

ILLEGAL VAPE IN THE EU **AFTER FEBRUARY 18, 2027**

EU Battery Regulation 2023/1542
What Every Manufacturer Must Know Now

compliance briefing for manufacturers

WHAT HAPPENED?

This applies to all products sold in the EU including **e-cigarettes and vaping devices**.

The European Union passed Regulation (EU) 2023/1542 — a new battery law that requires all portable batteries in consumer products to be easily removable and replaceable by the end-user.

Effective date: **February 18, 2027**



ARTICLE 11: THE 5 REQUIREMENTS

- Removable by **end-user** Battery must be removable **without** professional help
- Common tools only No proprietary tools, no heat, no solvents - standard **screwdriver is OK**
- Instructions included **printed in-box** + QR permanently **available online**
- Spare batteries for 5 years after last unit sold, at reasonable price
- No software lock firmware cannot block compatible battery replacement

WHY DISPOSABLE VAPES

FAIL ARTICLE 11?

- × Battery glued or soldered to PCB
- × Sealed case — ultrasonic weld or press-fit
- × No way to open without destroying the device
- × No spare batteries exist

100% Of Current Disposable Designs Are Non-Compliant

WHO IS **AFFECTED?**

If your product contains a battery and is sold in the EU — you are in scope. No exceptions.

Manufacturers

You design and produce the device



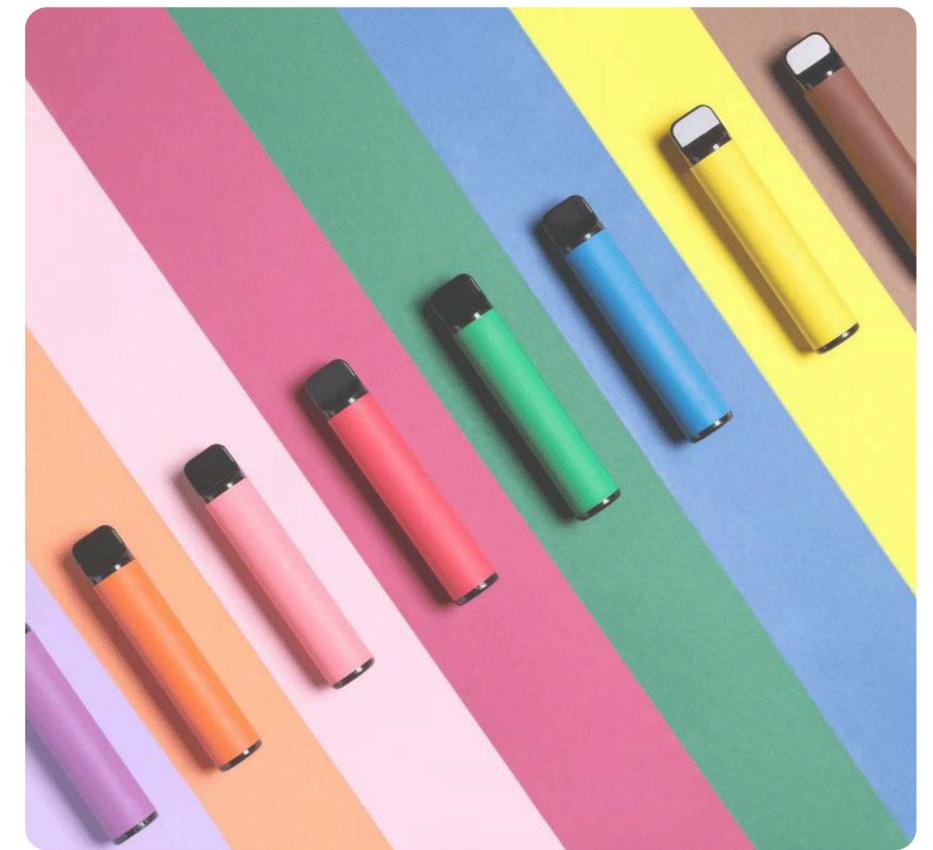
OEM / ODM

You manufacture for other brands



Brands / Importers

You place the product on the EU market



NO COMPLIANT BATTERY = NO EU MARKET ACCESS

Market surveillance under Regulation (EU) 2019/1020 — authorities can pull products from shelves and block imports.

€3.4B+

EU market size for vaping devices:
You lose all of it.

Non-removable battery

No CE marking

Blocked at customs

COMPLIANCE TIMELINE: KEY DEADLINES

Aug 2025 Old Directive repealed New regulation in force

Aug 2026 New labelling requirements Capacity, chemistry, hazard symbols

Feb 2027 Article 11 applies Batteries must be removable

Feb 2027 QR code mandatory On every battery

Less than 11 months left to redesign, certify and start production.

THIS IS NOT JUST THE EU. THE TREND IS GLOBAL.

