BatteryComply

THE EU BATTERY COMPLIANCE Field Guide

What customs actually checks before they release your container

A practical, cited handbook for importers, distributors and manufacturers placing batteries on the EU market in 2026 and 2027.

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For the full audit-on-your-PDF version:
https://batterycomply.com

Why this guide exists

EU Regulation (EU) 2023/1542 — the Battery Regulation — replaced the old Battery Directive on 18 February 2024 and is the most ambitious product regulation the EU has shipped in twenty years. It folds sustainability, traceability, transport safety, supply-chain due diligence and labelling into one staggered, deadline-driven framework.

It is also, in its current consolidated form, **117 pages long**, cross-references seven other EU laws, and the obligations phase in across nine separate dates between 2024 and 2031. Importers running 30 SKUs through customs every quarter cannot read this themselves and stay sane.

The good news: the practical day-to-day customs checks are a much shorter list. This guide is that list. Ten requirements, every one of them pinned to a specific Article or Annex of the regulation, with concrete pass/fail examples drawn from the documents we audit every week.

The bad news: every one of these is currently being missed, somewhere, on a container in transit right now. The 2023/1542 ramp-up is real — Dutch, German and French customs are actively holding shipments where the documentation falls short.

Who this is for: importers, distributors, customs brokers, compliance managers, and the procurement people who have to brief their suppliers in China on what to put on the label. If you ship batteries — standalone, in finished products, or as part of e-mobility — into the EU, this is your checklist.

How to use it: read top to bottom in 20 minutes. Then download your supplier's Declaration of Conformity, technical file, and packaging artwork, and walk through each check item-by-item against your real documents. If you find gaps, the recommended remediation wording at the end of each section is what you forward to your supplier.

To verify all ten in one upload, batterycomply.com runs the audit in 60 seconds with the same Article citations.

The 10 essential checks

1. **The Declaration of Conformity** — Article 18, Annex IX
2. **CE marking on the product and packaging** — Article 17
3. **The six items on the battery label** — Annex VI Part A
4. **The separate-collection (WEEE) symbol** — Annex VI Part A point 1
5. **The cadmium / lead hazardous-substance pictogram** — Annex VI Part A point 4
6. **The Battery Passport, where applicable** — Article 77, Annex XIII
7. **The UN 38.3 transport test summary** — Annex IX point 8
8. **The Article 7 carbon-footprint declaration, where applicable** — Article 7, Annex II
9. **Substance restrictions: mercury, cadmium, lead** — Article 6, Annex I
10. **Authorised representative for non-EU manufacturers** — Article 41

Two related obligations are flagged at the end as honourable mentions: Article 49 supply-chain due diligence and the recycled-content declarations phasing in from 2031.

CHECK 1

The Declaration of Conformity

Legal basis: Article 18 (in conjunction with Article 17 and Annex IX) of Regulation (EU) 2023/1542. The DoC is the manufacturer's signed legal statement that the product meets every applicable EU requirement. Without one, the battery cannot legally be on the EU market — full stop.

What customs looks for: a single document, generally one or two pages, that contains all of the following. Annex IX of the regulation gives the exact required structure:

- Battery model, type and serial number range, with enough detail to uniquely identify the product
- Manufacturer's name, registered trade name or trademark, and full postal address
- Name and address of the authorised representative, where the manufacturer is non-EU (see Check 10)
- A statement that the DoC is issued under the sole responsibility of the manufacturer
- The object of the declaration, with traceability — typically a model number plus a photograph or drawing reference
- A list of every relevant Union harmonisation legislation the product complies with (2023/1542 must be on it, plus any other applicable laws such as RED, EMC, RoHS)
- The harmonised standards or technical specifications the manufacturer applied (e.g. EN IEC 62133-2 for cell safety, EN 50436 for second-life)
- Where applicable, the name and identification number of the notified body that performed the conformity assessment, and a reference to the certificate
- The place and date of issue of the declaration
- The name, function and signature of the person empowered to sign

Common failure modes we see weekly:

- DoC references the old Directive 2006/66/EC instead of Regulation 2023/1542. This is the single most common failure. Suppliers update product but not paperwork.
- Manufacturer address is a P.O. box. EU customs increasingly require a real registered address.
- "Object of declaration" is so generic it could apply to any battery in the range. Customs needs traceability to the specific units in the container.
- Signed by "Compliance Department" rather than a named individual. Annex IX requires a name, not a department.
- Issued in Chinese or Mandarin only. The DoC must be available in a language the destination Member State accepts — typically English plus the local language for that border.

