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## Europe needs an ambitious regulatory framework to guarantee sustainability of batteries

Adopting sustainability requirements for batteries is crucial, as the electrification and decarbonisation of various sectors, such as mobility and energy storage, depends on the rechargeable battery technology. Lithium-ion batteries represent a rapidly growing global market which warrants an EU level response to avoid lock in to linear sub-standard industrial patterns and give a competitive advantage to EU industry to compete on quality. To fully capture the benefits of decarbonising the economy through electrification we need to address the environmental impact of battery production in terms of CO<sub>2</sub> emissions, resource depletion and ethical sourcing.

Although batteries will be an essential product in the EU's pathway to decarbonization, their material composition and non-use phase impacts necessitates that they are viewed as highly valued and strategic products from the EU environmental policy point of view. In the context of sustainable production and consumption, this means accelerating the roll out of well-designed clean, circular and durable batteries, while avoiding stifling innovation or that unnecessary, wasteful and polluting products reach the market. If batteries are made easy to refurbish, re-use and maintain for as long as possible, there is also an occasion to create new local jobs in the EU.

Following the discussions at the stakeholder meeting on the preparatory study on Ecodesign and Energy Labelling which took place on 2<sup>nd</sup> May, we are concerned about the lack of a clear vision on what could be an ambitious, effective, and fit-for-purpose European regulatory framework for batteries.

### A robust stand-alone European Regulation for sustainable batteries.

In that respect, we call for an ambitious set of rules regarding the sourcing of raw materials, the design and manufacturing stages of batteries, as well as the necessary information to be conveyed to end users and the supply chain actors to be set in **(a) European Regulation(s)**. Batteries put on the single market must have robust sustainability requirements ensuring, *inter alia*:

- A **reduced carbon footprint** over the whole product value chain and the full production cycle.
- An **ethical and responsible sourcing** of raw materials.

- A **circular design**, incorporating recycled material and facilitating the reuse, repurposing, remanufacturing and ultimately recycling.
- **Transparent communication and tracking of performance** across these criteria and on material/chemical contents to end users and supply chain actors.

Although it became increasingly clear that these rules will not be set under the framework of the Ecodesign Directive, we urge the Commission to keep a high level of ambition in terms of legal instruments and requirements to place batteries on the EU market. A Regulation has the potential to set harmonized rules across the single market, reduces the risks of fragmented national implementation, and will apply to all batteries placed on the EU market. Similarly high ambition should apply to the **revision of the Batteries Directive**, which we expect to set high collection and recycling targets for critical battery materials, clearly define the responsibilities of each actor in the value chain and drive the circularity of batteries. This would reinforce and complement the requirements to be set for the design stage and the placement on the market outlined in this letter.

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