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## **EUROBAT Feedback on EC Roadmap on the Evaluation of the EU End-of-Life Vehicles Directive**

EUROBAT welcomes the EC Roadmap on the evaluation of the EU End-of-Life Vehicles Directive.

Our industry believes it is particularly essential that the evaluation will look at possible inconsistencies and overlaps of the Directive with the circular economy and waste legislation, in particular the Waste Framework Directive, REACH and the Batteries Directive. It is also important to evaluate if the ELV Directive reflects the aims of this legislation such as the five step waste hierarchy, life-cycle thinking and resource efficiency. Ensuring consistency of the broader enabling and regulatory framework (Clean Energy Strategy, Mobility Packages, EU Trade Policy, etc.) in support of batteries has also been identified as objective of the European Battery Alliance and the European Commission's Action Plan. A consistent EU regulatory framework for batteries is the pre-condition to boost the manufacturing of all battery technologies in Europe.

Additionally, we would request that Commission evaluate the existing ELV exemption criteria to ensure consistent with other waste legislation substance restriction exemptions criteria such as RoHS (Article 5(1)) where for example the availability of substitutes and the socio-economic impact of substitution, as well as life-cycle thinking on the overall impacts of the exemption apply.

### **About EUROBAT**

EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has 52 members from across the continent comprising more than 90% of the 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, renewable energy storage and demand response services. More information on our website [www.eurobat.org](http://www.eurobat.org).