EUROBAT
ASSOCIATION OF EUROPEAN AUTOMOTIVE AND INDUSTRIAL BATTERY MANUFACTURERS

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EUROBAT feedback on the EC Roadmap on the Batteries Directive

EUROBAT welcomes the initiative of the European Commission to evaluate the Directive 2006/66 on batteries which is one of the central pieces of EU legislation for our sector.

Batteries fulfill important functions in multiple automotive and industrial applications, and there are currently four main battery families (lead, sodium, nickel, lithium). Batteries are used in all types of vehicles (internal combustion engine, hybrid and electric vehicles).They are also essential in a number of areas as a source of back-up power, contributing to the effective functioning of communications, IT, production & distribution of renewable energy, nuclear safety, oil and gas networks and for the storage of data in uninterruptible power supply as well as other industrial systems.

As regards the Roadmap, we would like to underline three points mentioned in the document that we consider to be of equal importance:

1. Competitiveness of the EU battery market: EUROBAT is the association of European automotive and industrial battery manufacturers and our members produce batteries of all types of chemistry in Europe, Middle East and Africa. The clear majority of our members has a European production foot-print and is marketing their products at a global level. We therefore welcome that the evaluation will also assess the impact of the provisions in the Directive on the competitiveness of the Batteries Industry within the EU.

The battery market is very dynamic with many recent technological and market developments, and we believe that the Battery Directive should be made fit for these fast-paced changes. Any revised legal text should be able to respond more quickly to any such new development. The objective must be to put in place a regulatory level-playing field for all battery technologies while, at the same time, ensuring business certainty for battery producers and all operators in the battery value chain. For the evaluation process this means that administrative principles (such as producer responsibility, financing or reporting requirements) should be designed in a way to guarantee stability for the market, while technical elements (such as addressing emerging battery technologies) should be flexible to satisfy the requirements of sustainable development.

2. Link with EU's ambition to promote a circular economy: We welcome the reference to circular economy in the EC Roadmap. Our sector is among the frontrunners when it comes to circular economy, as almost all automotive and industrial batteries are collected at end-of-life. Lead-based batteries, for example, are to almost 100% collected and recycled. In order to further improve collection and recycling processes, and to guarantee the safety of these processes, we ask to include a reference in the Batteries Directive to the forthcoming IEC

standard (IEC 62902) on labelling of batteries according to their chemistry. The objective of this suggestion is not to replace the current labelling of automotive and industrial batteries (‘crossed-out wheeled dust bin), but to add colored background labels to facilitate collection, sorting and, ultimately, treatment of these batteries.

We also believe that it is important to assess the impacts of the second-life of batteries on the whole life-cycle of batteries, including the end-of-life stage, from a producer responsibility and warranty point of view.

3. Legal and regulatory coherence with other pieces of EU legislation (End-of-Life Vehicles Directive, REACH etc.): We deem it as essential to assess and improve the legal and regulatory coherence of the Batteries Directive with other pieces of EU legislation (End-of-Life Vehicles Directive, REACH etc.). The Batteries Directive should be the primary legislative instrument used to regulate environmental, health and safety aspects of battery manufacturing, use and waste. This means that the overlaps between the Batteries Directive, the REACH Regulation and the End-of-Life Vehicles Directive should be identified and addressed to ensure that the legislative framework impacting EU battery technologies is coherent and simplified.

Fundamentally we believe that decisions about which battery chemistry to use for a given application should be left to the markets, meaning producers of batteries and those using them. Any decision to substitute one battery chemistry for another must first include consideration of required performance (as these products are often used as back-up equipment providing safety functionalities), the analysis of the environmental impact from cradle to grave along with a consideration of socio-economic aspects.

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About EUROBAT:

EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has 53 members from across the continent comprising more than 90% of the automotive and industrial battery industry in Europe. The members and staff work with all stakeholders, such as battery users, governmental organisations and media, to develop new battery solutions in areas of hybrid and electro-mobility as well as grid flexibility and renewable energy storage.

For more information, please visit www.eurobat.org or contact the office in Brussels.