

EU DECLARATION OF CONFORMITY

Drawn up under Article 18 and Annex IX of Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries (OJ L 191, 28.7.2023)

1 Battery model (product, category, and batch or serial number)

Product	ATB valve-regulated lead-acid (VRLA) batteries, AGM and GEL ranges – rechargeable, sealed, maintenance-free, non-spillable lead-acid batteries with immobilised electrolyte (absorbent glass mat or gel)
Ranges covered	AGM: GP, DC, FT, HR, LC, 2V, SSL · GEL: 2VG, DCG (see table)
Battery category	Industrial batteries (Article 3, point (13)): GP, DC, FT, HR, LC, 2V, 2VG and DCG ranges, specifically designed for industrial standby, cyclic and traction-support use. SLI batteries (Article 3, point (12)): SSL start-stop range.
Model, batch and serial identification	Each battery is marked with its model designation and a production date code (month and year). Production lots are traceable through the date code and the manufacturer's shipment records. Model designations, ratings and dimensions are recorded in the technical file (TF-VRLA-01).
Brand	ATB Power

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

2 Name and address of the manufacturer and, where applicable, its authorised representative

Manufacturer	ATB Power Limited , 95 Wai Yip Street, Kwun Tong, Hong Kong SAR · info@atbpower.com · atbpower.com
Authorised representative	For any matter concerning the Union market contact ATB Power Limited at info@atbpower.com. The importer responsible for a given consignment is identified on the battery, its packaging or the accompanying documents (Article 41(3)).

3 Responsibility

This declaration of conformity is issued under the sole responsibility of the manufacturer.

4 Object of the declaration

Valve-regulated lead-acid batteries in which the electrolyte is immobilised either in absorbent glass-mat separators (AGM ranges) or as a gel (GEL ranges), built from lead-dioxide positive plates and sponge-lead negative plates in dilute sulphuric acid, assembled as 2 V cells or 6 V, 8 V and 12 V monobloc batteries in moulded plastic cases with one-way pressure-relief valves, and fitted with faston, threaded-insert or automotive-post terminals according to the range. Intended use: standby (float) service, cyclic service and, for the SSL range, starting, lighting and ignition in vehicles. Each battery is identified by the model designation, the production date code and the manufacturer's name marked on the case, with the manufacturer's postal address on the identification label applied to the battery or its packaging (Article 38(7)), which together allow traceability.

5 Union harmonisation legislation

The object of the declaration described in point 4 is in conformity with the relevant Union harmonisation legislation:

- **Regulation (EU) 2023/1542** of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, amending Directive 2008/98/EC and Regulation (EU) 2019/1020 and repealing Directive 2006/66/EC (OJ L 191, 28.7.2023, p. 1).

No other Union harmonisation legislation is invoked in this declaration. Directive 2014/35/EU (low voltage) does not apply: the nominal voltages are below 75 V d.c. Directive 2014/30/EU (electromagnetic compatibility) is not invoked either: the batteries contain no active electronic component. Where a third-party attestation of electromagnetic compatibility is obtained for the ranges on a voluntary basis, it is filed in the technical documentation (TF-VRLA-14) as supporting information and does not form part of this declaration.

6 References to the relevant harmonised standards or common specifications used, or to the other technical specifications in relation to which conformity is declared

REFERENCE	TITLE / USE	RANGES
IEC 60896-21:2004	Stationary lead-acid batteries – Part 21: Valve regulated types – Methods of test	GP, FT, HR, 2V (type tests on representative models of the 12 V, 6 V, 2 V and front-terminal families)
IEC 60896-22:2004	Stationary lead-acid batteries – Part 22: Valve regulated types – Requirements	GP, FT, HR, 2V
EN 50342-1:2015+A2:2021; EN 50342-6:2015+A1:2018	Lead-acid starter batteries – General requirements and methods of test; batteries for micro-cycle applications	SSL
UN Model Regulations, ST/SG/AC.10/1/Rev.22, Chapter 3.3, Special Provision 238	Vibration and pressure-differential tests; non-spillable criteria (leakage at 55 °C, terminals protected against short circuit)	All ranges (representative model tests; immobilised-electrolyte construction common to the ranges)
IEC 62321 series	Determination of restricted substances in electrotechnical products (verification of Annex I and RoHS substances)	All ranges (common materials)
Regulation (EC) No 1907/2006 (REACH), Article 33	Candidate List (SVHC) screening and communication	All ranges

At the date of issue no harmonised standards (Article 15) or common specifications (Article 16) covering the requirements applicable to these products had been published under Regulation (EU) 2023/1542. Conformity is declared in relation to the technical specifications listed above, as documented in the technical documentation drawn up in accordance with Annex VIII, Part A. For the DC, LC, 2VG and DCG ranges, conformity with the applicable requirements of Articles 6 and 13 is demonstrated by the material declarations, substance screening and labelling specifications common to all ranges; no product performance standard is invoked for those ranges.

