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EUROBAT high level statement on the revision of the End-of-Life Vehicles Directive

Overregulation and overlapping standards must be avoided at all cost

The European automotive and industrial battery industry would like to provide its expert input into the ongoing review of the End-of-Life Vehicles Directive (ELV Directive). The industry wishes to stress the need for the Directive to ensure consistency across all legislation affecting batteries, particularly the upcoming Batteries Regulation and the review of REACH. Overregulation and conflicting mandates risk preventing batteries from contributing to achievement of the ambitious 2030 and 2050 EU climate targets, and puts additional pressure on national regulatory authorities' monitoring and enforcement budgets.

Batteries Regulation: We call for batteries to be excluded from the scope of the review of ELV Directive because of the clear provisions included in the Batteries Regulation proposal regarding design, hazardous substances and extended producer responsibility. A parallel regulation of the same issues in the ELV Directive would only create an administrative burden for industry and regulatory authorities across member states. A reference to batteries in the ELV Directive could be added to the proposal only if accompanied by a statement that the Batteries Regulation is the principal legislation regulating batteries.

REACH Regulation: The management of hazardous substances under the ELV Directive needs to be consistent with REACH and other relevant waste legislation, and socioeconomic considerations as well as the availability of technically equivalent alternatives for batteries must be included in the ELV Directive review.

Scope: If the scope of the Directive is indeed going to be extended beyond M1/N1 type approved vehicles, the related restrictions need to be assessed for those additional vehicle categories specifically.

We look forward to continuing to work with the European Commission and other stakeholders to ensure the review of the Directive provides a long-term and well-functioning regulatory framework for batteries and their value chain.

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. www.eurobat.org

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