

Checklist for portable and starter batteries without a passport duty

What still applies – labelling, QR code, removability, recycled content and deadlines for portable and SLI batteries, to tick off.

What this checklist covers

Nature of this checklist. This list follows the regulation text: the data points are law, not a forecast.

This checklist is part of our [reference on the digital product passport for batteries](#), which covers the timeline, the roles, the required data and the official documents for the whole industry; this page narrows it down to the batteries that need no passport.

Portable batteries and starter batteries for vehicles (SLI) need no battery passport. The EU Batteries Regulation (EU) 2023/1542 does not leave them alone for that: from 18 February 2027 every one of these batteries carries a QR code too, and labelling, removability, recycled content and due diligence arrive in stages. This checklist lists what applies to you when you place such batteries, or products containing them, on the EU market: the duties, what the QR code has to deliver, the deadlines as a timeline, and the official documents, linked under sources at the end. The whole list is also there to download as a PDF below.

The articles are those of the regulation.

Which battery do you have?

Tick the type that describes your battery and how you bring it to market. Both types share most duties below; the QR-code content and the recycled-content rules differ. The articles in brackets point to [Regulation \(EU\) 2023/1542](#).

- ☐ Portable battery: sealed, up to 5 kg, neither an EV, LMT, SLI nor industrial battery; this includes portable batteries of general use such as AA, AAA, C, D and 9 V (Art. 3).
- ☐ SLI battery: designed to supply power for starting, lighting or ignition of vehicles, including as auxiliary or backup battery (Art. 3).

- ☐ You place the battery itself on the market, or a product it is built into: both trigger duties, partly different ones.

Your duties

Everything [Regulation \(EU\) 2023/1542](#) asks of whoever places portable or SLI batteries on the market, without a passport. Tick off what is already in place; every item names its article, and the deadlines below say when it applies.

- ☐ Respect the substance restrictions: mercury at most 0.0005 %, cadmium in portable batteries at most 0.002 %, lead in portable batteries at most 0.01 % (Art. 6, Annex I).
- ☐ Attach the separate collection symbol, since 18 August 2025 on every battery, with the Cd or Pb symbol beneath it where the limits are exceeded (Art. 13(4) and (5)).
- ☐ Attach the label with the general information, from 18 August 2026 (Art. 13(1)).
- ☐ State the capacity on the label: rechargeable portable batteries and SLI batteries, from 18 August 2026 (Art. 13(2)).
- ☐ Print the minimum average duration in typical use and the words "non-rechargeable": non-rechargeable portable batteries, from 18 August 2026 (Art. 13(3)).
- ☐ Print or engrave the QR code visibly, legibly and indelibly, from 18 February 2027; it leads to the labelling, the EU declaration of conformity, the due-diligence report and the disposal information (Art. 13(6)(b) and (7)).
- ☐ Show the recycled content through the QR code: for SLI batteries the recovered shares of cobalt, lead, lithium and nickel (Art. 13(6)(c)).
- ☐ Build portable batteries removable and replaceable by end users when you place products with built-in batteries on the market, from 18 February 2027; instructions permanently online, spare batteries for five years after the last device, no software lock (Art. 11).
- ☐ Meet the minimum values for electrochemical performance and durability: portable batteries of general use except button cells, from 18 August 2028 or 24 months after the delegated act (Art. 9, Annex III).
- ☐ Document the recovered shares per model, year and plant: SLI batteries from 18 August 2028 or 24 months after the act on the method; minimum shares from 2031 and 2036 (Art. 8).
- ☐ Carry out the conformity assessment, issue the EU declaration of conformity, affix the CE marking (Art. 17 to 20).
- ☐ Set up supply-chain due diligence, have it verified and report on it, from 18 August 2027; applies from EUR 40 million net turnover (Art. 47 to 52).

- ☐ Register as a producer under extended producer responsibility and meet the collection targets: portable batteries 63 % by the end of 2027 and 73 % by the end of 2030 (Art. 55 ff.).

What the QR code has to deliver

The code on a portable or SLI battery has to lead to this information, complete, up to date and accurate:

- ☐ The information of the label: general information, capacity or minimum duration, separate collection symbol, Cd or Pb symbol (Art. 13(1) to (5))
- ☐ The EU declaration of conformity (Art. 18)
- ☐ The due-diligence report, once required (Art. 52(3))
- ☐ The information on the prevention and management of waste batteries: the role of end users in collection, collection systems, hazards of improper disposal, meaning of the symbols (Art. 74(1)(a) to (f))
- ☐ For SLI batteries the recycled content under Article 8

Deadlines

The dates that matter for portable and SLI batteries, taken from the application articles of the regulation. The later ones hang on delegated acts the Commission has not adopted yet and are marked as such.

