
Statement on Industrial Emissions Directive

EUROBAT members support the European Commission's Green Deal objective to review measures in order to address pollution from large industrial installations.

Batteries are critical to the fight to decarbonise our economy and tackle climate change. All battery technologies - lead, lithium, nickel and sodium — are needed to support the decarbonisation of the transport, energy, logistics, production and telecommunications sectors. Europe must indeed take the lead in designing and building the most environmentally sustainable energy storage solutions and supporting the development of its battery industry.

EUROBAT understands that battery production is one of the industrial activities currently under review. However, it is important to point out that the goal of the Industrial Emissions Directive should focus on regulating industrial production processes through Best Available Techniques (BAT), rather than specific industries.

The industrial processes commonly used in the production and recycling of batteries are already included in the scope of the Industrial Emissions Directive. For instance the process of lead melting (Annex I, 2.5 b) is a key process for manufacturing and recycling of lead batteries. Hence by regulating the process the risk from lead battery manufacturing and recycling is properly managed.

Besides, the industrial and automotive battery industry is an example in which a great variety of different technologies exist and as a consequence a great variety of industrial processes are covered. Lithium, lead, sodium and nickel batteries are produced within the EU for very different applications, and the impact of their production and of the individual industrial processes can vary considerably. In addition, batteries are complex products, consisting of connected individual cells or groups of cells, sometimes involving different actors along the value chain. It is therefore extremely impractical, if not impossible, to properly regulate "battery production" as such in under the IED.

Also it has to be considered that regulating processes rather than individual industries, the scope of the regulation is automatically extended beyond the individual industries.

We therefore suggest the Commission to refrain from including "battery production" under the new Industrial Emissions Directive. We recommend identifying processes that are relevant for the manufacturing of batteries and regulate these processes under IED.