 **UK:** Disposable vapes banned in 2025

 **France:** Disposable vape ban in effect since 2025

 **Germany:** Stricter enforcement of WEEE & battery collection

 **EU:** Battery removability law applies Feb 2027

Disposable is a dead format. *The only question is how fast you transition!*

THREE PATHS FORWARD



Do nothing

- Lose EU market access
- Stock becomes unsellable
- Customers switch to compliant competitors



Minimum adaptation

- Cosmetic changes only
- Risk of failing market surveillance
- Partial compliance \neq compliance



Full redesign now

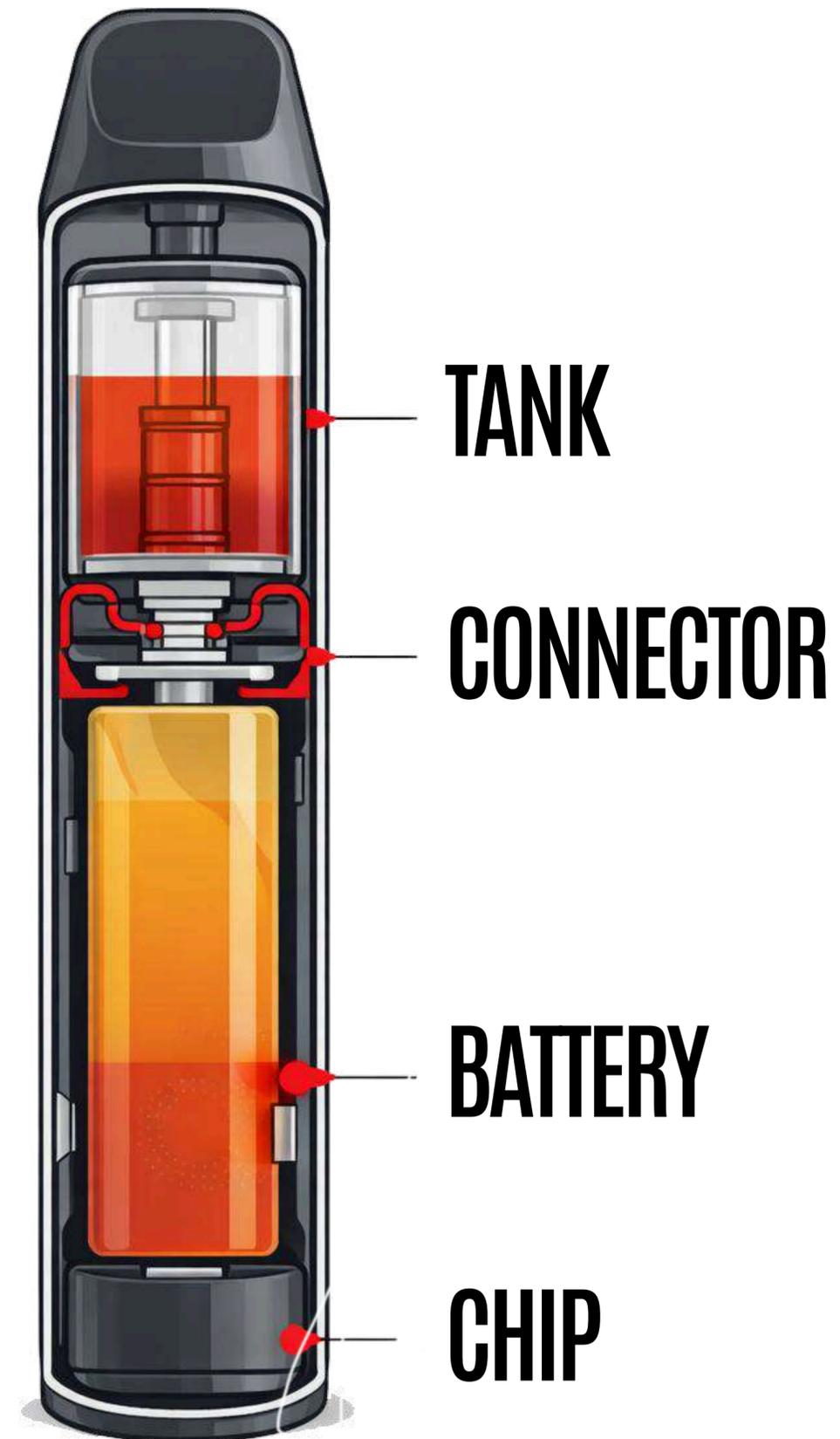
- Compliant product ready before deadline
- First-mover advantage
- Premium positioning as "EU-certified"

A COMPLIANT DESIGN ALREADY EXISTS

- ✓ Screw cap - user removes in seconds
- ✓ Standard cell - no proprietary battery
- ✓ Spring contacts - no soldering
- ✓ Spare parts available for 5+ years

COMPLETE GUIDE

- ✓ Full technical breakdown
- ✓ 3 design options
- ✓ Checklists and templates



EU 2027 VAPE BATTERY COMPLIANCE GUIDE

What's included:

- Full legal breakdown of Article 11
- Compliant device structure design
- Labelling & QR code checklist
- Declaration of Conformity template
- Reverse timeline: what to do and when
- 1-page printable readiness checklist

1-hour expert consultation:

- Review of your specific device
- Compliant / non-compliant verdict
- Actionable next steps for your R&D team
- Disposable and POD technical map
- TPD submission consultation

One redesign mistake costs 10× more than this guide.

WHO IS BEHIND THIS GUIDE?

GREGORY POKROVSKY

I help manufacturers redesign products before the deadline — not after the fine.

- **TPD PRO** founder
- 10 years in vape / e-cigarette industry
- 4kk devices sold in 2024
- Specialize in EU regulatory compliance for vaping devices

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GET THE FULL COMPLIANCE GUIDE

Technical Handbook + 1-Hour Consultation

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