(a) 26 % cobalt;</li> <li>(b) 85 % lead;</li> <li>(c) 12 % lithium;</li> <li>(d) 15 % nickel.</li> </ul>	Article 8(3)



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1. [https://thebatteryass.eu/assets/images/content-guidance/pdf/2023\\_Battery\\_Passport\\_Content\\_Guidance\\_Executive\\_Summary.pdf](https://thebatteryass.eu/assets/images/content-guidance/pdf/2023_Battery_Passport_Content_Guidance_Executive_Summary.pdf)
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3. [https://thebatteryass.eu/assets/images/content-guidance/pdf/2023\\_Battery\\_Passport\\_Content\\_Guidance\\_Executive\\_Summary.pdf](https://thebatteryass.eu/assets/images/content-guidance/pdf/2023_Battery_Passport_Content_Guidance_Executive_Summary.pdf)

## OUR NUMBERS

**300+**

CUSTOMERS WORLDWIDE

**195**

COUNTRIES COVERED

**90,000**

REGULATIONS