

Regulations for Lithium Batteries in Europe and Switzerland since Early 2026

As of: August 2026

1. European Union: Regulation (EU) 2023/1542 (EU Battery Regulation)

Regulation (EU) 2023/1542 constitutes the central legal framework governing the entire lifecycle of batteries within the European Union. It applies directly in all 27 member states without requiring national transposition, replacing the previous Battery Directive 2006/66/EC. The overarching objective is a more sustainable battery economy with higher recycling rates, transparent supply chains, and a lower carbon footprint.

1.1 New Deadlines and Obligations from January/February 2026

Date	Obligation	Battery Types Affected
15 January 2026	Re-registration of all battery producers in the national register (Germany: BattDG); existing registrations became invalid	All categories
16 January 2026	Battery take-back only through authorised Producer Responsibility Organisations (PROs) or approved individual take-back solutions	All categories
18 February 2026	Carbon footprint declaration obligation for rechargeable industrial batteries (> 2 kWh, without external storage); calculation must follow standardised methods and be verified by a third party	Rechargeable industrial batteries > 2 kWh
20 April 2026	Implementing Regulation enters into force: standardised digital reporting and registration formats for all battery obligations become binding	All categories

Sources: [lufapak.de – EU Battery Regulation 2026/2027](#) · [digiprodpass.com – EoL Reporting Rules 2026](#) · [ecocomply.ai – Implementing Rules 2026](#)

1.2 New Deadlines and Obligations from August 2026

Date	Obligation	Battery Types Affected
18 August 2026	Extended labelling obligation: batteries must display capacity, expected lifespan, chemical composition, disposal instructions, and the “non-rechargeable” symbol	All categories
18 August 2026	Carbon footprint performance class labelling for electric vehicle (EV) batteries: classification into classes based on CO ₂ intensity	EV traction batteries

Sources: [IHK Elbe-Weser – The new EU Battery Regulation](#) · [greenli-ion.com – EU Battery Regulation 2026](#)

1.3 Extended Producer Responsibility (EPR) – Ongoing from 2026

Extended Producer Responsibility (EPR) has been fully in force since August 2025 and is being actively enforced throughout 2026. Producers and importers are required to finance and organise free take-back systems for waste batteries. The collection targets applicable for 2026 are:

- **Portable batteries:** collection target of 45 % (baseline for the 63 % target by end of 2027)
- **LMT batteries (e-bikes, e-scooters):** collection target of 51 % by end of 2028

Source: [greenli-ion.com – EU Battery Regulation 2026](#)

1.4 Recycling Efficiency Requirements (Preparation for 2027)

Binding minimum recycling efficiency thresholds will apply to authorised treatment facilities from end of 2027. Preparation for these requirements must begin in 2026:

Material	Target by End of 2027	Target by End of 2031
Lithium	50 % recovery	80 % recovery
Cobalt, Copper, Lead, Nickel	90 % recovery	95 % recovery
Lithium-based batteries (overall)	65 % recycling efficiency	70 % recycling efficiency

Sources: [EUR-Lex – Sustainability rules for batteries](#) · [stenarecycling.com](#)

1.5 Digital Battery Passport (Preparation in 2026, Mandatory from February 2027)

From **18 February 2027**, the digital battery passport will be mandatory for LMT batteries, industrial batteries (> 2 kWh), and EV traction batteries. The underlying infrastructure (IT systems, data collection, QR code integration) must therefore be developed **during 2026**. The passport will contain information on carbon footprint, material composition, recycled content, performance parameters, and state-of-health data.

Sources: [IHK Elbe-Weser – Digital Battery Passport](#) · [lufapak.de](#)

1.6 Supply Chain Due Diligence (Postponed to August 2027)

The due diligence obligations for companies with annual turnover exceeding EUR 40 million, originally planned for August 2025, were postponed to **18 August 2027** by [Regulation \(EU\) 2025/1561](#). The obligations concern the raw materials cobalt, natural graphite, lithium, and nickel. Companies must audit supply chains for human rights violations and environmental damage, and report publicly.

Source: [IHK Elbe-Weser](#)

1.7 New Exemptions: Removability of Portable Batteries (July 2026)

In July 2026, the European Commission published exemptions to the rules on the removability of portable batteries. Certain product categories (e.g. medical devices, products subject to special environmental requirements) are exempt from the obligation – applicable from February 2027 – to make batteries removable and replaceable by end users without specialised tools.

Source: [EU Commission – Commission adds exemptions to rules on removability of portable batteries \(14 July 2026\)](#)

2. Dangerous Goods Transport Regulations (EU & Switzerland)

2.1 ADR 2025 – Road Transport (Mandatory from 1 July 2025)

[ADR 2025](#) (European Agreement concerning the International Carriage of Dangerous Goods by Road) also applies in Switzerland via the SDR. Key changes for lithium batteries:

- **New UN numbers:** UN 3556 (vehicles powered by lithium-ion batteries) and UN 3557 (vehicles powered by lithium metal batteries)
- **Damaged/defective batteries:** New special provision SV 677 classifies critically defective lithium-ion and sodium-ion batteries under **transport category 0** (highest hazard level); no exemptions under the 1,000-point rule are permitted
- **Training obligation:** For the first time explicitly extended to drivers and vehicle crews transporting dangerous goods in limited quantities
- Lithium-ion batteries remain **Dangerous Goods Class 9** (UN 3480 / UN 3481); batteries above 100 Wh must be treated as dangerous goods

Source: [haufe.de](#) – New ADR provisions for lithium and sodium-ion batteries

2.2 IATA DGR 2026 – Air Transport (from 1 January 2026)

The [67th edition of the IATA Dangerous Goods Regulations \(DGR\)](#) entered into force on **1 January 2026** without a transition period:

