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## The classification of batteries for emergency lighting, Uninterruptable Power Systems (UPS), medical equipment and alarm systems as industrial

The accurate classification of batteries is crucial as it determines the specific requirements they must meet, ranging from safety standards and performance benchmarks to appropriate recycling and disposal methods.

The proper classification of batteries, particularly small industrial batteries used in safety applications such as emergency lightings, Uninterruptable Power Systems (UPS), medical equipment and alarm systems, has to be addressed in a homogeneous and unambiguous way.

These batteries, often weighing less than 5 kilograms, serve indispensable industrial functions, and are specifically designed for that, including backup power applications.

EUROBAT, along with other influential stakeholders and regulatory bodies, considers these batteries as "industrial" due to their specialised design and function. Their role transcends that of mere power sources; they are integral components of safety systems, requiring professional removal and disposal to adhere to environmental standards and ensure public safety.

The criteria for classification extend beyond mere physical attributes like weight. As stipulated in the regulatory framework (Article 2.9 and Article 2.13), classification encompasses the intended use and handling requirements of the battery.

According to Batteries Regulation, Article 3 (9), 'Portable battery' means a battery: (1) that is sealed, (2) weight 5 kg or less, (3) is not designed specifically for industrial use and is neither and electric vehicle battery, an LMT battery, nor an SLI battery.

It is important to emphasise that these conditions are cumulative, meaning that all three conditions must be met for a battery to qualify as portable.

A deviation from this cumulative reading would inaccurately classify most batteries - including EV batteries and SLI batteries - as portable based on their sealed nature for the former, and on their non-specifically industrial use design for the latter, and would also classify most LMT batteries as portable due to their weight which is usually 5 kg or less.



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The IEC Glossary describes valve regulated lead–acid (VRLA) batteries as secondary batteries in which cells are closed but have a valve which allows the escape of gas if the internal pressure exceeds a predetermined value during its normal charging cycle, hence they are not fully sealed.

Therefore, VRLA batteries weighing 5 kg or less cannot be classified as portable batteries. Furthermore, they are neither SLI, nor LMT, nor EV batteries.

The classification of emergency lighting batteries as "industrial" rather than "portable" shall derive from the Batteries Directive. Indeed, it must be outlined that the categories and applications originally described in the Directive remain valid even if the Regulation has now differentiated the EVs and LMTs which were originally included in industrial batteries, and has also updated the definition of portable batteries by inserting a specific weight limit (to replace the former 'can be hand carried' criteria).

The Directive had already recognised the unique nature and application of emergency lighting batteries, which are a specific class of back-up power batteries, affirming that these batteries, due to their specialised use and requirements, shall be considered as industrial batteries<sup>1</sup>.

In conclusion, given the parameters in Article 3(9) and the IEC Glossary, it is evident that lead-acid batteries, which are not sealed and are designed for industrial purposes can be deemed as industrial batteries. Moreover, the categories and applications described in the Batteries Directive also remain valid for the classification of emergency lighting batteries as industrial. The classification of emergency lighting batteries as industrial is therefore logical, reflecting their specialised design for industrial use.

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<sup>1</sup> Recital 9: Examples of industrial batteries and accumulators include batteries and accumulators used for emergency or back-up power supply in hospitals, airports or offices (...)



## About EUROBAT

[www.eurobat.org](http://www.eurobat.org)

EUROBAT is the association of the European Manufacturers of automotive, industrial and energy storage batteries. EUROBAT represents more than 90% of the automotive and industrial battery industry in Europe through its more than 50 members from across the continent. EUROBAT members and secretariat work with all stakeholders, such as battery users, governmental organizations and media, to develop new battery solutions in areas of hybrid and electro-mobility as well as grid flexibility and renewable energy storage.

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