

Regulation (EU) 2023/1542 – Manufacturer’s Compliance Statement

ATB valve-regulated lead-acid (VRLA) batteries, AGM and GEL ranges · How ATB Power meets the EU Batteries Regulation for the products it places on the Union market

Issued by **ATB Power Limited** · atbpower.com · info@atbpower.com

1 Purpose and scope

Regulation (EU) 2023/1542 (the “Batteries Regulation”) applies to all batteries placed on the Union market from 18 February 2024 and replaces Directive 2006/66/EC. This statement summarises how **ATB Power Limited** (brand: ATB Power), acting as **manufacturer** within the meaning of Article 3, point (33) – a legal person that has batteries designed and manufactured and markets them under its own name – meets the Regulation for the products in Section 2. It accompanies EU Declaration of Conformity **ATB-DoC-2026-001** and is one of the documents made accessible through the QR code marked on the battery (Article 13(6), point (b)).

2 Products covered and battery category

ATB valve-regulated lead-acid (VRLA) batteries, AGM and GEL ranges: the AGM ranges GP, DC, FT, HR, LC, 2V and SSL and the GEL ranges 2VG and DCG, as identified by the model designation, production date code and ATB Power name marked on each battery.

RANGE	CONSTRUCTION / DUTY	NOMINAL VOLTAGE	MODEL DESIGNATIONS	BATTERY CATEGORY
GP	AGM, general purpose standby	6 V, 12 V	GP6-1.3 to GP6-12; GP12-1.3 to GP12-260	Industrial
DC	AGM, deep cycle	6 V, 8 V, 12 V	DC6-220 to DC6-400; DC8-180, DC8-200; DC12-24 to DC12-260	Industrial
FT	AGM, front terminal	12 V	FT12-55 to FT12-200	Industrial
HR	AGM, high rate	12 V	HR12-37 to HR12-520	Industrial
LC	AGM, lead-carbon long-life cyclic	6 V, 12 V	LC6-300, LC6-400; LC12-12 to LC12-230	Industrial
2V	AGM, 2 V long-life cells	2 V	2V-100 to 2V-3000	Industrial
SSL	AGM, start-stop automotive	12 V	SSL1 to SSL6	SLI
2VG	GEL, 2 V cells	2 V	2VG-200 to 2VG-3000	Industrial
DCG	GEL, deep cycle	12 V	DCG12-24 to DCG12-240; DCG12-200T	Industrial

Category rationale

The GP, DC, FT, HR, LC, 2V, 2VG and DCG ranges are designed for industrial use: standby (float) power for equipment and installations, cyclic service in industrial and professional applications, and traction-support duty. They are built for integration into equipment and systems, carry the marking “Designed for industrial use” and are supplied to equipment manufacturers, system integrators and distributors. They are **industrial batteries** under Article 3, point (13). The SSL range is specifically designed to supply electric power for starting, lighting and ignition in vehicles and is an **SLI battery** under Article 3, point (12).

3 Obligations of the manufacturer (Article 38) and how they are met

OBLIGATION	ARTICLE	IMPLEMENTATION BY ATB POWER
Design and manufacture in accordance with Articles 6 to 10, 12 and 14, as applicable; instructions and safety information supplied	38(1)	Type tests to IEC 60896-21/-22 (stationary AGM families) and EN 50342-1/-6 (SSL range) and substance verification held in the technical file; operating manual, safety data sheet and safety instructions published at the QR address.

OBLIGATION	ARTICLE	IMPLEMENTATION BY ATB POWER
Technical documentation and conformity assessment before placing on the market	38(2), 17, Annex VIII	Technical documentation drawn up per Annex VIII, Part A; conformity assessment Module A (internal production control).
EU declaration of conformity and CE marking	38(3), 18–20, Annex IX	ATB-DoC-2026-001 issued for the ranges covered; CE marking printed on each battery.
Retention of technical documentation and declaration	38(4)	10 years after the last battery of the model has been placed on the market.
Series production remains in conformity	38(5)	ISO 9001:2015 certified production site; supplier conformity, warranty and change-control declaration; ATB approval of label artwork and of any design or material change.
Model identification and batch / serial number	38(6)	Model designation and production date code printed on every battery.
Name, address, web and e-mail information on the battery	38(7)	Name, web and e-mail printed on every battery; postal address and the importer's identification (Article 4(3)) on the identification label applied to the battery or its packaging.
Access to battery management system data	38(8), 14	Not applicable – no battery management system (lead-acid).
Corrective action, withdrawal or recall; information to authorities	38(9), 38(10)	Contact point: info@atbpower.com (identification as under 38(7) above).

