EUROBAT
Association of european automotive and industrial batteries manufacturers

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EUROBAT feedback on ANNEX to the Commission Delegated Regulation supplementing Regulation (EU) 2023/1542 of the European Parliament and of the Council as regards minimum values for the electrochemical performance and durability of rechargeable industrial batteries

EUROBAT, the Association of European Automotive and Industrial Battery Manufacturers, welcomes the European Commission's draft working document supporting the development of setting minimum requirements for the electrochemical performance and durability of rechargeable industrial batteries.

A. Strategic Position & Implications

EUROBAT welcomes the technology-agnostic approach of the forthcoming Delegated Act under Article 10, which seeks to ensure that batteries placed on the EU market are both durable and high-performing. To this regard, technology-agnosticism should not be interpreted as a call for a simplified uniform, one-size-fits-all set of stress factors and testing requirements, ***which will unintentionally discriminate against specific battery technologies.***

Given the diversity of battery technologies and the wide range of operational conditions under which battery-powered applications operate, a technology-agnostic Delegated Act must adopt a holistic and application-sensitive approach that duly reflects these fundamental differences. ***Such an approach needs a constitute a comprehensive framework that considers all stages of a battery's life cycle and its operational environment, ensuring optimal lifespan, safety, and performance under real-life application profiles*** (ex. Back-up, telecom, motive, stationary storage, LMT etc)***.***

In its current form, the delegated act disadvantages the battery industry producing state-of-the-art battery cells based on lead technology in the Europe. ***This battery technology mainly manufactured in the EU perfectly suit manifold applications and many of these applications belong to the critical infrastructure****,* such as telecommunication, intra-logistics, data centres, maintenance, railways and many others. Additionally, it is often not seen or recognized, and therefore not taken into account, that ***batteries manufactured in Europe are the dominant technology in these key segments****.* Instead, the delegated act prefers others, mainly imported battery technologies, and unnecessarily increases the dependency of Europe – not only in regard to batteries (finished goods), but also on the raw materials side. The battery technology mainly produced in Europe is maintained in a closed circle, meaning the recycling rate is close to 100% and all the materials are kept in a closed loop. ***The recycling loop for this particular battery technology has proven itself over decades to be environmentally friendly and, unlike other technologies, economically viable. This is in line with the European Union's stated goal of entering the recycling***

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industry ('circular economy'), while at the same time reducing dependence on imported critical raw materials and key technologies.

If minimum performance and durability values are set above market needs and application requirements, Article 10 will miss its fundamental goal for which it was designed as **questions regarding how to assess the true performances and environmental benefits** are essential. For instance, how should one compare the lifetime of battery with a technology that has exceptionally high recyclability to one with lower recyclability, or evaluate the deployment of long-life batteries in applications with short service lifetimes? Similarly, does re-use or re-purposing always offer a clear environmental advantage for technologies that already achieve extreme high recyclability? A robust and proportionate assessment of these complex trade-offs requires a solid technical foundation. This critical task should be entrusted to the relevant standardization bodies.

To ensure robust, proportionate, and enforceable rules for evaluating performance and environmental benefits under real-world conditions, **EUROBAT strongly recommends that the Delegated Act rely on Harmonized EN Standards developed under CEN/CENELEC Mandate M/579, as these provide the appropriate framework to define measurable and repeatable test methods while capturing both the diversity of use cases and the variety of battery technologies.**

EUROBAT calls for **additional time** to collect and provide detailed data on the performance and durability of industrial batteries, as well as to supply concrete evidence on the potential impacts across the wide range of battery applications. Furthermore, ***EUROBAT recommends that the development of EU Harmonized Standards (hENs) defining minimum requirements for this battery category be reprioritized, so that the forthcoming Delegated Act Article 10.5 can effectively build upon and integrate the results of this standardization work after***. It should be noted that, for the portable battery category, the relevant hENs were considered ready more than a year prior to the Delegated Act under Article 9.2—therefore, similar alignment and timing are essential in this case as well.

Informative:

Timeline comparison (target dates)			
Portable batteries of general use		**Industrial batteries**	
DA (BR Art. 9.2)	hEN(s) (M/579)	DA (BR Art. 10.5)	hEN(s) (M/579)
18 Aug 2027	07 Jun 2026	**18 Feb 2026**	07 Jun 2026

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B. Implementing challenges - observations

EUROBAT observations on the different points of the draft working document:

1. **The proposed measures/calculations/methodologies are not aligned or even in contradiction with existing or developing specs from system integrators / customers.**
2. **For lead-based batteries in particular, standards are often developed or adapted to meet customer-specific requirements. Therefore, this legislation may drive the creation of additional technical standards that could conflict with existing ones.**
3. **As the use of second-life applications for industrial batteries remains very limited, relevant standards and KPIs have not been established for second-life use but rather focus on end-of-life (EoL) management.**
4. **To align with real-world conditions we would need to define parameters and calculation methodologies for each application and within each application to align them for each technology used to treat the battery technologies equally; which makes it very complex.**
5. **In conclusion: Because of the diversity of applications, the legislation risks to lack consistency within the real-world conditions, therefore it will miss its purpose for which it is designed.**

- **Timelines of the standardization request and the delegated act for minimum requirements appear to be misaligned.**
- **If minimum values exceed market requirements or application demands, state-of-the-art lead-based batteries manufactured in Europe will be banned. This would have a significant impact on the market, as these battery types currently hold a market share of 70–80%, depending on the application—for example, in key sectors such as logistics, data centres, telecommunications, and maintenance.**
  Compromising the objective for circular economy, as lead-based batteries currently achieve a recycling rate close to 100%.

6. **A well-established battery manufacturing industry in the EU will be sacrificed in favour of imported batteries from outside the EU. This will create an even greater dependency on cell and block battery producers abroad, with major implications for supply chain security.**
7. **Regulatory measures in the delegated act must be technology-neutral, geopolitically responsible, and aligned with the overarching objectives of the EU Battery Regulation. Lead battery technology should be recognized as a sustainable and strategically relevant option.**

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C. Conclusions & Call to Action

EUROBAT welcomes the **technology-neutral approach** adopted to define **minimum performance and durability requirements** for batteries. However, the requirements must be **adjusted** to ensure that **all established battery technologies** can comply, taking into account **real-life operating conditions** across applications.

To establish **robust and comparable evaluation rules** for both **technical performance** and **environmental benefits** under **real-world conditions**, **EUROBAT strongly recommends** that the forthcoming **Delegated Act** be **based on harmonized European (EN) standards**.

For this reason, **EUROBAT calls for a postponement** of the forthcoming **Delegated Act under Article 10(5)**. This would allow the Act to **fully integrate the outcomes of the ongoing standardization work** under **CEN/CENELEC Mandate M/579**, ensuring alignment between regulatory requirements and tested, consensus-based methodologies.

The **battery industry is fully committed** to finalizing this work within a **reasonable timeframe** so that the Delegated Act can build upon a **solid technical foundation** and ensure **effective and equitable implementation** across all battery chemistries and applications.

Please refer to the Annex (provided as a separate file) for the core technical arguments and proposed changes.

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About EUROBAT
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EUROBAT is the leading association for European automotive and industrial battery manufacturers, covering all battery technologies, and has more than 40 members. The members and staff work with all policymakers, industry stakeholders, NGOs and media to highlight the important role batteries play for decarbonised mobility and energy systems as well as numerous other applications.