

RoHS does NOT apply to batteries

To whom it may concern

Please take note that the directive 2011/65/EU (RoHS2) as well as the amendment of annex II, 2015/863/EU and other amendments does not apply to batteries, see Q1.6: “Are batteries within the scope of RoHS?” in the document “[FAQ key guidance document - RoHS](#)”

No. Recital 14 of RoHS 2 specifically states that RoHS should apply without prejudice to the Batteries Directive. Recital 29 of the batteries and accumulators directive (2006/66/EC6) states RoHS does not apply to batteries and accumulators used in electrical and electronic equipment.

Therefore, batteries are covered by the regulation 2023/1542/EC (Battery regulation) and directive 2006/66/EC (Battery directive), please find embedded our current COC to the battery regulation/directive.



See current COC Lithium with EU Battery Regulation.pdf on next page:

CERTIFICATE OF COMPLIANCE
with Regulation (EU) 2023/1542 of the European Parliament and of the Council of 12 July 2023 concerning batteries and waste batteries, and EU Battery Directive 2006/66/EC from 6 September 2006 with its amendment (Dir. 2008/12/EC, 2008/103/EC, 2013/56/EU, 2018/849/EU)

Renata SA's range of 3V Lithium Manganese Dioxide coin cells:

Renata CR1025 ^{1) 12)}	Renata CR2016.MFR ^{8) 12)}	Renata CR2430 ^{1) 12)}
Renata CR1216 MFR ^{6) 12)}	Renata CR2025 MFR ^{2) 12)}	Renata CR2430 MFR ⁵⁾
Renata CR1220 MFR ^{6) 12)}	Renata CR2032 MFR ^{2) 12)}	Renata CR2450N ^{1) 12)}
Renata CR1225 ^{1) 12)}	Renata CR2032.MFR ^{10) 12)}	Renata CR2477N ^{1) 12)}
Renata CR1616 ^{1) 12)}	Renata CR2025.MFR ^{9) 12)}	Renata CR2450N-MFR ^{7) 12)}
Renata CR1620 ^{1) 12)}	Renata CR2320 ^{1) 12)}	Renata CR2477N.MFR ¹¹⁾
Renata CR1632 ^{1) 12)}	Renata CR2325 ^{1) 12)}	
Renata CR2016 MFR ^{2) 12)}		

This document certifies that the battery models as stated above and provided by Renata SA comply with the above-mentioned legislations.

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Weight limits according to Regulation 2023/1542

Substance	Weight limit (ppm)
Lead (Pb)*	100
Cadmium (Cd)	20
Mercury (Hg)	5

Weight limits according to EU 2006/66 is 40ppm

¹⁾ SGS Test Report EC405623000 dated Feb 16, 2007
³⁾ SGS Test Report CANEC0904976701 dated October 12, 2009
⁵⁾ SGS Test Report CE/2009/45328 dated April 22, 2009
⁷⁾ CTI Test Report RLSZD001049480001 dated October 10, 2011
⁹⁾ CTI Test Report SCL01H064838002
¹¹⁾ CTI Test Report SCL01H064838005

²⁾ SGS Test Report EC405697500 dated March 14, 2007
⁴⁾ SGS Test Report CANEC0904976702 dated October 12, 2009
⁶⁾ SGS Test Report CE/2013/72260 dated September 2, 2013
⁸⁾ CTI Test Report SCL01H064838001
¹⁰⁾ CTI Test Report SCL01H064838003
¹²⁾ TÜV Test Report 713334655_REV02 dated June 5, 2024

Applicability of RoHS / WEEE / End of Life Vehicles Directives on Batteries:

- **The RoHS Directive**
(EU) 2017/2102 and (EU) 2015/863, amending 2011/65/EU of the European Parliament and of the Council of June 08, 2011 on the restriction of the use of certain hazardous substances in electrical and electronics equipment (RoHS Directive).
→ Does not apply to batteries. (See preamble 14 of the directive 2011/65/EU)
- **The WEEE Directive**
Directive 2012/19/EU of the European Parliament and of the Council of 4 July 2012 on waste electrical and electronic equipment (WEEE Directive) (including amendment 2018/849/EU).
→ Does apply to batteries and requires their removal and separate collection.
 Once removed from WEEE, used batteries are governed by the Battery Regulation 2023/1542/EC.
- **The "End of Life Vehicles" Directive**
Directive 2000/53/EC of the European Parliament and of the Council of September 18, 2000 on end of life vehicles (including amendment 2018/849/EU).
→ Does apply to batteries and requires their removal before treatment operations for depollution of end-of-life vehicles:
→ Once removed from end-of-life vehicle, used batteries are governed by the Battery Regulation 2023/1542/EC.

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