



Clarification on Battery Classification and Battery Passport Implementation under Regulation (EU) 2023/1542

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Sector Guidance

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Classification of Traction Batteries as Industrial Batteries

Traction batteries for railways deliver electrical energy and provide autonomous propulsion; therefore, they are classified as industrial batteries. **This classification aligns with Article 3.1(1) of the Regulation.** These batteries are typically integrated into railway systems and are custom-designed for specific applications based on customer needs.

Classification of Auxiliary Batteries as SLI Batteries

Auxiliary batteries for railway, as they deliver electrical energy for the starting of the train and for backup safety functions (e.g., emergency lighting, emergency exit doors opening, ...), shall be **classified as Starting, Lighting, and Ignition (SLI) batteries**. These batteries are cycled only occasionally, or not at all. This classification, consistent with the definition in Article 3.1(12) of the regulation, ensures that regulatory obligations are applied proportionately and appropriately, reflecting the role of these batteries.

About UNIFE

UNIFE, the European Rail Supply Industry Association, has operated in Brussels since 1992, representing European train builders and rail equipment suppliers. The association represents more than 120 of Europe's leading rail supply companies – ranging from SMEs to major industrial champions – that are active in designing, manufacturing, maintaining, and refurbishing rail transport systems (including trains, metros, trams, and freight wagons), as well as subsystems and related equipment. UNIFE also brings together national rail industry associations from 12 European countries.