GS1 in Europe Battery Regulation Guideline: Portable batteries

Implementation guideline for portable batteries under Regulation (EU) 2023/1542

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Disclaimer

Status of this document
This is version 1.0 (13 November 2026) of the GS1 in Europe guideline for portable batteries. It is a final release and is shared for information. It will be updated when the legislation, its secondary acts or the GS1 standards change.

Based on legislation, not a legal document
This guideline is based on Regulation (EU) 2023/1542 on batteries and waste batteries, related EU legislation (including delegated and implementing acts), and European Commission guidance and data models, as available on 13 November 2026. These texts are still being developed and amended, and later changes may not yet be reflected here.

This guideline is not a legal document and does not give legal advice. Only the official legal texts, as published in the Official Journal of the European Union, are binding. Each economic operator remains fully responsible for its own compliance with the applicable legislation.

How this guideline was developed
This guideline was first developed as a generic approach for all battery categories covered by the regulation. It was then translated into this standalone guideline for portable batteries. Some explanations may therefore also apply to other battery categories.

Use of GS1 standards
The use of GS1 standards is not required by the legislation, and this guideline does not make it a requirement. The guideline shows how GS1 standards *could* be used to meet the legal requirements. Companies are free to choose other solutions that comply with the legislation.

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1 Introduction

1.1 The Battery Regulation and this guideline

Regulation (EU) 2023/1542 of 12 July 2023 concerns batteries and waste batteries. It replaces the former Batteries Directive (Directive 2006/66/EC) and creates one framework for the whole battery lifecycle: sustainability and safety requirements, labelling and information, conformity assessment, battery due diligence, extended producer responsibility, and the collection, treatment and recycling of waste batteries. It applies to all batteries, regardless of their shape, volume, weight, design, material composition, chemistry, use or purpose, subject to its express exclusions (Article 1(3), (5)–(6)). This guideline focuses on portable batteries.

The Regulation applies in stages. It has applied generally since 18 February 2024, while many provisions apply from later dates. Some of these dates depend on secondary legislation, such as delegated and implementing acts.

For portable batteries, including portable batteries of general use, the Regulation covers the following topics. Each is explained in a chapter of this guideline:

- product requirements, such as restricted substances and, for portable batteries of general use, performance and durability (chapter 2);
- the responsibilities of manufacturers, importers, distributors and other actors (chapter 3);
- labels and the QR code that gives access to information (chapter 4);
- batteries that are incorporated in products, including removal and replacement by the end-user (chapter 5);
- battery due diligence (chapter 8);
- producer registration, extended producer responsibility and reporting (chapter 9);
- collection, treatment, recycling and re-use (chapters 10 and 11);
- the dates from the Battery Regulation that matter for portable batteries (chapter 14);
- the data that describes a battery, attribute by attribute (chapter 15).

In practice, operators need reliable data about batteries, the parties involved and the events that occur across the value chain. This calls for common identifiers, clear relationships between data and interoperable ways to access and exchange information.

This guideline explains what the Regulation requires for portable batteries and how GS1 standards support the identification, information access, data exchange and evidence functions that follow from those requirements.

The guideline is meant for manufacturers, importers, distributors, producers and other professional operators responsible for portable batteries, together with the teams and service providers that implement their identification and information systems.

1.2 GS1 in Europe

GS1 in Europe is the regional platform of GS1, the global not-for-profit standards organisation. It brings together the national GS1 organisations in 49 countries. These organisations govern GS1 in Europe through a Board of Directors made up of their Executive Directors.

GS1 in Europe supports a common system of standards for identifying products, locations and other entities and for sharing the related data between businesses. It works with national GS1 organisations, industry, trade associations and public authorities to promote the adoption of these standards across Europe. Companies obtain GS1 identification keys through their national GS1 organisation, which can also advise on national implementation.

For the Battery Regulation, GS1 in Europe is developing guidance on the use of GS1 identifiers and data carriers, of which this guideline is part. Related work includes a generic data model for batteries and open, interoperable ways to exchange battery data.

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This guideline uses the following GS1 standards. Their contribution and limits are explained where they are used.

GS1 standard	What it does	Used in this guideline for	Chapters
GTIN (Global Trade Item Number)	Identifies a trade item. With a batch/lot number or a serial number it distinguishes a production batch or an individual instance.	The battery model or trade item, a pack, and the scope of evidence	6, 7
GLN (Global Location Number)	Identifies a legal entity, party, function or location.	Operators, producers, sites and collection points	6, 9, 10
SSCC (Serial Shipping Container Code)	Identifies a logistic unit.	Transport, storage and collection units	6, 10, 12
GS1 Digital Link	Represents a GS1 identifier as a web address, giving web-enabled identification and an entry point to online resources.	The address carried by the QR code	7
EPCIS and CBV	Capture and share visibility events and the business vocabulary around them.	Shipments, packing, installation and treatment records	12
GDSN (Global Data Synchronisation Network)	Exchanges standardised trade-item master data between trading partners.	Master data, where its coverage has been verified	9

1.3 What this means for portable batteries

Portable batteries, including portable batteries of general use, do not require an Article 77(1) battery passport. From 18 February 2027 they follow the Article 13(6)(b) QR-information route.

The Regulation requires identification, information access and evidence but does not prescribe GS1 standards for these functions. This guideline proposes GS1 identification, GS1 Digital Link and relevant data-exchange standards.

GTIN identifies a battery trade item; batch/lot and serial qualifiers distinguish production batches and individual instances. GLN identifies parties and locations, SSCC identifies logistic units, and EPCIS captures and shares visibility events. The following chapters explain the contribution and limits of each component.

A QR code, its encoded identifier, the information service, physical labels and CE marking have different functions; a QR code alone is not a passport. Chapter 1.4 gives the category test, and chapter 16 explains the terms used here.

1.4 How to read this guideline

The guideline follows the questions an operator needs to answer. What does the Regulation require? Who is responsible? Which battery and which information are concerned? How do GS1 standards support the implementation? Where a chapter proposes the use of GS1 standards, it separates what the Regulation requires from what this guideline proposes, and it states the limits of the standard.

How this guideline was created. This guideline is one of five category guidelines: portable batteries, light means of transport (LMT) batteries, starting, lighting and ignition (SLI) batteries, industrial batteries and electric vehicle (EV) batteries. All five are based on the GS1 in Europe master guideline, which covers every battery category. Each category guideline takes the common sections of the master and its category-specific section and presents what applies to that category as a document that can be read on its own. Because they share one basis, the five guidelines use the same structure, terms and conventions.

Check the category first. This guideline applies to portable batteries: batteries that are sealed, weigh 5 kg or less, are not specifically designed for industrial use and are neither EV, LMT nor SLI batteries (Article 3(1), point (9)). Confirm the category before relying on the guideline; chapter 16 gives the definition of each category. A battery that falls into another category, such as an LMT, industrial or electric vehicle battery, is assessed under that category, and a battery passport may then apply.

Choose a reading path. Read chapters 1 to 5 for the regulatory outcome, then the chapters that match your role:

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Your situation	Start with	Then read
Manufacturer or brand owner placing portable batteries on the market	Chapters 2, 3 and 4	Chapters 6 and 7, and chapter 8 where due diligence applies
Importer or distributor	Chapters 3 and 4	Chapter 9 for producer status and chapter 10.1 for take-back
Maker of a product that incorporates a portable battery	Chapter 5	Chapters 4 and 6
Producer or producer responsibility organisation	Chapter 9	Chapter 10 and chapter 14
Collector, treatment operator or recycler	Chapter 10	Chapters 11 and 12
Operator re-using, repurposing or remanufacturing batteries	Chapter 11	Chapters 3 and 4
IT, data or GS1 implementation specialist	Chapters 6, 7 and 12	Chapters 13 and 15
Compliance reviewer checking dates and open points	Chapter 14	The chapter cited in each row

Conventions used in this guideline.

- **Provisions.** Article numbers refer to Regulation (EU) 2023/1542 unless another act is named. The requirement tables have a provision column so that each statement can be checked against the legal text.
- **Required or proposed.** A statement that cites a provision describes what the Regulation requires. A statement introduced as a proposal or recommendation of this guideline is an implementation choice, not a legal duty.
- **Dates.** Chapter 14 lists the dates in one table. Where a date depends on a later act ("whichever is later"), check that act before treating the duty as operative.
- **Open points.** Codes such as OQ-REG-003 mark open legal questions. Chapter 14 lists those that concern portable batteries and explains their status. Check the open point before relying on the statement that cites it.
- **Technical basis.** Paragraphs headed "Technical basis" name the GS1 standard and section behind an explanation. They are mainly for the people who implement it.
- **References and terms.** References such as "chapter 14" point to this document, while "Chapter VII of the Regulation" points to the Regulation. Chapter 16 explains the terms and abbreviations.
- **Limits.** Identifiers, QR codes and event records support the retrieval of evidence. They do not demonstrate conformity. Registration, producer responsibility and reporting arrangements differ between Member States, so confirm them nationally.

2 Product requirements and evidence

A battery may be placed on the market or put into service only if it meets the requirements that apply to it and does not present a risk to human health, the safety of persons, property or the environment (Article 5). This chapter sets out the requirements that apply to portable batteries.

2.1 What applies to portable batteries

Requirement	Effect on portable batteries	Provision
Restricted substances	Limits on mercury, cadmium and lead apply, with separate entries for batteries in M1 and N1 vehicles	Article 6; Annex I
Performance and durability	Minimum values apply only to portable batteries of general use, excluding button cells, from a conditional date	Article 9; Annex III
Removal and replacement	The person placing a product incorporating a portable battery on the market must ensure end-user removal and replacement, subject to derogations (chapter 5)	Article 11(1)–(3), (7)–(8)

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Requirement	Effect on portable batteries	Provision
Labelling and information	General, capacity or minimum-duration labels apply according to battery type, together with the separate-collection symbol, the chemical symbol and the QR code (chapter 4)	Article 13(1)–(7); Annex VI

Carbon-footprint (Article 7), recovered-material (Article 8), Article 10 performance, Article 12 storage-safety and Article 14 state-of-health requirements do not currently apply to portable batteries. The Article 17(1) conformity assessment therefore covers Articles 6, 9 (portable batteries of general use only) and 13, and the Article 17(2) procedures for Articles 7 and 8, with their date trigger, are not relevant (chapter 3).

2.2 Restricted substances

Portable batteries must not contain substances restricted by Annex I unless the conditions in that Annex are met. This applies in addition to Annex XVII to Regulation (EC) No 1907/2006 and Article 4(2)(a) of Directive 2000/53/EC. A general statement of "substance compliance" does not replace a check of the current Annex I for the substance, battery and use concerned (Article 6).

Substance	Batteries concerned	Limit by weight	Exceptions	Reference
Mercury	All batteries, whether or not incorporated in appliances, light means of transport or other vehicles	0.0005%	None	Annex I, entry 1
Cadmium	Portable batteries, whether or not incorporated in appliances, light means of transport or other vehicles	0.002%	None	Annex I, entry 2, point 1
Lead	Portable batteries, whether or not incorporated in appliances, from 18 August 2024	0.01%	Portable zinc-air button cells until 18 August 2028	Annex I, entry 3, points 1–2
Lead	Portable batteries incorporated in M1 and N1 vehicles	0.1% in homogeneous material	Batteries incorporated in, or used as spare parts for, vehicles type-approved before 1 January 2024	Annex I, entry 3, points 3–4
Hexavalent chromium	Batteries incorporated in M1 and N1 vehicles	0.1% in homogeneous material	None stated	Annex I, entry 4

This table shows Annex I as replaced by Regulation (EU) 2026/1738 (Article 53 and Annex XII), which applies from 13 August 2026 (Article 59(2)). M1 and N1 vehicles include special purpose vehicles of those categories, and batteries in other vehicle categories fall under the general entries only. M1 and N1 are the categories of passenger cars and light goods vehicles in Regulation (EU) 2018/858. Open points remain on how Article 4(2)(a) of Directive 2000/53/EC applies to batteries until 31 August 2032 and how "homogeneous material" applies to a battery, and on whether entry 3, point 1, reaches a portable battery in an M1 or N1 vehicle (OQ-REG-016).

2.3 Carbon footprint

Article 7 sets carbon-footprint requirements for certain battery categories, but not for portable batteries. It currently applies only to EV batteries, LMT batteries and rechargeable industrial batteries above 2 kWh. No carbon-footprint declaration, class or threshold is therefore required for portable batteries (Article 7).

2.4 Recovered-material content

Article 8 deals with the share of cobalt, lead, lithium and nickel in a battery that comes from recovered waste, and it does not currently apply to portable batteries (Article 8(1)–(3)).

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2.5 Performance and durability

A portable battery of general use is a portable-battery subcategory. It comprises batteries specifically designed to be interoperable and having one of the formats listed in Article 3(1), point (10): 4.5 V (3R12), button cell, D, C, AA, AAA, AAAA, A23 or 9 V (PP3). It covers rechargeable and non-rechargeable batteries. The interoperable design and the listed format are cumulative: a battery is not within the subcategory merely because it is portable or has a similar use.

From 18 August 2028 or 24 months after the Article 9(2) delegated act enters into force, whichever is later, manufacturers must ensure that portable batteries of general use other than button cells meet the minimum values set by that act for the applicable Annex III parameters (Article 9(1)–(2)).

Battery type	Annex III parameters
Non-rechargeable (Part A)	Minimum average duration, delayed discharge performance and resistance to leakage
Rechargeable (Part B)	Rated capacity, charge (capacity) retention, charge (capacity) recovery, endurance in cycles and resistance to leakage
Button cell	Excluded from the minimum-value requirements in Article 9(1)–(2)

The Commission has not yet published the delegated act under Article 9(2), which will set the minimum performance values and how they are measured. Until it is published, these values are not known and the start date cannot be fixed. The start date will be 18 August 2028 or 24 months after the act enters into force, whichever is later (OQ-REG-015). Check for the act before you set operational requirements.

Article 9(3) only requires the Commission to assess, by 31 December 2030, measures for non-rechargeable portable batteries of general use. It does not ban or phase out these batteries.

Apart from Article 9 and the separate reporting in chapter 9, portable batteries of general use follow the same requirements as other portable batteries. They need no battery passport and follow the same QR route.

2.6 How GS1 standards support implementation

The Regulation requires this evidence but does not prescribe GS1 standards. This guideline proposes the following uses. They identify what the evidence applies to and help retrieve it. They do not validate composition, calculate a value or establish conformity.

Requirement	How GS1 standards support it	Granularity and limitations
Restricted substances	GTIN identifies the model linked to a controlled material declaration. GTIN plus batch/lot number links production evidence to a batch, and GTIN plus serial number supports an investigation of one battery. GLN identifies a manufacturer, testing function or manufacturing location. EPCIS shares material-receipt, production, release, recall and corrective-action events.	Model level fits an unchanged specification; batch level fits inputs or test results that vary per production batch. A GLN does not replace a legally required identity, accreditation or authority-issued identifier.
Performance and durability	Portable batteries of general use: GTIN identifies the model that the values apply to. Master data associated with that GTIN holds the values, and a GS1 Digital Link URI gives access to them.	The values are normally common to a model, so GTIN is sufficient at model level. GDSN exchanges this master data only where attribute coverage has been verified.

