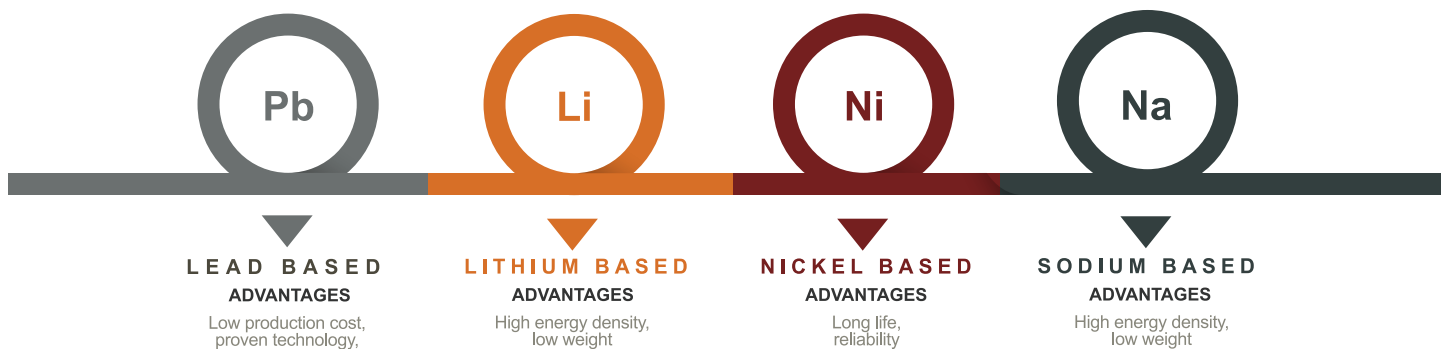


## STANDING TOGETHER FOR THE PRESERVATION OF SUSTAINABLE BATTERY PRODUCTION IN EUROPE

### GENERAL INFORMATION ON THE SECTOR:

Batteries have a broad range of uses. They are used in the consumer sector (e.g. smartphones, power tools and e-bikes), as stationary energy storage (e.g. emergency power supply, renewable energy), as traction batteries (e.g. electric vehicles) or as classic car batteries (also increasingly as start-stop batteries).

### BATTERY TECHNOLOGIES AND APPLICATIONS



Batteries also play a significant role in the shift towards more electro-mobility. Today, every electric and hybrid vehicle has both a lithium-ion traction battery and at least one lead-based battery, which is particularly essential for safety functions. Batteries are equally indispensable in machinery and mechanical engineering (e.g. industrial trucks, driverless transport systems). Batteries are also a necessary component of the infrastructure of telecommunications equipment.

The European battery sector employs 30,000 people, achieving annual sales of some € 6.5 billion across all battery technologies. Battery manufacturers are established in a total of 16 member states. Companies in the sector have invested nearly € 1 billion in research and development over the last five years. They manufacture batteries for both domestic and global markets.

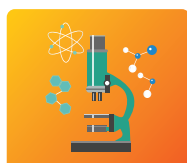
OVER **30.000** EMPLOYEES IN EUROPE



MORE THAN

**30**

battery manufacturing plants



**16**

research centers



OVER

€ **6.5** BN

annual turnover



MORE THAN

**50**

Manufacturers and Associate members from across the value chain

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## WHAT CHANGES DO EU INSTITUTIONS PLAN?

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Currently, legislative decisions or changes are in the works in the field of environmental policy, which have the potential to represent a threat to battery manufacturing in Europe.

Envisaged regulations on the use of substances that are essential for the functioning of batteries (such as lead and lead compounds, cadmium and cadmium compounds, cobalt compounds, nickel and nickel compounds) threaten massive job losses and plant closures. Lead, as an example: due to the extensive dependence of various applications on the lead-based battery (particularly in the automotive industry), potential substitution options are not likely to prevail in the medium term. In this context, European and national legislators must consider that there is already comprehensive legislation in place covering the production, use and after-use phases of the product. An authorisation procedure according to REACH would not lead to any additional improvements in terms of environmental protection or occupational safety.