18 FEBRUARY 2024

The regulation applies

Most provisions of the Batteries Regulation apply from this day (Art. 96). Everything below builds on it; batteries placed on the market since then fall under its conformity rules.

18 AUGUST 2024

Lead limit for portable batteries

Portable batteries may contain at most 0.01 % lead by weight (Annex I); zinc-air button cells are exempt until 18 August 2028. Already due; check your cell specifications.

18 AUGUST 2025

Separate collection symbol

Every battery carries the crossed-out bin symbol, with the Cd or Pb symbol beneath it where the limits are exceeded (Art. 13(4) and (5)). Already due; check your current label.

18 AUGUST 2026

Label with information, capacity or minimum duration

Every battery carries a label with the general information of Annex VI; rechargeable portable and SLI batteries add their capacity, non-rechargeable ones their minimum average duration and the words "non-rechargeable" (Art. 13(1) to (3)). Shifts if the implementing act on the format arrives later.

18 FEBRUARY 2027

QR code and removability

From this day every battery carries a QR code leading to its labelling, declaration of conformity and disposal information (Art. 13(6)), and products with built-in portable batteries must let the end user remove and replace them (Art. 11).

18 AUGUST 2027

Supply-chain due diligence

Companies above EUR 40 million net turnover run a supply-chain due-diligence policy, have it verified and report on it (Art. 47 ff.). Postponed from 2025 by Regulation (EU) 2025/1561.

31 DECEMBER 2027

Collection target of 63 %

Producers of portable batteries must collect 63 % of what they place on the market, through their producer responsibility scheme (Art. 59).

18 AUGUST 2028

Performance, durability and recycled content

Portable batteries of general use must meet the minimum electrochemical performance and durability values of Annex III (Art. 9), and SLI batteries document their recovered shares of cobalt, lithium, nickel and lead (Art. 8(1)); each 24 months after its delegated act if that comes later.

31 DECEMBER 2030

Collection target of 73 % and carbon-footprint review

The collection target for portable batteries rises to 73 % (Art. 59), and the Commission assesses whether to extend the carbon-footprint duties to portable batteries (Art. 7(4)).

18 AUGUST 2031

First minimum recycled shares for SLI batteries

The active materials of SLI batteries must contain at least 16 % recovered cobalt, 85 % lead, 6 % lithium and 6 % nickel (Art. 8(2)). A sourcing question for the contracts you sign in 2029.

18 AUGUST 2036

Higher minimum recycled shares for SLI batteries

The shares rise to 26 % cobalt, 85 % lead, 12 % lithium and 15 % nickel (Art. 8(3)).

Sources

The documents this checklist is drawn from, and what each one is good for.

Document	What for
Regulation (EU) 2023/1542	The regulation itself: Art. 6 and Annex I on substances, Art. 9 on performance, Art. 11 on removability, Art. 13 on label and QR code, Art. 8 on recycled content.
Regulation (EU) 2025/1561	The postponement of the due-diligence duties to 18 August 2027.
Commission page on the Batteries Regulation	Overview, questions and answers and the ongoing acts.

How to prepare

Five steps in the order they pay off, from the label you already print to the passport you may choose to offer.

1. **Check label and symbols:** compare your current labelling with Article 13. The separate collection symbol has been mandatory since 2025; capacity or minimum duration follow in 2026.
2. **Plan the QR code:** decide where the code sits on battery or packaging and where it leads. It has to stay readable over the whole lifetime and must not depend on a service that can disappear.
3. **Check removability:** if you sell devices with built-in batteries, clarify with engineering whether end users can replace the battery with commercially available tools and whether spare batteries stay available for five years.
4. **Consider a voluntary passport:** the QR code has to lead to labelling, declaration of conformity and disposal information anyway. A product passport delivers exactly that, in every official language, and is ready should the Commission extend the duties. [Register for free](#) and create one model.
5. **Schedule recycled content and due diligence:** for SLI batteries the recovered shares sit with the cell manufacturers; put them into the purchasing contracts. From EUR 40 million turnover the due-diligence duties arrive in 2027.

As of 9 September 2026. The current version of this checklist:

<https://transpareo.com/en/industries/batteries/checklist-portable-and-starter-batteries>