



Consumer products

HCT-202607-04

## EU Adopts Draft Amendment to Batteries Regulation on Battery Removability and Replaceability

On 14 July 2026, the European Commission adopted a draft amendment to Regulation (EU) 2023/1542 (the Batteries Regulation) concerning removability and replaceability requirements. The amendment aims to update the list of derogations for portable battery removability and replaceability.

Next, the EU will formally publish the revised regulation. It shall enter into force on the twentieth day following its publication and shall be directly applicable in all Member States. The main contents of the draft amendment are as follows:

| Content                                           | Article 11(2) Current requirements                                                                                                                                                                                                                                                                                                                     | Article 11(2) Draft regulation                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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| Products with removable and replaceable batteries | 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:<br>(a) appliances specifically designed to operate primarily in an environment that is regularly subject to splashing water, water | 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:<br>(a) appliances, <b>including wearable devices</b> , 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;<br>(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;<br>(c) <b>wearable devices for which the safety, durability, or water resistance may be compromised by user access to the battery and which:</b><br>(1) <b>due to their nature, size or form, are considered to be too small to allow the end-user to properly and safely handle a</b> |





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|  | <p>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><b>battery replacement; or</b></p> <p><b>(2) rely on a compact, sealed enclosure to maintain functional integrity, including protection against dust, and shock;</b></p> <p><b>(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 Council<sup>1</sup> ,</b></p> <p><b>(e) wireless thermometer probes specifically designed for food contact during food preparation processes;</b></p> <p><b>(f) products falling within the scope of Article 1 of Directive 2014/34/EU of the European Parliament and of the Council<sup>2</sup> ;</b></p> <p><b>(g) on-body delivery systems specifically designed for the subcutaneous administration of medicinal products;</b></p> <p><b>(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.</b></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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## Regulatory Background

Batteries are a crucial technology for sustainable development, green mobility, clean energy, and climate neutrality. Portable batteries are used to power an increasing number of products, from wearable devices to toys, textiles or medical devices.

The Regulation on Batteries and Waste Batteries (the Regulation) introduces in its Article 11 general requirements for the removability and replaceability of portable batteries incorporated in products being placed on the market. As a general rule, portable batteries need to be removable and replaceable by end-users at any time during the lifetime of the products in which they are incorporated. This is meant to prevent premature obsolescence and increase the collection of waste





portable batteries at the end-of-life.

However, in specific justified cases, as set out in Article 11(2) of the Regulation, portable batteries may be removable and replaceable by independent professionals, instead of by end users. The Commission is empowered by Article 11(4) of the Regulation to adopt delegated acts adding further products to the list of products for which batteries only need to be removable and replaceable by independent professionals. This delegated act is the first such act stemming from that empowerment.

**Original link:** <https://ec.europa.eu/info/law/Batteries-Regulation-list-of-products-exempted>

## HCT SOLUTION:

In response to the latest developments in the EU Battery Regulation, we offer: determination of exemption clause applicability, and one-stop testing and certification services for EU market access. Waltek HCT has long been tracking and interpreting the latest international and domestic regulatory updates. We are equipped with state-of-the-art instruments and facilities, supported by a professional and efficient operational team, and backed by extensive experience in inspection and testing.

