



## Circular Economy Action Plan and Industrial Strategy recognise the need for a coherent legislative framework on batteries

- EU Industrial Strategy correctly identifies the battery sector as strategic, but fails to recognise the relevance of all battery technologies and applications
- Circular economy is a key pillar of the EU Green Deal: batteries are a great example of effective collection and recycling
- Coherence across different initiatives is needed to promote battery manufacturing, including industrial strategy, circular economy and substance management

Brussels, 10 March 2020 - EUROBAT welcomes the publication of the EU Industrial Strategy and Circular Economy Action Plan, and in particular the focus on batteries. Batteries are a key enabling technology for achieving our decarbonisation targets across several sectors, from energy and transport to logistics and telecommunications. We therefore welcome the call to work in a strategic and coherent way to address the needs of key sectors for the decarbonisation of the economy. The European Battery Alliance is clearly a positive example in this sense.

However, we regret that the strategy fails to recognise the diversity of applications and technologies present in the battery market today – all battery technologies (lead, lithium, sodium and nickel-based batteries) are needed to achieve the EU's decarbonisation targets across a variety of sectors. Energy storage and motive power batteries (i.e. forklift trucks) also have considerable potential in this sense. Europe must take a lead in creating a positive environment and regulatory framework that enables all battery technologies and applications to grow. The battery industry currently represents over 30,000 jobs in Europe, and the expected growth in demand will ensure jobs and important opportunities in the coming years. A coherent policy framework across different initiatives is needed to support this growth.

We therefore welcome the upcoming legislation on batteries and the revision of the End of Life Vehicles Directive announced in the Circular Economy Action Plan. We believe that this is the occasion to finally develop a coherent legislative framework on batteries and to solve inconsistencies and overlaps, to ensure business certainty, investments and predictability. We therefore call on the Commission to work coherently across different legislative initiatives, including, for instance, the soon-to-be-released Chemicals Strategy for Sustainability. We advocate for all different risk management options for strategic battery materials, such as binding occupational exposure limits (OEL), to be considered before a substances ban, which could place EU manufacturers at a competitive disadvantage or even prevent the further development of the European battery industry.

The principle of circular economy is central to the Green Deal and must be respected in all sectors. Industrial and automotive batteries already have a strong track record of collection and recycling in the EU. In particular, lead-based batteries are collected and recycled at the end of their life, and the materials are used to manufacture new batteries in a closed-loop system. The recycling of materials used in batteries will be of key importance to ensure resource availability, climate change mitigation and environmental protection.

**MEDIA CONTACT:** *Gert Meylemans*



+32 2 761 1653 / +32 475 565 6561



[gmeylemans@eurobat.org](mailto:gmeylemans@eurobat.org)



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EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has more than 50 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.