7 Notified body

No notified body is involved. This declaration is issued under **Module A – Internal production control** (Annex VIII, Part A; Article 17(1), point (a)(i)), the procedure for the requirements of Articles 6, 9, 10, 12, 13 and 14, which the manufacturer carries out itself. A notified body only enters the picture when Article 7 (carbon footprint) or Article 8 (recycled content) applies to a battery,

because those two requirements are assessed under Module D1 (Annex VIII, Part B; Article 17(2)). Neither applies at the date of this declaration: Article 7 concerns rechargeable industrial batteries above 2 kWh and takes effect 18 months after its delegated and implementing acts enter into force, which has not yet happened; Article 8 concerns industrial batteries above 2 kWh and SLI batteries from 18 August 2028 at the earliest. Models of 2 kWh or less are outside both Articles. When either Article starts to apply, this point will name the notified body and its certificate for the models concerned.

8 Additional information

8.1 Applicability of the requirements of Articles 6 to 10 and Articles 12, 13 and 14

REQUIREMENT	APPLICABILITY	BASIS / EVIDENCE (TECHNICAL FILE REFERENCE)
Art. 6 and Annex I – restrictions on substances (mercury, cadmium, lead)	Applies	Mercury < 0.0005 % w/w and cadmium ≤ 0.002 % w/w confirmed by the material declaration of the production site and laboratory screening (TF-VRLA-06, TF-VRLA-07). Lead is the active material of the electrochemical system; the lead restriction in Annex I, entry 3 applies to portable batteries only. Every battery is marked “Pb” under the separate collection symbol (Art. 13(5)).
Art. 7 – carbon footprint declaration	Not applicable at the date of issue	Concerns rechargeable industrial batteries with a capacity above 2 kWh, electric vehicle and LMT batteries; for industrial batteries the obligation applies 18 months after the entry into force of the delegated and implementing acts of Article 7, which have not yet been adopted.
Art. 8 – recycled content	Not applicable at the date of issue	Documentation of recycled content for industrial batteries above 2 kWh and SLI batteries applies from 18 August 2028 or 24 months after entry into force of the delegated act, whichever is later.
Art. 9 – performance and durability of portable batteries of general use	Not applicable	Concerns portable batteries of general use; the products are industrial batteries designed for industrial use (Art. 3, point (13)) or SLI batteries (Art. 3, point (12)).
Art. 10 – performance and durability of industrial batteries	Applies to rechargeable industrial batteries above 2 kWh	From 18 August 2024 those models are accompanied by a document stating the electrochemical performance and durability parameters of Annex IV, Part A; minimum values apply only once the delegated act of Article 10(5) is in force.
Art. 11 – removability and replaceability	Not applicable	Applies to portable and LMT batteries only.
Art. 12 and Annex V – safety of stationary battery energy storage systems	Not applicable as placed on the market	The batteries are component batteries for standby, cyclic and automotive systems and are not placed on the market as stationary battery energy storage systems. Safety type tests to IEC 60896-21/-22 (gas emission, high-current tolerance, short-circuit current, protection against internal ignition, thermal-runaway sensitivity, abusive over-discharge, dimensional stability, mechanical abuse) and to EN 50342-1/-6 for the SSL range are held in the technical file (TF-VRLA-02, TF-VRLA-03).
Art. 13 and Annex VI – labelling and marking	Applies	Separate collection symbol sized to Art. 13(4) and “Pb” marking (Art. 13(5)); CE marking (Art. 19-20); manufacturer identification (Art. 38(7)); model identification and production date code (Art. 38(6)); capacity marked on SLI batteries (Art. 13(2)); general information of Annex VI, Part A applied ahead of the mandatory date; QR code per Art. 13(6) and Annex VI, Part C giving access to this declaration and to the information under Art. 74(1), points (a) to (f), applied ahead of 18 February 2027.
Art. 14 – battery management system	Not applicable	Lead-acid batteries without a battery management system.
Chapter VII – battery due diligence	Not applicable	Net turnover of the manufacturer below the EUR 40 million threshold of Art. 47; application of the Chapter postponed to 18 August 2027 by Regulation (EU) 2025/1561.

8.2 Technical documentation and retention

The technical documentation (Annex VIII, Part A) is held by the manufacturer and is made available to national authorities on reasoned request (Article 38(10)). This declaration and the technical documentation are kept for 10 years after the last battery of the models covered has been placed on the market (Article 38(4)). The declaration is kept up to date and is accessible through the QR code marked on the battery at <https://atbpower.com/eu1542>.

8.3 Series production

Procedures are in place to keep series production in conformity: production under an ISO 9001:2015 certified quality management system, a supplier conformity, warranty and change-control declaration requiring prior written notice of any change in design, materials, components or production site, and re-verification before any changed product is released under an ATB model designation (TF-VRLA-11, TF-VRLA-12).

8.4 Transport classification

The batteries meet the non-spillable criteria of UN Special Provision 238 and, when packaged with the terminals protected against short circuit, are not subject to the IMDG Code (SP 238), the IATA Dangerous Goods Regulations (Special Provision A67) or ADR (SP 238 / SP 598). See ATB Transport Classification Statement ATB-DEC-2026-004.

ISSUED BY THE MANUFACTURER

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