- **Maximum state of charge (SOC) of 30 %** for lithium batteries in vehicles and equipment during air transport (packing instructions 952 and 966)
- New recommendations for power banks and spare batteries in carry-on luggage
- New labelling rules: battery marking and other hazard labels must be placed on the same surface

Source: [safetytrainingplus.com](#) – IATA DGR 2026

3. Switzerland: National Battery Law

3.1 Legal Basis: Chemical Risk Reduction Ordinance (ChemRRV)

Swiss battery law is based on the [Chemical Risk Reduction Ordinance \(ChemRRV, SR 814.81\)](#), Annex 2.15. Switzerland is not an EU member state and is therefore not directly bound by the

EU Battery Regulation. However, the Federal Office for the Environment (FOEN/BAFU) is monitoring EU developments and reviewing whether adjustments to Swiss law are necessary.

Sources: [BAFU – Batteries \(DE\)](#) · [BAFU – Batteries \(EN\)](#)

3.2 Prepaid Disposal Fee (VEG) and Reporting Obligation – Ongoing

All producers and importers placing batteries on the Swiss market (including the Principality of Liechtenstein) for the first time are subject to the **reporting and fee obligation** vis-à-vis [INOBAT](#). The fee is calculated by battery type and weight and finances collection, transport, and recycling. Updated fee schedules apply for 2026:

- [Fee schedule for electric vehicles 2026](#)
- [Contribution schedule for vehicle batteries 2026](#)
- [Contribution schedule for industrial batteries 2026](#)

Reporting deadlines: quarterly, semi-annual, or annual (depending on the arrangement with INOBAT); self-declaration via the AVEG portal.

Source: [INOBAT – Producers/Importers](#)

3.3 Take-Back Obligation – Ongoing

All points of sale are legally required to accept used batteries **free of charge**, regardless of whether a new purchase is made. Consumers are obliged to return used batteries to collection points or retailers. There are more than **11,000 collection points** throughout Switzerland.

Lithium-ion batteries are additionally classified as **dangerous goods** and are subject to ADR/SDR transport regulations.

Sources: [BAFU – Batteries](#) · [netzerocompare.com – Switzerland Battery Take-Back](#)

3.4 New Storage Regulations for Lithium-Ion Batteries (from 1 January 2026)

From **1 January 2026**, the safe storage of lithium-ion batteries is legally prescribed in Switzerland. The regulations concern in particular:

- Spatial separation of storage and charging operations
- Use of certified safety cabinets (for energy content > 1 kWh)
- Protection against thermal runaway (uncontrolled heat generation)
- Storage temperature 15–20 °C, state of charge 30–50 % (SOC)

Sources: [zentralbeschaffung.ch – Safe Storage of Batteries](#) · [City of Zurich – Fact Sheet: Safe Storage of Lithium-Ion Batteries](#)

3.5 Revision of the ChemRRV (Consultation 2026)

In January 2026, Switzerland notified the WTO of a revision to the ChemRRV. The revision primarily concerns PFAS, mercury, and persistent organic pollutants, and does not directly address batteries. However, the FOEN is monitoring the EU Battery Regulation and reviewing whether more extensive adjustments to Swiss battery law are required.

Source: [SGS – Switzerland Consults Over Revision to Law on Dangerous Chemicals \(Feb. 2026\)](#)

4. Summary: Key Deadlines at a Glance

Date	Regulatory Framework	Measure
1 Jan. 2026	IATA DGR 67th edition	Max. 30 % state of charge for lithium batteries in air transport
1 Jan. 2026	Switzerland (national/cantonal regulations)	Legal storage requirements for lithium-ion batteries
15 Jan. 2026	EU 2023/1542 (D: BattDG)	Re-registration of all battery producers
16 Jan. 2026	EU 2023/1542 (D: BattDG)	Battery take-back only through authorised PROs
18 Feb. 2026	EU 2023/1542	Carbon footprint declaration for industrial batteries > 2 kWh
20 Apr. 2026	EU 2023/1542 (Implementing Regulation)	Standardised digital reporting/registration formats
18 Aug. 2026	EU 2023/1542	Extended labelling obligation (capacity, lifespan, chemistry)
18 Aug. 2026	EU 2023/1542	CO ₂ performance class labelling for EV batteries
Ongoing 2026	Switzerland ChemRRV / INOBAT	Reporting and fee obligation, take-back obligation, updated 2026 tariffs

5. Further Resources and Official Links

Source	Description	Link
EUR-Lex	Full text Regulation (EU) ²⁰²³ / ₁₅₄₂	eur-lex.europa.eu
EUR-Lex	Summary: Sustainability rules for batteries	eur-lex.europa.eu (EN)
EU Commission	Environment – Batteries and waste batteries	environment.ec.europa.eu
FOEN/BAFU	Swiss Federal Office for the Environment – Batteries	bafu.admin.ch/en/batteries
INOBAT	Registration, fees, reporting obligation Switzerland	inobat.ch
fedlex.admin.ch	ChemRRV SR 814.81 (Swiss battery law)	fedlex.admin.ch
IHK Elbe-Weser	Overview EU Battery Regulation (DE)	ihk.de
greenli-ion.com	EU Battery Regulation 2026 Compliance Deadlines	greenli-ion.com
digiproddpass.com	EU Battery EoL Reporting Rules 2026	digiproddpass.com
haufe.de	ADR 2025 – New provisions for lithium batteries	haufe.de
safetytrainingplus.com	IATA DGR 2026 – All changes	safetytrainingplus.com
netzerocompare.com	Switzerland Battery Take-Back Obligations	netzerocompare.com