

**Charging the future:  
How the new EU battery regulation will shape the next decade**

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- Batteries are **key to the decarbonisation** process and the EU's **shift towards zero-emission**
- Demand for batteries is expected to grow by more than **10X** by 2030
- EU Battery Regulation is the 1<sup>st</sup> holistic piece of legislation under EU Green Deal – covering entire life cycle: sourcing, design, use and end-of life
- Replaces the current batteries directive of 2006
- Will apply to **all batteries** including portable batteries, electric vehicle batteries, industrial batteries, starting, lightning and ignition (SLI) batteries and batteries for light means of transport (e.g. electric bikes, e-mopeds, e-scooters).
- Applies to battery whether it is incorporated into a product or is supplied together with or separately from a product in which it is to be used.
- “**Battery producers**” placing a battery on the EU market will be subject to EPR including, for example, financing the separate collection and transport of waste batteries.
- Has **dual legal basis** with all elements, except end-of life management (Chapter VIII), harmonized across the EU







### **Sustainability and safety:**

e.g. carbon footprint rules, min. recycled content, performance & durability criteria, safety parameters



### **Labelling and information:**

e.g. information on sustainability and data on state of health and expected lifetime



### **End-of-life management:**

e.g. collection targets & obligations, targets for recycling efficiencies & recovered materials, EPR



### **Obligations of economic operators:**

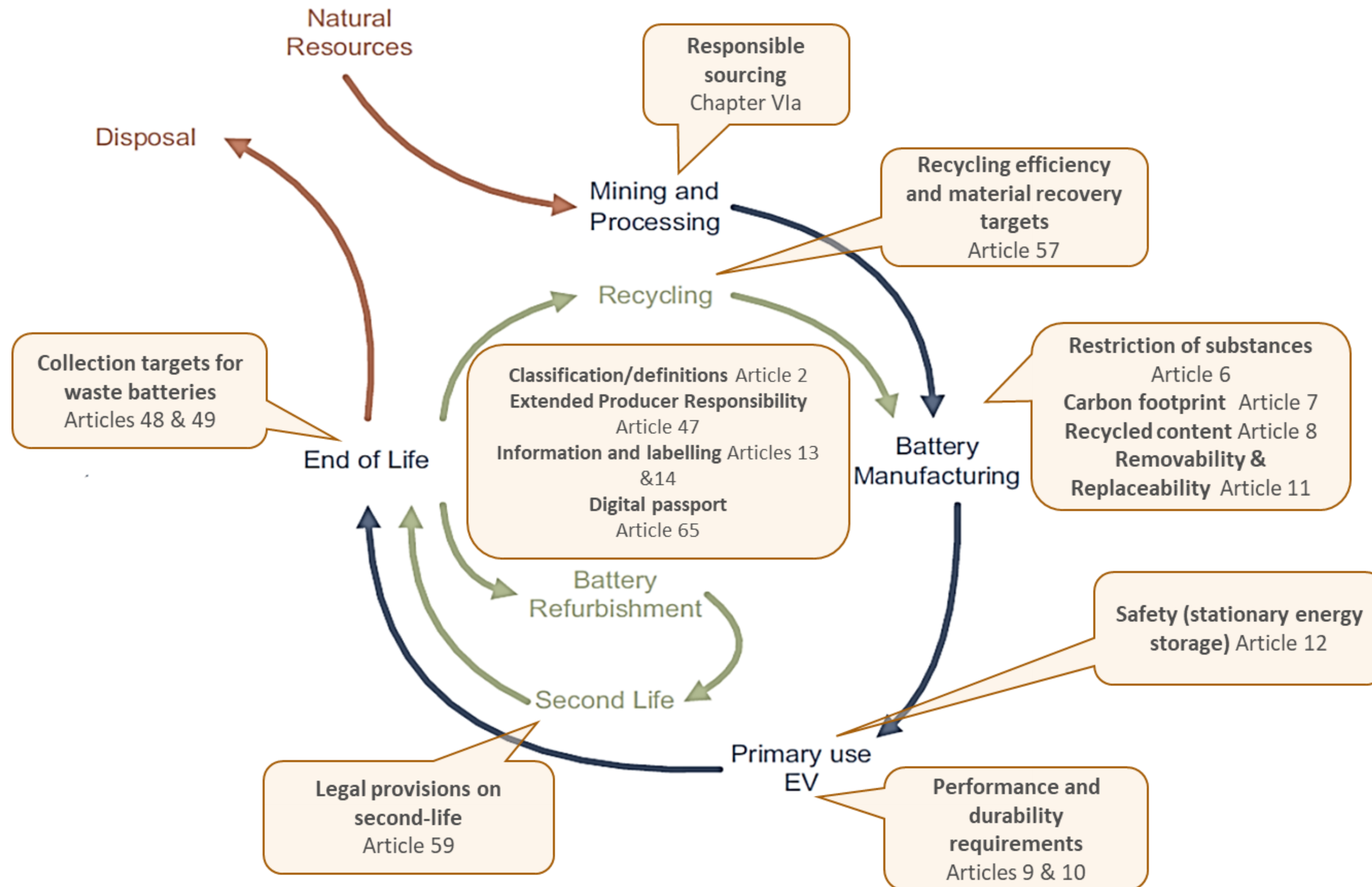
e.g. linked to product requirements and due diligence schemes



