

# Q&A for Covered Battery-Embedded Products

Updated May 15, 2026

## Covered Battery-Embedded Product (CBEP) Determinations

**Q:** What is a CBEP?

**A:** “Covered battery-embedded product” is defined in Public Resources Code (PRC) section 42463(f)(1) as “a product containing a battery from which the battery is not designed to be easily removed from the product by the user of the product with no more than commonly used household tools.”

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**Q:** Are there battery-embedded products that are statutorily excluded from the definition of CBEP?

**A:** Yes. Excluded devices are listed in PRC section 42463(f)(2) and include: certain medical devices used or prescribed in healthcare settings; video display devices that are covered electronic devices (CEDs), as defined in PRC section 42463(g)(1)(A); energy storage systems, as defined in subdivision (a) of section 2835 of the Public Utilities Code; electronic nicotine delivery systems, as defined in section 375(7) of Title 15 of the United States Code, which include electronic cannabis vaping devices.

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**Q:** Is there a publicly available list of all CBEPs sold in California?

**A:** CalRecycle compiled this list of products from notices sent to CalRecycle by manufacturers pursuant to PRC section 42466.2. The information contained in the documents below was provided by manufacturers and questions about specific product determinations should be directed to manufacturers.

- [The PDF Table document](#) consolidates the data from the Manufacturer Notices into an easy-to-read chart that lists categories of products, manufacturer and brand names, and examples of products within each category.
- [The Notices Excel spreadsheet](#) lists all noticed products from copies of the Manufacturer Notice that have been provided to CalRecycle. This list is sortable by brand, manufacturer, and device type, and contains product model numbers and UPC numbers (if provided).

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By posting these lists of products, CalRecycle is not endorsing the accuracy of the lists or otherwise confirming that these products are CBEPs as defined in PRC 42463(f). Also, these lists may erroneously include devices that are not CBEPs such as:

- Products that are video display devices (as defined by [PRC section 42463\(g\)\(1\)\(A\)](#)).
- Products that are a loose battery (as defined at [PRC section 42420.1\(d\)](#)).
- Products that are not considered covered electronic devices.

Additionally, these lists are not complete lists of all CBEPs as they are based upon the notices that manufacturers provided to CalRecycle. The absence of a CBEP from these lists does not relieve a manufacturer's responsibility pursuant to PRC section 42466.2 or a retailer's obligation to collect the covered battery-embedded waste recycling fee on a CBEP from a consumer. If a retailer is unsure, they are encouraged to contact the product manufacturer. These lists are subject to change and will be updated periodically, and a listserv notice will be sent out.

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**Q:** Are electronic devices with embedded batteries located on a circuit board considered CBEPs?

**A:** Batteries that are not easily removable with commonly used household tools meet the definition of a CBEP in PRC section 42463(f)(1), unless they are specifically excluded by PRC section 42463(f)(2).

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**Q:** Are Tire Pressure Monitoring Sensors (TPMS) subject to the CBEP recycling fee?

**A:** It depends on how they are sold:

TPMS sensors that contain an embedded battery that is not designed to be easily removed are subject to the CBEP recycling fee (1.5% of retail sales price, capped at \$15) when sold separately as standalone replacement or aftermarket part. (See Public Resources Code section 42463(f); Title 14 of the California Code of Regulations (CCR) sections 18660.5(a)(18), (a)(18.5), and (a)(22)).

The fee does not apply when TPMS sensors are sold as part of a new or used motor vehicle. Title 14 CCR section 18660.5(a)(18.5)(A) states motor vehicles are not a covered battery-embedded product. This exclusion for motor vehicles includes components installed in the vehicles at the time of sale, such as factory-installed TPMS sensors. (Please see "Q: Are motor vehicles CBEPs?").

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The fee does not apply in the case of a warranty claim or replacement where no sale occurs. For example, if a consumer receives a free TPMS sensor replacement under warranty with no retail transaction, the CBEP fee is not charged.

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**Q:** Are motor vehicles CBEPs?