3 Responsible actors and conformity

Duties attach to a role, and the role has to be determined for the particular battery and transaction. One organisation can hold several roles. (Article 3(1), point (22)). A GS1 identifier does not determine a role but supports the identification of the different parties. A GLN can be used to identify all the economic operators listed below.

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3.1 The economic operators

Role	Who it is	Main duties	Provision
Manufacturer	The person that manufactures a battery, or has one designed or manufactured, and markets it under its own name or trade mark or puts it into service for its own purposes	See below (paragraph 3.2)	Article 3(1), point (33); Article 38
Authorised representative	A person established in the Union, appointed by written mandate	Keeps the declaration and specified documents for ten years, supplies conformity evidence on a reasoned request, cooperates on risks and immediately notifies authorities of a risk. The mandate cannot transfer the product-compliance duties, the technical documentation or the due-diligence duties	Article 3(1), point (63); Article 40
Importer	A person established in the Union that places a battery from a third country on the Union market	Verifies the conformity assessment, technical documentation, declaration, CE marking, other markings and labels, accompanying documents, instructions, safety information and manufacturer details before placing the battery. Adds its own name or trade mark and contact details on the battery or, where impossible, its packaging or accompanying document	Article 3(1), point (64); Article 41
Distributor	A supply-chain person other than the manufacturer or importer that makes a battery available	Acts with due care. Verifies producer registration, CE marking, other markings and labels, accompanying material and manufacturer and importer details before making the battery available	Article 3(1), point (65); Article 42
Fulfilment service provider	A person handling warehousing, packaging, addressing and dispatching	Ensures these do not jeopardise compliance, cooperates with authorities and immediately informs them of a risk	Article 43
Producer	A role under extended producer responsibility, decided per Member State (chapter 9). Not the same as the manufacturer	Registers, finances and reports	Article 3(1), point (47); Articles 55–58 and 75

Importers and distributors protect conformity during storage and transport. Where appropriate to the risk, importers also sample-test batteries, investigate complaints, keep a register where necessary and inform distributors of this monitoring (Articles 41 and 42). Instructions and safety information are provided in the language or languages determined by the relevant Member State (Article 38).

3.2 Manufacturer duties

Manufacturers must (Article 38(1)–(8)):

- ensure compliance with the applicable requirements, which for portable batteries means Article 6 and, for portable batteries of general use, Article 9;
- provide clear instructions and safety information in the required language or languages;
- apply the required markings and labels (chapter 4);
- draw up technical documentation and carry out, or have carried out, the applicable conformity assessment before placing the battery on the market or putting it into service;
- after conformity is demonstrated, draw up the EU declaration of conformity and affix the CE marking;
- maintain procedures so that series-produced batteries remain conforming; and

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- provide the required battery identification and manufacturer contact information, namely name, registered trade name or trade mark, postal address, and a website and email address if available (Article 38(6)–(7)).

Cell and module suppliers must provide manufacturers, free of charge, with the information and documentation needed for compliance (Article 39).

3.3 When another actor becomes the manufacturer

An importer or distributor is treated as the manufacturer if it places a battery on the market or puts it into service under its own name or trade mark, modifies a battery already on the market so that compliance could be affected, or changes its purpose (Article 44). An operator carrying out preparation for re-use, preparation for repurposing, repurposing or remanufacturing and then placing the battery on the market or putting it into service is also treated as the manufacturer (Articles 38(11) and 45; chapter 11).

3.4 Conformity assessment

The manufacturer has to show that a battery meets the applicable requirements. This is done through a conformity assessment, using the module in the table that fits the requirements and the type of production. A module is a fixed procedure from Annex VIII. The Regulation does not define series and non-series production. In practice, Modules A and D1 work at battery-model level, while Module G verifies each battery individually.

Requirements assessed	Series production	Non-series production	Provision
Articles 6 (restrictions on substances), 9 (performance and durability, portable batteries of general use only) and 13 (labelling and marking)	Module A or D1	Module A or G	Article 17(1)
Additional assessment after the listed circular operations (see chapter 11)	Module A	Module A	Article 17(3)

Source: Article 17(1)–(3); Annex VIII, Parts A–C.

What the modules mean:

- Module A (internal production control): the manufacturer carries out the assessment under its own responsibility.
- Module D1 (production quality system): a notified body assesses the manufacturer's production quality system and monitors it.
- Module G (unit verification): a notified body verifies the individual unit.

Records and correspondence with a notified body use the official language or languages of the country where the notified body is established, or another language it accepts (Article 17(4)).

The conformity-assessment provisions apply from 18 August 2024 (Article 96(2)(b)). The assessment covers the applicable requirements only, and GS1 standards do not replace it.

3.5 Technical documentation

Before placing a battery on the market or putting it into service, the manufacturer draws up documentation that enables conformity assessment and contains an adequate risk analysis. Depending on the module and the applicable requirements, it includes the description and intended use; design and manufacturing material; a specimen of the required label; applied standards and specifications; alternative solutions; calculations and evidence; and test reports (Article 38(2); Annex VIII, Parts A–C, point 2). It must be retrievable and supplied to authorities on request (Articles 38(10), 41(7)–(8) and 42(6)).

The Regulation does not prescribe GS1 identifiers for linking technical documentation to the batteries it covers. GTIN identifies the battery trade item and provides a reference for linking its model-level technical documentation. GTIN plus serial number identifies an individual battery and links records specific to that

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unit. These links are maintained in the documentation system; the identifiers themselves do not contain the documentation.

3.6 EU declaration of conformity

The declaration states that conformity with the applicable product requirements has been demonstrated. It follows Annex IX, includes the applicable Annex VIII elements, is kept current, is translated as required by the Member State, and is electronic, with paper supplied on request.

Where several Union acts require an EU declaration of conformity for the battery, a single declaration covers those acts and states their publication references. By drawing up the declaration, the manufacturer assumes responsibility for the battery's compliance with this Regulation (Article 18(3)–(4)).

Under Modules A and D1, the declaration identifies the battery model; under Module G, it identifies the individual battery assessed (Annex VIII, Part A, point 4; Part B, point 7.2; Part C, point 5). The Regulation does not prescribe GS1 identifiers for this purpose. In the GS1 approach proposed here, GTIN identifies the battery trade item associated with the model-level declaration. GTIN plus serial number identifies the individual battery associated with a Module G declaration. GTIN alone does not distinguish individual batteries.

3.7 CE marking

CE marking shows conformity with applicable Union harmonisation legislation; it is not a battery, batch or party identifier. It must be visible, legible and indelible and be affixed before placing on the market or putting into service. If marking the battery is impossible or not warranted because of its nature, it goes on the packaging and accompanying documents. Where a notified body is required, its number follows the CE marking (Article 3(1), point (36); Articles 19–20).

3.8 Record retention

Record	Actor	Period	Provision
Technical documentation and declaration	Manufacturer	Ten years; read Article 38(4) together with the selected Annex VIII module	Article 38(4); Annex VIII
Declaration and records named in the mandate	Authorised representative	Ten years after placing on the market or putting into service	Article 40(3)(a)
Copy of the declaration and access to technical documents	Importer	Ten years after placing on the market	Article 41(7)
Identity of the immediate supplier	Economic operator	Ten years after receipt	Article 46(1)–(2)
Identity of the recipient, quantity and exact models	Economic operator	Ten years after supply	Article 46(1)–(2)

The modules have different retention triggers: Module A measures from placing on the market of the last battery of the model, and Module G uses records specific to the unit. Article 38(4) refers to technical documentation in Annex IX, although Annex VIII contains it. Retention policies should satisfy the selected module and verify the current text (OQ-REG-008).

3.9 Corrective action, withdrawal and recall

Manufacturers and importers that believe a battery they placed on the market is non-compliant must immediately correct, withdraw or recall it, as appropriate. If it presents a risk, they immediately inform the relevant authority, with details of the non-compliance and the action taken. Distributors ensure that appropriate action is taken and give a similar notification. A distributor or importer that believes a battery is non-compliant must not make it available or place it on the market until conformity is restored (Articles 38(9)–(10), 41(5)–(6) and (8), 42(3), (5)–(6) and 43).

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Authorities may require correction, withdrawal or recall, and action extends to the affected batteries the operator made available throughout the Union. Measures can also apply to a compliant battery that presents a risk. Formal defects, including absent or improper CE marking, declaration or documentation, or missing manufacturer or importer details, must be corrected (Articles 79, 81 and 83). GS1 identifiers help locate the affected parties, models, batches or instances (chapter 12). They do not determine the remedy or prove conformity.

3.10 How GS1 standards identify parties and locations

The Regulation requires party, contact and supply-chain identity information but does not prescribe GS1 standards. GLN identifies economic operators, functions and locations, so that the same party is recognised in every record. The associated data holds the name, address and contact details; a GLN does not itself communicate them.

Object	How GLN is used	Level
Economic operator	Identifies the legal entity or party in master and transaction data	Party or legal entity
Conformity, quality or recall department	Identifies the function separately	Function
Manufacturing, storage, testing or dispatch site	Identifies the location or sub-location	Location or sub-location

A GLN does not determine an operator's role and does not replace an authority-issued identifier. Technical basis: GS1 GLN Allocation Rules Standard, sections 2.1–2.3.

4 Physical labels and QR-accessible information

Physical labels, CE marking, the QR code and the information behind it are separate mechanisms, each with its own scope and date. A QR code is a data carrier, not a battery passport, and it does not replace physical markings or CE marking. The manufacturer ensures Article 13 labelling (Article 38(1)); importers and distributors verify it (Articles 41(2) and 42(2)).

4.1 Physical labels and markings

Mechanism	What it covers	Date or trigger	Provision
General label	Annex VI, Part A information, described below	18 August 2026 or 18 months after the Article 13(10) implementing act enters into force, whichever is later (OQ-REG-001)	Article 13(1), (7), (10); Annex VI, Part A
Capacity label	Rechargeable portable batteries	18 August 2026 or 18 months after the implementing act referred to in Article 13(10) enters into force, whichever is later.	Article 13(2), (7), (10)
Minimum average duration and "non-rechargeable" label	Non-rechargeable portable batteries	18 August 2026 or 18 months after the implementing act referred to in Article 13(10) enters into force, whichever is later.	Article 13(3), (7), (10)
Separate-collection symbol	All portable batteries. The symbol has a minimum size and a packaging alternative for very small batteries	18 August 2025	Article 13(4), (7); Annex VI, Part B
Cd or Pb symbol	Batteries containing more than 0.002% cadmium or 0.004% lead, printed beneath the collection symbol	Transition to be confirmed (OQ-REG-002)	Article 13(5), (7)

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The general label includes manufacturer identity; battery category and Article 38(6) identification; place and date of manufacture; weight; capacity; chemistry; hazardous substances other than mercury, cadmium or lead; usable extinguishing agent; and critical raw materials above 0.1% by weight (Annex VI, Part A). Article 38(6) requires model identification with a batch or serial number, product number or another identifying element. It does not universally require serialisation. GTIN identifies model and can be combined with batch and serial number.

4.2 Placement

The labels and the QR code must be printed or engraved visibly, legibly and indelibly on the battery. Where this is not possible or not warranted because of the nature and size of the battery, they are affixed to the packaging and to the accompanying documents (Article 13(7)). This differs from the special packaging rule where the separate-collection symbol would be smaller than 0.47 × 0.47 cm (Article 13(4)). One QR code does not replace other physical markings required by law.

4.3 Physical CE marking

CE marking and QR access are separate. CE marking is affixed under Articles 19–20 (chapter 3). The QR code gives access to the declaration of conformity under Article 13(6)(b). Neither replaces the other.

4.4 The QR code requirement

From 18 February 2027 all batteries must bear a QR code (Article 13(6)). For portable batteries, it gives access to the Article 13(6)(b) information. Portable batteries have no battery passport.

4.5 Information the QR code gives access to

The Regulation requires this information to be complete, up to date and accurate (Article 13(6)). It does not prescribe the identification level behind the QR code.

Information	What it means	Provision
Applicable labels and markings under Article 13(1)–(5)	The general label, capacity or duration information and the symbols	Article 13(6)(b)
EU declaration of conformity	The declaration covering the battery	Articles 13(6)(b) and 18
Report on the battery due-diligence policy	The Article 52(3) report, where the operator or battery is within Chapter VII of the Regulation (chapter 8). Where no report exists, the Regulation does not state how the reference is handled, and no reporting duty should be invented (OQ-REG-003)	Articles 13(6)(b) and 52(3)
Waste prevention and management information	The complete Article 74(1)(a)–(f) set (chapter 10), not an abbreviated recycling statement	Articles 13(6)(b) and 74(1)

4.6 Status change after a circular operation

A battery subjected to preparation for re-use, preparation for repurposing, repurposing or remanufacturing must bear new labels or markings with information on the change of status, accessible through the QR code (Article 13(9); Annex XIII, point 4). This does not create a passport. The exact information and granularity for batteries without a passport are unresolved (OQ-REG-007). See chapter 11.

5 Batteries incorporated in products and service relationships

A battery remains subject to the Regulation when incorporated into another product (Article 1(3)). A battery in or with another product remains a separate regulated object, and its category and capacity decide its passport outcome, not the product it is in.

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5.1 Removal and replacement by the end-user

From 18 February 2027, any person placing on the market a product incorporating a portable battery must ensure that the battery is readily removable and replaceable by the end-user throughout the product lifetime (Articles 11(1) and 96(2)(a)). This is not only a battery-manufacturer duty. The rule concerns the entire battery, not individual cells or other parts. Readily removable means removable with commercially available tools, without specialised tools unless supplied free with the product, proprietary tools, thermal energy or solvents.

The product must include instructions and safety information on battery use, removal and replacement, also permanently available on a public website in a form easily understood by end-users (Article 11(1)). The following duties also apply:

- a replacement must be compatible without affecting functioning, performance or safety;
- replacement batteries must be available as spare parts for at least five years after the last unit of the equipment model is placed on the market, at a reasonable and non-discriminatory price (Article 11(7)); and
- software must not impede replacement with a compatible battery or key components (Article 11(8)).

5.2 Derogations and exclusions

The end-user requirement does not apply where continuity of power supply is necessary and a permanent connection between the product and the battery is required for the safety of the user and the appliance or, for products whose main function is collecting and supplying data, for data integrity (Article 11(3)).

The products below may be designed so that the battery is removable and replaceable only by independent professionals. Article 11(2) is shown as replaced by Delegated Regulation (EU) 2026/1770, Article 1, in force from 11 November 2026. Check the current Commission guidance under Article 11(9) (OQ-REG-004).

