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Relationship between Batteries and the RoHS Directive and the EU Battery Directive

The RoHS directive (2002/95/EC), RoHS 2 directive (2011/65/EU), and Directive (EU) 2015/863 does not apply to batteries. Batteries are covered by the EU Battery Directive (2013/56/EU). While batteries and battery packs are exempt from the requirements of the RoHS directive, Panasonic has committed to eliminate the use of these RoHS substances from our products.

We, Panasonic Corporation, hereby declare that our products indicated below are currently in compliance with EU Directive 2002/95/EC, 2011/65/EU, 2015/863, and EU Regulation 2023/1542 with respect to the following 10 substances:

1) Lead (Pb)
2) Cadmium (Cd)
3) Mercury (Hg)
4) Hexavalent chromium (Cr(VI))
5) Polybrominated biphenyls (PBB)
6) Polybrominated diphenyl ethers (PBDE)
7) Bis(2-ethylhexyl) phthalate (DEHP)
8) Benzyl butyl phthalate (BBP)
9) Dibutyl phthalate (DBP)
10) Diisobutyl phthalate (DIBP)

RoHS Compliance by Product Type:

BR Series – Poly-carbonmonofluoride Lithium Batteries
BR"A" Series – Extended Temperature Range Coin Cells
CR Series – Manganese Dioxide Lithium Batteries
CG Series – Lithium Ion Pin Cell
VL Series – Vanadium Rechargeable Lithium Batteries
ML Series – Manganese Rechargeable Lithium Batteries
ML-R Series – Reflow Solderable ML Lithium Batteries (discontinued)
NBL Series – Niobium Rechargeable Lithium Batteries (discontinued)
MT Series – Titanium Lithium Batteries
HHR & BK– Nickel Metal Hydride Rechargeable Cells - NiMH
LR – Alkaline Batteries
CGA, CGR, CG, NCA, NCR, UF, UFP, UR – Lithium Ion Cells

Exceptions

LC-R, LC-P, LC-X, LC-XC, UP-RW, UP-VW & UP-PW - Valve Regulated Lead Acid Batteries (VRLA) (discontinued)
P Series - Nickel Cadmium Cells - NiCd (discontinued)
Cadnica – Nickel Cadmium Cells – NiCd (discontinued)
UM Series, (**R1NW & 6F22NW discontinued)** - Carbon Zinc Batteries

Valve Regulated Lead Acid batteries, Nickel Cadmium batteries and Carbon Zinc batteries have lead or cadmium levels exceeding the agreed levels under the requirements of the ROHS Directive. They can, however, continue to be sold in the EU as long as they are sold in compliance with the EU Battery Directive.

Considerations

Batteries are specifically not covered by the RoHS Directive. The Technical Adaptation Committee (TAC) under the WEEE and RoHS Directives concluded in their December 17, 2003 meeting that batteries were not covered by either Directive.
Please refer to the EU Commission WEEE FAQ section 1.9 for reference.
http://ec.europa.eu/environment/waste/pdf/faq_weee.pdf