

## EUROBAT statement on Industrial Emissions Directive revision (2 March 2022)

EUROBAT members support the European Commission's Green Deal objective to review measures to address pollution from large industrial installations.

Batteries are critical to the fight to decarbonize our economy and tackle climate change. All battery technologies - lead, lithium, nickel and sodium based batteries — are needed to support the decarbonization of the transport, energy, logistics, and telecommunications sectors. Europe must indeed take the lead in designing and building the most environmentally sustainable energy storage solutions and supporting the development of its battery industry.

EUROBAT understands that battery production is one of the industrial activities currently under review. However, it is important to point out that the goal of the Industrial Emissions Directive should focus on **regulating industrial production processes** through Best Available Techniques (BAT), **rather than specific industries**.

The critical industrial processes commonly used in the production and recycling of batteries are already included in the scope of the Industrial Emissions Directive.

Besides, the industrial and automotive battery industry is an example in which a great variety of different technologies exist and as a consequence a great variety of industrial processes are concerned.

Lithium, lead, sodium and nickel batteries are produced within the EU for very different applications, and the impact of production and of the individual industrial processes can vary considerably. In addition, batteries are complex products, consisting of connected individual cells or groups of cells. Often enough involving various actors along the value chain. It is therefore extremely impractical, if not impossible, to properly regulate "battery production" as such in under the IED.

Also it needs to be considered that a battery manufacturing site does not necessarily have all critical processes integrated onsite and that these critical processes can also be allocated to the supply chain. Regulating the respective processes rather than a manufacturing site would be far more effective to mitigate potential risks and enhance sustainability.

Typical processes that are used in the battery manufacturing supply chain are

- The processing of non-ferrous metals (IED, Annex I, No. 2.5 b) is a key process for the manufacturing and recycling of all batteries. In the case of lead based batteries, this is typically an integrated part of the manufacturing site. In case of Lithium based batteries this process (production of copper and aluminum foils) typically is allocated to the supply chain and not integrated into the battery manufacturing site.
- The production of metal oxide (cathode material) is already subject to IED as regulated under Annex 4.2 e (Production of inorganic chemicals, such as (e) non-metals, metal-oxides or other....).

Also it needs to be verified to which extent the production of anode material is already subject to the requirements of Annex VII (Technical provisions relating to installations and activities using organic solvents).

Also it has to be considered that when regulating processes rather than individual industries, the scope of the regulation is automatically extended beyond the individual industries.

We therefore suggest the Commission to refrain from including “battery production” under the to-be-revised Industrial Emissions Directive. We recommend identifying processes that are relevant for the manufacturing of batteries and regulate these processes under IED.

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### **About EUROBAT**

EUROBAT is the leading association for European automotive and industrial battery manufacturers, covering all battery technologies, and has more than 50 members. The members and staff work with all policymakers, industry stakeholders, NGOs and media to highlight the important role batteries play for decarbonised mobility and energy systems as well as all other numerous applications.