Article 11(2) point	Products	Is the derogation conditional on ensuring the safety of the user and the appliance?
(a)	Appliances, including wearable devices, specifically designed to operate primarily in an environment regularly subject to splashing water, water streams or water immersion, and intended to be washable or rinseable	Yes — the derogation applies only where needed to ensure that safety.
(b)	Professional medical imaging and radiotherapy devices, and in vitro diagnostic medical devices	No — Article 11(2) does not impose this additional condition on point (b).
(c)	Wearable devices whose safety, durability or water resistance may be compromised by user access to the battery and which are too small for the end-user to handle a battery replacement properly and safely, or which rely on a compact, sealed enclosure to maintain functional integrity, including protection against dust and shock	Yes — the derogation applies only where needed to ensure that safety.
(d)	Until 31 July 2030, electric toys incorporating rechargeable batteries, when the derogation is necessary, due to the nature or size of the toy, to ensure its safety when used in accordance with Article 10(2) of Directive 2009/48/EC	Yes — the derogation applies only where needed to ensure that safety.
(e)	Wireless thermometer probes specifically designed for food contact during food preparation	Yes — the derogation applies only where needed to ensure that safety.
(f)	Products within the scope of Article 1 of Directive 2014/34/EU (equipment for potentially explosive atmospheres)	Yes — the derogation applies only where needed to ensure that safety.
(g)	On-body delivery systems specifically designed for the subcutaneous administration of medicinal products	Yes — the derogation applies only where needed to ensure that safety.
(h)	Telematics devices intended for roof-mounted installation in agricultural and construction machinery and designed to be exposed to harsh vibrations, dust and wet conditions during their intended use	Yes — the derogation applies only where needed to ensure that safety.

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5.3 Battery, host product and combined supply

The battery and the host product are separate identification and data objects. Where each is a trade item, the battery GTIN identifies the battery and a separate GTIN identifies the appliance. Battery chemistry, capacity and mass describe the battery; host-product mass and performance describe the host. State clearly which object each attribute describes. If the battery is not managed as a trade item, assess the appropriate identification structure instead of assuming that the host GTIN identifies it.

Information need	Relationship to record	Boundary
Describe a product design	Host model linked to permitted battery models, quantities and specification versions	Compatibility with a battery model does not prove that a particular unit contains it
Identify production affected by a battery batch	Host production batch or instances linked to the installed battery GTIN and batch/lot number	If alternative batteries are used, the relationship has to distinguish the actual production concerned
Retrieve an installed battery's service history	Identified host instance linked to the battery GTIN plus serial number	The host identity does not replace the individual battery identity
Record removal or replacement	End the previous installation relationship and record the new one, with its effective date and supporting service record	Do not overwrite the history as though the replacement battery had always been installed

These relationships give access to battery evidence from a host-product record. GS1 standards EPCIS can be used to describe the association or disassociation of the host and battery such as installation and removal (GS1 EPCIS Standard, version 2.0.1, section 7.4.6, pp. 96–102). Any access route through the host supplements the battery's own QR and placement requirements and is no permission to omit the battery marking.

A battery supplied with, but not incorporated in, another product remains a separate object. Where each is a trade item, the battery and the host product each have a GTIN, and a combined retail or supply configuration requires its own GTIN under the applicable allocation rules. Maintain a record for the combined trade item, the host product and each battery trade item, with the quantity of each. A predefined assortment follows the GS1 allocation rules for its composition and changes (GS1 GTIN Management Standard, section 2.9, p. 17).

For example, a product supplied with two portable batteries of general use has a combined trade-item record that links to the battery GTIN and a quantity of two. Packing records distinguish battery batches where they vary. The battery mass used for reporting (chapter 9) is the mass of the two batteries, not of the combined product. A contents list does not identify individual batteries, and an outer commercial QR code does not automatically satisfy the battery QR placement rule.

5.4 How GS1 standards support service relationships

The Regulation requires removal, replacement and information duties but does not prescribe GS1 standards. GTIN identifies the battery model and a separate GTIN identifies the host product. A GS1 Digital Link URI gives access to instructions and safety information on use, removal and replacement. GLN identifies a party or service location, and GTIN plus serial number keeps track of the replacement and repair of individual batteries.

Persons placing products incorporating portable batteries on the market must ensure that replacement batteries remain available as spare parts for at least five years after the last unit of the equipment model is placed on the market (Article 11(7)). A battery GTIN alone does not identify the equipment model or record that date. The supporting records therefore need to link the replacement battery to the relevant equipment model and retain the date used to determine the minimum availability period.

Separately, instructions and safety information on battery use, removal and replacement must remain permanently available on a publicly accessible website (Article 11(1)). Their availability must therefore continue when the ordinary commercial product page is withdrawn.

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6 Identification and data granularity

The Regulation requires batteries to be identified, but the level depends on the purpose. Manufacturers must provide model identification with a batch or serial number, product number or another identifying element, on the battery or, where its size or nature makes this impossible, on the packaging or accompanying document (Articles 38(6), 41(2)(d) and 42(2)(d)). The Regulation does not prescribe GS1 standards but GS1 standards provide a mechanism to identify each of these levels in an interoperable and globally unique way.

6.1 Identification levels

What is identified	GS1 identification	What it is for
Battery model or trade item	GTIN	Identify batteries that share the same specification
Production batch	GTIN plus batch/lot number	A group of identical items manufactured under uniform conditions. A batch/lot number without its GTIN is not sufficient
Individual battery	GTIN plus serial number	Each battery has its own identification. GTIN alone does not identify an individual battery
Product grouping, such as a pack	Its own GTIN where required	Every level of a trade item that is priced, ordered or invoiced has its own GTIN. It does not identify each contained battery
Logistic unit, such as a pallet	SSCC	One physical logistic unit. It does not identify a model, batch or battery and cannot serve as the battery's identifier; the contents have to be recorded
Party, function or location	GLN	Operators, departments and sites. It does not replace an authority-issued identifier

A battery is a trade item when it is a product for which predefined information needs to be retrieved and that may be priced, ordered or invoiced at a point in the supply chain. This can be a cell, module, battery pack or another configuration. Where a pack and a replaceable module are each traded separately, each has its own GTIN. Chapter 5 covers batteries in or with other products.

6.2 The level that fits portable batteries

The level of identification should reflect the information needed and the function. For high-volume portable batteries, model and batch-level identification will commonly be appropriate. The QR code requirement does not itself require individual serialisation; Portable batteries are not subject to the battery passport requirement under Article 77. Serialisation is therefore needed only where another regulatory requirement or an operational need calls for it.

For portable batteries of general use, distinguish clearly between the individual battery format, a saleable multipack, any higher packaging level and the production batch. An identifier assigned to a multipack does not identify each battery within it.

6.3 Working with model, batch and individual records

Level	How it is implemented	Limits
Model	Create a controlled relationship between the trade item and the regulatory model. Link documents and attributes to their source, owner, version and period of applicability, so that batch and individual records and web resources reuse them	Model data cannot distinguish one battery's history. A changed document does not necessarily require a new GTIN; retain the version that applies to batteries already supplied
Batch	Link the batch to its model and production documents. Keep batch-specific information with the batch, and preserve the batch identity through packing and supply, recording mixed batches separately	A batch record does not prove that every battery in it has a measured characteristic, unless the evidence supports that
Individual	Create the record before relying on the identifier downstream, link it to the model and batch, and preserve it in installation, supply and service records. Test that the physical identifier	Voluntary serialisation does not change the legal passport status of the battery

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Level	How it is implemented	Limits
	retrieves that individual battery and not only a general product page	

Select the combination that answers the actual information need. Do not apply a finer level without a regulatory or operational reason.

6.4 Keeping identifiers stable

The GTIN Management Standard describes which changes to an item require a new GTIN. The economic operator assesses the product change, the supply chain's need to distinguish it, the continued accuracy of model, batch and individual records, and the continuity of documents. Keep the GS1 identifier associated with the same battery or battery model, even if the information, service provider or website changes. Do not reassign it to another object.

Technical basis: GS1 General Specifications, release 26.0, sections 1.3.1–1.3.1.4, pp. 35–40, and 1.3.5.1, p. 56; GS1 GTIN Management Standard, release 1.1, sections 1–2, pp. 8–18.

7 Implementing QR access with GS1 Digital Link

Portable batteries have no battery passport, so the address in the QR code connects to the Article 13(6)(b) information and not to a passport. The Regulation requires this access but does not prescribe GS1 standards. This guideline proposes GS1 Digital Link, which provides a globally unique identifier and a stable entry point.

7.1 Building the GS1 Digital Link URI

A GS1 Digital Link URI is a web address that encodes a GTIN and qualifiers, including batch/lot number and serial number. It is used as follows:

1. Determine what is identified and at which level. Keep an incorporated or supplied battery distinct from its host product. Where the required information is the same for the whole model, use GTIN alone. Where it varies by production batch, add the batch/lot number. This is this guideline's proposal, not a legal requirement (Article 13(6)).
2. Allocate a GTIN to the battery trade item and add the appropriate qualifier such as batch number.
3. Construct the URI following section 4 of the GS1 Digital Link URI Syntax standard.
4. Encode the URI in a QR code following GS1 rules, meeting Article 13(7) and Annex VI, Part C.
5. Direct requests to the correct resources, and give each resource an owner who checks that updates remain applicable to the identified batteries.
6. Keep the identifier associated with the same battery or model, even if the information, service provider, website or resolver changes.

The conceptual form is `https://example.com/01/{GTIN}/10/{BATCH}`. `example.com` and the values in braces are placeholders, not production identifiers or allocation advice.

7.2 Connecting the information

Resource to make accessible	How it is connected
Applicable information under Article 13(1)–(5)	Link the battery record to the relevant labelling information, using batch-specific data where the information varies
EU declaration of conformity under Article 18	Identify the declaration covering the battery and keep its applicability and version
Report under Article 52(3)	Link the applicable operator report to the batteries and reporting period it covers. Do not invent a reporting duty for an excluded operator (OQ-REG-

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Resource to make accessible	How it is connected
	003)
Waste-prevention and management information under Article 74(1)(a)–(f)	Provide the complete applicable set, including collection and safety information, rather than an abbreviated recycling statement

Article 13(6) requires the information to be complete, up to date and accurate. QR access does not replace physical markings or CE marking under Articles 19–20. What has to be accessible after a circular operation needs further assessment (OQ-REG-007).

7.3 Resolvers and several audiences

Component	Function
QR code	Data carrier that encodes the URI, read by image scanners and mobile devices
GS1 Digital Link URI	Web-enabled identifier
Resolver	Service that connects a GS1 identifier to one or more sources of information about the identified item. Different organisations can operate one
Web resource	The human-readable page, or the data service, that the request reaches

A resolver is optional. A direct information page is also possible, and using a GS1 Digital Link URI does not imply using a conformant resolver. Where a GS1-conformant resolver is selected, describe resources with link types (next section) and metadata, configure the default route and test resolution at each supported level (GS1-Conformant Resolver Standard, release 1.2.1, sections 2.5–2.6 and 2.14). Maintain domain ownership, resource addresses and responsibility for updating links.

The same identity can lead to several resources. Selecting a resource and being authorised to read it are separate functions: selecting a repair-information link does not establish a right to read restricted information.

User or system	Resource	Control
Public reader	The applicable Article 13(6)(b) information	A reliable public entry point for the identified battery
Repairer, treatment operator or recycler	Technical, dismantling or safety information that the producer provides (chapter 10)	Apply the access policy for that information
Authority or notified body	Information within its regulatory access rights	Authenticate and authorise access at the relevant service, and keep the requested battery scope
Trading partner	Commercial documents or event records shared by agreement	Apply commercial access policies separately from public access

7.4 Link types

A resolver describes each resource it links to with a link type from the GS1 Web Vocabulary. This guideline recommends the following link type for the QR route of portable batteries:

Batteries	QR route	Link type	Resource
Portable batteries, including portable batteries of general use	Article 13(6)(b)	`gs1:pip` (Product Information Page)	The page that gives access to the applicable information, declaration, report and waste information

This is a stable link type in GS1 Web Vocabulary version 1.18. `gs1:pip` is defined as “a link to information specifically about the identified item, typically operated by the brand owner or a retailer of the product and aimed at consumers”.

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The Regulation does not prescribe link types; this is a recommendation of this guideline. A link type describes a resource. It does not grant access to restricted information. Further resources can be given other link types.

The URI forms in this guideline cite GS1 Digital Link URI Syntax release 1.6.0, sections 4 and 5, pp. 19–37. GS1 has published release 1.7.0, ratified August 2026; assess it before finalising a technical specification.

8 Battery due diligence

Economic operators placing portable batteries on the market or putting them into service fall within the battery due-diligence framework, subject to the turnover and circular-operation exclusions in Article 47. These obligations apply from 18 August 2027 under Article 48(1), as amended by Regulation (EU) 2025/1561. Whether a battery requires a passport under Article 77 does not determine whether these obligations apply.

8.1 Who it applies to and from when

Chapter VII of the Regulation, on battery due diligence, applies to an economic operator that places batteries on the market or puts them into service, subject to Article 47. A covered operator must establish and implement a battery due-diligence policy addressing the raw materials and risks in Annex X and meet Articles 48–52, from 18 August 2027 (Article 48(1), as amended by Regulation (EU) 2025/1561).

Annex X lists cobalt, natural graphite, lithium, nickel and chemical compounds based on them that are necessary for manufacturing battery active materials. Its risk categories cover environment, climate and human health; human rights, labour rights and industrial relations; and community life, including that of indigenous peoples (Annex X, points 1–2). Article 48(8) permits amendments, so check the applicable delegated acts.

Two exclusions apply (Article 47):

- **Turnover.** An operator is excluded only where both elements are met: it had net turnover below EUR 40 million in the financial year preceding the last financial year, and it is not part of a parent-and-subsidiary group whose consolidated turnover exceeds EUR 40 million. Retain evidence for both.
- **Circular operations.** Chapter VII of the Regulation does not apply to batteries subjected to preparation for re-use, preparation for repurposing, repurposing or remanufacturing that had already been placed on the market or put into service before that operation. This covers those batteries only, not the operator's other activities.

