



The EU plans to revise the list of products exempt from removability and replaceability requirements under the Battery Regulation

Recently, the European Commission published a draft amendment to Article 11 of the Batteries Regulation (EU) 2023/1542 concerning requirements for removability and replaceability. This draft aims to update the list of products exempted from the removability and replaceability requirements for portable batteries. The draft is now open for public consultation; the consultation period spans four weeks, with a deadline for submissions set for May 26, 2026.

The following is a comparison of the differences between the revised draft and current requirements regarding the list of exempted products:

Content	Current requirements	Draft regulation
Exempted products	<p>2. By way of derogation from paragraph 1, the following products incorporating portable batteries may be designed in such a way as to make the battery removable and replaceable only by independent professionals:</p> <p>(a) appliances specifically designed to operate primarily in an environment that is regularly subject to splashing water, water streams or water immersion, and that are intended to be washable or rinseable;</p> <p>(b) professional medical imaging and radiotherapy devices, as defined in Article 2, point (1), of Regulation (EU) 2017/745, and in vitro diagnostic medical devices, as defined in Article 2, point (2), of Regulation (EU) 2017/746;</p> <p>The derogation set out in point (a) of this paragraph shall only be applicable where such derogation is required to ensure the safety of the user and the appliance.</p>	<p>2. By way of derogation from paragraph 1, the following products incorporating portable batteries may be designed in such a way as to make the battery removable and replaceable only by independent professionals:</p> <p>(a) appliances, including wearable devices, specifically designed to operate primarily in an environment that is regularly subject to splashing water, water streams or water immersion, and that are intended to be washable or rinseable;</p> <p>(b) professional medical imaging and radiotherapy devices, as defined in Article 2, point (1), of Regulation (EU) 2017/745, and in vitro diagnostic medical devices, as defined in Article 2, point (2), of Regulation (EU) 2017/746;</p> <p>(c) wearable devices for which the safety, durability, or water resistance may be compromised by user access to the battery and which:</p> <p>(1) due to their nature, size or form, are considered to be too small to allow the end-user to properly and safely handle a battery replacement; or</p> <p>(2) rely on a compact, sealed enclosure to maintain functional integrity, including protection against</p>





	<p>dust, and shock;</p> <p>(d) until 31 of July 2030, electric toys that incorporate rechargeable batteries. when, due to the nature or size of the toy, the derogation is necessary to ensure the safety of the toy when used in accordance with Article 10(2) of Directive 2009/48/EC of the European Parliament and of the Council1 ,</p> <p>(e) wireless thermometer probes specifically designed for food contact during food preparation processes;</p> <p>(f) products falling within the scope of Article 1 of Directive 2014/34/EU of the European Parliament and of the Council2 ;</p> <p>(g) on-body delivery systems specifically designed for the subcutaneous administration of medicinal products;</p> <p>(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.</p> <p>The derogations set out in points (a), (c), (d), (e), (f), (g) and (h) of this paragraph shall only be applicable where such derogation is required to ensure the safety of the user and the appliance.”</p>
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Original Link:

https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/14857-Batteries-Regulation-list-of-products-exempted-from-the-general-removability-and-replaceability-requirements_en

HCT SOLUTION:

The requirements regarding the removability and replaceability of portable batteries under the EU Battery Regulation have long been a key area of focus for clients in the consumer electronics sector. We advise our clients to closely monitor regulatory updates, proactively assess whether their products qualify for any exemptions, and adjust their product designs to ensure compliance with these removability and replaceability requirements. HCT Testing possesses a professional technical team and extensive experience in product compliance management, enabling us to develop customized solutions for our clients and assist enterprises in effectively navigating various technical barriers.