### **Electronic information exchange**

e.g. EU electronic exchange system, battery passport, QR code

# Key Elements- full battery life cycle covered



## Secondary Legislation- details yet to be defined



**Hazardous substance management**  
COM evaluation report (Art. 6) – restriction  
procedure (Art 86-88)



**Labelling (Art. 13)**  
Harmonized specifications



**Carbon Footprint (Art. 7)**  
Methodology – Format – Classes – Market access



**Due Diligence Policies (Art. 47ff)**  
Application guideline – Substances – Risk categories



**Recycled Content (Art. 8)**  
Methodology – Target re-assessment – Market  
access



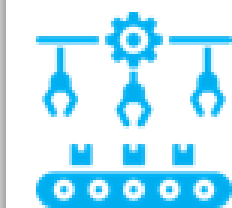
**End-of-life Management (Art. 71ff)**  
Recycling efficiency – Material recovery –  
Equivalent conditions – Reuse & repurpose



**Performance & Durability (Art. 10)**  
Methodology – Market access



**Reporting (Art. 76)**  
Report to Commission

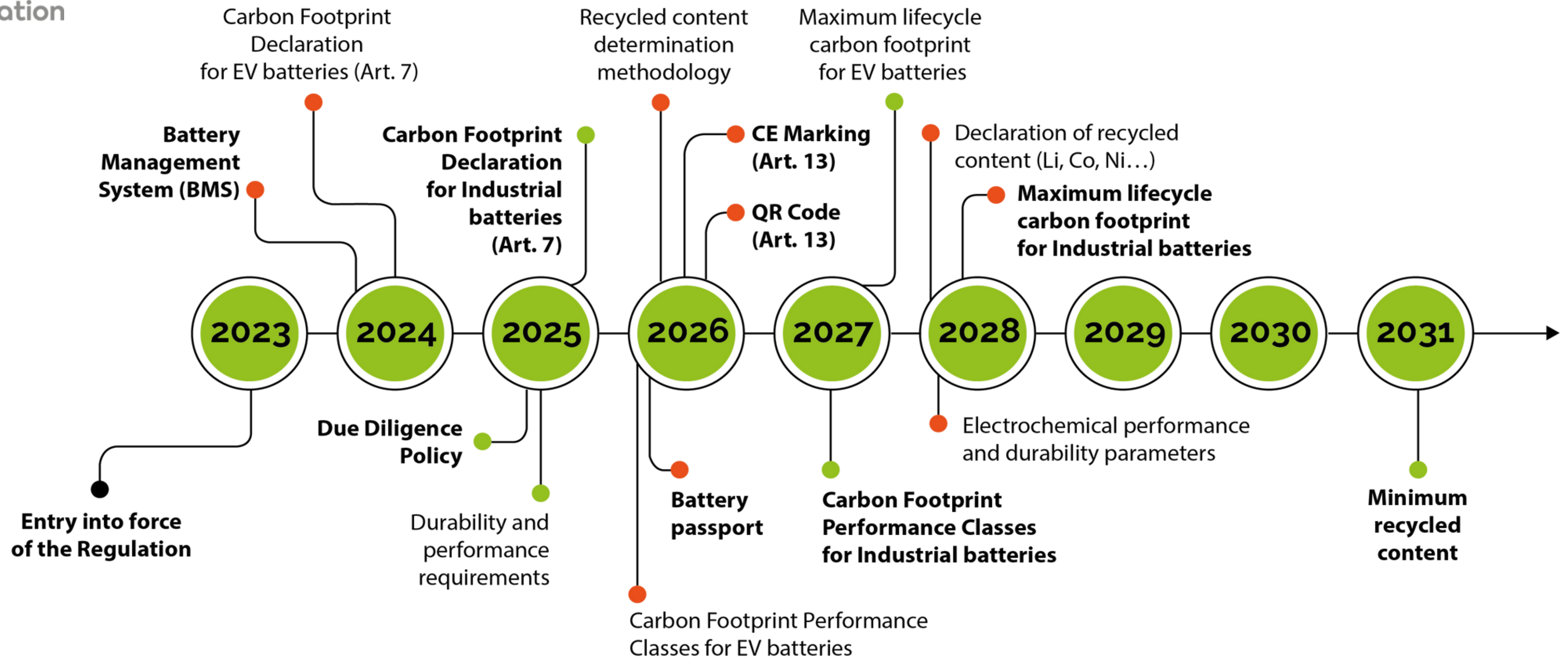


**BESS Safety (Art. 12)**  
Common specification



**Battery Passport (Art. 77)**  
Format - Update content – Access level criteria





- Legal text adopted on 10<sup>th</sup> July 2023 and came into force following publication in the Official Journal on **18<sup>th</sup> August 2023**
- Requirements will be phased in over the next decade and many operational details still to be defined through secondary legislation



**A closer look at  
some of the new  
requirements**

**Producer'** means any **manufacturer, importer or distributor** or other natural or legal person that, irrespective of the selling technique used, including by means of distance contracts, either:

a) is established in a Member State and **manufactures batteries under its own name or trademark**, or has batteries designed or manufactured and supplies them for the first time under its own name or trademark, including those incorporated in appliances, light means of transport or other vehicles, within the territory of that Member State;

**Manufacturer**

(b) is established in a Member State and **resells within the territory of that Member State, under its own name or trademark**, batteries, including those incorporated in appliances, light means of transport or other vehicles, manufactured by others, on which the name or trademark of those other manufacturers does not appear;

**Reseller**

(c) is established in a Member State and **supplies for the first time in that Member State on a professional basis, batteries, including those incorporated in appliances, light means of transport or other vehicles, from another Member State or from a third country; or**

**Importer**

(d) **sells batteries**, including those incorporated in appliances, light means of transport or other vehicles, **by means of distance contracts directly to end-users**, whether or not they are private households, in a Member State, and is established in another Member State or in a third country;