What to send your supplier if it's missing or wrong:

Per Article 18 and Annex IX of EU Regulation 2023/1542, please update the Declaration of Conformity for [model] to reference Regulation 2023/1542 (replacing the previous Directive 2006/66/EC reference), include a named signatory, and provide the full postal address of the manufacturer. The DoC must be issued in English and [local language]. Please send the revised version before the next shipment.

CHECK 2

CE marking on the product and packaging

Legal basis: Article 17 of Regulation (EU) 2023/1542. The CE mark is the visible, physical declaration that the product passes EU conformity. Without it on the battery itself or on the packaging, customs will hold the shipment.

What customs looks for:

- The CE mark is **affixed to the battery itself**, visibly, legibly and indelibly. If physical constraints prevent that (very small battery, sealed inside another product), it goes on the packaging and on the documentation accompanying the battery.
- Minimum height **5 mm**, unless the battery is smaller than that — in which case the mark must be readable but proportionally smaller.
- The mark must follow the official EU graphical proportions (the "C" and "E" are based on a grid of squares, with specific spacing). Cheap factories sometimes ship a stretched or distorted CE — that's a non-conforming mark and customs treat it as if no mark were present.
- If a notified body was involved in the conformity assessment, the body's four-digit identification number must appear immediately after the CE mark.

Common failure modes:

- CE mark on the box but not on the battery. Acceptable only if the battery is too small to take the mark physically — needs documentary evidence.
- Stretched or non-proportional CE. Some Chinese factories use a logo-style CE that fails the proportions test.
- Customs in China sometimes use a "CE" mark that means "China Export" — visually similar but legally meaningless. Spot it: the legitimate CE has a specific gap between the C and E; the fake CE letters touch.
- Notified body number missing. If your conformity-assessment route required one (e.g. Module B+C2 for some battery categories), the four-digit code must be present.

What to send your supplier if missing:

Per Article 17 of EU Regulation 2023/1542, the CE marking must be affixed visibly, legibly and indelibly on the battery itself, with a minimum height of 5 mm and the official EU proportions. Please confirm the marking on [model] complies with these requirements and is not the visually similar "China Export" mark. If a notified body assessment applies, the four-digit body identification number must appear immediately after the CE mark.

CHECK 3

The six items on the battery label

Legal basis: Article 13 plus Annex VI Part A of Regulation (EU) 2023/1542. Six pieces of information must be on every battery sold or placed in service in the EU. Together they let an end-user, a customs officer, or a recycler identify what the battery is and what's in it.

The six items:

1. **Manufacturer's name, registered trade name or trademark, and contact address.** Same identifying info as on the DoC.
2. **Battery type, model and batch or serial number.** Sufficient for traceability back to a specific manufacturing run.
3. **Date of manufacture.** Format flexibility allowed (YYYY-MM, YYYY-MM-DD, or week-of-year code) but must be readable without specialist tools.
4. **Weight of the battery.** In grams or kilograms. Crucial for transport classification (Check 7) and for end-of-life recycling planning.
5. **Capacity.** In milliampere-hours (mAh) for portable batteries, or watt-hours (Wh) for industrial, EV and LMT batteries above the relevant threshold. The unit must match the battery category.
6. **Chemical composition.** The dominant active chemistry — Li-ion, Ni-MH, NiCd, lead-acid, etc. For lithium chemistries, the cathode formulation (NMC, LFP, NCA, LCO) is best practice but not strictly required at this level.