8.2 What a covered operator has to do

Duty	What it means	Provision
Policy	Adopt and clearly communicate to suppliers and the public a policy on the Annex X raw materials and risks, consistent with the instruments in Annex X, point 4	Article 49(1)(a)–(b)
Management system	Support the policy, assign oversight to top management and keep records for at least ten years	Article 49(1)(c)
Supply-chain controls	Operate controls and transparency, including a chain-of-custody or traceability system identifying upstream actors	Article 49(1)(d)
Supplier contracts	Incorporate the policy and risk-management measures into contracts and agreements	Article 49(1)(e)
Grievance mechanism	Establish grievance, early-warning and remediation mechanisms, directly or through permitted arrangements	Article 49(1)(f)
Risk assessment	Identify and assess adverse-impact risks against the policy and the Annex X categories, and report findings to top management	Article 50(1), (3) and (4)
Risk mitigation	Adopt a strategy to prevent and mitigate impacts, monitor it, and consider suspending or ending supplier engagement after failed mitigation. Consult suppliers and stakeholders where mitigation continues during trade	Article 50(1)(b) and (2)
Third-party verification	Have the policy verified and periodically audited by a notified body, which	Articles 48(2) and 51

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Duty	What it means	Provision
	issues a report and, where the policy meets Articles 49, 50 and 52, an approval decision	
Annual public report	Publish, including online, a report that end-users can readily understand, clearly identifies the batteries concerned, describes the steps taken and significant impacts, and summarises verification, including the notified body's name. Where the operator demonstrates recycled sources, disclose its conclusions in reasonable detail	Article 52(3)–(4)

Article 48(4) permits collaboration, including through schemes recognised under Article 53, without removing individual responsibility. Participation in an industry scheme should not be described as equivalent unless the Commission's recognition applies.

The operator documents the following for each raw material (Article 49(2)): description, trade name and type; the immediate supplier's name and address; country of origin and transactions from extraction to the immediate supplier; quantity in the battery, as a percentage or weight; applicable third-party verification reports; and, where the conditions of Article 49(2)(f) are met, additional information on materials from conflict-affected or high-risk areas.

Management-system records are kept for at least ten years (Article 49(1)(c)). Documentation showing fulfilment of Articles 49, 50 and 52, including the verification report, approval decision and audit reports, is kept for ten years after the last battery manufactured under the relevant policy is placed on the market (Article 48(3)). This second trigger requires a durable link between the policy version and the batteries manufactured under it.

8.3 How GS1 standards support implementation

The Regulation requires supply-chain controls, identification of upstream actors and a report that clearly identifies the batteries, but does not prescribe GS1 standards (Articles 49(1)(d), 49(2) and 52(3)). This guideline proposes the following:

Requirement	GS1 application	Limitations
Identify the raw material	Where the material is a trade item, GTIN identifies the material class and GTIN plus batch/lot number identifies a material batch/lot. Master data holds the trade name and type	A GTIN does not itself communicate these attributes
Identify the immediate supplier	GLN identifies the supplier legal entity or function, and separate GLNs identify physical locations. The GLN Data Model associates organisation, address and contact information	Keep the supplier distinct from extraction, processing and dispatch locations. GLN complements the required name and address
Document origin and transactions	GTIN with batch/lot identification distinguishes the material flow, EPCIS shares events involving the material, actors and locations, and transaction records hold the commercial transactions	An EPCIS event or GLN does not establish legal origin. Record the country of origin explicitly, with evidence
Relate material quantity to production	An EPCIS TransformationEvent associates identified material inputs and their quantities with identified battery outputs	EPCIS keeps the input-to-output relationship but does not calculate or verify the quantity. The level depends on whether composition varies by model, recipe, batch/lot or battery
Associate verification reports	Reports are linked to GLNs for the supplier, notified body and sites, and to GTINs for the battery trade items covered	Retrieval does not replace risk assessment, mitigation, verification or audit
Handle conflict-affected or high-risk areas	GLNs identify upstream actors and locations, GTIN with batch/lot identification distinguishes the affected flow, and EPCIS records movements and custody	GS1 identifiers do not determine whether an area is conflict-affected or high-risk
Relate policies and reports to batteries	GTIN identifies each battery model or configuration. Governed records associate it with the policy, reporting period and report version. A GS1 Digital Link URI connects an identified battery to the published report	The link does not expand the report's scope and must not expose confidential evidence

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Requirement	GS1 application	Limitations
Keep provenance where evidence varies	GTIN plus batch/lot number, or GTIN plus serial number where the battery is already individually identified, is linked to material batches/lots, suppliers and evidence	Model level is inadequate where origin, supplier or material lot differs. Chapter VII of the Regulation creates no universal serialisation duty

An operator can then follow a battery record back to the relevant supplier and evidence, or identify production affected by a supplier issue. Every raw-material unit does not need to be serialised, and confidential evidence does not belong in a public QR resource. Design the events from the needs of Articles 49–50, and protect confidential and personal information. EPCIS does not prove responsible sourcing, validate documents, perform risk assessment or replace notified-body verification.

Article 52(3) prescribes neither an identifier nor whether one report covers one or several models. A report link should define the reporting operator and period, identify each model or justified grouping, associate the applicable policy and verification summary, publish stable version and status information, and keep relationships when a GTIN, supplier, formulation, policy or report changes. Where evidence varies by batch, a model-level presentation must not imply uniform provenance.

Article 13(6)(b) refers to the Article 52(3) report, but Article 47 can exclude the operator or battery. How the QR code handles this is unresolved (OQ-REG-003; chapter 4).

Technical basis: GS1 General Specifications, sections 1.3.1, 1.3.1.2, 1.3.1.4, 1.3.3 and 1.3.4, pp. 35–53; GS1 GLN Allocation Rules Standard, sections 2.1.1–2.1.2, p. 10; GS1 EPCIS Standard, version 2.0.1, sections 7.4.5–7.4.6, pp. 93–102.

9 Producer registration, EPR and market reporting

Producer registration and extended producer responsibility (EPR) apply to portable batteries, including those incorporated in appliances, light means of transport or other vehicles. They do not depend on the battery passport. The decisive questions are who first makes the battery available in a Member State, how it is supplied, and whether an authorised representative for EPR or a producer responsibility organisation acts for the producer (Article 3(1), points (47)–(49); Articles 55–58).

9.1 Who the producer is

“Producer” is a role determined separately for each Member State. It is not necessarily the manufacturer named on the battery. Article 3(1), point (47), covers a person that, irrespective of the selling technique used, including distance contracts:

- is established in a Member State and supplies, for the first time in that Member State, batteries manufactured under its own name or trade mark;
- is established in a Member State and resells, for the first time in that Member State and under its own name or trade mark, batteries manufactured by another party, whose name or trade mark does not appear on the batteries;
- is established in a Member State and supplies, for the first time in that Member State and on a professional basis, batteries from another Member State or a third country; or
- is established in another Member State or a third country and sells batteries by distance contract directly to end-users in the Member State concerned.

A party can be the producer in one Member State without being the producer for the same battery in another. Record which legal entity acts as the producer in each Member State and for each supply route, together with the reason and supporting evidence. The same organisation does not necessarily hold that role for every transaction or territory (Article 3(1), point (47)). An operator that first makes available a battery resulting from a listed circular operation is the producer of that battery (Article 56(2)).

9.2 Registration

A producer must submit an electronic application in every Member State where it first makes a portable battery available, and may supply there only if it, or its EPR authorised representative, is registered (Article

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55(1)–(2)). Before making a battery available, a distributor verifies that the producer is registered (Article 42(2)(a)).

The application includes the producer's name, brand names, address and contact details; its national identification code, trade-register or equivalent official number and tax identification number; each relevant battery category and chemistry; information on the EPR, collection and data-reliability arrangements and any appointed producer responsibility organisation; and a statement that the information is true (Article 55(3)). EPR and collection information can instead be supplied through the Article 58 authorisation application. Member States may combine registration and authorisation, request additional documents, set procedures and charge proportionate fees.

Once the application is complete, the competent authority grants registration and provides a registration number within no more than 12 weeks (Article 55(9)(b)). The authority may refuse or withdraw registration where required information or evidence is absent or insufficient or the producer no longer meets the EPR requirements, and must withdraw it where the producer has ceased to exist (Article 55(11)). The producer must notify the competent authority without undue delay of any change to the registration information and of the permanent end of making the registered batteries available in that Member State (Article 55(12)). Check current status, and do not treat possession of a number as permanent proof of compliance.

9.3 Producer responsibility and costs

A producer may appoint an authorised producer responsibility organisation (PRO) to fulfil EPR on its behalf, and a Member State may make this mandatory where justified (Article 57(1)). Contributions to a PRO are modulated at least by category and chemistry (Article 57(2)). A producer fulfilling EPR individually, or a PRO fulfilling it collectively, must obtain authorisation and provide the required guarantee (Article 58).

Costs the producer covers	Provision
Separate collection and subsequent transport and treatment, accounting for specified revenues	Article 56(4)(a)
Compositional surveys of collected mixed municipal waste	Articles 56(4)(b) and 69(5)
Information on prevention and management of waste batteries	Articles 56(4)(c) and 74
Data gathering and reporting to competent authorities	Articles 56(4)(d) and 75

These costs are shown separately to the end-user at the point of sale of a new battery (Article 74(5)). For a battery that has undergone a listed circular operation, the original and subsequent producers may establish a cost-sharing mechanism (Article 56(5)).

9.4 Online sales and platforms

A producer selling directly by distance contract to end-users in a Member State from another Member State or a third country must appoint, by written mandate, an EPR authorised representative in every Member State of sale (Article 3(1), points (47)(d) and (48); Article 56(3)).

Online platforms within Section 4 of Chapter III of Regulation (EU) 2022/2065 (the Digital Services Act) that allow consumers to conclude distance contracts with producers must obtain the relevant producer register and registration number or numbers, plus the producer's self-certification that it offers only batteries meeting the specified EPR requirements (Article 62(6)). If registration information is not public, Member States give qualifying platforms free access (Article 55(13)). Another identifier may be an internal lookup key but does not satisfy Article 62(6), and self-certification is not independent verification.

9.5 Reporting quantities

Producers or, where appointed, PROs report annually to the competent authority by category and chemistry, including batteries incorporated in vehicles and appliances. The report covers the amount first made available; amounts collected, delivered for treatment, exported for treatment or specified circular operations, and delivered for preparation for re-use or repurposing; and the collection rate (Article 75(1), (4)). Collection rates use the three-year-average method in Annex XI. Portable batteries of general use are reported as a separate amount (Article 75(1)(b)). This does not create a separate collection target for them; Article 94(2)(e) instead requires the Commission's review to consider one.

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Reporting is territorial: batteries that leave the Member State in the same year before sale to end-users are excluded from the amount first made available. Reports are due within six months after the reporting year. The first reporting year is 2026, with reports due by 30 June 2027. This is calculated from Article 75(7) and Article 2 of Implementing Regulation (EU) 2025/2289, which entered into force on 11 December 2025.

Article 1 of that implementing act sets the format Member States use to report to the Commission and does not directly address operators. Operators report in the format set by the competent authorities of each Member State where they have reporting duties (Article 75(8)), so check the current requirements of those authorities or of the PRO. The Commission format is still useful for planning, because it shows the data Member States have to supply (Article 76(1); Implementing Regulation (EU) 2025/2289, Annexes I to III).

9.6 How GS1 standards support registration and reporting

The Regulation requires official identity information, an authority-issued number and category-, chemistry- and weight-based reporting. It does not prescribe GS1 standards. This guideline proposes the following:

Requirement	GS1 application	Limitations
Keep the registration number issued in each Member State (Article 55(9)(b))	GLN identifies the producer legal entity. The registration record links that GLN to each authority-issued registration number, its Member State, issuing authority, current status and effective dates. This enables trading partners to retrieve the relevant registration information. GLN does not replace the registration number or confirm that registration remains valid.	A GLN complements the number and does not replace it. Having a GLN does not demonstrate registration or EPR compliance. One producer can hold several national numbers
Identify the producer (Article 55(3)(a)–(b))	GLN identifies the producer legal entity or function, with associated name, address, contact details and official identifiers	Keep the issuing jurisdiction and identifier type of each official identifier
Distinguish collection, return, warehouse or reporting locations	Separate GLNs identify locations and functions enabling activities and records to be linked to the correct site or responsible function.	A location GLN does not identify the registered producer and does not replace a permit
Report by category, chemistry and weight (Article 75)	GTIN identifies the battery trade item, so that quantities recorded for that trade item are grouped and totalled consistently. Product master data linked to the GTIN describes the battery's category, chemistry and unit weight. Related records specify whether the battery is supplied separately or incorporated in another product and identify the responsible producer in each Member State.	A GTIN does not encode this data. GS1 standards do not determine producer status, calculate liability or replace authority formats

A reporting process can then work as follows:

1. Identify the responsible producer and Member State for the activity.
2. Retrieve the battery data for the supplied model and period.
3. Derive battery quantities from direct sales or recorded host and bundle contents, keeping the source calculation.
4. Capture returns, corrections and movements out of the Member State before sale to end-users.
5. Aggregate into the prescribed category, chemistry and weight measures, with links back to source records.

Do not count every shipment as a quantity first made available on the market in a Member State. Determine whether the movement represents a first supply on that market before including it in the reported total. Also prevent counting the same battery and its mass twice when a battery is part of the host product. Where a battery is incorporated in or supplied with another product, the host-product GTIN and the battery GTIN remain separate, linked data. Technical basis: GS1 General Specifications, sections 1.3.1 and 1.3.3–1.3.5.1, pp. 35–36 and 49–56; GS1 GLN Allocation Rules Standard.

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9.7 What to confirm in each Member State

- the competent authority, register and electronic application route;
- whether registration and authorisation are combined, and whether appointing a PRO is mandatory for the category;
- additional documents, procedures, fees and language requirements;
- how distributors and online platforms verify current registration;
- collection-system, guarantee, contribution and enforcement arrangements;
- reporting taxonomy, electronic format, validation rules and correction process; and
- national measures for matters that Chapter VIII of the Regulation does not fully harmonise.

10 Collection, treatment and recycling

Waste portable batteries are subject to the collection, treatment and recycling requirements described in this chapter. These obligations apply although portable batteries do not require an Article 77(1) battery passport (Articles 59, 62 and 70–75).

10.1 Collection and take-back

Producers or appointed producer responsibility organisations (PROs) must establish free, territory-wide separate collection through connected points and deliver the batteries to a permitted treatment facility, covering batteries regardless of nature, chemistry, condition, brand or origin (Article 59(1), (2), (4)–(6)).

Distributors must take back qualifying waste batteries free of charge and without requiring a new purchase, at or in the immediate vicinity of the retail outlet, and in quantities normally discarded by non-professional end-users. The duty is limited to categories they offer or have offered and does not apply to waste products containing batteries (Article 62(1)–(2)). Distributors must hand over the collected waste batteries to the responsible producer or PRO or to a selected waste management operator (Article 62(3)). Distance-selling distributors must provide sufficient collection points, and for sales with delivery they must offer free take-back and inform the end-user when ordering (Article 62(4)–(5)). End-users should discard waste batteries separately from other waste (Article 64).

Date	Minimum collection rate	Provision
31 December 2023	45%	Article 59(3); Annex XI
31 December 2027	63%	Article 59(3); Annex XI
31 December 2030	73%	Article 59(3); Annex XI

The collection rate compares the weight of waste portable batteries collected in a Member State in the reporting year with the average annual weight first made available to end-users in that Member State during the three preceding calendar years. The reporting year is not included in that three-year average (Annex XI, points 1–3). The targets apply to portable batteries collectively, not separately to portable batteries of general use. The Commission is empowered to adopt delegated acts by 18 August 2027 amending the method and adapting the targets, so check current acts before configuring calculations (Article 59(7); OQ-REG-013).