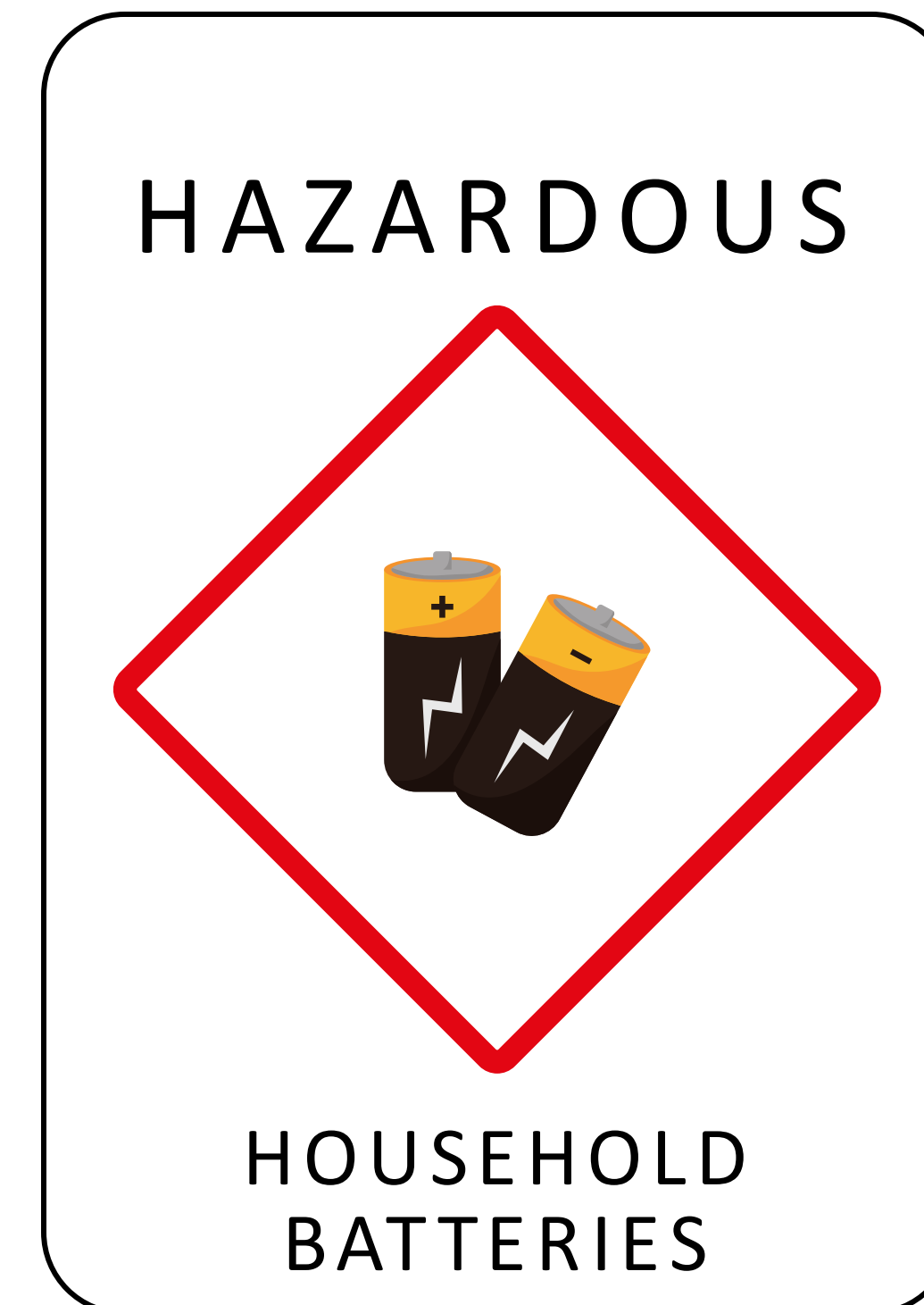
**Distance seller**

**Important as the “Producer” is responsible for all Chapter VIII “management of waste batteries” requirements**



## Article 6: Restrictions on Substances

- Designed to stimulate development of environmentally sustainable batteries manufactured without use of very hazardous substances.
- Commission has power to propose a restriction if risks demonstrated from use of a hazardous chemical in a battery (will consider full lifecycle including recycling) that are not considered to be adequately controlled.
- By 31 December 2027, the Commission, assisted by the European Chemicals Agency, shall prepare a report on use of substances of concern used in batteries.
- Substance of concern defined as causing “adverse effect on human health or the environment or hampering recycling for safe and high quality secondary raw materials”.
  - Lead, Cadmium, Cobalt already highlighted as priority in this review.
- European Chemicals Agency (ECHA) tasked with providing opinion on restrictions to EU Commission by December 2026