**A:** No, a motor vehicle is not a covered battery-embedded product. (See 14 CCR section 18660.5(a)(18.5)(A)).

Additionally, please see 14 CCR section 18660.5(a)(29.5) which states:

“Motor vehicle” has the same meaning as set forth in Section 415 of the Vehicle Code.

(A) “Motor vehicle” does not include any of the following:

1. A motorized scooter.
  2. A motorized skateboard.
  3. A motorized hoverboard.
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**Q:** Are power banks (e.g. portable cell phone chargers) considered CBEPs?

**A:** Power banks with and without ancillary functionality (e.g. flashlights and radios) are classified as loose batteries and must be managed under the requirements of the [Responsible Battery Recycling Act](#).

“A battery that charges or powers a product, such as by physically abutting it or by the insertion of its cable into the product, and can be manually removed from the product without the use of any tools” is not a CBEP. (14 CCR section 18660.5(a)(22)(B)(3)).

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**Q:** If I have a covered video display device (VDD) that also has an embedded battery, such as a tablet or laptop, can I use the approved cancellation method for battery-embedded covered electronic waste (CEW) to dismantle the covered video display device?

**A:** A VDD is not a CBEP. (See PRC section 42463(f)(2)(B)). There are different requirements for cancellation of covered video display devices than there are for CBEPs. Covered video display devices, such as tablets or laptops, claimed for payment must be cancelled in compliance with 14 CCR sections 18660.32(c)(1) and (2). CBEPs claimed for payment must be cancelled in compliance with applicable law. Battery-

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embedded CEW must be cancelled pursuant to 14 CCR section 18660.32(c)(3)) which requires “cancellation of battery-embedded CEW by removing the embedded battery in a manner that complies with Chapter 23 of Division 4.5 of Title 22 of the California Code of Regulations, including ensuring the casing of each individual battery cell is not breached and the casing remains intact and closed, and dismantling the CEW into specific material streams such as batteries, plastics, metals, glass, fibers, and any hazardous waste components, if applicable.”

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## VDD Determinations

**Q:** What is a covered video display device and where can I find a list of devices that meet this definition?

**A:** A CED that is a video display device is defined in PRC section 42463(g)(1)(A) as “a video display device containing a screen greater than four inches, measured diagonally, that is identified in the regulations adopted by DTSC pursuant to subdivision (c) of section 25214.10.1 of the Health and Safety Code.”

Device categories that meet this definition are listed in [section 66260.201\(e\)](#) of 22 CCR:

- (1) CRT-containing devices (CRT devices);
- (2) CRTs;
- (3) CRT-containing computer monitors;
- (4) LCD-containing laptop computers;
- (5) LCD-containing desktop monitors;
- (6) CRT-containing televisions;
- (7) LCD-containing televisions (excluding LCD projection televisions);
- (8) Plasma televisions (excluding plasma projection televisions);
- (9) Portable DVD players with LCDs;
- (10) Organic light-emitting diode (OLED)-containing televisions;
- (11) OLED-containing laptop computers;
- (12) OLED-containing tablets;
- (13) OLED-containing desktop monitors;
- (14) LCD-containing tablets; and

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(15) LCD-containing smart displays.

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## Fee Questions

**Q:** What is the covered battery-embedded waste recycling fee?

**A:** PRC section 42464(b)(1) requires that, on and after January 1, 2026, a consumer shall pay a covered battery-embedded waste recycling fee upon the purchase of a new or refurbished CBEP. 14 CCR section 18660.40(d) provides, in part, that:

On or after January 1, 2026, 1.5 percent of the retail sales price for each covered battery-embedded product sold for use in this state by a retailer. The covered battery-embedded waste recycling fee shall not exceed \$15.00. For the purposes of this section, "retail sales price" shall have the same meaning as "sales price" in section 6011 of the Revenue and Taxation Code.

For example, 1.5% up to the cap of \$15 means that any CBEP equal to or greater than \$1,000 shall apply the covered battery-embedded waste recycling fee cap of \$15.).