Common failure modes:

- Capacity stated in mAh on a battery that legally requires Wh. The boundary is often misjudged for e-bike batteries and small industrial packs.
- Manufacturing date encoded as a date code only the factory understands ("BX24-31"). Annex VI requires it to be readable.
- Chemistry stated as "lithium" without specifying ion vs metal vs polymer. Three different regulatory regimes apply to those.
- Items 1–6 split across the battery, the packaging, and a separate paper insert. Annex VI requires all six items together on the battery itself, with the same physical-constraint exception as the CE mark.

What to send your supplier if items are missing:

Per Annex VI Part A of EU Regulation 2023/1542, the battery label must carry: (1) manufacturer name and address, (2) type/model/batch number, (3) date of manufacture, (4) weight, (5) capacity in mAh or Wh as appropriate to the battery category, (6) chemical composition (Li-ion, NiMH, etc.). All six items must appear on the battery itself unless physical constraints make this impossible. Please update [model]'s label artwork to include the missing items.

CHECK 4

The separate-collection (WEEE) symbol

Legal basis: Annex VI Part A point 1 plus Article 13 of Regulation (EU) 2023/1542. The crossed-out wheeled bin tells the consumer this battery cannot go in regular household waste. It is a legal requirement, not a courtesy.

What customs looks for:

- The official **crossed-out wheeled bin pictogram**, exactly as specified in the EU graphical-symbols register.
- Affixed to the battery itself, or — for very small batteries — to the packaging.
- Minimum height **3 % of the largest face of the battery**, but never less than **5 mm**. So a battery whose largest face is 80 mm × 50 mm needs the symbol to be at least 5 mm tall (not 2.4 mm).
- Indelible. Stickers that fall off, ink that smears, or printing that wears off in normal use are non-compliant.

Common failure modes:

- Symbol present but stretched or distorted, breaking the graphical-register specification. Amateur graphics designers often "tidy" the symbol into a non-compliant shape.
- Symbol too small. Spot-check: hold a 5 mm ruler against it.
- Symbol present on the packaging only, when the battery's largest face is well above the 3 % threshold.
- Symbol missing entirely. Common on industrial batteries because manufacturers think "industrial = not consumer = no separate-collection symbol needed". Wrong — Annex VI applies regardless of category.

What to send your supplier if missing or wrong:
Per Annex VI Part A point 1 of EU Regulation 2023/1542, the crossed-out wheeled bin pictogram is mandatory on the battery itself (or packaging where physical constraints apply). Minimum height is 3% of the largest battery face, never less than 5 mm. The symbol must follow the official EU graphical-register specification — please verify the artwork against the EU register and confirm the printed result is indelible.

CHECK 5

The cadmium / lead hazardous-substance symbol

Legal basis: Annex VI Part A point 4 of Regulation (EU) 2023/1542, in conjunction with the substance limits in Annex I.

When it applies: any battery containing more than 0.002 % cadmium by weight, or more than 0.004 % lead by weight, must be marked with the chemical symbol of the relevant element ("Cd" or "Pb") underneath the separate-collection pictogram.

What customs looks for:

- Chemical symbol **directly under** the crossed-out wheeled bin, not elsewhere on the label.
- Symbol height **at least one-quarter the height** of the bin pictogram. So if the bin is 8 mm tall, the "Cd" or "Pb" must be at least 2 mm.
- The symbol matches the actual content — a battery with both Cd and Pb above their thresholds carries both symbols.

Common failure modes:

- Lead-acid batteries shipped without the "Pb" symbol. This is incredibly common because the manufacturer assumes "everyone knows lead-acid is lead-acid". Customs disagrees.
- "Cd" or "Pb" symbol present but separated from the bin pictogram (e.g. on a different side of the label). Annex VI specifies physical adjacency.
- NiCd batteries shipped without "Cd". NiCd is a controlled chemistry — it must carry the Cd symbol AND meet the more restrictive marketing rules in Article 6.

What to send your supplier if missing:

Per Annex VI Part A point 4 of EU Regulation 2023/1542, batteries containing >0.002% cadmium by weight must carry the "Cd" symbol, and >0.004% lead by weight must carry the "Pb" symbol, placed directly underneath the separate-collection pictogram at minimum one-quarter its height. Please confirm [model]'s chemistry and update the label if either symbol is missing.