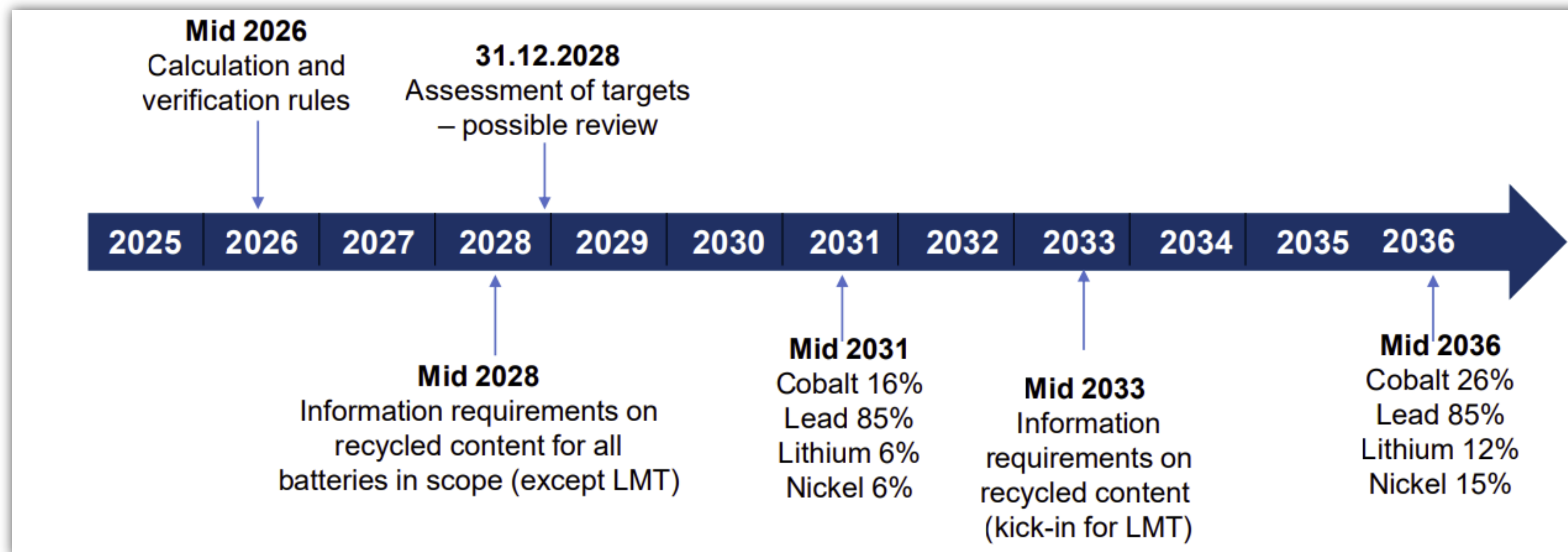
- Applies to **Electric Vehicle, rechargeable industrial batteries with a capacity greater than 2 kWh and LMT batteries**
- A carbon footprint declaration must be drawn up for **each battery model per manufacturing plant**
- CF calculated as **kg of carbon dioxide equivalent per one kWh of the total energy provided by the battery over its expected service life;**
- Raw material manufacture, battery manufacturing, distribution and end-of-life all included (but not use phase).
- Stepwise approach as secondary legislation still needs to be developed and published
  - COM to publish **calculation methodology through a “delegated Act”**, Industry has to declare CF information
  - COM to **publish CF Classes**, Industry has to label CF Class
  - COM **defines max. CF class for market access**, products above max. CF Class excluded from market
- **Delegated Acts describing Carbon Footprint Methodology** published:
  - Electric Vehicle: **Feb 2024**
  - Industrial: **Feb 2025**
  - LMT: **Feb 2027**

## Article 7- CARBON FOOTPRINT

- **Declaration of CF [on label]**
  - EV - 18 months after EIF or 12 month after DA, whichever is the latest
  - IE > 2kWh - 30 months after EIF or 18 month after DA, whichever is the latest **[Q1 2026]**
  - LMT - 60 months after EIF or 18 month after DA, whichever is the latest
- **CF class [on label]**
  - EV - 36 months after EIF or 18 month after DA, whichever is the latest
  - IE > 2kWh - 48 months after EIF or 18 month after DA, whichever is the latest **[end 2027]**
  - LMT - 78 months after EIF or 18 month after DA, whichever is the latest
- **Max. CF class for market access**
  - EV - 54 months after EIF or 18 month after DA, whichever is the latest
  - IE > 2kWh - 66 months after EIF or 18 month after DA, whichever is the latest **[mid 2029]**
  - LMT - 96 months after EIF or 18 month after DA, whichever is the latest

