21 May 2026

Supplemental Position on the Draft Battery Labelling Implementing Act
Preferential Use of Digital Labelling

The European Commission has developed a draft implementing act for EU Batteries Regulation (EU) 2023/1542, focusing on the marking and labelling of batteries. **EPBA - Consumer Batteries Europe** reiterates previously raised concerns by drawing upon the multi-industry Digital First initiative.

The Commission proposes a series of elements for the battery label and packaging, with minimum font sizes and a hierarchy of required information. Conversely, we suggest a more balanced and workable solution for shifting disproportionate technical detail to alternative digital locations, leaving a minimum set of information on product or packaging to inform and guide the consumer. As a result, consumers will benefit from clearer, more up-to-date product information, yet avoiding overcrowded physical labels. In line with the Packaging and Packaging Waste Regulation (PPWR) such a solution will reduce packaging waste, while keeping essential safety information available for shoppers.

To ensure consumers have the information necessary to make an informed decision and safely use the batteries, we advocate for the following hierarchy for battery marking and labelling.

Label on Battery Surface

Battery labels offer very limited surface, with the average AAA label comprising less than 15 cm^2. Therefore, we recommend using this space for basic information and safe use instructions i.e.,

- Manufacturer's name, registered trade name or registered trademark;
- Battery category and model identification, batch or serial number or product number or another element enabling its identification (e.g. "AA" or "LR6");
- Electrochemical composition based on the specifications set out in Annex IV (e.g. "alkaline");
- CE Mark;
- Separate collection symbol referred to in Article 13(4) of Regulation (EU) 2023/1542;
- Non-rechargeable label referred to in Article 13(3) of Regulation (EU) 2023/1542 and in Article 3 of this Regulation, where applicable; and
- **Lithium Coin Only**, with a 16+ mm diameter: Keep out of reach symbol as set out in IEC 60086-4.

Additionally, the following information could be included on the battery label or moved to packaging, subject to the size of the label and required font sizes:

- QR code or other digital labels leading to information in all Member State languages
- Place of manufacture; and
- Additional IEC safety warnings.

Packaging

Similarly, packaging for portable batteries is not of sufficient size to permit all stated information. We recommend the following mandatory information on packaging, size permitting, and required in only one language with additional languages available via QR code or other digital label:

- Battery category and model identification, batch or serial number or product number or another element enabling its identification (e.g. "AA" or "LR6");
- Electrochemical composition based on specifications set out in Annex IV (e.g. "alkaline");
- Recycling information as required by the PPWR and national legislation if the PPWR does not supplant the national legislation;
- EAN Code;
- Non-rechargeable warning for primary batteries; and
- **Lithium coin packaging only**: safety warnings.

The following information could be also included on packaging:

- Date of manufacture or "best if used by date" or other system to identify age of battery;

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Furthermore, the following information could be included on the battery packaging or online accessible through digital labelling, depending upon the size of the packaging and required font sizes:

- Average duration of the battery when used in specific applications, in line with the specifications set out in Part C; and
- Usable extinguishing agent or, if relevant, the fire class of that agent determined in accordance with standard EN 2:2005-01.

QR Code or Other Digital Label

Upon scanning a QR code or other digital label, consumers should have access to the following information in a quick, transparent and easy-to-understand manner:

- All information contained on the label on the surface of the battery and on packaging, except for date of manufacture etc.
- Translations of claims and marketing materials into local languages
- Average duration of the battery when used in specific applications, in line with the specifications set out in Part C if not contained on battery packaging;
- Usable extinguishing agent or, if relevant, the fire class of that agent determined in accordance with standard EN 2:2005-01 if not contained on battery packaging;
- Names and concentrations of restricted and hazardous substances referred to in Article 4(1) and (2) of Regulation (EC) 1272/2008in accordance with their nomenclature as set out in Article 18 and in line with the established SVHC concentration thresholds under REACH regulation;
- Critical raw materials listed in Annex II to Regulation (EU) 2024/1252 which are present in the battery in a concentration of more than 0,1 %, weight by weight; and
- Battery mass at the time of manufacturing.

Additionally, the QR code or other digital label should lead consumers to written safety and environmental warnings in Member State languages and all other information the manufacturer wishes to repeat for customer convenience.

Inserts are Not a Viable Solution

Inserts (paper accompanying documents) are not industry standard for portable batteries. They would cost millions of euros to implement via creation of new packaging machinery, violating the PPWR's instruction to reduce packaging with no significant increase in consumer information. Furthermore, it would significantly degrade the safety of lithium coin cell packaging as such a move would require doubling the thickness of both walls, expanding the edges to accommodate the insert and a newly required second label since a double-sided label would have one side blocked by the insert, while the insert could apply pressure to the seal. Therefore, we strongly advise against the insert discussed in the draft regulation in favor of digital labelling for providing additional information.

Michael Dickstein
Chair

Olga Karline Henkele
Secretary General

About EPBA – Consumer Batteries Europe

We are the leading organisation of quality manufacturers of portable batteries and power solutions in Europe. It comprises a total of seven member companies, along with several associated members. In 2023, our members sold 5.5 billion batteries, i.e., Alkaline, Zinc-Carbon, Lithium coin, and other button cells, and rechargeable batteries, along with two million chargers in Europe. The sector employs around 4,000 people in Europe, and the VAT contribution amounts to approximately EUR 260 million. We are dedicated to advancing the sustainable, safe, and efficient use of portable batteries across Europe. Our mission is to advocate for innovation and environmental stewardship in the battery industry, promote best practices in manufacturing and recycling, and ensure compliance with stringent safety and environmental standards. We work closely with stakeholders, including the EU institutions, policymakers, and consumers, to safeguard and enhance our positive contribution to the EU economy, the environment, and the communities in which we operate.