

Press Release



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One year of the EU Battery Regulation – TÜV SÜD looks back and ahead

Munich. 18 August 2025 marks the first anniversary of the EU Battery Regulation (EU) 2023/1542 coming into force. This new legislation governs the entire life cycle of batteries, from the extraction of raw materials to their use and recycling. For the first time, it establishes a uniform legal instrument with direct validity throughout Europe. TÜV SÜD reflects on the past year and looks ahead to the next regulatory milestones, including CO₂ footprints, battery passports and extended producer responsibility.

Looking back: A challenging start to a new era

The EU Battery Regulation replaces the previous Battery Directive (2006/66/EC) and covers electric vehicle batteries, lead-acid batteries, industrial energy storage systems, and stationary systems, among other things. The aim is to transform the market towards sustainability, the circular economy and product safety.

„Many companies initially found it difficult to define their role correctly, such as determining whether they were considered a supplier, producer or importer,“ explains Nicholas Bellino, Senior Account Manager and battery expert at TÜV SÜD. „Technical documentation in particular – the core element of proving battery conformity – presented challenges for our customers and often required several revisions before meeting the requirements.“

The mandatory CE marking and conformity assessment procedure have been in force since 18 August 2024, but smaller market players in particular have found the requirements overwhelming. Additionally, as the regulation was new, many secondary legal acts were still in the process of being drafted and are still in the process of being drafted. „The market was looking for guidance – and many found it at TÜV SÜD. Our customers value us as both a testing body and as a sparring partner with an international overview and in-depth technical understanding,“ Bellino continues.

CO₂ footprint: the game changer from 2025

According to Article 7 of the Regulation, manufacturers of certain types of batteries (including EV and industrial batteries) must prepare and independently verify a CO₂ balance sheet for each battery model and production site. The final version of the Delegated Regulation is expected in the third or fourth quarter of 2025 and is considered a regulatory turning point.

The calculation is carried out in accordance with the PEF (Product Environmental Footprint) methodology and covers all life stages – from raw material procurement and manufacturing to the point of „placing on the market“. Particularly critical: Primary data must be used for certain processes, and the data used must undergo a data quality rating. „Implementing the current version of the Delegated Act presents affected companies with significant procedural, strategic and resource-intensive challenges. We are helping to reduce the complexity and the error rate through training and compliance checks,“ emphasises Bellino.

Further stages: responsibility and transparency

- Due diligence postponed to 2027
Due diligence for critical raw materials (e.g. cobalt, lithium, nickel) has been postponed until February 2027, but companies should already start analysing their supply chains for environmental and social risks and establishing transparent control systems now.
- Extended producer responsibility from 2025
The extended take-back obligation will come into force in August 2025. Manufacturers (≠ producers) must register with the manufacturer register in every EU member state in which they import batteries for distribution. This means they are responsible for ensuring that used batteries are collected and recycled at authorised facilities, and for providing proof of this.
- Battery passport from 2027
A digital battery passport will be mandatory for LMT, EV and industrial batteries with a capacity of >2 kWh. It will contain information on the state of health, service life, chemical composition and origin of the materials, among other things. These requirements are based on the EU's Digital Product Passport. Some companies are using the battery passport requirement as an opportunity to provide end customers with additional information that is of interest to them, beyond what is required.

Notified bodies: TÜV SÜD is seeking designation

Conformity assessments – for example, for the carbon footprint, the proportion of recycled material or the safety of stationary battery storage systems – may only be carried out by notified bodies. TÜV SÜD has applied for designation and is preparing for this role with its global network.

„Our globally networked team enables us to operate effectively worldwide and offer our customers optimal service. This is particularly helpful when plants need to be audited on site,“ says Bellino.

Support from TÜV SÜD

TÜV SÜD offers a comprehensive portfolio of services related to the EU Battery Regulation:

- Conformity assessments
- Verification of CO₂ footprints (PCF) and recycling rates
- Training and workshops
- Support with battery passport requirements
- Preparation for due diligence and supply chain transparency
- *Coming soon: Approval as a notified body (including CE marking)*

„The EU Battery Regulation should not be a burden – it should be the roadmap to a sustainable industry,“ summarises Nicholas Bellino. „Those who act now will secure their market approval and gain long-term advantages.“

Further information:

- <https://www.tuvsud.com/battery-regulation>

Note for editorial staff: The press release is available on the Internet at:

[tuvsud.com/newsroom](https://www.tuvsud.com/newsroom).

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Founded in 1866 as a steam boiler inspection association, the TÜV SÜD Group has evolved into a global enterprise. Around 30,000 employees work at over 1,000 locations in about 50 countries to continually improve technology, systems and expertise. They contribute significantly to making technical innovations such as Industry 4.0, autonomous driving and renewable energy safe and reliable. [tuvsud.com](https://www.tuvsud.com)