Because batteries are manufactured and marketed globally, special European regulations would create a tremendous disequilibrium in global competition. For example, manufacturers outside the EU need no REACH authorisation for batteries imported into the EU and containing SVHC substances (Substances of Very High Concern). So, the competitiveness of the European battery industry would be gravely undermined. This would also be counter to the principles of the European Commission's battery alliance, which has set itself the goal of strengthening Europe as a battery production location.

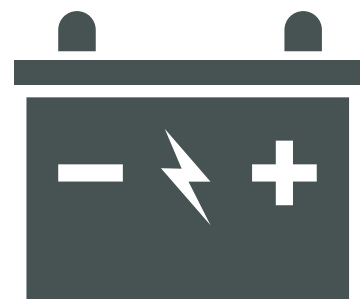


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## WHAT ARE THE GOALS OF THE EUROPEAN BATTERY SECTOR?

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The European battery industry favours an across-the-board increase in the consistency of relevant EU directives, working towards harmonisation of substance risk management requirements. Several European regulations contain requirements for the handling, use or restriction of active battery substances. Metals and metal compounds used in batteries are among a group of chemical substances that are already subject to comprehensive regulation. Aware of the potential risks of these substances, the sector already applies comprehensive measures to protect the environment and employees, which go beyond the legal requirements. There is no chance of the user being exposed to these substances, if proper use conditions for the battery are respected.



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# THE EUROPEAN BATTERY INDUSTRY THEREFORE PROPOSES THE FOLLOWING:

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## 1. EU Battery Directive:

The European Commission is currently reviewing the Batteries Directive. A proposal for a revised directive is expected in 2020. The European Commission has set itself the goal of developing and manufacturing safe and sustainable batteries in Europe - a goal which we wholeheartedly support. Automotive and industrial batteries are already part of a closed product loop today, 'and have the world's highest collection rate, over 99%, in the case of lead-based batteries.' The objectives of the battery industry are as follows:

- To revise the Batteries Directive by putting the focus on the sustainability of batteries (full product cycle of putting on the market, use phase, end-of-life and recycling).
- To transfer provisions on batteries from other directives into the Batteries Directive to prevent duplicate regulations.
- To regulate the chemical properties of different battery technologies through European chemicals legislation (REACH, CLP etc.), while considering all risk management options.
- To unambiguously identify the electrochemical system of batteries, thus improving the separate collection and processing of used batteries.
- To establish a regulatory framework for the second use of batteries ('second life').



## 2. End-of-life Vehicles Directive (ELV):

To continue to allow the use of lead-based batteries and maintain the exemption for lead-based batteries because:

- No substitution options exist in the medium term.
- A high resource availability of lead is ensured with end-of-life batteries providing the raw materials to make new products.
- A high collection and recycling rate of 99% and high recycling efficiency for lead batteries is achieved.
- The evaluation of battery technologies must not be based only on technical criteria, since the significance of existing battery technologies plays a critical role for the European employment situation.



## 3. REACH Regulation:

The industry requests that suitable risk management options be assessed early in the regulatory process so that active substances for batteries are not included on the REACH authorisation list if more appropriate and proportionate measures are available. In many cases risks to human health are restricted to the workplace given that batteries are sealed units that are effectively recycled at end-of-life through requirements of the Battery Directive. Risks may therefore be more proportionately addressed through existing occupational health & safety legislation (OSH) and through adoption of Occupational Exposure Limits that are protective of health:

- There are EU-wide legally binding occupational exposure limits in place for lead and compounds (up for revision), agreed in trilogue and in the process of being published in the Official Journal of the EU for cadmium and compounds, already included the 4th wave of Carcinogens and Mutagens Directive (CMD) revision for nickel and compounds, and in the work program of ECHA Risk Assessment Committee (RAC) for cobalt and compounds, and lead and compounds

**EUROBAT is the association of European manufacturers of automotive batteries, industrial and energy storage batteries. EUROBAT has more than 50 member companies covering some 90% of the European battery sector. The member companies are developing new battery solutions with all stakeholders, including for hybrid vehicles, electromobility, network flexibility and renewable energy storage systems.**

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