

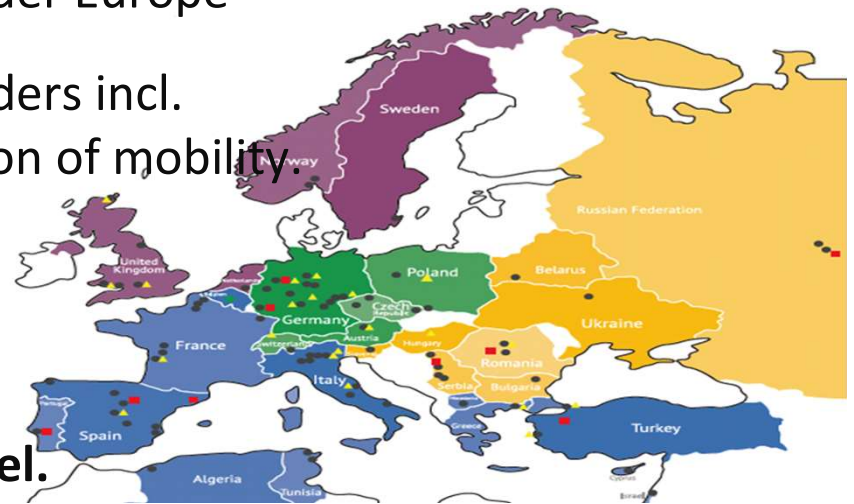
Regulatory update on Europe

Rene Schroeder
17th Asian Battery Conference
21 September 2017



About the association, its members and competitive European industry

- **Manufacturers and supply chain of automotive and industrial batteries.**
Represents industry at EU and national level.
- With **52 members from across the continent** comprising more than **90% of the battery industry** in the wider Europe
- **Exchanges expert information** to stakeholders incl. renewable energy storage and electrification of mobility.
- **Jobs in Europe are important for a strong current and future industrial base.**
- Technologies: **Lead, Lithium, Sodium, Nickel.**



1. EU Regulatory framework on batteries

Three major pieces of EU legislation:

1. End-of-Life Vehicles Directive

2. REACH Regulation

3. Battery Directive

EU Regulatory framework on batteries

Where are we in the process?