CHECK 6

The Battery Passport (in scope: LMT, industrial >2 kWh, EV)

Legal basis: Article 77 plus Annex XIII of Regulation (EU) 2023/1542. From **18 February 2027,** every battery in three categories sold or placed in service in the EU must carry a Digital Battery Passport.

Who is in scope:

- **LMT batteries** — Light Means of Transport: e-bikes, e-scooters, e-mopeds, electric kick-bikes. Largest category by unit volume.
- **Industrial batteries above 2 kWh capacity** — forklift, AGV, telecom backup, behind-the-meter and grid-scale storage.
- **EV batteries** — passenger cars, vans, trucks, buses.

Out of scope today: phone, laptop, tool, portable consumer batteries. These are expected to be brought into scope by 2030.

What the Battery Passport actually is:

- A **public web URL** that resolves to a structured JSON-LD document describing one specific physical battery.
- The URL is encoded in a **QR code (ISO/IEC 18004)** printed on the battery itself or on its packaging.
- The unique identifier in the URL is an ISO/IEC 15459 UPI — typically URN:UUID:.
- The data behind the URL is the structured payload defined in Annex XIII, with three access tiers: public (everyone), legitimate-interest (repairers, recyclers), authorities-only (customs, market surveillance).

CHECK 6

Annex XIII required fields (public tier): model identifier, manufacturer name and ID, manufacturing date and place, battery category, weight, dimensions, rated capacity (Wh), nominal voltage, expected lifecycle in cycles, chemistry, recycled-content declarations (mandatory from 18 August 2031), carbon footprint per kWh (Article 7 phase-in), supply-chain due-diligence policy reference, end-of-life contact.

Common failure modes (already visible in 2026 pre-deadline shipments):

- No passport at all. Container holds at customs, importer scrambles to issue retroactively. Costs five-figure detention plus rework.
- QR code points to an internal company URL that requires login. Annex XIII requires the public-tier projection to be available without authentication.
- JSON-LD payload uses non-standard field names. The schema.org + EU Joint Research Centre namespace is the canonical context.
- One QR code shared across multiple battery units. The regulation requires per-unit identification.

What to do: for batteries in scope, you have two paths. Either your manufacturer issues passports (rare in 2026 — most aren't ready), or you (the importer) issue them on import. BatteryComply at €289 per passport, lifetime hosting included, is the SMB-friendly path.

CHECK 7

The UN 38.3 transport test summary

Legal basis: Annex IX point 8 of Regulation (EU) 2023/1542 (referencing UN Manual of Tests and Criteria, Section 38.3) plus the broader transport-safety regime under ADR / IATA-DGR. What it is: every lithium battery (cell or pack) must pass a series of eight tests defined in UN Manual §38.3 — altitude simulation, thermal cycling, vibration, shock, external short circuit, impact/crush, overcharge, forced discharge. The result is a "test summary" document that travels with the battery.

What customs looks for:

- **A specific document** titled "UN 38.3 Test Summary" or equivalent, NOT just a passing reference in the DoC.
- **Required content** in the test summary (per UN Manual ST/SG/AC.10/11/Rev.7 + Amendment 1, paragraph 38.3.5):
  - Manufacturer name and contact
  - Cell or battery model
  - Cell or battery mass (in grams)
  - Cell or battery type (cylindrical, prismatic, pouch, button)
  - Watt-hour rating or lithium content (in grams of lithium for primary lithium-metal)
  - Physical description (drawing or photograph)
  - List of tests performed and the result of each
  - Reference to the test laboratory's report number and date
  - Edition of UN Manual against which the testing was done

CHECK 7

Common failure modes:

- "We've passed UN 38.3" stated in a single line in the DoC, with no attached summary document. Customs needs the actual summary.
- Test summary references an outdated edition of the UN Manual. The current edition is Rev.7 with Amendment 1; older editions (Rev.5, Rev.6) are no longer accepted for new shipments.
- Test summary covers a different model than what's in the container. The model number in the summary must match the model number on the battery label.
- Test summary issued by the manufacturer themselves rather than an accredited test lab. Some routes allow self-declaration but most border officials will challenge it.