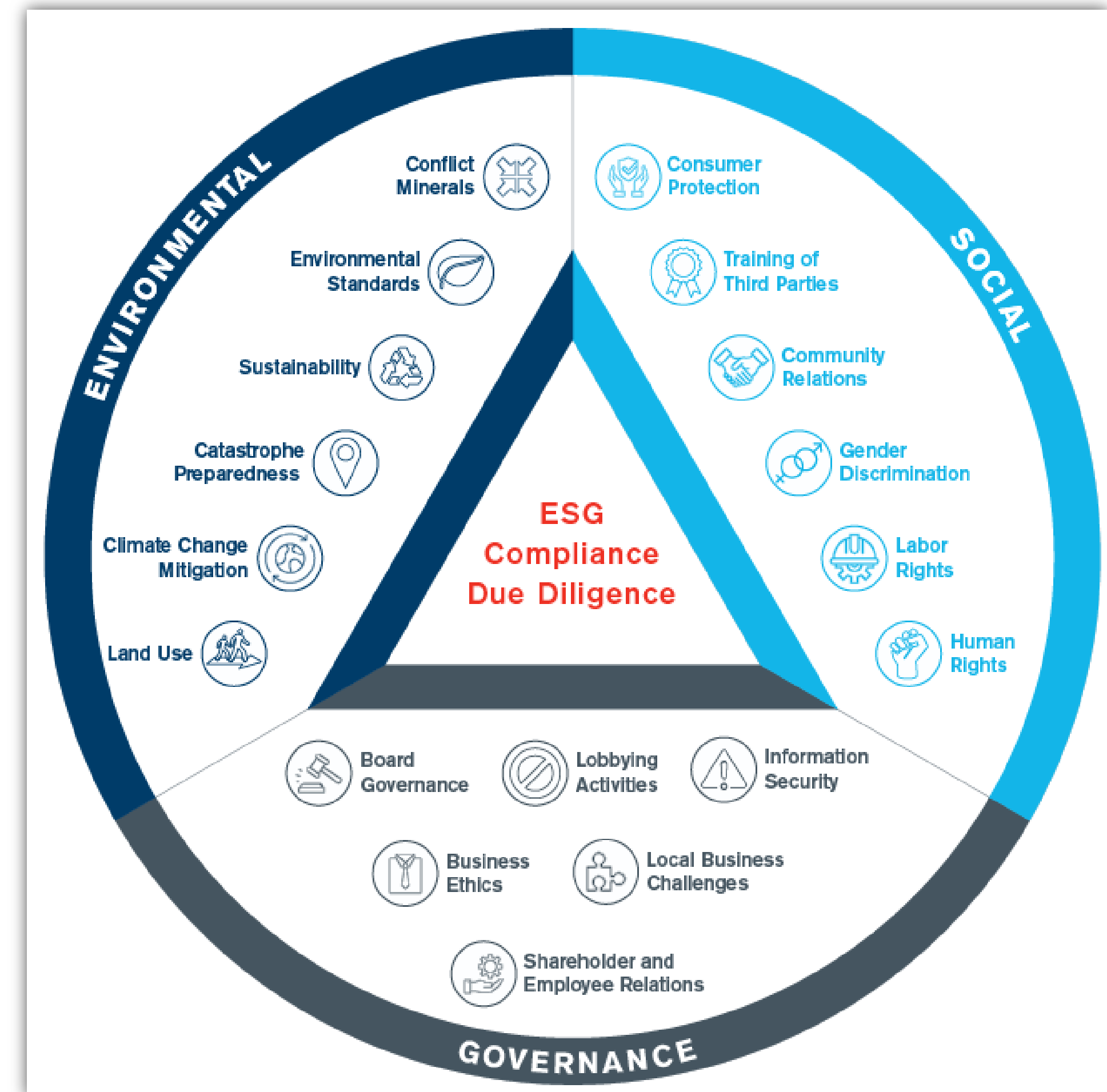


- Applicable to **Industrial, SLI (former automotive), EV batteries and LMT**
- Percentage share of recycled content of Co, Ni, Li in active materials of the battery, or Pb in the battery
- Applies for **each battery model per year and per manufacturing plant**
- Staged approach: calculation methodology first, then declaration of recycled content (information requirements), then minimum targets for recycled content (cobalt, lead, lithium, nickel) to gain market access
- Possibility to review minimum targets at end of 2028