10.2 End-user and operator information

For the battery categories they supply in a Member State, producers or appointed PROs must make available to end-users and distributors information on (Article 74(1)(a)–(f)):

- the role of end-users in waste prevention and in separate collection;
- good practices for extending use, and the possibilities of re-use, preparation for re-use, preparation for repurposing, repurposing and remanufacturing;

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- where to return waste batteries and the available options for preparing them for re-use or repurposing and treating them;
- safety instructions for handling waste batteries, including lithium risks;
- the meaning of labels and symbols; and
- the impact of substances, including from inappropriate discarding.

Producers or appointed PROs must provide this information at regular intervals for each battery model from the time it is first made available in the Member State. At a minimum, the information must be visible at the point of sale and on online platforms. It must be easy for end-users to understand and provided in a language or languages set by the Member State. Distributors supplying batteries to end-users must provide this information permanently in their premises where it must be easily accessible and clearly visible. They must also provide information on how to return waste batteries free of charge, including when selling through online platforms (Article 74(4)). Producers or PROs are required to conduct awareness campaigns and offer incentives to encourage correct discarding (Article 74(6)). Commercially sensitive information stays confidential (Article 74(7)).

Producers also must provide distributors and waste operators information on safety and protective measures for storage and collection. They must provide model-specific dismantling and safety information to operators carrying out preparation or treatment, including information about components, materials and hazardous-substance locations. The information has to be provided electronically and free of charge and on request (Article 74(2)–(3)).

10.3 Storage, transport, handover and treatment

Collection infrastructure must suit the expected volume and hazardous nature of the batteries. Transport containers must meet Directive 2008/68/EC (Article 59(1)(c)). At treatment facilities, impermeable surfaces and weatherproof covering or suitable containers are required, and batteries must not be mixed with conductive or combustible waste. Lithium-based batteries require heat, water, damage, orientation, ventilation, isolation and warning controls (Annex XII, Part A, points 2–4).

Operators of treatment facilities for end-of-life vehicles and waste electrical and electronic equipment (WEEE) must hand over removed batteries to the relevant producer, PRO or selected waste operator and keep transaction records (Article 65). What these records contain beyond what is expressly listed is still an open question (OQ-REG-014). An operational record normally includes date, source, destination, parties, category, chemistry, measured quantity, logistic-unit reference and intended operation. These are recommended data fields for implementation, not additional legal requirements.

Separately collected waste batteries must undergo treatment and must not be disposed of or sent to energy recovery. Treatment takes place in a permitted facility, complies with Annex XII, Part A, and uses best available techniques under Directive 2010/75/EU. Batteries are also removed from waste electrical and electronic equipment (WEEE), end-of-life vehicles and other waste products during treatment (Articles 70–71; Annex XII, Part A).

10.4 Recycling targets and documentation

Each permitted facility ensures that all waste batteries made available to it are accepted and undergo preparation for re-use, preparation for repurposing or recycling (Article 71(1)). Recyclers must achieve the following targets (Article 71(2)–(3); Annex XII, Parts B and C):

Date	Target by material
Efficiency by 31 December 2025	Lead-acid 75%; lithium-based 65%; nickel-cadmium 80%; other 50% by average weight
Recovery by 31 December 2027	Cobalt, copper, lead and nickel 90% each; lithium 50%
Efficiency by 31 December 2030	Lead-acid 80%; lithium-based 70% by average weight
Recovery by 31 December 2031	Cobalt, copper, lead and nickel 95% each; lithium 80%

The Commission was required to assess by 18 August 2026 whether these targets should be revised and must repeat the assessment at least every five years thereafter. It may amend the targets through

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delegated acts (Article 71(5)). Before implementing the targets in your systems, check whether any such amendments have been adopted.

Delegated Regulation (EU) 2025/606, in force since 24 July 2025, sets the calculation, verification and documentation rules (Article 71(4)):

Subject	What the Annex requires	Annex section
Recycling efficiency	Output fractions as a mass percentage of input fractions per calendar year, separately for lead-acid, lithium-based, nickel-cadmium and other batteries. Emissions do not count. Until 31 December 2029, oxygen, carbon and iron from cell-level sources, phosphorus, chlorine and sulphur may be counted. From 1 January 2030, carbon and iron from cell-level sources and phosphorus shall be counted, while oxygen, chlorine and sulphur may be	1 and 2
Input composition	The share of each chemistry by sorting analysis. Overall composition from producer information held in an electronic record or from analysis of outputs, emissions and waste, or by sampling the input	2
Material recovery	For cobalt, copper, lead, lithium and nickel, the mass in output fractions at the recovery calculation point as a percentage of the mass in input fractions. Black mass is an intermediate fraction, not an output fraction	1 and 3
Mercury and cadmium	Input amounts and amounts safely immobilised and disposed of, and for cadmium also the amount in recycled output fractions	4
Documentation	Data every year, by Member State of collection, to the competent authorities of the Member State of treatment, electronically, using the template for each chemistry. Where several permitted facilities are involved, the first recycler collects and provides the information	1, 5–9 and 10
Verification	The competent authority of the Member State of treatment verifies the calculations every calendar year and, for recycling outside the EU, the evidence of equivalent conditions. It may request evidence and audit	10

10.5 Shipments of used and waste batteries

Waste batteries or their fractions may be treated outside the Member State concerned or outside the Union, provided that the shipment complies with Regulations (EC) No 1013/2006 and (EC) No 1418/2007 (Article 72(1)). Check the shipment rules that currently apply before relying on these references (OQ-REG-020).

Waste exported from the Union counts towards the obligations, efficiencies and targets in Articles 70 and 71 only if the exporter provides documentary evidence, approved by the competent authority of destination, that treatment took place in conditions equivalent to those required by the Regulation and in accordance with other Union law on human health and environmental protection (Article 72(3)). The Commission is empowered to set criteria for assessing equivalent conditions by delegated act (Article 72(4)).

Competent authorities may inspect shipments of used batteries suspected to be waste, and the costs may be charged to the producers of the relevant category, third parties acting for them or other persons arranging the shipment, where the shipment turns out to consist of waste (Article 72(2)). A holder claiming to ship used batteries, not waste batteries, must have the following available (Annex XIV, points 1, 3 and 4):

What the holder needs	Content
Invoice and contract	A copy of the invoice and contract for the sale or transfer of ownership, stating that the batteries are destined for direct re-use and are fully functional
Evidence of testing	Copies of the records, such as the certificate of testing, proof of functionality for every battery or fraction in the consignment, and the protocol with the record below
Declaration	A declaration by the holder that nothing in the consignment is waste under Article 3, point (1), of Directive 2008/98/EC
Protection	Appropriate protection against damage during transport, loading and unloading, in particular sufficient packaging and appropriate stacking
Testing	A test of the state of health and an evaluation of the presence of hazardous substances, with the results recorded
Record on the battery or packaging	Fixed securely but not permanently, on the unpacked battery or on the packaging so that it can be read without removing the packaging. It states the name of the battery or fraction, its

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What the holder needs	Content
	identification number where applicable, the year of production if available, the name and address of the company testing the state of health, the types of test, and the results with their date
With every load	A relevant transport document and a declaration of responsibility by the person liable

The invoice, testing evidence and testing and record steps do not apply where documentary proof shows a business-to-business transfer agreement under which the used battery is sent back to the producer or a third party acting for it for repair under warranty with the intention of re-use. They also do not apply where a battery for professional use is sent for refurbishment or repair under a valid contract, or where it is defective and is sent for root cause analysis, under the conditions in Annex XIV, point 2. Without the required proof and protection, the object is considered waste and the load is presumed to be an illegal shipment (Annex XIV, point 5). The Commission may supplement these requirements by delegated act, in particular on the state of health (Article 72(2)).

10.6 Reporting by operators

Reporter	Minimum scope	Provision
Producers or PROs	Market, collection, rate, treatment, export and preparation quantities (chapter 9)	Article 75(1)
Other collecting waste operators	Applicable collection and destination quantities	Article 75(1), second subparagraph, and (3)
Treatment operators and recyclers	Received and processed quantities; efficiency; recovery; output destinations and yields	Article 75(5)
Other waste holders exporting for treatment	Exported quantities and applicable treatment data	Article 75(6)

The first reporting year is 2026, with reports due by 30 June 2027 (chapter 9). In multi-facility recycling, the first recycler collects and reports the information. Data provided under Delegated Regulation (EU) 2025/606 may also be considered for Article 75(5) (Annex, section 5, point 1).

10.7 How GS1 standards support collection, treatment, reporting and shipment of waste batteries

10.7.1 How GS1 standards support waste records

The Regulation and the delegated act do not prescribe GS1 standards. This guideline proposes the following for the source records:

Need	GS1 application	Limitations
Identify the battery model in a waste record	GTIN identifies the battery model or trade item, and associated data holds category, chemistry and other attributes	Keep the battery identifier distinct from the host-product identifier
Distinguish a batch	GTIN plus batch/lot number identifies the batch	Chapter VIII of the Regulation does not require every waste battery to keep batch identity
Keep individual identity	GTIN plus serial number identifies the battery where that identity remains available	Universal serialisation is not needed. An unreadable serial number must not be reconstructed or inferred
Identify parties and locations	GLN identifies legal entities, functions and physical locations	A GLN complements a permit or other authority-issued identifier
Identify a pallet, cage, drum or container	SSCC identifies the logistic unit, and governed records hold its measured or declared contents	SSCC does not identify each battery inside or establish its contents

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Need	GS1 application	Limitations
Record collection and treatment events	EPCIS ObjectEvent records observations and status changes, AggregationEvent associates objects with a logistic unit, and TransformationEvent captures the relationship between inputs and outputs. CBV provides terms such as collecting, decommissioning, disassembling and inspecting	EPCIS does not prove permitting, correct treatment or target achievement, and does not replace statutory reports, verification, audits or authority decisions

Define event ownership, granularity, aggregation, measurement, corrections, access, confidentiality, retention and reconciliation with the Article 75 totals. Record measured quantities instead of inferring them from identifiers, and distinguish net battery mass from container mass.

10.7.2 Data for the recycling documentation

First recyclers document recycling in the templates in sections 6 to 9 of the Annex to Delegated Regulation (EU) 2025/606. The mapping below is this guideline's own: no GS1 source maps these templates. Where no published GS1 term was found, the table says so and proposes none.

Template field	How GS1 standards support the source record	Limitations
First recycler, each facility and further operator: name, address and country	GLN identifies the party or facility, and master data holds the name and address, including the country code	The template still requires these details written out, with a contact person
Calendar year	The EPCIS event time records when each event occurred	The recycler assigns events to the calendar year
Individual recycling steps	TransformationEvent captures the relationship between inputs and outputs, and the business location, identified by GLN, shows where the step took place	Inputs and outputs need identifiers for the event to link them. No published CBV business step for recycling was found; CBV provides the value "other"
Waste batteries entering recycling: mass	SSCC identifies the logistic unit received, AI (330n) expresses its logistic weight, and an EPCIS quantity expresses an amount identified at class level	Logistic weight is the gross weight of the whole unit. The template asks for the measured wet mass of the waste batteries
Waste batteries entering recycling: type and chemistry	GTIN identifies the battery trade item where it remains identifiable	Waste batteries are often mixed. No published GS1 Web Vocabulary term for battery chemistry was found, and GDSN coverage has not been verified
European Waste Catalogue (EWC) code	Record the applicable EWC code explicitly in the waste or consignment record and link it to the identified material or logistic unit.	No published GS1 field for this code was identified in the sources reviewed for this guideline.
Member State of collection	An EPCIS source of type "location" carries the GLN of the collection location, and master data holds its country code	No published GS1 term for this concept was found. It is available only where collectors share these events and data
Intermediate and output fractions, including black mass	No published GS1 rule for identifying waste fractions was found	A TransformationEvent links only fractions that carry an identifier. Masses are measured and calculated by the recycler
Further operator, destination and yield	GLN identifies the further operator, and EPCIS shipping events record the handover	The recycler measures the yield
Rates, mercury and cadmium amounts, and verification	None. These are not GS1 functions	The first recycler calculates the rates, and the competent authority verifies them

Technical basis: GS1 General Specifications, sections 1.3.3, 3.3.1 and 3.6.3, p. 221; GS1 EPCIS Standard, sections 7.3.3.1, 7.3.4, 7.3.5, 7.3.6.4 and 7.4.5, pp. 54–55, 65 and 93; GS1 Core Business Vocabulary Standard, sections 7.1, 7.4 and 9.3, pp. 54 and 117.

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10.7.3 Mixed and damaged streams

Collection covers batteries regardless of condition. SSCC identifies a mixed container, and records associate it with measured or estimated content by category and chemistry. After sorting, new logistic units and measured contents can be related to the incoming unit. Damaged, leaking or thermally affected batteries are segregated and recorded at the level needed for safety and transport controls. If an original label, serial number or QR code is unreadable, an operator must not create an unverified link. A local consignment identifier can preserve custody while recording that the original identity is unknown.

10.7.4 Shipments of used and waste batteries

The Regulation requires this evidence but does not prescribe GS1 standards. This guideline proposes the following for the records behind it:

Need	GS1 application	Limitations
State the identification number of the battery on the record, where applicable (Annex XIV, point 3)	GTIN plus serial number identifies an individual battery, and GTIN plus batch/lot number identifies a batch	A GS1 identifier does not show that a battery is used and not waste. It does not replace the record, and an unreadable identifier must not be reconstructed
Identify the holder and the testing company	GLN identifies the legal entity or location, with its name and address in the associated data	The record still has to state the name and address
Identify the load and its contents	SSCC identifies the logistic unit, and records hold its contents	SSCC does not identify the batteries inside
Record the movement	EPCIS shipping and receiving events record custody, with transaction references to the invoice and transport document	Event records do not authorise a shipment or prove equivalent treatment

Technical basis: GS1 General Specifications, sections 1.3.1.2, 1.3.1.4, 1.3.3 and 1.3.5.1; GS1 EPCIS Standard, version 2.0.1, sections 7.4.2–7.4.3, pp. 78–88.

11 Re-use and other circular operations

11.1 The operations

The Regulation distinguishes the operations by waste status, intended purpose and technical outcome (Article 3(1), points (29)–(32)):

Operation	What it means
Re-use	A used battery used again. It does not itself amount to a new placing on the market
Preparation for re-use	A waste battery prepared for use again without other pre-processing
Preparation for repurposing	A waste battery prepared for a different purpose or application
Repurposing	A battery that is not waste, used for a different purpose or application
Remanufacturing	A used battery disassembled and evaluated at cell and module level, restored to at least 90% of original rated capacity, with no more than 3% difference in state of health between individual cells, for its original purpose or application

A battery intended for industrial use after preparation for repurposing or repurposing is an industrial battery (Article 3(1), point (13)). Determine the battery category after the operation before selecting the QR-information route. If the resulting battery remains portable, Article 77(1) does not require a passport. If its category changes, assess the applicable capacity threshold and the placing-on-the-market or putting-into-service date before determining the passport requirement (Articles 13(6) and 77(1)).