What to send your supplier:

Per Annex IX point 8 of EU Regulation 2023/1542 and UN Manual of Tests and Criteria Section 38.3, please provide the full UN 38.3 Test Summary document for [model], referencing the current edition of the UN Manual (ST/SG/AC.10/11/Rev.7 + Amend.1). The summary must be a standalone document with all eight test results, the test laboratory's report number, and the cell/battery identifying details. A passing reference in the DoC is not sufficient.

CHECK 8

Article 7 carbon-footprint declaration

Legal basis: Article 7 of Regulation (EU) 2023/1542, with phase-in dates that depend on the battery category.

Who is in scope, and from when:

- **EV batteries:** carbon-footprint declaration mandatory from **18 February 2025**. Performance-class label mandatory from **18 August 2026**. Maximum carbon-footprint thresholds enforced from **18 February 2028**.
- **Industrial batteries above 2 kWh:** carbon-footprint declaration mandatory from **18 August 2026.** Class label from **18 February 2028.** Thresholds from **18 February 2030.**
- **LMT batteries:** carbon-footprint declaration mandatory from **18 February 2028.**
- **Portable batteries:** out of scope at this level; future amendment expected.

What the declaration must contain:

- Total carbon footprint of the battery, expressed as **kg CO_2-equivalent per kWh** of total energy provided over the expected service life.
- Life-cycle-stage breakdown: raw material acquisition + pre-processing, main product production, distribution, end-of-life.
- Identification of the battery model and the manufacturing plant.
- Date of declaration and reference to the EU Joint Research Centre methodology used (PEFCR for batteries).
- Verification statement from a notified body or accredited verifier — self-declaration is not accepted for the regulatory record.

Common failure modes:

- "Our carbon footprint is low" with no actual number. Customs and downstream buyers are increasingly asking for the verified declaration.
- Declaration provided in a non-PEFCR format. Other methodologies (ISO 14067, GHG Protocol Product Standard) are not acceptable substitutes for the regulatory record.
- Verification by the manufacturer's own internal team. Article 7 requires independent verification.

What to send your supplier (if you're past the relevant deadline):
Per Article 7 of EU Regulation 2023/1542, [model] requires a verified carbon-footprint declaration in kg CO_2-eq/kWh, broken down by life-cycle stage, using the PEFCR for batteries methodology. The declaration must be verified by a notified body or accredited verifier. Please provide the declaration document, verification certificate, and methodology reference.

CHECK 9

Substance restrictions: mercury, cadmium, lead

Legal basis: Article 6 plus Annex I of Regulation (EU) 2023/1542. Three substances are restricted across all battery categories with very narrow exceptions.

The hard limits (Annex I):

- **Mercury (Hg):** zero. No battery placed on the EU market may contain mercury at all, with no current exemptions. (Old button-cell exemption was withdrawn in 2024.)
- **Cadmium (Cd):** zero in portable batteries, with the narrow exception of Cd in industrial batteries used in emergency lighting and alarm systems. NiCd batteries for general consumer use have been off the EU market since 2009.
- **Lead (Pb):** restricted to <0.01 % by weight in portable batteries. Lead-acid traction and starter batteries are exempt and remain legal — but they must carry the "Pb" symbol (Check 5).

REACH / RoHS interaction: the EU's broader chemicals regulation (REACH, Regulation (EC) 1907/2006) and the electronics-specific RoHS Directive (2011/65/EU) impose additional restrictions on substances commonly found in battery assemblies — phthalates, brominated flame retardants, hexavalent chromium. Batteries themselves are excluded from RoHS scope but adjacent components (cables, connectors, BMS PCBs) are not.

Common failure modes:

- Lead-acid battery with no "Pb" symbol AND no documented lead-exemption claim. Customs holds the shipment.
- NiCd battery shipped to consumer market. Banned outright since 2009.
- Cell-level chemistry compliant but solder used in BMS contains banned substances. Test reports for the cell don't cover the assembled product.
- Mercury contamination from manufacturing process. Rare but does happen — usually only caught by specific test.