4 Requirement-by-requirement position

REQUIREMENT	APPLIES?	POSITION AND EVIDENCE
Art. 6 / Annex I – mercury, cadmium, lead restrictions	Yes	Mercury < 0.0005 %, cadmium ≤ 0.002 % w/w (TF-VRLA-06, TF-VRLA-07). Lead is the active material; the lead limit in Annex I, entry 3 applies to portable batteries only. See ATB-DEC-2026-002.
Art. 7 – carbon footprint declaration	Not yet	Concerns rechargeable industrial batteries above 2 kWh, EV and LMT batteries; for industrial batteries it applies 18 months after the delegated and implementing acts enter into force, and those acts are still pending.
Art. 8 – recycled content documentation	Not yet	Industrial batteries above 2 kWh and SLI batteries: from 18 August 2028, or 24 months after the delegated act, whichever is later.
Art. 9 – portable batteries of general use	No	Concerns portable batteries of general use; the products are industrial and SLI batteries.
Art. 10 – industrial performance and durability	Above 2 kWh	Rechargeable industrial batteries above 2 kWh are accompanied by a document with the Annex IV, Part A performance and durability parameters; minimum values follow the delegated act of Article 10(5).
Art. 11 – removability and replaceability	No	Portable and LMT batteries only.
Art. 12 / Annex V – stationary battery energy storage systems	No, as placed on the market	Component batteries; not placed on the market as stationary battery energy storage systems. IEC 60896-21/-22 safety type tests held in the technical file for the stationary families.
Art. 13 / Annex VI – labelling and marking	Yes	Separate collection symbol (from 18 August 2025) and “Pb”; CE; manufacturer and model identification; capacity marked on the SSL range (Art. 13(2)); general information label of Annex VI, Part A applied ahead of the mandatory date; QR code applied ahead of 18 February 2027. See ATB-INF-2026-005.
Art. 14 – battery management system	No	No BMS.

REQUIREMENT	APPLIES?	POSITION AND EVIDENCE
Art. 17-20 – conformity assessment, EU DoC, CE marking	Yes	Module A; ATB-DoC-2026-001; CE marking on the battery.
Chapter VII – battery due diligence	No	Net turnover below EUR 40 million (Art. 47). Application postponed to 18 August 2027 by Regulation (EU) 2025/1561. No due diligence report under Art. 52(3) is therefore required.
Chapter VIII – extended producer responsibility, registration, take-back, end-user information	Yes – through the producer in each Member State	The economic operator that first makes ATB batteries available in a Member State is the producer (Art. 3, point (47)), registered in that Member State's producer register (Art. 55), and operates the free-of-charge take-back of waste industrial and SLI batteries (Art. 61) and end-user information (Art. 74). See ATB-INF-2026-006.

5 Roles in the Union supply chain

- **Importer (Article 41).** Before placing the batteries on the market the importer verifies that the EU declaration of conformity and technical documentation exist, that the CE marking and the labels of Article 13 are present, that the batteries are accompanied by instructions and safety information in the language of the Member State, and that the manufacturer's identification of Article 38(6) and (7) is present. The importer indicates **its own name, postal address and, if available, web and e-mail address on the battery** or, where that is not possible, on the packaging or in a document accompanying the battery (Article 41(3)), keeps a copy of the declaration for 10 years and ensures the technical documentation can be made available on request.
- **Distributor (Article 42).** Verifies producer registration, CE marking and labels, accompanying documents and the identification of manufacturer and importer before making the battery available.
- **Producer (Article 3, point (47)) and extended producer responsibility.** Registration in the national register of producers, financing of separate collection and treatment, take-back of waste industrial and SLI batteries free of charge (Article 61), and information to end-users (Article 74). ATB Power supplies the product information needed for these obligations.

6 Key dates

DATE	PROVISION	RELEVANCE
18 February 2024	Regulation applies (Art. 96); substance restrictions of Art. 6 in force	Mercury and cadmium limits met; lead limit concerns portable batteries only.
18 August 2024	Art. 17 and Chapter VI (Art. 96(2)): conformity assessment, CE marking, EU DoC and the obligations of manufacturers, importers and distributors	EU DoC ATB-DoC-2026-001, CE marking, technical documentation, identification on the battery.
18 August 2025	Separate collection symbol (Art. 13(4)); Chapter VIII (EPR) applies; Directive 2006/66/EC repealed	Crossed-out wheeled bin with "Pb" on every battery; producer registration and take-back through the producer in each Member State.
18 August 2026 (earliest)	General information label of Annex VI, Part A and capacity marking of SLI batteries (Art. 13(1)-(2)): from 18 August 2026 or 18 months after the implementing act of Art. 13(10) enters into force, whichever is later	Label content already applied; layout will be aligned to the harmonised specifications when the implementing act is published.
18 February 2027	QR code on all batteries (Art. 13(6))	QR code applied ahead of the date.
18 August 2027	Battery due diligence (Chapter VII) as postponed by Regulation (EU) 2025/1561	Not applicable below the EUR 40 million threshold.
18 August 2028 (earliest)	Recycled content documentation for SLI batteries (Art. 8)	SSL range; documentation to be prepared with the production site.

7 Standing of this document

This statement is issued by **ATB Power Limited** as the manufacturer of the products it covers, from the records in its technical file: type tests and material screening on representative models, the production site's material declarations, the label specifications and ATB Power's own evaluations. No laboratory or certification body has assessed the document itself, and it does not stand in for the reports behind it. It describes the products as built at the date printed above; ATB Power re-issues it when a design, a material, a production site, a legal requirement or a piece of evidence changes, and the version reachable through the QR code on the battery is the current one. Market surveillance authorities receive the underlying technical documentation on reasoned request (Article 38(10) of Regulation (EU) 2023/1542); customers who need extracts for their own compliance records can obtain them under a confidentiality agreement by writing to info@atbpower.com.

ISSUED BY THE MANUFACTURER

ATB Power Limited · Updated 2026-09-27 · atbpower.com · info@atbpower.com