European Compliance Organisation for Batteries

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EUCOBAT feedback to the batteries labelling rules

EUCOBAT welcomes the opportunity to contribute to the public consultation on the upcoming implementing act on battery labelling under Regulation (EU) 2023/1542. Clear, harmonised and practical labelling requirements are essential to ensure safe handling, efficient collection, correct treatment and high-quality recycling of waste batteries across the EU.

As the European association representing national battery collection schemes, EUCOBAT focuses its feedback on aspects that directly impact waste management operations and reporting obligations.

1. Labelling of second-life batteries

EUCOBAT supports the requirement that batteries subject to preparation for reuse, repurposing, remanufacturing or other second-life applications must be re-labelled in accordance with Article 13 of the Batteries Regulation when placed back on the market.

However, beyond physical relabelling, it is crucial to ensure **traceability and reporting consistency**:

- Once a label is removed or replaced, this change must be reflected in reporting systems.
- The battery should be reported as collected under its **original battery category**, and subsequently reported as **new Put on the Market (PoM)** under the new relevant category.
- This is essential to avoid double counting, misclassification and distortions in collection and recycling statistics.

EUCOBAT therefore recommends that the implementing act explicitly clarifies the reporting obligations linked to relabelling of second-life batteries.

2. Placement of labels and QR codes on packs, modules and cells

EUCOBAT strongly stresses that batteries are rarely collected in the same configuration in which they are placed on the market. In practice:

- Battery packs are frequently dismantled into **modules and cells** for collection or take-back, repair, reuse, or recycling.
- If labelling and QR codes are placed **only on the battery pack**, all traceability information is lost once dismantling occurs.

To ensure operational feasibility, EUCOBAT recommends:

- Mandatory labelling and QR codes not only on battery packs, but also on **modules**.
- Where technically feasible, key information should also be available at cell level.
- If physical labelling on cells is not possible due to size constraints, **colour coding** should be introduced to indicate battery category.

This would:

- Enable correct identification of battery type throughout the entire lifecycle.
- Prevent mixing of cells from different categories.
- Avoid situations where batteries lacking proper labelling become unidentifiable and therefore escape producer responsibility and proper waste management.
- Support safe handling, proper treatment and correct reporting by waste operators.

3. Ensuring full lifecycle traceability

For collection schemes and recyclers, traceability is critical to:

- Apply correct treatment routes.
- Ensure compliance with safety requirements.
- Accurately report data to national authorities and the Commission.

EUCOBAT therefore emphasises that labelling requirements must be designed from a **waste management perspective**, not only from a product compliance perspective. The implementing act should ensure that information remains accessible even after dismantling and second-life operations.

4. Labelling information relevant for safety and waste management

In line with the objectives of the Batteries Regulation to ensure safe handling, traceability, and environmentally sound management of waste batteries, EUCOBAT highlights the importance of providing nominal energy capacity information (in Wh or kWh) on battery labels. This information is essential for the safe transport and treatment of waste batteries, in particular to determine appropriate P911 packaging for batteries in critical condition.

While the draft label in Annex II includes capacity information expressed in mAh or Ah, this requires additional calculation and may create practical challenges. More importantly, for industrial and electric vehicle batteries (Annex III), capacity information is not included at all. EUCOBAT considers it essential that, at least at battery pack or module level, nominal energy capacity be indicated directly in Wh or kWh.

Providing this information would support the Regulation's objectives by facilitating safe waste handling, compliance with transport requirements, and effective implementation of producer responsibility obligations.

5. General considerations

EUCOBAT calls for:

- Harmonised implementation across all Member States to avoid fragmentation.
- Practical and proportionate requirements that reflect real operational practices.
- Sufficient transition time for economic operators to adapt to new labelling rules.

About EUCOBAT

EUCOBAT is the European association of national compliance schemes for batteries. Representing not-for-profit organizations, EUCOBAT supports sustainable battery use, ensures proper recycling, and promotes environmental protection through efficient collection networks.

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