



Impact of the Batteries Regulation (EU) 2023/1542 on the notification of electronic cigarettes in the EU-CEG portal

From **18 February 2027**, the requirements of Regulation (EU) 2023/1542 of the European Parliament and of the Council concerning batteries and waste batteries ([the Batteries Regulation](#)) will apply. According to these requirements, portable batteries used in electronic cigarettes must be designed in such a way that end-users can easily remove and replace them.

Under Article 11 of the Batteries Regulation, portable batteries used in electronic cigarettes must be designed so that end-users can replace them using commercially available tools and without damaging the product. Therefore, electronic cigarette devices in which batteries cannot be removed or replaced may no longer comply with the applicable European Union requirements from 18 February 2027.

The European Commission has published guidelines on the application of Article 11 of the Batteries Regulation (Commission Notice C/2025/214), available at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52025XC00214>

The guidelines explain that a battery is considered replaceable when it can be removed and replaced by another compatible battery without damaging either the device or the battery itself. The tools needed to remove and replace the battery must be commercially available to end-users.

These requirements may affect the notification of electronic cigarettes in the EU Common Entry Gate (EU-CEG).

Although the Batteries Regulation does not amend the notification requirements for electronic cigarettes set out in the Tobacco Products Directive 2014/40/EU (TPD), the implementation of its provisions may require changes to the design of electronic cigarettes. Such changes may affect the information submitted in the EU-CEG.

If an electronic cigarette is modified in order to ensure that the battery can be removed and replaced, such a change in the product design may be considered a substantial modification of the product. In addition, depending on the nature of the changes made, the product type previously notified in the EU-CEG may also change.

In cases where the changes made result in a change of the previously notified product type, manufacturers and importers should submit a new EU-CEG notification.

We would like to remind economic operators that, under the TPD requirements, new or substantially modified electronic cigarette products must be notified no later than six months before they are placed on the Lithuanian market.

Economic operators are recommended to ensure that the information and technical documentation submitted in the EU-CEG accurately reflect the characteristics of the product placed on the market, including information on the possibility to remove and replace the battery.