What to send your supplier:
Per Article 6 and Annex I of EU Regulation 2023/1542, batteries placed on the EU market must contain zero mercury, zero cadmium (except specified industrial-application exemptions), and less than 0.01% lead by weight in portable applications. Please provide test certificates from an accredited laboratory verifying [model] meets these limits, and confirm any exemption claims with documentary basis.

CHECK 10

Authorised representative for non-EU manufacturers

Legal basis: Article 41 of Regulation (EU) 2023/1542.

Who needs one: every manufacturer whose registered office is outside the EU and who places batteries on the EU market.

What they do: the authorised representative is an EU-established legal entity that takes regulatory responsibility on the manufacturer's behalf. They:

- Hold the technical file and DoC, available for inspection by market-surveillance authorities for ten years after the last unit was placed on the market.
- Cooperate with authorities on requests for information, recalls, or non-compliance investigations.
- Are named in the DoC and on the documentation accompanying the battery.

What customs looks for:

- Authorised representative named on the DoC, with full registered address in an EU Member State.
- Contact details (phone, email) for the AR.
- Written mandate between manufacturer and AR — usually held by the AR, but may be requested by authorities.

Common failure modes:

- Non-EU manufacturer, no AR named. Most common in low-volume / drop-shipping scenarios. Customs can refuse the shipment.
- AR named but the entity is no longer active (struck off the company register, or AR has terminated the mandate). Annual verification is good practice.
- AR is the importer themselves. Acceptable structurally, but the importer must hold a separate, signed mandate from the manufacturer — the import relationship doesn't auto-create AR status.

What to send your supplier:
Per Article 41 of EU Regulation 2023/1542, a non-EU manufacturer placing batteries on the EU market must appoint an EU-established authorised representative. Please provide the AR's full name, registered EU address, and contact details, and confirm a written mandate is in place. The AR must also be named in the Declaration of Conformity for [model].

Two honourable mentions

Article 49 — Supply-chain due diligence (phasing in 2025–2027)

For batteries containing cobalt, lithium, nickel, or natural graphite — i.e. nearly every Li-ion battery — Article 49 requires manufacturers to operate a supply-chain due-diligence policy aligned with the OECD Due Diligence Guidance for Responsible Supply Chains. Documentation requirements phase in across 2025 and 2026.
This isn't yet a customs-stop-your-container item — but it will be. Compliance managers should already be mapping their supply chains, identifying smelter-of-origin for each critical raw material, and preparing the policy documentation.

Recycled-content declarations (mandatory from 18 August 2031)

By 2031, EV and industrial batteries above 2 kWh must declare minimum recycled-content shares: 16 % cobalt, 6 % lithium, 6 % nickel, 85 % lead. By 2036 these tighten further. The Battery Passport (Check 6) is where these declarations live.
For 2026 and 2027, recycled-content fields are recommended but not yet enforced in the passport payload. Best practice: include them anyway, even as zero values. It signals to your buyers that you're tracking — and your auditors will appreciate the head-start.

The 2024–2031 phase-in calendar

Date	Obligation	Affected
Feb 18, 2024	Old Directive 2006/66/EC repealed; Regulation 2023/1542 in force	All categories
Aug 18, 2024	Article 6 substance restrictions tightened	All
Feb 18, 2025	EV carbon-footprint declaration mandatory	EV
Aug 18, 2025	Authorised representative obligation in force	Non-EU manufacturers
Aug 18, 2026	Industrial >2 kWh carbon-footprint declaration mandatory	Industrial
Aug 18, 2026	EV carbon-footprint performance-class label mandatory	EV
Feb 18, 2027	Battery Passport mandatory	LMT, industrial >2 kWh, EV
Feb 18, 2028	Industrial CFP class label; LMT CFP declaration; EV CFP threshold	Multiple
Feb 18, 2030	Industrial CFP threshold	Industrial
Aug 18, 2031	Recycled-content declarations enforceable	EV, industrial >2 kWh

The single most important date for SMB importers right now is 18 February 2027: the Battery Passport deadline. Less than a year out from the time of writing.

Glossary

Annex — A regulatory appendix carrying the same legal force as the main Articles. Annex VI specifies labelling, Annex IX specifies the Declaration of Conformity, Annex XIII specifies the Battery Passport.

