

## EUROBAT feedback on the draft Commission Implementing Regulation establishing the format of the carbon footprint declaration for batteries in accordance with Regulation (EU) 2023/1542 of the European Parliament and of the Council (28 May 2024)

### EUROBAT recommendations for the finalisation of the implementing act:

- The carbon footprint declaration should include a reporting period, or date of validity of the label, reflecting the duty to re-calculate the carbon footprint of a battery when it increases by more than 10%.
- A resolution expressed in grams of CO<sub>2</sub>-equivalent/kWh is not defined, and no information is available on how it should be calculated and verified, neither in the 2023 draft JRC Report nor in other official documents.

EUROBAT, the Association of Manufacturers of Automotive and Industrial Batteries, welcomes the upcoming adoption of a methodology for determining the carbon footprint of electric vehicles. EUROBAT maintains its support for the introduction of a carbon footprint declaration, performance classes and maximum thresholds to promote green batteries made in Europe.

Nonetheless, EUROBAT considers that several elements of the proposed format of the carbon footprint declaration need to be amended to ensure that it can be applied in practice and its enforcement properly monitored by notified bodies, and that it properly reflects the climate impact and benefits of the battery value chain, also in line with our proposed changes to the [draft delegated act on the methodology](#).

### 1) Duty to draft a new carbon footprint declaration in case of an increase of 10% or more in the amount of CO<sub>2</sub>-equivalent emitted.

The draft delegated act on the methodology for calculating the carbon footprint does not specify the timeframe over which the manufacturer must check if a 10% increase in the total amount of CO<sub>2</sub>-equivalent emitted has happened, and if, in turn, a new carbon footprint declaration should be drafted.

If, over the course of time, due to changes in the bill of materials, changes in the origin of the materials, changes in processes, changes related to the use of electricity and other auxiliaries, or any other changes, the amount of CO<sub>2</sub>-equivalent emitted increases by more than 10% compared to the carbon footprint calculated, this shall be considered a change to the battery's technical characteristics relevant for the requirements of Regulation (EU) 2023/1542 and thus for the new battery model a new carbon footprint shall be calculated and a new carbon footprint declaration shall be drawn up.

It may be that changes in the carbon footprint need to be verified by the manufacturer at the point when the carbon footprint performance class of the battery model needs to be declared, in line with point 8 of Annex II of

the Batteries Regulation. So far there is a lack of information on the exact conditions triggering the obligation to draft a new carbon footprint.

There is a similar omission in the draft implementing act on the format, which fails to include a reporting period, or date of validity of the label, reflecting the duty to re-calculate the carbon footprint of a battery when it increases by more than 10% for a specific battery model.

Overall, the carbon footprint declaration should include a date of validity and the rules for the carbon footprint methodology should foresee a clear revision index, as with every quality document.

## 2) Resolution of the carbon footprint declaration

**4. CALCULATION RULES**

The carbon footprint of electric vehicle batteries shall be calculated as the amount of CO<sub>2</sub>-equivalent emitted during the life cycle stages of the battery that are within the system boundary, expressed in kilogram ('kg') CO<sub>2</sub>-equivalent, divided by the total amount of energy provided by the battery over the battery's service life determined in accordance with section 2.1. It shall be reported in kg CO<sub>2</sub>-equivalent/ kilowatt-hour ('kWh') **with a resolution of 0.001 kg CO<sub>2</sub>-equivalent/kWh.**

<b>Life-cycle carbon footprint</b>	<b>[amount] kg CO<sub>2</sub>-eq. per kWh*</b>
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There is a mismatch between the draft implementing act on the format of the carbon footprint declaration and the draft delegated act on the methodology for the calculation of the carbon footprint, with the former specifying a resolution in Kg CO<sub>2</sub>-equivalent/kWh and the latter in g CO<sub>2</sub>-equivalent/kWh.

A resolution expressed in grams of CO<sub>2</sub>-equivalent/kWh is not defined, and no information is available on how it should be calculated and verified, neither in the 2023 draft JRC Report nor in other official documents.

### About EUROBAT



Avenue de Tervueren 188A, Box4, 1150 Brussels, Belgium  
EU Transparency Register: 39573492614-61



EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has more than 50 members from across the continent comprising more than 90% of the automotive and industrial 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.