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11.2 Placing on the market again

A used battery that undergoes re-use only is considered to have been placed on the market at the time it was first made available. A battery that has undergone preparation for re-use, preparation for repurposing, repurposing or remanufacturing is deemed to be placed on the market anew (Article 38(11), read with recital 16). An imported used battery is placed on the Union market when it first enters the Union, and an imported battery that has undergone a listed operation must comply with the applicable requirements on entering the Union (recital 16). The original conformity assessment, category and battery passport outcome cannot simply be assumed to remain sufficient.

11.3 Responsibility

An operator that carries out preparation for re-use, preparation for repurposing, repurposing or remanufacturing and then places the resulting battery on the market or puts it into service is considered a manufacturer (Article 38(11)). It must perform the applicable manufacturer duties, including technical documentation, conformity assessment with an additional Module A assessment, the EU declaration of conformity, CE marking, identification, instructions, safety information and labelling (Articles 17–20 and 38). Examination, performance testing, packing and shipment must follow adequate quality-control and safety instructions. The operator complies with the Regulation and relevant Union product, environmental, health and transport-safety law, taking account of any category change (Article 45). A remanufacturing operator must give authorities, on request, documentation that meets Article 3(1), point (32).

The due-diligence rules in Chapter VII of the Regulation do not apply to batteries already placed on the market before the listed operation (Article 47), but this does not remove the duties under Articles 38 and 45.

11.4 Labels, QR code and passport

Article 13(9) requires batteries that have undergone preparation for re-use, preparation for repurposing, repurposing or remanufacturing to bear new labels or markings indicating their changed status. This information must be accessible through the QR code. Annex XIII, point 4(c), lists the statuses “original”, “repurposed”, “re-used”, “remanufactured” and “waste”.

This does not create an Article 77 passport for portable batteries. Which information has to be accessible, at what granularity and from when is unresolved (OQ-REG-007). Maintaining a link to the original battery is an operational measure, not a battery passport requirement. It supports conformity evidence, status history, safety investigations and recall scope.

Article 73 does not provide a general end-of-waste test for portable batteries.

11.5 How GS1 standards support lifecycle relationships

The Regulation requires renewed identification (Article 38(6)) and status information (Article 13(9)). It does not prescribe GS1 standards. This guideline proposes the following:

Need	GS1 application	Limitations
Identify the resulting battery	GS1 General Specifications, section 2.1.15, “Identification of non-new trade items”, determines whether the existing GTIN is kept or a new GTIN is allocated. It refers to the GTIN Management Standard only where a new GTIN is allocated because the original GTIN cannot be recovered	A new status is not automatically an instruction to assign a new GTIN
Identify an individual resulting battery	A GTIN plus serial number identifies the battery, while records associate it with the original battery or batteries	Universal serialisation is not imposed. Do not reuse an original serial identifier for a different resulting battery
Identify a production or test batch	GTIN plus batch/lot number identifies the batch, and records relate it to testing, components and process evidence	Choose the level by whether evidence varies by batch or by battery
Keep the link to the original	Records link the original and resulting batteries using their GTINs and relevant batch/lot or serial numbers. They also identify who recorded the link, when, the operation performed and the supporting evidence.	Access controls keep confidential data within the legal or business purpose
Identify the operator	GLN identifies the legal entity, function or location	A GLN adds to, and does not replace, a

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Need	GS1 application	Limitations
and facility		permit or registration number, and does not prove competence or conformity
Identify a shipment	SSCC identifies the logistic unit, and records hold its contents	SSCC does not identify the contents, and contents change when units are packed or split
Record the events	EPCIS captures receipt, inspection, state-of-health testing, disassembly, transformation, assembly, commissioning, packing, shipping and disposition change. An EPCIS TransformationEvent links identified inputs to the outputs produced by a process. An AssociationEvent records a relationship between identified objects, such as a battery installed in a host product, or the end of that relationship. Select the event type according to the actual process and the event definitions; a repair or assembly operation is not automatically a transformation. CBV defines terms such as inspecting, repairing, disassembling and commissioning	CBV does not reproduce the legal categories. EPCIS does not prove end-of-waste status, remanufacturing or conformity

Resulting batteries, removed cells, replacement components, packaging and logistic units are distinct objects, each identified at the level its process needs. Technical basis: GS1 General Specifications, section 2.1.15, pp. 133–134, and section 1.3.1.4, pp. 39–40; GS1 EPCIS Standard, version 2.0.1, sections 7.4.5–7.4.6, pp. 93–102.

12 Supply-chain records and information exchange

12.1 What the Regulation requires

Economic operators must, on request of a national authority, provide market surveillance authorities with the identity of any economic operator that supplied them with a battery and of any operator they supplied, with the quantity and exact models. They must be able to do so for ten years after being supplied and ten years after supplying (Article 46). This applies independently of the battery passport, and neither a passport nor a due-diligence system replaces these records. Recital 76 explains the purpose: tracing operators makes market surveillance simpler and more efficient.

A minimal record preserves the supplying and receiving operators, the exact battery model and the quantity. Transaction date, document reference, ship-from and ship-to location, batch/lot or serial identifier, logistic-unit identifier and event time aid retrieval, reconciliation and recall, but Article 46 does not expressly require them. It requires operator and model traceability, not consumer identity or serialisation.

12.2 Critical Tracking Events and Key Data Elements

The Regulation does not prescribe GS1 standards, and it does not say how the traceability requirements are to be met. This guideline proposes using EPCIS to build the traceability system, based on two elements: Critical Tracking Events (CTEs) and Key Data Elements (KDEs). Together they turn the broad aim of traceability into concrete operational requirements, because they define when information must be captured and which information is needed.

A CTE is an event in the life of a battery or a batch where information must be recorded, for example receiving, manufacturing, packing, shipping, installation, collection or treatment. The KDEs describe each event by answering who, what, where, when and why:

- Who and where: a GLN identifies the parties and the locations involved.
- What: a GTIN identifies the battery model, with a batch/lot number or serial number where more detail is needed. An SSCC identifies a logistic unit, such as a pallet or container. Quantities state how many objects, or how much of the identified material, are involved.

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- When and why: the date and time, the business context, such as the reason for the event.

These concepts are part of the GS1 Global Traceability Standard.

For Article 46, a GLN works as a party key linked to the name, address and evidence of the operator's identity (GS1 Global Location Number Data Model Solution Standard, sections 4–5, pp. 11–50). It does not replace an authority-issued identifier.

Section 12.3 shows which types of data carry this information and how GS1 standards share them.

12.3 Master data, transaction data and event data

Traceability relies on different types of data, and it is important to share the right information at the right time. Master data describes the identified trade items, parties and locations. Transaction data records commercial activities such as orders, deliveries and invoices. Event data records observations and business events involving identified objects. These data sets complement one another: an event record does not replace the product attributes or commercial documents needed to interpret it.

Type of data	What it is	How GS1 standards share it
Master data	Descriptive attributes of objects, parties and locations identified with GS1 identifiers, which are relatively stable	Some companies use data pools based on GDSN to exchange trade-item master data. Location and party data can be registered and shared through GS1 registry platforms
Transaction data	Trade transactions that trigger or confirm activities, such as orders, deliveries and invoices	Electronic Data Interchange (EDI), or documents supplied with a shipment
Event data	Where an object is, when it happened and why, through the supply chain	EPCIS shares event data

Transaction data is exchanged through existing commercial processes and documents, so this guideline gives no separate guidance on it. The two subsections below cover master data and event data.

12.3.1 Master data with GDSN

Where GDSN is used to share battery master data, state for each attribute whether it describes the battery or a host product, who owns it, the target market, the units, the conditions and the validation rules. The sources reviewed for this guideline do not show that current GDSN attributes and target-market profiles cover every data element the Regulation requires.

12.3.2 Event data with EPCIS

CTEs define which activities need to be recorded for traceability. EPCIS defines how to represent and share those records, and CBV provides a common vocabulary for describing their business meaning. EPCIS is a choice of this guideline, not a requirement of the Regulation. An EPCIS implementation for battery traceability can follow these steps:

1. Define the purpose. State which legal duty or business question the records must answer (for example, showing who supplied a battery to an operator under Article 46), for which party and for which period.
2. Choose the level of detail. Record at model, batch, individual battery, packaging or logistic-unit level. Do not use a GTIN alone to identify an individual battery.
3. Identify parties and locations. Use GLNs for the parties, functions and locations involved.
4. Define the events and data. Choose the CTEs and KDEs (section 12.2), including quantities, corrections, returns, splits, aggregation and transformation.
5. Map events to EPCIS and CBV. Match each process to an EPCIS event type and CBV term, after checking their full definitions (see the table below). A CBV term that resembles a regulated activity does not mean the Regulation requires it, and an event record does not prove that the activity was performed lawfully.

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6. Set up data management. Decide how records are captured, validated, stored, queried, authenticated, authorised and retained.
7. Test the records. Check that they can answer a real request, such as an authority asking for an Article 46 record, throughout the full ten-year period.

The table shows how common battery processes map to EPCIS event types.

Process	EPCIS event	Relationship preserved
Observing receipt or shipment	ObjectEvent with the appropriate business context	Identified objects or quantities, event time, locations and transaction references
Packing batteries or cases into a logistic unit	AggregationEvent, where its physical containment semantics apply	Parent logistic-unit identity and contained identities or quantities
Installing or removing a battery in a host product	AssociationEvent, where its semantics apply	The identified battery's relationship to the host
Consuming material inputs and producing battery outputs	TransformationEvent	Identified inputs, outputs and quantities, to the precision the process evidence supports

EPCIS supports capture and query interfaces, access control and redaction, and it does not require one central database (GS1 EPCIS Standard, version 2.0.1, sections 8.1–8.2, pp. 103–145). It supports visibility and evidence management, but it does not replace conformity assessment, audit, verification, certification or an authority decision.

12.4 Data quality, access and confidentiality

Traceability data has to be accurate, complete, timely and consistent enough for its function. Controls cover identifier validity, model and quantity reconciliation, duplicate events, late data, corrections, master-data changes and preservation (GS1 Global Traceability Standard, sections 3.3.1–3.3.5, pp. 18–21). Access is based on role and purpose. An Article 46 record has to be available to a market surveillance authority on request, but Article 46 does not require it to be public or prescribe a network architecture. Data-protection, confidentiality, cybersecurity and contractual requirements continue to apply.

12.5 Recall and withdrawal

Traceability records help determine affected models, batches or instances, identify recipients and quantities, locate stock, notify trading partners, reconcile returns and keep an auditable response record. Article 46 does not universally require batch or serial data. If records exist only at model level, the affected scope may have to include all units of that model supplied during the relevant period. Finer identification narrows an action only where reliable evidence confines both the issue and the distribution to that batch or those instances. Chapter 3 sets out the duties.

13 Category implementation example

These examples show how the decisions in the preceding chapters apply. They are illustrative, not complete compliance checklists. Each states assumed facts; a change in intended use, capacity, configuration, actor or date can change the result. The Regulation does not prescribe GTIN, GLN, SSCC, GS1 Digital Link or EPCIS for these examples. In the conceptual identifiers, `example.com` and the values in braces are placeholders.

13.1 Rechargeable AA batteries in a retail pack

Assumed facts. A manufacturer places a retail pack of four rechargeable AA batteries on the Union market after 18 February 2027. The batteries are specifically designed to be interoperable and are portable batteries of general use under Article 3(1), point (10). Each battery is the same model and production batch, and the pack is the orderable retail trade item.

Regulatory outcome. The batteries do not require a passport under Article 77(1), and each battery is subject to the Article 13(6)(b) QR route. Because they are rechargeable, the capacity label applies from the

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conditional date in Article 13(2) and (10), and Article 13(3) does not apply. General labelling follows Article 13(1) and Annex VI. The separate-collection symbol and, where the threshold is exceeded, the chemical symbol also apply (Article 13(4)–(5)). The minimum values for the rechargeable Annex III parameters apply from the conditional date in Article 9(1)–(2). The producer includes the batteries in portable-battery collection and reporting and separately reports the amount of portable batteries of general use (Article 75(1)(b)).

GS1 implementation. GTIN identifies the retail pack. The pack record states which battery trade item it contains and the quantity of four. Packing records link that configuration to the actual battery batch/lot supplied. The pack GTIN identifies the retail pack; it does not identify each contained battery or establish its production batch. If the batteries are also traded separately or need their own information association, a separate GTIN identifies the battery trade item. GTIN plus batch/lot number links the batteries to batch-specific records. A GS1 Digital Link URI encoded in the required QR code is a web entry point to the Article 13(6)(b) resources, for example https://example.com/01/{GTIN}/10/{BATCH}.

Limits. This is an information service, not a passport. A pack GTIN does not identify each battery, and Article 13(7) has to be assessed before relying on packaging and accompanying documents. Serialisation is not required merely because a QR code is required. OQ-REG-001 and OQ-REG-003 remain relevant.

13.2 Rechargeable battery incorporated in an appliance

Assumed facts. A manufacturer places on the market a cordless appliance containing a rechargeable portable battery. The appliance and battery are distinct trade items. The product is not within an Article 11(2) derogation or Article 11(3) exclusion.

Regulatory outcome. The battery does not require a passport under Article 77(1), and Article 13(6)(b) applies from 18 February 2027. From that date, the person placing the product on the market ensures that the battery is readily removable and replaceable by the end-user and provides the required instructions and safety information (Article 11(1)–(3) and (7)–(8)). The manufacturer identifies the battery under Article 38(6), and Article 13(7) governs alternative placement.

GS1 implementation. GTIN identifies the appliance trade item, and a separate GTIN identifies the battery trade item. A model-to-model association supports product information; installation, service, safety investigation or recall may need a batch-level or instance-level relationship. A GS1 Digital Link URI for the battery connects to the Article 13(6)(b) information.

Limits. Battery attributes describe the battery, not the appliance, and the appliance identifier is not the battery identifier. OQ-REG-004 remains relevant.

