

May 2007

Eurobat position on car batteries in REACH

On behalf of the European automotive battery industry and in the context of the ongoing discussions on REACH (RIP 3.8), Eurobat would like to present the following arguments regarding the definition of car batteries:

Car batteries need no maintenance from the car owner. The only personnel which may be involved from time to time in maintenance operations are trained professionals. Under normal or reasonably foreseeable conditions of use, there is no intention of preparation (electrolyte) release.

Car batteries can therefore not be considered as containers with a substance inside and even less as a substance or preparation as defined in Article 3.1 or 3.2 of REACH.

Car batteries are articles as defined in Article 3.3 of REACH.

Eurobat calls upon the European Commission to implement a simple and realistic definition of car batteries in the framework of REACH. Car batteries are articles as defined in Article 3.3 of REACH and not substances or preparations as defined in Article 3.1 or 3.2 of REACH.