

Declaration – Restricted Substances

Regulation (EU) 2023/1542, Article 6 and Annex I (mercury, cadmium, lead) · Directive 2011/65/EU (RoHS) as amended by Delegated Directive (EU) 2015/863

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

1 Products covered

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

2 Requirements considered

- **Regulation (EU) 2023/1542, Article 6 and Annex I** – batteries shall not contain more than 0.0005 % mercury by weight (entry 1); portable batteries shall not contain more than 0.002 % cadmium (entry 2) and, from 18 August 2024, more than 0.01 % lead (entry 3) by weight.
- **Regulation (EU) 2023/1542, Article 13(5)** – batteries containing more than 0.002 % cadmium or more than 0.004 % lead shall be marked with the chemical symbol Cd or Pb beneath the separate collection symbol.
- **Directive 2011/65/EU (RoHS)**, Annex II as amended by Delegated Directive (EU) 2015/863 – ten restricted substances in electrical and electronic equipment.

Where RoHS stands in relation to a battery: Directive 2011/65/EU restricts substances in electrical and electronic equipment. A battery supplied on its own is outside that scope and falls under the Union's battery legislation instead (Regulation (EU) 2023/1542, which replaced Directive 2006/66/EC); building it into equipment does not change this. Equipment makers still need to know what the battery materials contain, and Section 4 answers that question.

3 Declaration – Regulation (EU) 2023/1542, Annex I

SUBSTANCE	LIMIT IN ANNEX I	STATUS IN THE PRODUCTS COVERED	BASIS
Mercury (Hg), CAS 7439-97-6	≤ 0.0005 % w/w (all batteries)	Conforms. Not intentionally added; not detected in the screened materials (detection limit 2 mg/kg = 0.0002 %).	TF-VRLA-06, TF-VRLA-07
Cadmium (Cd), CAS 7440-43-9	≤ 0.002 % w/w (portable batteries); marking threshold 0.002 % (Art. 13(5))	Conforms. Not intentionally added; ≤ 3 mg/kg (0.0003 %) in the screened materials, below the marking threshold. No "Cd" marking required.	TF-VRLA-06, TF-VRLA-07

SUBSTANCE	LIMIT IN ANNEX I	STATUS IN THE PRODUCTS COVERED	BASIS
Lead (Pb), CAS 7439-92-1	≤ 0.01 % w/w for portable batteries only (entry 3); marking threshold 0.004 % (Art. 13(5))	Present as the active material (lead, lead dioxide, lead sulphate). The products are industrial and SLI batteries; the portable-battery lead limit does not apply. Each battery is marked " Pb " beneath the separate collection symbol.	Product design; TF-VRLA-09, TF-VRLA-10

ATB Power Limited declares that the products covered comply with the restrictions on substances laid down in Article 6 and Annex I of Regulation (EU) 2023/1542.

4 RoHS substance status of the battery materials (informative)

The homogeneous non-active materials common to the ranges – case and cover material, terminal metal, sealing compound and separator material – were screened in accordance with the IEC 62321 series (ICP-OES/AAS, UV-Vis, GC-MS). All ten RoHS substances were below the Annex II maximum concentration values in every material screened:

SUBSTANCE	MAXIMUM CONCENTRATION VALUE	RESULT (HIGHEST VALUE IN SCREENED MATERIALS)
Lead (Pb)	0.1 %	≤ 185 mg/kg (0.019 %) in terminal metal; ≤ 13 mg/kg in case material
Mercury (Hg)	0.1 %	Not detected
Cadmium (Cd)	0.01 %	≤ 3 mg/kg (0.0003 %)
Hexavalent chromium (Cr VI)	0.1 %	Not detected
Polybrominated biphenyls (PBB)	0.1 %	Not detected
Polybrominated diphenyl ethers (PBDE)	0.1 %	Not detected
Bis(2-ethylhexyl) phthalate (DEHP)	0.1 %	Not detected
Butyl benzyl phthalate (BBP)	0.1 %	Not detected
Dibutyl phthalate (DBP)	0.1 %	Not detected
Diisobutyl phthalate (DIBP)	0.1 %	Not detected

Screening report reference TF-VRLA-06. The table covers the non-active materials only. The lead in the plates and the electrolyte is the working material of a lead-acid battery; RoHS does not regulate it, and as the battery is assessed under its own legislation its lead content has no bearing on the RoHS status of the equipment it powers.

5 Standing of this document

This declaration 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