14 Dates and remaining verification

14.1 Key dates

Date or trigger	Requirement	Provision
18 August 2024	Economic-operator and conformity framework (Chapter VI of the Regulation), subject to underlying dates; portable-battery lead limit	Articles 17–20, 38–46 and 96(2)(b); Annex I, entry 3
18 August 2025	Separate-collection symbol and producer-responsibility rules (Chapter VIII of the Regulation)	Articles 13(4) and 96(2)(c)
13 August 2026	Replacement Annex I table	Annex I; Regulation (EU) 2026/1738
Conditional from 18 August 2026*	General label, and capacity or minimum-duration label	Article 13(1)–(3), (10)
18 February 2027	Article 13(6)(b) QR code and Article 11 product rules	Articles 11, 13(6)(b) and 96(2)(a)
30 June 2027	First Article 75 reports, covering reporting year 2026	Article 75(7); Implementing Regulation (EU) 2025/2289, Article 2
18 August 2027	Battery due diligence, for covered operators	Article 48(1), as amended
By 18 August 2027	Commission empowerment to amend the collection-rate method and adapt the target	Article 59(7)

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Date or trigger	Requirement	Provision
31 December 2027	63% collection rate	Article 59(3)
18 August 2028	End of the zinc-air button-cell exemption from the lead limit	Annex I, entry 3
Conditional from 18 August 2028*	Minimum values for portable batteries of general use, excluding button cells	Article 9(1)–(2)
31 December 2030	73% collection rate; Commission assessment of non-rechargeable portable batteries of general use	Articles 9(3) and 59(3)

* A conditional requirement applies from the date shown or after the period specified in the Regulation following the entry into force of the relevant delegated or implementing act, whichever is later. Before treating such a date as operative, verify the act, its entry into force and the period specified in the cited provision. The Cd and Pb marking transition requires legal confirmation (OQ-REG-002).

14.2 Open questions

Check these before relying on a statement that cites them. “Legal interpretation” means the Regulation does not settle the point. “Act or source to verify” means the answer depends on a secondary act or other source that has not been fully reviewed for this guideline.

Code	Question	Provisions	Status	Chapters
OQ-REG-001	Has the Article 13(10) implementing act entered into force, and which date and specifications now govern the labels?	Article 13(1)–(3), (10)	Act or source to verify	4
OQ-REG-002	How do the Cd and Pb marking duty and the transition from Directive 2006/66/EC interact between 18 February 2024 and 18 August 2025?	Articles 13(5), 95 and 96	Legal interpretation	4
OQ-REG-003	What must the QR code do where no Article 52(3) report is required because the operator or battery is outside Chapter VII of the Regulation?	Articles 13(6)(b), 47 and 52(3)	Legal interpretation	4, 8
OQ-REG-004	What is the current effect of the Commission guidance under Article 11(9), and are any further Article 11(4) derogations applicable? Delegated Regulation (EU) 2026/1770 (Commission act C(2026) 5031, published on 22 October 2026), Article 1, replaces Article 11(2), with entry into force on 11 November 2026. That published amendment is reflected in chapter 5; the guidance and any further derogations remain to be checked.	Article 11(2), (4) and (9)	Act or source to verify	5
OQ-REG-007	Which Annex XIII, point 4 information must be QR-accessible for non-passport batteries after a circular operation, at what granularity and from when?	Article 13(9); Annex XIII, point 4; Article 77(1)	Legal interpretation	4, 11
OQ-REG-008	Is the Article 38(4) reference to Annex IX a drafting error, and how does its 10-year period fit the different Annex VIII wording?	Article 38(4); Annex VIII	Act or source to verify	3
OQ-REG-013	Have delegated acts amended the collection-rate method or targets? The empowerment runs to 18 August 2027.	Articles 59(7) and 60(8); Annex XI	Act or source to verify	10
OQ-REG-014	What content and retention apply to Article 65(2) and Article 46 records beyond what is expressly listed?	Articles 46 and 65(2)	Legal interpretation	10

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Code	Question	Provisions	Status	Chapters
OQ-REG-015	Which Article 9(2) measures set the minimum values and test conditions, and what date follows?	Article 9(1)–(2); Annex III	Act or source to verify	2
OQ-REG-016	Three points remain on the replacement Annex I: whether Article 4(2)(a) of Directive 2000/53/EC still restricts batteries until 31 August 2032, now that its battery exemptions ended on 13 August 2026; whether Annex I, entry 3(1), reaches a portable battery in an M1 or N1 vehicle; and how "homogeneous material" applies to a battery.	Article 6(1); Annex I, entries 2–4; Regulation (EU) 2026/1738, Articles 5(5) and 57(1)(a)	Legal interpretation	2
OQ-REG-020	Which current shipment instruments and transitional rules govern used and waste batteries?	Article 72; Annex XIV	Act or source to verify	10

The portable-battery collection targets apply to the category collectively, and button cells are within the portable-battery-of-general-use definition but excluded from Article 9(1)–(2).

GS1 standards support implementation but do not establish compliance. National reporting formats are confirmed with each Member State (chapter 9).

15 Data model for portable batteries

This chapter lists the information relevant to portable batteries and explains each attribute's meaning, data type, applicability and conditions. The chapter references show where the underlying requirement is explained. The tables bring together information used for labelling, QR access, reporting and other regulatory functions; they do not mean that every attribute must appear behind the QR code. The full list, for all battery types, is in Annex A, the "Attributes" sheet of the separately published companion workbook EU_battery_attribute_list_v0.5_GS1.xlsx. It does not map the attributes to GS1 standards. The Regulation requires the information but does not prescribe a data model or GS1 standards for it.

15.1 How this overview was created

The list was built in four steps:

1. **Commission data model.** The Commission's battery data model, version 1.0.0 of 30 October 2026, is the starting point. It is official but is not a legal act. The names, definitions and data types of its attributes come from that model.
2. **Regulation.** The list was checked against the consolidated text of the Regulation of 13 August 2026 and its secondary acts. Commission guidance on passport data points, version 3.2 of 19 October 2026, helped to interpret the data points. It states that it is not the Commission's official position.
3. **Additions. Attributes required by the Regulation but absent from the Commission's model were added. The Commission's model concerns batteries with a digital product passport. This guideline reuses its terms where they fit portable-battery information and marks additional attributes separately. Reusing a term does not make a portable battery subject to passport requirements or make the term a GS1 standard attribute.**
4. **Check by battery type.** Every attribute was checked for this battery type against the Regulation. This chapter keeps the attributes that apply to portable batteries and leaves out the rest.

15.2 How to read the tables

Column	Meaning
Attribute	The attribute's name. An asterisk (*) marks an attribute that is not in the Commission's model, so its name is a proposal in this guideline, not a Commission or GS1 term

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Column	Meaning
Definition	The Commission's definition. For attributes marked with an asterisk, it is a definition written for this guideline from the legal text
Data type	The kind of value the attribute holds
Requirement	Whether the attribute applies to portable batteries
Condition or timing	When a conditional or later attribute applies
Chapter	The chapter of this guideline that explains the requirement

Code	Meaning
M	Mandatory
O	Optional
C	Conditional: applies only in certain cases
Later	Required by the Regulation, but not to be filled in yet because of a later date or a secondary act

Read the tables with these limits in mind:

- **The Regulation prevails.** This overview is a reading aid. It does not create obligations or replace the legal text.
- **A code is a summary.** The notes in Annex A hold more detail on conditions, dates and open questions.
- **Not every attribute is QR-code information.** Some are kept for authorities or reported by the producer.
- **The list is a working document and may be updated.** Attributes marked with an asterisk have not yet been reviewed by the Commission or GS1.
- **Each attribute describes the battery** unless the table says otherwise. Keep battery data separate from host-product data (chapter 5).

Annex A also shows each attribute's identifier, access rights, allowed units, code list, application date, legal basis, guidance data point and notes. Identifiers starting with `GS1-` mark added attributes. The prefix marks the additions only: these attributes are not GS1 standard terms.

15.3 The data model

15.3.1 Manufacturer and importer

Importer attributes apply only to imported batteries.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
`manufacturerIdentification`	Manufacturer name, registered trade name or registered trademark [at least one of]	Group	M		4, 3
`manufacturerName`	Manufacturer name, registered trade name or registered trademark [at least one of]	Text	C	At least one of name, registered trade name or trade mark (Article 38(7))	4, 3
`manufacturerTradeName`	Manufacturer name, registered trade name or registered trademark [at least one of]	Text	C	At least one of name, registered trade name or trade mark (Article 38(7))	4, 3
`manufacturerTrademark`	Manufacturer name, registered	Text	C	At least one of	4, 3

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
	trade name or registered trademark [at least one of]			name, registered trade name or trade mark (Article 38(7))	
manufacturerPostalAddress	Manufacturer single contact postal address	Text	M		4, 3
manufacturerContactDetails	If available, manufacturer web and email address [both optional]	Group	O		4, 3
manufacturerWebsite	If available, manufacturer web and email address [both optional]	URI	O		4, 3
manufacturerEmail	If available, manufacturer web and email address [both optional]	URI	O		4, 3
importerIdentification *	Importer name, registered trade name or registered trade mark [at least one of].	Group	C	Imported batteries only	3
importerName *	Importer name.	Text	C	Imported batteries only	3
importerTradeName *	Importer registered trade name.	Text	C	Imported batteries only	3
importerTrademark *	Importer registered trade mark.	Text	C	Imported batteries only	3
importerPostalAddress *	Importer postal address, indicating a single contact point.	Text	C	Imported batteries only	3
importerWebsite *	Importer web address, if available.	URI	C	Imported batteries only, if available	3
importerEmail *	Importer email address, if available.	URI	C	Imported batteries only, if available	3

15.3.2 Battery identification and manufacture

At least one manufacturer name and one identification element are needed, which is why the sub-attributes are conditional.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
batteryCategory	Battery category [3-code list]	Code (battery-category)	M		1.4, 4
batteryIdentification	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Group	M		6, 4
modelIdentifier	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Text	C	Model identification with a batch or serial number, product number or another identifying element (Article 38(6))	6, 4
batchNumber	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Text	C	Model identification with a batch or serial number, product number or another	6, 4

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
				identifying element (Article 38(6))	
serialNumber	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Text	C	Model identification with a batch or serial number, product number or another identifying element (Article 38(6))	6, 4
productNumber	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Text	C	Model identification with a batch or serial number, product number or another identifying element (Article 38(6))	6, 4
otherIdentificationElement	Model identification and batch or serial number, or product number or another element allowing their identification [at least one of]	Text	C	Model identification with a batch or serial number, product number or another identifying element (Article 38(6))	6, 4
manufacturingPlace	The place of manufacture (geographical location of a battery manufacturing plant) [town, region, country/jurisdiction]	Group	M		4
manufacturingCity	The place of manufacture (geographical location of a battery manufacturing plant) [town, region, country/jurisdiction]	Text	C	Where needed to state the location of the plant (Annex VI, Part A)	4
manufacturingRegion	The place of manufacture (geographical location of a battery manufacturing plant) [town, region, country/jurisdiction]	Text	C	Where needed to state the location of the plant (Annex VI, Part A)	4
manufacturingCountry	The place of manufacture (geographical location of a battery manufacturing plant) [town, region, country/jurisdiction]	Country code (ISO 3166-1 alpha-3)	M		4
manufacturingDate	The date of manufacturing [month and year]	Year-month (YYYY-MM)	M		4
generalUseFormat *	The listed format that makes the battery a portable battery of general use.	Code (general-use-format)	C	Portable batteries of general use only	2, 1.4

15.3.3 Physical characteristics and composition

These attributes describe the battery model.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
batteryWeight	The weight [unit kg]	Quantity (value + unit)	M		4
batteryCapacity	The capacity [unit Ah]	Quantity (value + unit)	M		4
batteryChemistry	The chemistry [code list]	List of codes	M		4

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
		(battery-chemistry)			
hazardousSubstances	The hazardous substances present in the battery, other than mercury, cadmium or lead [free text]	List of Text	M		4
extinguishingAgent	Usable extinguishing agent [free text]	Multilingual text	M		4
criticalRawMaterials	Critical raw materials present in the battery in a concentration of more than 0,1 % weight by weight [code list]	List of codes (critical-raw-material)	M		4

15.3.4 Sustainability and responsible sourcing

"Later" means the Regulation requires the information, but it does not have to be filled in yet.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
dueDiligenceReport *	Report on the battery due diligence policy referred to in Art. 52(3).	Document link (URL + media type)	Later	Only for operators within Articles 47–48, from 18 August 2027. Name is a proposal. If no report exists: OQ-REG-003	8, 4

15.3.5 Labels, markings and conformity

CE marking and the symbols are physical markings. A data attribute records them and does not replace them.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
separateCollectionSymbol	The marking requirements laid down in Article 13(4) [Yes/No]	Boolean (always true)	M		4
chemicalSymbol	The marking requirements laid down in Article 13(5) [code list]	List of codes (battery-chemical-symbol)	C	Above 0.002% cadmium or 0.004% lead (Article 13(5)). Marking date: OQ-REG-002	4
minimumAverageDuration *	Minimum average duration of a non-rechargeable portable battery when used in specific applications.	To be defined (labelling implementing act pending)	C	Non-rechargeable portable batteries only (Article 13(3))	4
nonRechargeableIndication *	Indication that a portable battery is non-rechargeable.	Boolean	C	Non-rechargeable portable batteries only (Article 13(3))	4
euDeclarationOfConformity	The EU declaration of conformity referred to in Article 18 [a web link]	Document link (URL + media type)	M		3, 4
ceMarking *	Whether the battery bears the CE marking.	Boolean	M		3, 4

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
notifiedBodyIdentificationNumber *	Identification number of the notified body following the CE marking.	Text	C	Only where Annex VIII requires it	3
batteryInstructionsAndSafetyInformation *	Clear, understandable and readable instructions and safety information accompanying the battery.	Multilingual text or document link	M		3
technicalDocumentation *	Technical documentation for the conformity assessment.	Document link	M		3, 2

15.3.6 Waste prevention, producer and reporting information

Some of these attributes describe the producer, the sale or a report, not the battery.

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
wasteBatteryPreventionManagementInfo	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Group	M		10, 4
endUserRoleInWastePrevention	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
endUserRoleInSeparateCollection	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
separateCollectionPoints	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
takeBackCollectionPoints	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
preparationForReuseFacilities	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
preparationForRepurposingFacilities	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
wasteBatteryTreatmentFacilities	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
wasteBatterySafetyInst	The information regarding the	Multilingual	M		10, 4

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
ructions	prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	text			
batteryLabelSymbolMeaning	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
batterySubstancesImpact	The information regarding the prevention and management of waste batteries laid down in Article 74(1), points (a) to (f) [multiple free text]	Multilingual text	M		10, 4
storageCollectionSafetyInformation *	Safety and protective measures, including occupational safety, for storing and collecting waste batteries.	Multilingual text or document link	M		10
treatmentModelInformation *	Dismantling processes and safety measures for storage, transport and treatment, identifying components, materials and the location of hazardous substances.	Document link	C	Electronically and free of charge, on request, as far as operators need it (Article 74(3))	10
producerRegistrationNumber *	Registration number granted by the competent authority of each Member State.	List of Text	M		9
wasteManagementCostsAtSale *	Costs covered by the producer under Art. 56(4)(a)-(d), shown separately to the end-user.	To be defined	M		9
firstMadeAvailableQuantity *	Amount first made available on the market in a Member State in a calendar year, by chemistry and category.	Quantity (value + unit)	M		9

15.3.7 Instructions, composition and dismantling

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
hostProductRemovalInstructions *	Instructions and safety information on the use, removal and replacement of portable batteries, permanently online on a public website.	URI	C	Describes the host product, not the battery. Only for products incorporating portable batteries, subject to Article 11(2)–(3)	5

15.3.8 Performance and durability values

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
generalUsePerformanceValues *	Values for the electrochemical performance and durability parameters in Annex III.	To be defined (delegated	Later	Portable batteries of general use, excluding button	2

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Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
		act pending)		cells, from the Article 9 date (OQ-REG-015). Not QR information	

15.3.9 Battery status and use

Attribute	Definition	Data type	Requirement	Condition or timing	Chapter
batteryStatus	Information on the status of the battery, defined as 'original', 'repurposed', 're-used', 'remanufactured' or 'waste' [code list]	Code (battery-status)	C	After a circular operation, a new label showing the change of status is accessible through the QR code (Article 13(9); OQ-REG-007)	4, 11

15.4 Limitations

Annex A is a working document and may be updated. The chemical code list in the Commission's model has no codes for some common portable chemistries, such as alkaline and zinc-air. Annex A proposes additional codes, which are not Commission or GS1 codes. The questions that affect this data model are OQ-REG-001, OQ-REG-003 and OQ-REG-007 (chapter 14).