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**Q:** If a retailer sells a covered video display device that also has an embedded battery, such as a tablet or laptop, does the retailer need to charge both the recycling fee for video display devices and the battery-embedded waste recycling fee?

**A:** No. The retailer will only charge the recycling fee for video display devices, since video display devices that are CEDs are excluded from the definition of a CBEP. (See PRC section 42463(f)(2)(B)).

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**Q:** If I have a covered video display device that also has an embedded battery, such as a tablet or laptop, can I claim both the non-CRT recycling payment rate and the covered battery-embedded waste recycling payment rate?

**A:** No. Tablets and laptops are listed in 22 CCR section 66260.201(e) as covered video display devices. Covered video display devices are excluded from the definition of CBEPs. (PRC section 42463(f)(2)(B)). As such, recyclers may only claim the recycling payment rate on covered video display devices, such as laptops and tables.

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**Q:** Can a retailer pay the fee on behalf of the consumer?

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**A:** A retailer can pay the fee on behalf of the consumer through the procedures referenced in [PRC section 42464\(e\)\(1\)](#) or [PRC section 42464\(e\)\(2\)](#). For more information related to the payment or the administration of the fee, please contact the California Department of Tax and Fee Administration (CDTFA). The following link is to a page that gives guidance and contact information: [Covered Electronic Waste Recycling Fees Guide](#).

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**Q:** Is an online marketplace a retailer?

**A:** An online marketplace may be considered a marketplace facilitator. Any marketplace facilitator that is registered or required to register with CDTFA is considered the retailer selling or making the sale of covered electronic products sold through its marketplace for purposes of paying or collecting the relevant fees. You may visit CDTFA's [Tax Guide for Marketplace Facilitator Act](#) for additional information.

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**Q:** If I currently have an eWaste account with CDTFA reporting the electronic waste recycling fee on video display devices, do I need a separate account to report the covered battery-embedded waste recycling fee?

**A:** Yes, you must register for a new Covered Battery-Embedded Waste Recycling Fee account with CDTFA to report the Covered Battery-Embedded Waste Recycling Fee. The Covered Battery-Embedded Waste Recycling Fee account is a separate account from your eWaste account.

To register for a Covered Battery-Embedded Waste Recycling Fee account, visit CDTFA's online services webpage at <https://onlineservices.cdtfa.ca.gov/> for account registration. Once registered for a Covered Battery-Embedded Waste Recycling Fee account, you will need to file returns and pay the Covered Battery-Embedded Waste Recycling Fees due quarterly with CDTFA.

If you do not sell any CBEP's and only sell video display devices, you do not need a Covered Battery-Embedded Waste Recycling Fee account. The Covered Battery-Embedded Waste Recycling Fee does not apply to video display devices. (See Public Resources Code section 42463(f)(2)(B)). For further questions related to the Covered Battery-Embedded Waste Recycling Fee account, please see the CDTFA [Covered Electronic Waste Recycling Fees Guide](#), which includes contact information.

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**Q:** If a manufacturer didn't notice a retailer about a CBEP, is the retailer still required to charge the fee?

**A:** Yes. Failure of a manufacturer to send a notice to retailers pursuant to PRC section 42466.2 does not relieve retailers from their obligation to collect and remit the covered battery-embedded waste recycling fee. If a retailer is unsure whether a product is a CBEP, they are encouraged to contact the product manufacturer.

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## **CBEP Claims**

**Q:** Are currently approved CEW collectors required to collect battery-embedded CEW at the beginning of the year or can they transition over time?

**A:** Approved collectors can continue to collect the types of CEW indicated on their application and are not required to start collecting battery-embedded CEW on January 1, 2026. If an approved collector wishes to collect battery-embedded CEW it must first [update the information](#) contained in its existing application, pursuant to 14 CCR section 18660.18.

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**Q:** Does a recycler have to ship batteries before submitting a claim for the cancelled CBEPs?

