

Avenue Marcel Thiry, 204
B-1200 Brussels, Belgium
Tel: +32 2 774 96 53
Fax: +32 2 774 96 90
E-Mail: eurobat@kelleneurope.org
www.eurobat.org

EUROBAT

Association of European Storage Battery Manufacturers
Association des Fabricants Européens d'Accumulateurs
Vereinigung Europäischer Akkumulatoren-Hersteller

10 November 2006

Eurobat position on provisions regarding mandatory capacity marking for automotive batteries in the new battery Directive

Eurobat would like to call your attention on provisions regarding the mandatory capacity marking on automotive batteries in the new battery Directive (Article 21.2).

Eurobat fully supports the provision of accurate and thorough information to consumers on the products they purchase. This is why Eurobat would like to make suggestions to assist with the effective implementation of the provisions regarding capacity marking for automotive batteries.

Eurobat stresses the importance of the provision of information on the performance of batteries rather than their capacity. In the implementation measures regarding capacity marking for automotive batteries, the word 'capacity' should therefore be replaced by 'performance'. To provide relevant information on performance, the labelling should indicate the cold cranking amperes (CCA) rather than ampere-hours.

In order to provide consumers with consistent and comparable information, the marking of automotive batteries should include four criteria:

- **Dimensions of the battery:** it is important that a battery fits to the vehicle it is mounted in. This is particularly relevant for after market batteries. All automotive batteries should therefore bear a code indicating dimension (for example: H6 corresponds to L x W x T cm)
- **Performance,** meaning the cold cranking capability of a battery (capability to start an engine, in particular under adverse conditions (low temperatures). This is critical information for consumers as certain types of engines, in particular diesel engines, have specific requirements. In order to purchase the appropriate model of battery, consumers should therefore be informed of the performance of each battery.
- **Endurance:** this is the actual combination of the energy content stored in a battery and the rate at which the battery is discharged over its lifetime.
- **Safety:** characteristics improving the safety of the use of a battery should be clearly indicated. For instance, the fitting of the battery with a special lid to prevent any leakage or with a specific box to avoid that electronic parts will be harmed should be

Eurobat is the representative association for automotive and industrial battery manufacturers and their suppliers, the collective voice of over 30 European operations employing around 30,000 professionals in Europe.

For questions or further information, please contact Pierre Conrath at Eurobat, email: eurobat@kelleneurope.com, tel. + 32 2 774 96 53

mentioned on the label of batteries to enable consumers to establish a distinction between batteries according to their safety features.

Justification

- The definition of the requirements for capacity marking for automotive batteries should take into account the fact that the capacity in the technical meaning applying to electrical components and measured in ampere hours is not the most important element of information to provide to consumers. The information enabling consumers to effectively choose batteries in an objective way is related to the capability of a battery to start the engine of their vehicle. This is known as cold cranking amperes (CCA).
- The capacity of a battery measured in ampere-hours varies according to the discharge rate used. The discharge rate can be set to 1, 5 or 20 hours. The capacity of a battery measured with this method varies in a non-linear way. Each type and model of automotive battery has different capacities at different discharge rates. The setting of an arbitrary discharge rate used for all batteries would therefore not enable the provision of objective and accurate information to consumers and substantially limit the design of new and more efficient models of automotive batteries.
- An automotive battery fulfils many different functions. The main function is to start the engine. Besides this main function, a battery mounted on a vehicle supplies energy for many additional uses vital for the functioning of onboard electric and electronic devices. There is a significant difference in terms of energy required for these functions: to start the engine a battery must provide a high intensity discharge for a short time whereas other functions require low intensity electric energy over longer periods of time.

Eurobat calls upon the Members of the Technical Adaptation Committee discussing the implementation of these provisions to adopt standards that will lead to the highest level of consumer information and be workable for the manufacturers of automotive batteries by considering the suggestions formulated above.

Eurobat is the representative association for automotive and industrial battery manufacturers and their suppliers, the collective voice of over 30 European operations employing around 30,000 professionals in Europe.

For questions or further information, please contact Pierre Conrath at Eurobat, email: eurobat@kelleneurope.com, tel. + 32 2 774 96 53