16 Terms and abbreviations

This chapter explains the terms used in this guideline. Where a term comes from the Regulation, the legal text prevails.

16.1 Battery categories

Portable batteries are one of these categories. Chapter 1.4 explains how to use the test for this guideline.

Term	Meaning	Source
Portable battery	A sealed battery weighing 5 kg or less, not designed specifically for industrial use, that is not an electric vehicle, LMT or SLI battery.	Article 3(1), point (9). "Portable" is a defined category and is not determined by weight alone.
Portable battery of general use	A rechargeable or non-rechargeable portable battery specifically designed to be interoperable and having one of these formats: 4.5 V (3R12), button cell, D, C, AA, AAA, AAAA, A23 or 9 V (PP3).	Article 3(1), point (10). This is a subcategory of portable battery.
Light means of transport battery (LMT battery)	A sealed battery weighing 25 kg or less, specifically designed to provide traction power for wheeled vehicles powered by an electric motor alone or by motor and human power, including type-approved category-L vehicles, and which is not an electric vehicle battery.	Article 3(1), point (11). No capacity threshold limits the Article 77(1) passport duty for an LMT battery.
Starting, lighting and ignition battery (SLI battery)	A battery specifically designed to supply electric power for starting, lighting or ignition and which can also be used for auxiliary or backup purposes in vehicles, other means of transport or machinery.	Article 3(1), point (12).
Industrial battery	A battery specifically designed for industrial uses; a battery intended for industrial uses after preparation for	Article 3(1), point (13). The Article 77(1) passport threshold is capacity greater

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Term	Meaning	Source
	repurposing or repurposing; or any other battery weighing more than 5 kg that is not an electric vehicle, LMT or SLI battery.	than 2 kWh, not battery weight.
Stationary battery energy storage system	An industrial battery with internal storage, specifically designed to store electric energy from and deliver it to the grid, or to store electric energy for and deliver it to end-users, regardless of where and by whom it is used.	Article 3(1), point (15). It remains an industrial battery; its passport status depends on whether its capacity is greater than 2 kWh (Article 77(1)).
Electric vehicle battery	A battery that weighs more than 25 kg and is specifically designed to provide traction power in a hybrid or electric category-L vehicle, or a battery specifically designed to provide traction power in a hybrid or electric vehicle of category M, N or O.	Article 3(1), point (14). Applying the 25 kg limit to the battery is this guideline's reading, read with the LMT definition. The referenced vehicle categories are those in Regulations (EU) No 168/2013 and (EU) 2018/858.

16.2 Regulatory terms

Term	Meaning	Source
Battery passport	The electronic record required from 18 February 2027 for 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. It contains battery-model information and information specific to the individual battery. It is accessible through the Article 13(6) QR code, which links to the unique identifier attributed by the economic operator placing the battery on the market. The QR code and unique identifier must comply with the ISO/IEC 15459 standards listed in Article 77(3), or equivalent. The Regulation does not prescribe a GS1 identifier. Article 77(1) applies by reference to placement on the market or putting into service from 18 February 2027; it does not state that a battery placed on the market or put into service before that date acquires a passport merely by remaining in service. Following preparation for re-use, preparation for repurposing, repurposing or remanufacturing, a battery placed on the market or put into service is to have a new passport linked to the passport or passports of the original battery or batteries, and responsibility transfers to the operator specified in Article 77(7).	Articles 13(6), 77(1)–(7) and 78; Annex XIII. The treatment of batteries placed on the market or put into service before 18 February 2027 follows the temporal wording of Article 77(1); later placement or putting into service after a circular operation must be assessed under Articles 38(11), 45 and 77(7).
QR code	A machine-readable matrix code that links to information required by the Regulation. For a passport battery, the QR code provides access to the battery passport; for batteries outside Article 77(1), Article 13(6)(b) specifies a different information set.	Article 3(1), point (24); Article 13(6). A QR code is not, by itself, a battery passport.
Making available on the market	Any supply of a battery for distribution or use on the Union market in the course of a commercial activity, whether in return for payment or free of charge.	Article 3(1), point (17).
Placing on the market	The first making available of a battery on the Union market.	Article 3(1), point (16).
Putting into service	The first use, for its intended purpose in the Union, of a battery that has not previously been placed on the market.	Article 3(1), point (18).
End-user	A person in the Union to whom a product has been made available, either as a consumer outside any trade, business, craft or profession, or as a professional end-user in the course of industrial or professional activities.	Article 3(2)(b) of the Regulation, which takes the term from Article 3 of Regulation (EU) 2019/1020.
Market surveillance authority	An authority designated by a Member State as responsible for carrying out market surveillance in its territory.	Article 3(2)(b) of the Regulation, which takes the term from Article 3 of Regulation (EU) 2019/1020.
Notified body	A conformity assessment body that has been notified under Chapter V of the Regulation.	Article 3(1), point (41).
Conformity assessment	The process demonstrating whether the sustainability, safety, labelling, information and due diligence requirements of the	Article 3(1), point (39).

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Term	Meaning	Source
	Regulation have been fulfilled.	
CE marking	A marking by which a manufacturer indicates that the battery is in conformity with the applicable requirements in Union harmonisation legislation providing for its affixing.	Article 3(1), point (36).
Battery model	A version of a battery all units of which share the same technical characteristics relevant for the Regulation's requirements on sustainability, safety, labelling, marking and information, and the same model identifier.	Article 3(1), point (19).
Battery cell	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), point (4).
Battery module	A set of battery cells connected together or encapsulated within an outer casing to protect them against external impact, meant to be used alone or in combination with other modules.	Article 3(1), point (3).
Active material	A material which reacts chemically to produce electric energy when the battery cell discharges, or to store electric energy when the battery is being charged.	Article 3(1), point (5).
Rechargeable and non-rechargeable battery	A battery that is, or is not, designed to be electrically recharged.	Article 3(1), points (6) and (7).
State of health	A measure of the general condition of a rechargeable battery and its ability to deliver the specified performance compared with its initial condition.	Article 3(1), point (28).
Hazardous substance	A substance classified as hazardous under Article 3 of Regulation (EC) No 1272/2008.	Article 3(1), point (52).
Homogeneous material	A term used in Annex I for some limits by weight. How it applies to a battery is an open question (OQ-REG-016).	Annex I, entries 2–4.
Waste battery	A battery that is waste as defined in Article 3, point (1), of Directive 2008/98/EC.	Article 3(1), point (50).
Waste management operator	A person dealing on a professional basis with the separate collection or treatment of waste batteries.	Article 3(1), point (56).
Treatment	An operation carried out on waste batteries after they have been handed over to a facility for sorting, preparation for re-use, preparation for repurposing, preparation for recycling or recycling.	Article 3(1), point (53).
Recycler	A person who carries out recycling in a permitted facility.	Article 3(1), point (58).
Recycling efficiency	The ratio, as a percentage, obtained by dividing the mass of output fractions accounting for recycling by the mass of the waste batteries' input fraction.	Article 3(1), point (60).
Black mass	A powder of electrode materials produced when batteries are processed for recycling. For the recycling calculations it is an intermediate fraction, not an output fraction.	Delegated Regulation (EU) 2025/606, Annex, sections 1 and 3, for its status. The description of the powder is its general technical meaning.
Battery due diligence	An economic operator's obligations on its management system, risk management, third-party verification and disclosure, to identify, prevent and address social and environmental risks linked to the raw materials for battery manufacturing.	Article 3(1), point (42).
Vehicle categories L, M, N and O	L: two- and three-wheel vehicles and quadricycles. M: passenger vehicles, with M1 up to eight seats plus the driver. N: goods vehicles, with N1 up to 3.5 tonnes. O: trailers.	Regulations (EU) No 168/2013 (L) and (EU) 2018/858 (M, N and O).

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16.3 Roles

Term	Meaning	Source
Economic operator	A manufacturer, authorised representative, importer, distributor, fulfilment service provider or another person subject to obligations concerning the manufacture or circular processing of batteries, their making available or placing on the market, including online, or their putting into service.	Article 3(1), point (22). The actor responsible for a particular duty must be determined from the operative provision; the general definition does not assign every duty to every economic operator.
Manufacturer	A person that manufactures a battery, or has a battery designed or manufactured, and markets it under its own name or trademark or puts it into service for its own purposes.	Article 3(1), point (33). A manufacturer is not necessarily the "producer" for every Member State.
Authorised representative	A person established in the Union that has a written mandate from a manufacturer to act on its behalf for specified tasks concerning the manufacturer's obligations under Chapters IV and VI of the Regulation.	Article 3(1), point (63). This role is distinct from an authorised representative for extended producer responsibility under Article 3(1), point (48).
Importer	A person established in the Union that places on the market a battery from a third country.	Article 3(1), point (64).
Distributor	A person in the supply chain, other than the manufacturer or importer, that makes a battery available on the market.	Article 3(1), point (65).
Producer	A manufacturer, importer, distributor or other person that meets one of the Member-State-specific first-supply or distance-selling conditions in Article 3(1), point (47), including for batteries incorporated in appliances, light means of transport or other vehicles.	Article 3(1), point (47). This concise definition must be applied with all four alternatives in points (a)–(d); it is not a synonym for manufacturer.
Fulfilment service provider	A person handling warehousing, packaging, addressing and dispatching, as set out in chapter 3.	Article 3(2)(b) of the Regulation, which takes the term from Article 3 of Regulation (EU) 2019/1020; Article 43.
Authorised representative for extended producer responsibility	A person established in a Member State where the producer places batteries on the market, other than the producer's own, appointed by the producer to fulfil its obligations under Chapter VIII of the Regulation.	Article 3(1), point (48).
Producer responsibility organisation (PRO)	A legal entity that financially, or financially and operationally, organises the fulfilment of extended producer responsibility obligations on behalf of several producers.	Article 3(1), point (49).

16.4 GS1 terms

Term	Meaning	Source
GTIN	GS1 identification key that identifies a trade item. A GTIN alone does not identify an individual battery instance.	GS1 General Specifications, section 1.3.1, p. 35. Whether the battery, a host product or both are trade items requiring separate identification depends on the implementation scope.
GTIN plus batch/lot number	GS1 identification structure that distinguishes a production batch/lot of a trade item.	GS1 General Specifications, section 1.3.1.2, p. 37. Batch-level identification does not identify an individual instance.
GTIN plus serial number	GS1 identification structure that distinguishes an individual instance of a trade item.	GS1 General Specifications, section 1.3.1.4, p. 39. Allocation and lifecycle governance remain necessary.
GLN	GS1 identification key that identifies a legal entity, party, function or location.	GS1 General Specifications, sections 1.3.3–1.3.4, pp. 49–54. A GLN does not replace an authority-issued registration number or other legally issued identifier, but complements and links to it.
SSCC	GS1 identification key that identifies a logistic unit.	GS1 General Specifications, section 1.3.5, pp. 55–56. It does not identify each battery contained in the logistic unit.

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Term	Meaning	Source
GS1 Application Identifier	A numeric code that defines the meaning and format of the data element that follows it in a GS1 element string.	GS1 General Specifications, section 3, pp. 201–276. Relevant examples include AI (01) for GTIN, AI (10) for batch/lot number and AI (21) for serial number.
GS1 Digital Link URI	A URI representation of a GS1 identifier and, where applicable, its key qualifiers and data attributes. It provides web-enabled identification and an entry point to online resources associated with the identified object.	GS1 Digital Link Standard: URI Syntax, sections 3.1 and 4, pp. 18–36. A URI, resolver or linked webpage is not by itself a battery passport and does not satisfy the passport's data, access, persistence, security or governance requirements.
Link type	A term from the GS1 Web Vocabulary that describes the kind of resource a resolver links to, such as `gs1:dpp` (Digital Product Passport) or `gs1:pip` (Product Information Page).	GS1 Web Vocabulary, version 1.18. This guideline recommends `gs1:dpp` for the passport route and `gs1:pip` for the non-passport route (chapter 7).
EPCIS	GS1 standard for capturing and sharing visibility event data concerning identified objects and business processes.	GS1 EPCIS Standard, version 2.0.1, sections 1, 6 and 7, pp. 21–102. EPCIS records do not prove regulatory compliance or replace conformity assessment, verification, certification, audit or an authority decision.
GDSN	GS1 network for standardised trade-item master-data exchange.	Use is subject to verification that current attributes, validations and target-market implementation cover the intended battery data. GDSN must not be presented as covering every regulatory data element until that mapping has been verified.
Trade item	A product for which predefined information needs to be retrieved and that may be priced, ordered or invoiced at a point in the supply chain.	Chapter 6 explains how it is used.
Logistic unit	A pallet, case, cage, container or similar unit assembled for transport or storage.	SSCC identifies the logistic unit. Its contents are recorded separately; SSCC does not identify each contained battery. Chapter 6 explains the identification levels.

16.5 Abbreviations

Abbreviation	Meaning
AI	Application Identifier
CBV	Core Business Vocabulary
CE	Conformité Européenne
CTE	Critical Tracking Event
EDI	Electronic Data Interchange
EPCIS	Electronic Product Code Information Services
EPR	Extended producer responsibility
EU	European Union
EV	Electric vehicle
EWC	European Waste Catalogue
GDSN	Global Data Synchronisation Network
GLN	Global Location Number
GTIN	Global Trade Item Number
KDE	Key Data Element
LMT	Light means of transport
PRO	Producer responsibility organisation
QR	Quick Response

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Abbreviation	Meaning
SLI	Starting, lighting and ignition
SSCC	Serial Shipping Container Code
URI	Uniform Resource Identifier
WEEE	Waste electrical and electronic equipment

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