
Battery eco-design regulation: how to turn an opportunity into a threat?

In view of the first stakeholder meeting on the development of eco-design regulation on batteries, EUROBAT, the Association of European Automotive and Industrial Battery Manufacturers, expresses its concern on the scope of preparatory study and the possible application of the future eco-design regulation.

We absolutely agree with Vice-President Maroš Šefčovič on his intention to make Europe a world leader in green batteries. We also believe that eco-design regulation could be a positive tool to support the development and production of green batteries in Europe. However, **we fear that legislation applicable indiscriminately to all industrial batteries will have detrimental effects on the European battery industry**, but also on customers and users as they will be forced to source products that may not be the best suited for their application. Today, industrial batteries as defined in the Battery Directive include extremely different applications, from xEVs traction batteries to energy storage (residential and grid-level), UPS systems, telecom towers and industrial vehicles (cranes, forklifts, etc.). For instance, energy density is relevant only in those segments where weight is an issue, like for instance in e-mobility applications.

Requirements among industrial batteries are extremely different, depending on the specific application, and it is therefore very difficult to think about a single eco-design regulation to cover all sectors. Besides, each battery technology currently available on the market (lead, lithium, sodium and nickel) is best suited to serve specific market segments, thanks to their different features. For this reason, we call the Commission to **respect the diversity of applications and requirements in the industrial battery market sector**, avoiding legislative proposals that would damage the European Battery industry in specific market segments. In particular, we believe that **the scope of the eco-design must be limited to e-mobility applications**, because of their decarbonisation potential and their forecasted growth in the coming years.

Finally, we find simply unacceptable that such an important initiative risks to have detrimental effects for the European battery industry due to the urgency to have it approved fast. “Lack of time” is mentioned four times in the first task report, and the deadlines to comment on each task are extremely tight. We therefore call the Commission to **favor properly developed legislation over rushed one**, dedicating to this exercise the time that such an important industry deserves.