

EU Battery Regulation Checklist

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EU compliance for merchants

Labelling, EPR and passport duties for batteries

Scope

- Identify all products that contain or are supplied with batteries.
- Determine the battery category for each, such as portable, industrial or LMT.
- Confirm your role as manufacturer, importer or distributor.
- Assign responsibility for battery compliance.

Labelling and marking

- Label batteries with capacity and chemistry information.
- Apply the crossed-out wheeled-bin symbol for separate collection.
- Prepare for the QR code requirement applying from 2027.
- Ensure labels are durable and legible.

Extended producer responsibility

- Register as a producer for batteries in each country where you place them on the market.
- Arrange take-back and collection of waste batteries per country.
- Report volumes and pay fees to the relevant national schemes.
- Keep evidence of registration and reporting.

Battery passport

- Identify batteries that will require a battery passport.
- Prepare to provide passport data from 18 February 2027.
- Gather the information needed to populate the passport with your suppliers.

Removability and replaceability

Check whether portable batteries in your products can be removed and replaced by the end user.

Prepare for portable-battery removability requirements from 2027.

Provide clear instructions for safe removal and replacement.

Information duties

Provide required information on battery performance and durability.

Make hazardous-substance and recycling information available.

Keep supplier documentation supporting your compliance.

The EU Battery Regulation (EU) 2023/1542 phases in obligations over several years, including the battery passport from 18 February 2027 and QR and portable-battery removability duties in 2027.