

November 30, 2023

Dear customers

Panasonic Energy Co., Ltd.
Energy Device Division

The compliance with European battery regulations

Thank you for your great cooperation and continuous trust in our products.

As you are aware, new battery regulations have recently been announced and implemented in the European Union (EU). These regulations aim to enhance the sustainability of batteries through decarbonization, advanced resource circulation, responsible sourcing, and increased information disclosure. The requirements align with our company's mission, and they encompass a wide range of provisions, including specific regulatory limits and deadlines for each battery category. To ensure compliance with each requirement and to progressively expand our adherence to the various provisions, it is essential for us to make necessary preparations in advance.

Currently, there is an urgent need for us to prepare for compliance with the CE marking, which will become mandatory from August 2024 onwards. We intend to proceed with compliance in accordance with the requirements of each provision, taking into consideration the lead time required for our batteries to be listed in the European Economic Area (EEA)*1. Furthermore, we understand that regulations regarding substance restrictions will come into effect from February 2024, and we believe that we are already in compliance with the existing regulations.

Battery category (see table)

The small lithium batteries, nickel-metal hydride batteries, and dry batteries have the options of "industrial use" and "portable" depending on the customer's final product. We propose classifying batteries that are sold to end users (such as CR lithium primary batteries) as "portable batteries," and classifying other batteries designed for industrial use, assuming battery implementation by experts, as "industrial batteries."

CE marking

Coin-shaped and pin-shaped batteries are small and do not have space for the CE marking*3. Unless there is individual packaging (pillow packaging), it must be displayed on the customer's final product or instruction manual, etc. in accordance with the regulations.

For cylindrical batteries(Excluding nickel-metal hydride cells used in assembled batteries), we plan to affix the CE marking on the battery itself. If there are any changes in the design of the battery, we will inform you in advance through our sales team. Dry batteries that comply with this regulation are given a new ordering number.

As for assembled batteries, the marking will be done based on customer requests. If there are plans to market them in the EEA, please contact your sales representative.

* ¹ EEA: European Economic Area member states (30 countries)

* ² Launch: To be put on the market as a product, including products that have already been sold.

* ³ Marking height 5mm or more : From Regulation (EC) No 765/2008 ANNEX II Clause 3

About declaration of conformity

We understand that if a device with a built-in battery or a battery supplied by us as a repair part is sold in the EEA , the manufacturer under this regulation is the customer. Please note that it is the manufacturer's responsibility to prepare a declaration of conformity. As a battery supplier stipulated in Article 39, we will provide the necessary information free of charge to our customers who are manufacturers. Article 6 The provision of information regarding restricted substances is scheduled to begin around April 2024 .

About contact

Request date for CE marking on assembled batteries : Wednesday , January 20 , 2023

Contact point for inquiries regarding this matter: Sales representative

Table

Products	Battery type	Code	Buy in market	Replace	Category	CE marking On battery
Coin shape lithium primary battery	BR Coin	BR	No	Technician	Industrial	impossible
	CR Coin (for consumer)	CR	Yes	User	Portable	impossible
	CR Coin (for industrial)* ¹	CR	No	Technician	Industrial	
	High temp. BR coin	BR-A	No	Technician	Industrial	impossible
	High temp. CR coin	CR-A				
Cylindrical lithium primary battery	BR cylinder	BR	No	User	Industrial	possible
	CR cylinder (for consumer)	CR	Yes	User	Portable	possible
	CR cylinder (for industrial)* ²	CR	No	Technician	Industrial	possible
Pin shape lithium primary battery	BR pin	BR	Yes	User	Portable	impossible
Coin shape lithium secondary battery	CTL coin	CTL	No	Technician	Industrial	impossible
	MS Coin	MS				
	MT coin	MT				
	ML coin	ML				
	VL coin	VL				
lithium ion battery	Pin ion	CG	No	Technician	Industrial	impossible
Nickel metal hydride battery	For consumer	BK,HHR	Yes	Technician	General use portable	possible
	For industrial	BK,HHR	No	User	Industrial	possible
Dry battery	Manganese battery	R	Yes	User	General use portable	possible
	Alkaline battery	LR				

*1 with tab-terminal, etc.

*2 cells with "Industrial" marking, with tab-terminal or connector, assembled battery, etc.

Sincerely,