
11 March 2026

General Feedback

EUROBAT, the Association of European Automotive and Industrial Battery Manufacturers, welcomes the Battery Booster Facility as a vital response to the ramp-up challenges facing Europe's battery ecosystem amid global overcapacity and subsidy distortions. The Battery Booster Facility, with its €1.5 billion interest free loan mechanism, recognises high scrap rates, yield optimisation, and quality validation critical during the ramp-up phase and will complement the Net Zero Industry Act and Strategic Action Plan for Batteries.

However, the current draft unduly restricts access due to two restrictive eligibility thresholds, namely limiting support to **electric vehicle (EV) battery cell production only** and **to site a capacity of ≥ 10 GWh**. Together, these conditions risk unnecessarily narrowing the scope of the Facility, and excluding important segments of Europe's battery ecosystem, in particular they would exclude:

- Cell production for other industrial battery applications, such as semi-traction, motive power off-road vehicles and for stationary energy storage, the latest vital for grid expansion, stability and reliability
- Capacity expansions by established EU battery manufacturers, despite the that scaling up existing production capacities is critical to strengthening Europe's domestic battery industry
- Battery technologies with high degree of recyclability fitting the Circular Economy drive and the Critical Raw Material Act. Batteries that are needed for critical infrastructure since an increasing share of UPS batteries are coming from country posing a serious and structural risk to security.

Smaller-scale facilities (<10 GWh) which play an important role in supporting the production output and/or supply chains of the large EV cell production gigafactories

EUROBAT therefore recommends broadening eligibility criteria by specifically stating that the EU support applies to all sustainable battery chemistries and reconsidering the ≥ 10 GWh site threshold. This would ensure that the BBF would support the full diversity of Europe's battery ecosystem and maximises its impact of Europe's industrial competitiveness, cybersecurity and energy transition.

Article 2: Definitions

The 'ramp-up phase' (2b) definition is precise but EV-centric.

Recommendation: Amend 2b to: "'ramp-up phase' means the transitional period of a production site for [battery cells for electric vehicles, energy storage systems, or any other industrial application](#), or parts thereof, starting with the conclusion of the production part approval process until the production output reaches 90% of the nameplate production capacity, sufficient first-pass-yield levels in their production, quality compliant with off-take demand requirements, and operational stability of the installation, while progressively increasing production output; "

Article 3: Objective

Issue: Limits to "electric vehicle applications" excludes energy storage and industrial battery production critical for Europe's manufacturing base and grid flexibility.

Recommendation: Revise to: "The objective of the Facility is to support projects concerning battery cell production facilities [for electric vehicles, energy storage systems, and other industrial applications](#) in the ramp-up phase."

Article 5: Implementation and form of support

Issue: 5(2) repeats EV limitation. The €500M cap (5(3)(ii)) represents 33% of total funding, potentially favouring mega-projects over diversified support.

Recommendation:

- Amend 5(2) to reference "[battery cells for electric vehicles, energy storage systems, and industrial applications](#)" per Art 3 revision.
- Consider lowering cap or scaling by project size (e.g. € [X] M per GWh capacity) to enable broader distribution across more facilities.

Article 6: Eligibility

Critical issues:

- 6(2)(c): 10 GWh minimum excludes existing <10 GWh sites and smaller-scale producers critical to gigafactory supply chains.
- 6(2)(d): "First full commercial scale production of electric vehicle battery cells, at global level" disqualifies expansions and established EU firms with prior global production. Also, same recommendation as for Art.3 applies.

Recommendations:

- Delete 6(2)(c) or lower to include supply chain-critical projects.
- Revise 6(2)(d) to: "At the time of application, the project [constitutes the first commercial-scale production site in the EEA for battery cells by the final recipient, or a significant capacity expansion \(≥50%\) thereof.](#)"