## Articles 48,49, 50- Due Diligence

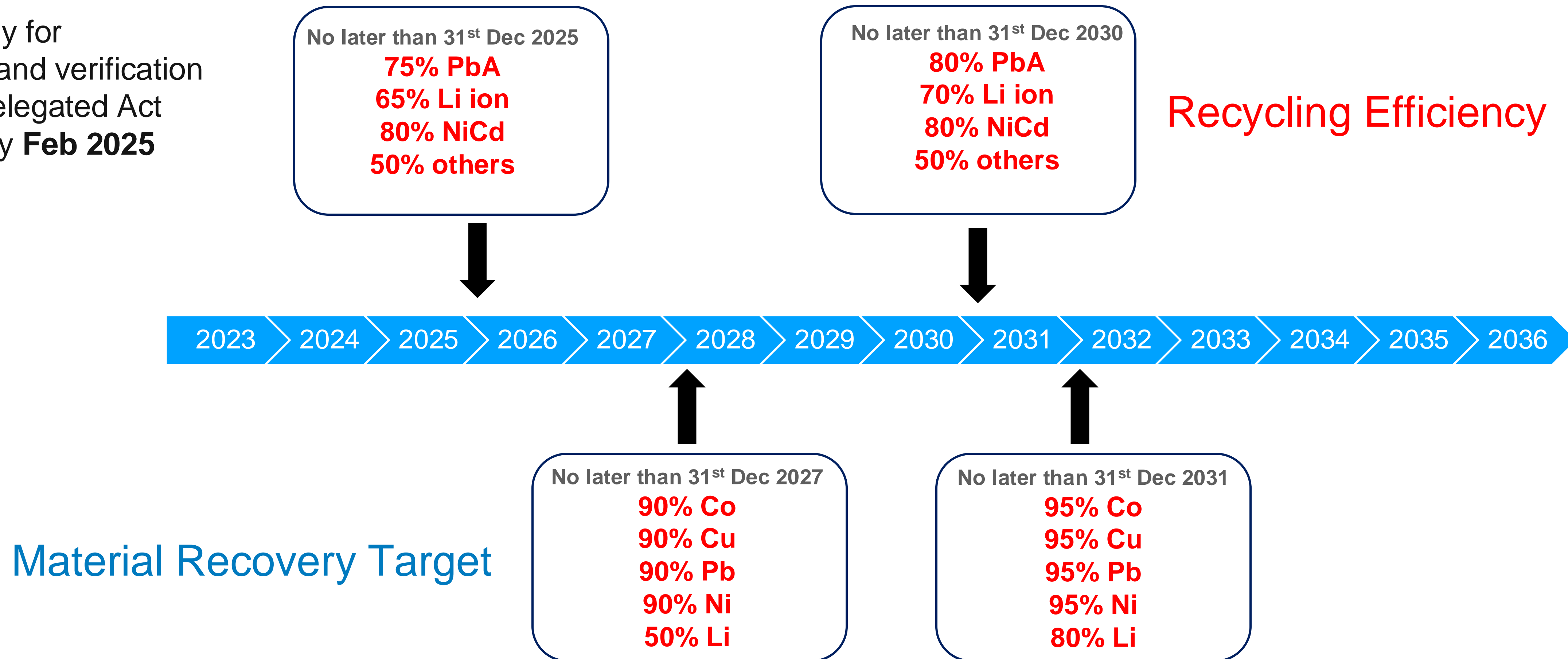
- From **18 August 2025**, economic operators that place batteries on the market or put them into service shall fulfil due diligence obligations for raw materials:
  - Cobalt, Nickel, Natural Graphite, Lithium
- By **18 February 2025**, the Commission shall publish guidelines as regards the application of the due diligence requirements
- Due diligence to cover social & environmental risks (e.g air & water pollution, GHG emissions, energy use, biodiversity protection etc) as well as human rights, labour rights and industrial relations (e.g OHS, child labour, trade union freedoms, indigenous people's rights etc)
- Economic operators shall have their battery due diligence policies **verified by a notified body** ('third-party verification')