Article — A numbered legal provision. The regulation has 96 Articles. Article 17 covers CE marking, Article 77 covers the Battery Passport, etc.

Battery Passport — A public web URL with a QR code, encoding structured Annex XIII data about a specific battery unit. Mandatory from 18 Feb 2027 for LMT, industrial >2 kWh, and EV batteries.

CFP — Carbon footprint, expressed in kg CO_2-eq / kWh of energy provided over the battery's service life.

DoC — Declaration of Conformity. The manufacturer's signed legal statement that the product complies with all applicable EU laws.

LMT — Light Means of Transport. E-bikes, e-scooters, e-mopeds, electric kick-bikes. Notified body — An EU-accredited independent third party authorised to perform conformity-assessment procedures.

PEFCR — Product Environmental Footprint Category Rules. The EU JRC methodology for calculating carbon footprint, mandatory under Article 7.

Regulation (EU) 2023/1542 — The Battery Regulation. Replaced Directive 2006/66/EC on 18 February 2024.

REACH — Regulation (EC) 1907/2006 on chemicals registration. Imposes substance restrictions parallel to Annex I.

RoHS — Directive 2011/65/EU on hazardous substances in electronics. Batteries are out of scope, but adjacent components (BMS, cables) are not.

SVHC — Substance of Very High Concern. The REACH "candidate list" of restricted substances, currently ~240 substances and growing.

UN 38.3 — Section 38.3 of the UN Manual of Tests and Criteria. Eight transport-safety tests every lithium battery must pass.

UPI — Unique Product Identifier per ISO/IEC 15459. The format used in Battery Passports — typically URN:UUID:.

What to do next?

You have three options.

Option 1 — Read the regulation yourself. EUR-Lex link below. Allow a week of compliance-manager time, or three weeks of part-time evening reading.

Option 2 — Hire a consultant. Reputable EU compliance consultants charge €800–€2,000 per document for a structured review. Three-week turnaround typical. Worth it for high-stakes products and edge cases.

Option 3 — Use BatteryComply. Upload your supplier's PDFs (Declaration of Conformity, technical file, spec sheet, UN 38.3 summary). In 60 seconds we run all ten checks above with the same Article citations, return a structured pass/fail report, and tell you exactly what your supplier needs to fix. €149 per document, with bulk discounts at 5+.

The first verdict (APPROVED / CONDITIONAL / NOT APPROVED) is free — pay only for the full citations and remediation wording.

https://batterycomply.com

Primary sources

- **Regulation (EU) 2023/1542** — official EUR-Lex consolidated text: https://eur-lex.europa.eu/eli/reg/2023/1542/oj
- **UN Manual of Tests and Criteria** — Section 38.3: https://unece.org/transport/dangerous-goods/un-manual-tests-and-criteria-rev7-amend1
- **REACH Regulation (EC) 1907/2006** — consolidated: https://eur-lex.europa.eu/eli/reg/2006/1907/oj
- **RoHS Directive 2011/65/EU** — consolidated: https://eur-lex.europa.eu/eli/dir/2011/65/oj
- **Joint Research Centre PEFCR for batteries:** https://eplca.jrc.ec.europa.eu/permalink/PEFCR_Batteries.pdf

About BatteryComply

BatteryComply is an EU Battery Regulation 2023/1542 audit tool for importers, distributors and SMB manufacturers. Upload your supplier's documents, get a structured pass/fail audit against all 10 requirements above in 60 seconds, with Article-level citations and supplier-ready remediation wording.

Built and run from Denmark. Data hosted in the EU. No account required to start.

Do you have questions: **info@batterycomply.com**

This guide is offered free as part of our work to make the EU battery-compliance ramp-up survivable for SMB importers. If it saved you from a customs hold, the best thing you can do is forward it to one other importer who'd benefit.

The link to share is **https://batterycomply.com/guide.**

E*dition 1, April 2026. The regulation is consolidating; field practice is evolving. We'll publish Edition 2 with any material amendments. Until then: this guide reflects the law as in force on the date of writing.*

Nothing in this guide is legal advice. For high-stakes shipments and edge cases, consult a notified body or qualified counsel.

BatteryComply