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Position paper on Revision of EU legislation on registration, evaluation, authorisation and restriction of chemicals

EUROBAT welcomes the Commission Inception Impact Assessments for a revision of Regulation (EC) No 1907/2006 of the European Parliament and of the Council concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH).

All battery technologies use substances that have hazardous properties. For instance, lead, cobalt, nickel and cadmium are commonly included in batteries. EUROBAT agrees that the risks to human health and/or the environment resulting from the use of hazardous substances need to be properly managed. The risk of exposure for workers along the value chain is already addressed through the proper enforcement of the existing EU legislative framework (e.g. REACH and Occupational Health and Safety legislation). REACH incorporates mechanisms which allow for the creation of risk management measures targeted at the use of substances at the desired stage of the battery life.

As a consequence, EUROBAT urges the European Commission to – through the revision of REACH – continue to improve the interface with other pieces of legislation, and make use of the well-established and effective REACH and OSH Regulations when regulating hazardous substances. Multiplying competing processes to regulate hazardous substances, for example as suggested in the new Batteries Regulation, does not enhance the effectiveness of worker and environmental protections, but creates instability that is detrimental to the sustainable growth of a new industry needed for the energy transition.

Moreover, EUROBAT acknowledges the inclusion of the Essential Use Concept (EUC) and welcomes the policy debate that has arisen. We strongly encourage the Commission and Member States to carefully consider the need for the EUC and, subsequently, its scope of applicability. EUROBAT is convinced that open discussions on this topic, that includes all relevant stakeholders, need to take place.

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.