1. ELV – latest review almost completed

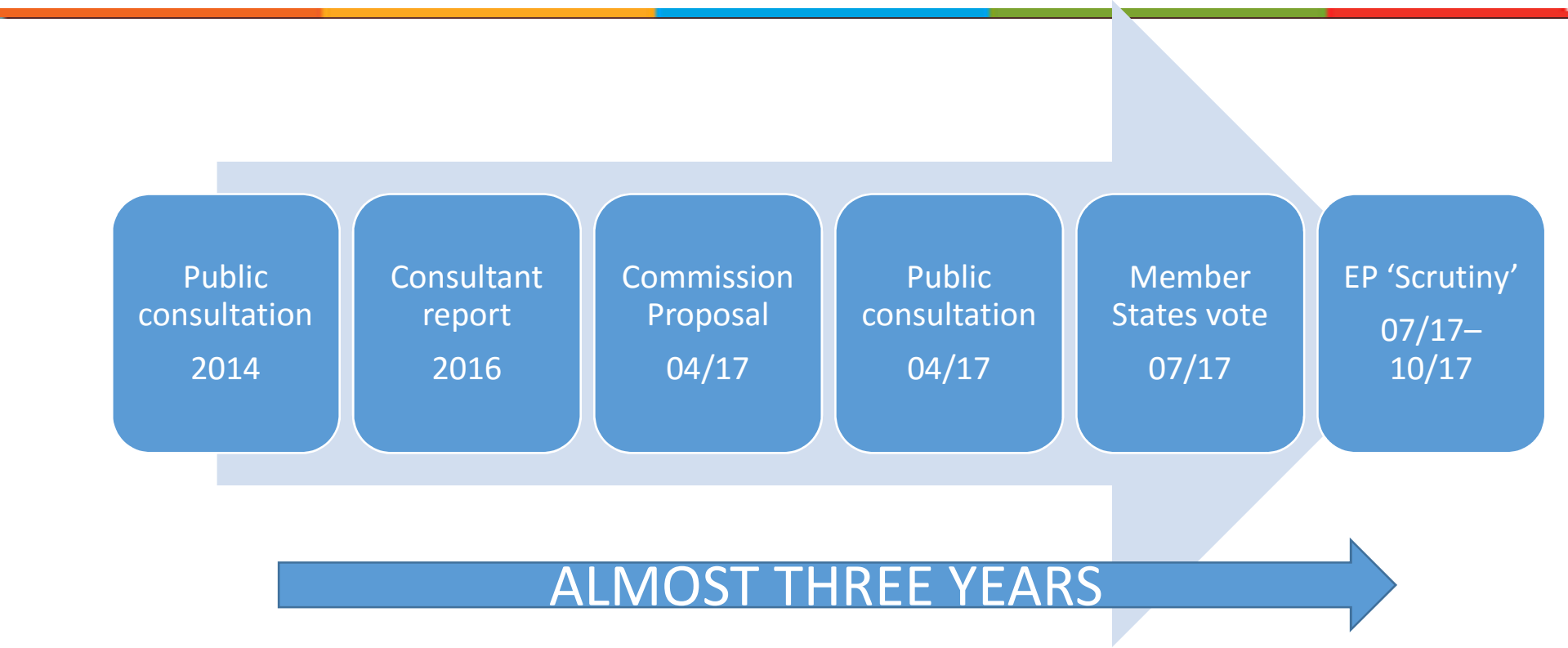
2. REACH – Decision in next months/year

3. Battery Directive – review started

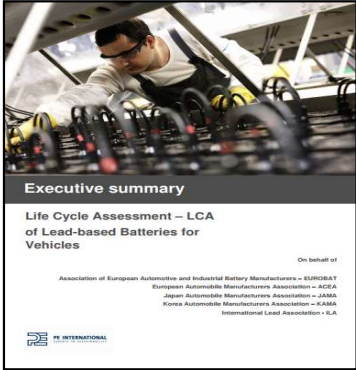
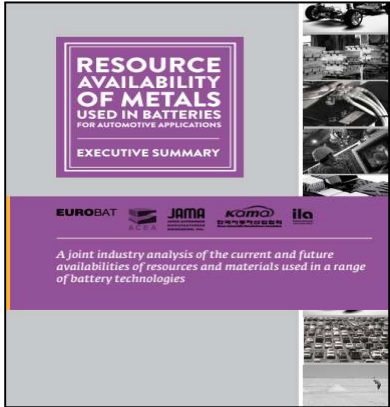
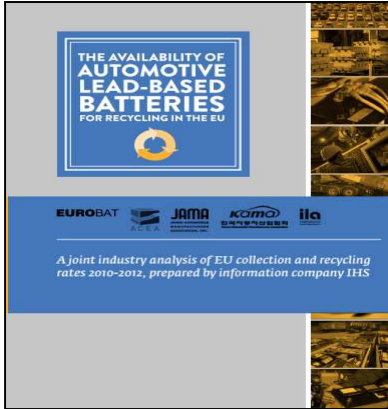
2. End-of-Life Vehicles Directive

- Directive dates from 2000 and bans four heavy-metals, incl. lead
- Exempt certain materials and components of vehicles from the substance ban if the use of these substances is unavoidable
- Annex II with exemptions from this ban with regular reviews
- Exemption for automotive lead batteries (annex II.5)
- Directive shall be amended on a regular basis, according to technical and scientific progress
- Delete materials and components of vehicles from Annex II if the use of these substances is avoidable
- First review in 2010; second review 2014-2017

