

**Battery industry comments on**  
**Directive for the revision of the Directives on**  
**End-of-life vehicles, waste batteries and accumulators and waste electrical and**  
**electronic equipment**

**Amendment 24 European Parliament adopted position**

Brussels, 30 May 2017

The undersigned associations representing the battery industry in Europe are strongly calling representatives participating in the Trilogue meetings on the above Directive to oppose amendment 24 as proposed by the European Parliament (annexed). This amendment requests the European Commission to review by 31 December 2018 the Battery Directive taking into account *'[...] the technical development of new types of batteries that do not use hazardous substances, in particular no heavy or other metals or metal ions'*.

We believe that the objective to promote the removal of metals or metal ions is neither sound nor unrealistic in the short to medium term. Based on the information that we have on the research project exploring organic polymer based battery technology (polymer Redox-Flow Batteries) which has apparently inspired this amendment, we believe that great caution is needed since some of the organic products which are being used are considered to be dangerous and may pose a hazard to the environment. Another organic material used in the research is considered to be corrosive.

Also this proposed amendment would exclude 80% of the elements from the periodic table of elements from being used for energy storage purposes. This would be an enormous obstacle for the potential to develop advanced batteries in Europe.

Finally, the voltage level of these batteries is not compatible with the voltage that is commonly used to let an appliance run, and the energy density of these batteries is significantly lower than consumer primary batteries which are currently on the market. This would mean that the battery compartment of an appliance needs to be 50 – 100 times the size of what is currently being used in order to get the same energy as today, which would be unacceptable for any application.

Based on the information that we have, we are of the opinion that this technology is not yet ready for mass production. Although we welcome any research on new battery technologies, the actual commercialisation of it should be market driven and not be pushed by legislation. For this reason, the requirement to conduct an impact assessment is premature based on the above-mentioned arguments.

Whether batteries contain metals, or benefit from metal ions or not, should not be the decisive criteria. The question is whether the system is environmentally friendly or not. The evaluation of battery technologies should no longer focus on the intrinsic properties of single substances or substance groups, but should consider the overall environmental, social and economic impact during the entire lifecycle. The proposed amendment by the European Parliament does not pass this litmus test. Batteries containing metals is a very efficient way, in a circular economy perspective, to ensure the high recycling efficiencies, enshrined in the battery directive, can be met.

**About EPBA**

The European Portable Battery Association is the authoritative voice of the portable power industry. It supports the common interests of its members regarding portable batteries and battery chargers with European institutions and other leading international bodies to provide consumers with complete power solutions which are sustainable across their life-cycle.

**About EUROBAT**

EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has 52 members from across the continent comprising more than 90% of the battery industry in Europe. The members and staff work with all stakeholders, such as battery users, governmental organisations and media, to develop new battery solutions in areas of hybrid and electro-mobility as well as grid flexibility and renewable energy storage.

**About RECHARGE**

RECHARGE aisbl is the Advanced Rechargeable and Lithium Battery Association. RECHARGE is representing the specific interests of the Rechargeable Battery Industry in Europe. RECHARGE's mission is to promote the value of rechargeable batteries through their life cycle. RECHARGE's Membership includes Rechargeable Battery Manufacturers, Original Equipment Manufacturers, Rechargeable Batteries Recyclers and Raw materials suppliers to the Battery Industry.

## Annex – Amendment 24

### Proposal for a directive

#### Article 2 – paragraph 1 – point 2 – point b a (new)

Directive 2006/66/EC

Article 23 – paragraph 3 a (new)

*Text proposed by the Commission*

*Amendment*

*(ba) The following paragraph is added:*

***“3a. By 31 December 2018, in the context of Circular Economy Action Plan and in view of the Union’s commitment to make the transition towards a circular economy, the Commission shall review this Directive as a whole and in particular its scope and the targets, based on an impact assessment. That review shall take into account the Union’s circular economy policy objectives and initiatives, and the technical development of new types of batteries that do not use hazardous substances, in particular no heavy or other metals or metal ions. The Commission shall also examine the possibility of setting resource specific targets, in particular for critical raw materials. That review shall be accompanied by a legislative proposal, if appropriate.”***