**A:** Unlike the requirements for recyclers relating to bare cathode ray tubes (CRTs), there are no requirements to ship battery residuals prior to submitting a claim.

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**Q:** Do recyclers need to record and report the manufacturer name, model number, and individual weight for each battery-embedded CEW claimed for payment?

**A:** No, recyclers do not need to record and report the manufacturer name, model number, and individual weight for each battery-embedded CEW claimed for payment as this is a requirement applicable only for non-CRT CEW claimed for payment (see requirements for non-CRT CEW in Section 18660.25). Battery-embedded CEW are not non-CRT CEW (see requirements specific for battery-embedded CEW in Section 18660.26).

## **Physical Management of CEW**

**Q:** Can a universal waste recycler shred intact battery-embedded products, or circuit boards with attached batteries?

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**A:** The regulations provide cancellation methods of battery-embedded CEW. (See 14 CCR section 18660.32). (Treatment methods involving e-waste and potentially hazardous e-waste residuals fall under the purview of the Department of Toxic Substance Control ([DTSC](#)) and those questions should be directed to [electronicwaste@dtsc.ca.gov](mailto:electronicwaste@dtsc.ca.gov).)

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**Q:** How long can batteries be stored at a recycling facility prior to shipment?

**A:** Storage times for e-waste and potentially hazardous e-waste residuals fall under the purview of [DTSC](#), and those questions should be directed to [electronicwaste@dtsc.ca.gov](mailto:electronicwaste@dtsc.ca.gov).

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**Q:** Approved Recyclers of CBEPs must weigh and issue separate weighmaster certificates for each treatment residual derived from cancellation of battery-embedded CEW. Each battery chemistry is considered a separate residual. Does that mean that each battery chemistry must also be shipped offsite separately?

**A:** CalRecycle has no requirements for how batteries are shipped offsite. The requirement is to weigh the total amount of batteries of each chemistry resulting from the claim, prior to shipment. (See section 18660.26(e)(4)).

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## CBEP Notice to Retailers

**Q:** What information must be listed in a CBEP manufacturer's annual notice to retailers?

**A:** PRC section 424266.2 requires manufacturers of CBEPs to send an annual notice to retailers on or before every July listing any battery-embedded product manufactured by that manufacturer that is subject to a BEP recycling fee, and those that are exempt. PRC section 42466.2 requires manufacturers to identify those products by brand and model number, and to send a copy of the notice to CalRecycle. (See also, 14 CCR section 18660.41.5). CalRecycle developed a [recommended template](#) that manufacturers may use to send to retailers. This template is **optional**.

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## CBEP Manufacturer Report

**Q:** When is the manufacturer report for CBEP manufacturers due?

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**A:** On or before July 1, 2027, and every year after, manufacturers of CBEPs must submit aal report to CalRecycle covering the previous calendar year. (PRC section 42467). See CalRecycle's [Manufacturer Information webpage](#) for details.

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## CBEP Labeling Requirements

**Q:** What are the labeling requirements for CBEPs?

**A:** On and after January 1, 2026, a new or refurbished CBEP cannot be sold in the state unless the item is labeled with the name of the manufacturer or the manufacturer's brand label so that it is readily visible. (PRC section 42466.1(a)).

Additionally, a new or refurbished CBEP must either be labeled with information identifying the chemistry of the battery contained within the covered electronic device (see below) **or** the manufacturer must include that information on the manufacturer's internet website. (PRC section 42466.1(b)).

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**Q:** What is battery chemistry?

**A:** Regulations define "Battery Chemistry" as "the specific combination of materials used in the cathode, anode, and electrolyte of the battery. Types of battery chemistries include, but are not limited to, lithium-ion, nickel metal hydride, nickel-cadmium, and small sealed lead-acid." (See section 18660.5(a)(8)).

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**Q:** For the internet website labeling option, should manufacturers provide a battery chemistry logo or mark on the product website, or can companies link to technical documentation which contains battery chemistry information (e.g. an environmental data sheet)?