Lengthy decision-making process

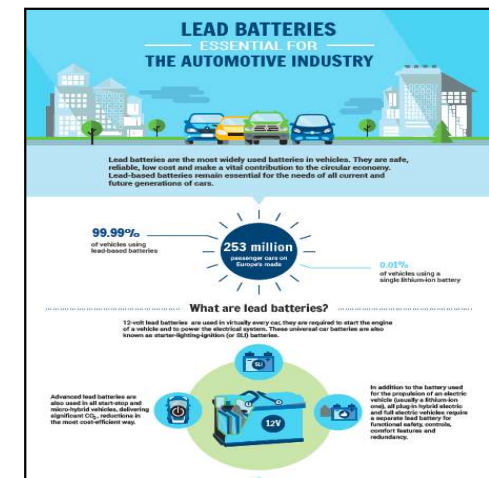


Documentation for ELV review



Arguments for a continued exemption

- Key reasons why automotive lead batteries should continue being exempted from the ELV substance ban:
 - No mass-market alternatives
 - 99% collection and recycling rate
 - Proven safety & reliability record
 - Cost-effectiveness of lead batteries
 - Highly-regulated by legislation



(Almost) final text

- Commission proposal for next exemption period:

Lead and lead compounds in components		
5(a). Lead in batteries in high voltage systems (2a) that are used only for propulsion in M1 and N1 vehicles	Vehicles type approved before 1 January 2019 and spare parts for these vehicles	X
5(b). Lead in batteries for battery applications not included in entry 5(a)	(1)	X

(1) This exemption shall be reviewed in 2021.

(2a) Systems that have a voltage of >75VDC as defined in Directive 2006/95/EC

3. REACH Regulation

- REACH Regulation = Registration, Evaluation & Autorisation of Chemicals
- „The aim ... is to ensure the good functioning of the internal market while assuring that the risks from substances of very high concern are properly controlled and that these substances are progressively replaced by suitable alternative substances or technologies where these are economically and technically viable.” (REACH, Art 55)
- Four lead compounds currently under discussion:
 - Lead monoxide
 - Lead tetroxide
 - Pentalead tetraoxide sulphate
 - Tetralead trioxide sulphate

REACH Regulatory EU process

2013

- Inclusion on list of 'Substances of very High Concern'

2016

- Suggestion of European Chemical Agency to include on REACH authorisation list

2018

- Decision about inclusion on REACH authorisation list

REACH - key messages against authorisation listing

1. Existing EU legislation controls environmental and occupational health & safety risks from lead battery production and recycling
2. Exempt lead compounds used for battery manufacturing from REACH authorisation requirements

4. EU Battery Directive

- First Directive from 1991
- Entry-into-force of current Directive in 2006
- Review and revision has started
- Main provisions:
 - applies to all batteries and accumulators, no matter their chemical nature, size or design
 - prohibits the marketing of batteries containing some hazardous substances
 - defines measures to establish schemes aiming at high level of collection and recycling
 - fixes targets for collection and recycling activities
 - sets out provisions on labelling of batteries and their removability from equipment
 - defines producer responsibility for batteries

EC objectives of the review process

- **Objectives of European Commission:**
 - Assess need for further risk management measures
 - For batteries containing heavy metals, appropriateness of the minimum collection targets for all waste portable batteries
 - Possible introduction of further targets and the appropriateness of recycling efficiency levels set by the Directive.
 - Legal consistency, including with other pieces of legislation.
 - Recent evolutions of technical aspects and of the use of batteries (e.g. second-use) of vehicle batteries in stationary power storage installations)
 - Consider how the reuse, recycling and collection of batteries can be enhanced.

Timeline of review and revision process



EC Roadmap – 08/16

EC Public Consultation – 07/17

Evaluation – Q1/18

EC proposal – Not before end of 2018

EUROBAT position on Battery Directive

- Three EUROBAT points as guiding principles for the revision of the EU Battery Directive
 1. Ensure the competitiveness of EU battery manufacturers
 2. Link the Directive with EU's ambition to promote a circular economy
 3. Create legal and regulatory coherence with other pieces of EU legislation (End-of-Life Vehicles Directive, REACH etc.)

Thank You

For more information
eurobat@eurobat.org



www.eurobat.org

+32 2 761 1653

@eurobat_org

