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## **Standardisation as a strategic tool for EU Industrial Policy**

In May 2021, the European Commission presented an update of its Industrial Strategy. In this document, the Commission refers to a forthcoming strategy on standardisation for a more assertive stance on European interests in standardisation.

As EUROBAT, the Association of European manufacturers of automotive and industrial batteries, we agree that standardisation is a highly strategic activity and can offer competitive advantages. European battery standards are mainly developed by the European Committee for Electrotechnical Standardisation (CENELEC), the International Electrotechnical Commission (IEC), and, for EV batteries, also by the International Standards Organization (ISO) and within the United Nations Economic Commission for Europe (UNECE). European battery manufacturers, as well as other operators involved, are participating actively in the standardisation process and are chairing numerous battery-related international standardisation committees. There is a relation between international and European standards, and standards developed in Europe can become internationally agreed standards, fostering European leadership in standards-setting and promoting European competitiveness.

A clear indication that the European Commission sees the strategic value of battery standards, are the related provisions in the new Batteries Regulation, proposed in December 2020. The Batteries Regulation is particularly relevant because it is the first example of Environmental legislation 2.0, and we could expect that the legislative approach used for this file will be replicated also in other proposals. For this reason, we see quite some concerns with the Commission's proposal on batteries when it comes to standardisation, since it could have some negative effects on the competitiveness of the EU battery industry.

According to the proposed Batteries Regulation, the Commission is planning to task the development of common specifications to the Joint Research Centre. These common specifications would replace standards if the relevant harmonised standards developed by CEN/CENELEC "are not sufficient" (Art. 16.b). This would mean a substantial deviation from the New Legislative Framework (NLF) and not ensure the same level of stakeholders' participation, openness to all operators involved, and transparency as when using the CEN/CENELEC framework to develop European standards.

Looking for alternative or complementary technical specifications for no other reason than because European Standardisation Organizations (ESOs) and the Commission temporarily fail to find a common understanding on a standardisation request would be a step backwards and potentially not bring Europe forward in the development of competitive batteries for the challenges of the Green Deal.

Besides, common specifications developed by the Joint Research Centre would not have the same weight of CEN/CENELEC standards when it comes to developing international standards, with the concrete risk of damaging the ability of Europe to influence international standards making and the competitiveness of European products on the global market.

CEN/CENELEC is best positioned as an independent facilitator between industry, consumers and regulators to proactively support European competitiveness, the protection of the environment and sustainable growth for the wellbeing of all citizens. European standards are driven by business and prepared through a transparent, balanced and consensus-based process in which all relevant stakeholders are involved.

For that reason, EUROBAT welcomes the intention of the Commission to present a strategy on standardisation and support a more assertive stance on European interests in standardisation. However, Article 16 of the draft Batteries Regulation should be modified to recognise the key role of CEN/CENELEC and to avoid a conflict of attribution between standardisation committees and the Joint Research Centre.

### **About EUROBAT**

*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.*