**A:** PRC section 42466.1(b) requires a manufacturer to label a CBEP with information identifying the chemistry of the battery contained within the covered electronic devices sold by the manufacturer or include that information on the manufacturer's internet website. Therefore, the battery chemistry name or logo, listed on a webpage, or in a document posted to a webpage, would meet that requirement.

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**Q:** Is the battery chemistry required to be identified for every embedded battery in a product that may include multiple embedded batteries?

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**A:** PRC section 42466.1(b) requires a manufacturer to label a CBEP with information identifying the chemistry of the battery contained within the covered electronic devices sold by the manufacturer or include that information on the manufacturer's internet website. This includes all batteries "contained within" the CBEP, if there is more than one type of battery chemistry.

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**Q:** Should companies utilize the "lithium-ion" label or the more detailed labeling needed such as "lithium cobalt oxide," "lithium iron phosphate," or "lithium metal?"

**A:** PRC section 18660.5(a)(8) defines "Battery Chemistry" as "the specific combination of materials used in the cathode, anode, and electrolyte of the battery. Types of battery chemistries include, but are not limited to, lithium-ion, nickel metal hydride, nickel-cadmium, and small sealed lead-acid." The manufacturer may use the specific chemistry names, such as "lithium cobalt oxide" and "lithium iron phosphate," or the more inclusive name, "lithium-ion." For the "lithium metal" chemistry used in primary batteries, CalRecycle recommends using a different name, such as "lithium metal," or "LMB."

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**Q:** Should battery chemistry labeling information be on the product itself or is labeling on the embedded battery acceptable?

**A:** PRC section 42466.1(b) requires a manufacturer to label a CBEP with information identifying the chemistry of the battery contained within the covered electronic devices sold by the manufacturer or include that information on the manufacturer's internet website. There is no option to label the embedded battery instead of the device.

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## Payment Rates

**Q:** What is the recovery rate paid to collectors for SB 1215 material?

**A:** Battery-embedded CEW is a type of CEW and not a separate category from CEW. (14 CCR section 18660.5(a)(20)). There is one recovery rate paid to approved collectors for all types of CEW (irrespective of whether the type is CRT CEW, non-CRT CEW, or battery-embedded CEW). The current recovery rate paid to approved collectors is \$0.40 cents per pound for all types of CEW. (14 CCR section 18660.33(b)).

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## Designated Approved Collector

**Q:** How does SB 1215 affect Designated Approved Collector (DAC) requirements?

**A:** Current DACs can collect battery-embedded CEW under existing Designations, as a Designation is established for collecting CEW, which include CRT CEW, non-CRT CEW, and starting January 1, 2026, battery-embedded CEW. However, pursuant to 14 CCR section 18660.49, there are some tasks that may need to be completed if the scope of the Designation changes in order for the DAC to collect battery-embedded CEW:

- The scope of the Designation would need to be modified if there are changes in collection locations and/or method of collection, such as the location(s) where the collection activities may occur on behalf of the Local Government are changing due to collecting covered battery embedded products. This includes:
    - The geographic area within the Local Government's jurisdictional boundaries where the DAC may provide CEW collection services; and
    - Any specific sites and addresses at which permanent drop-off services will be provided.
    - The method and description of CEW collection activities to be provided by the DAC (e.g., permanent drop-off, curbside service, illegal disposal clean-up, or temporary special events).
  - If the scope of the Designation changes (as indicated above), the Local Government must immediately notify CalRecycle and the DAC in writing. The DAC must also notify the Local Government and CalRecycle, in writing, at least 30 calendar days prior to a change taking effect or within 10 calendar days after an unforeseen change related to the DAC's contact information or operational status or the name of the organization under which the DAC is operating. The DAC must not act on any changes in the scope of the Designation prior to the notifications. The DAC must provide a copy of the change-of-scope notification that the Local Government provided to CalRecycle, to another approved collector or approved recycler at the time the Designated Approved Collector transfers CEW to another approved collector or approved recycler.
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