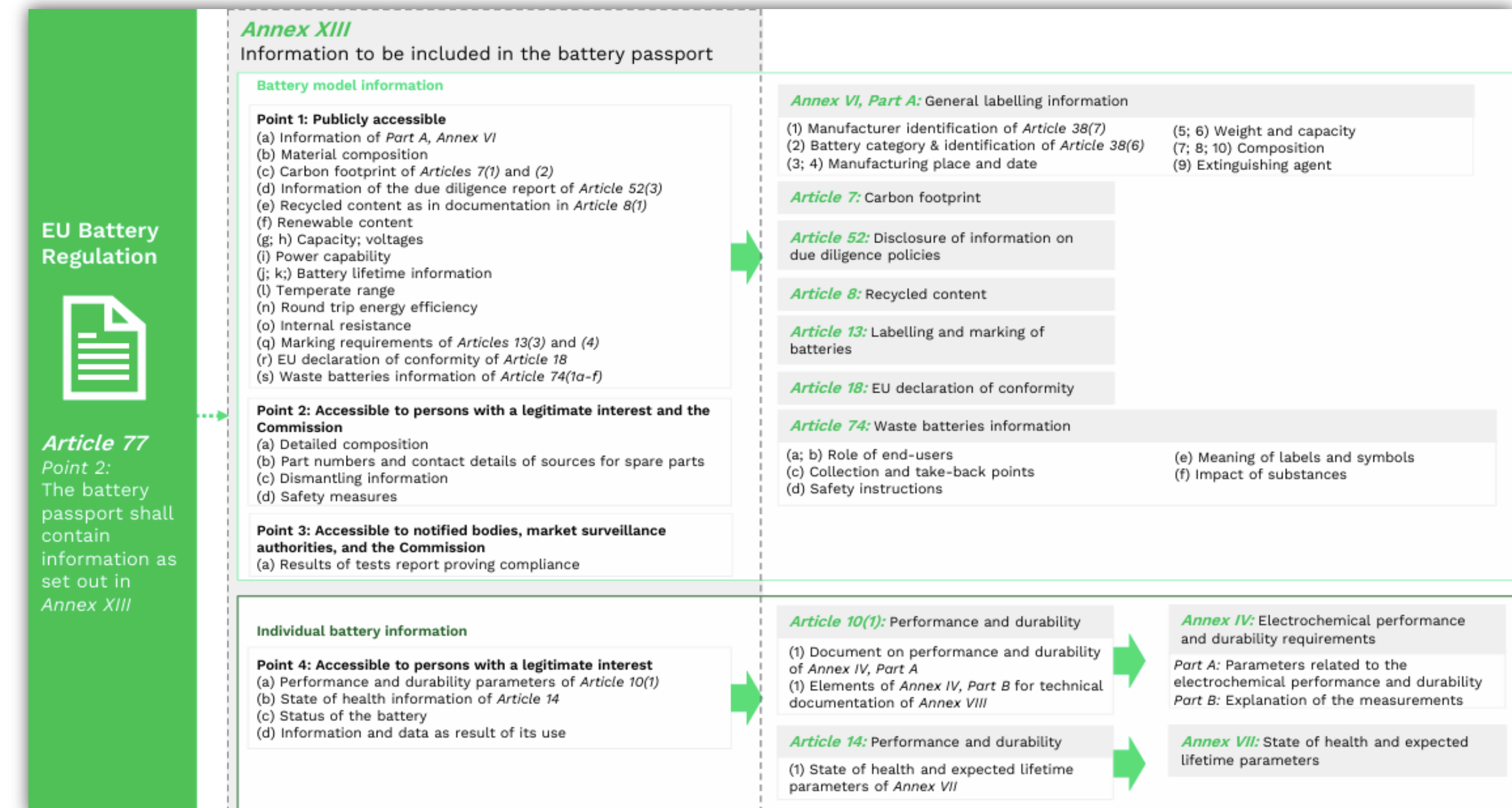
# Article 71- Recycling Efficiency and Material Recovery Targets

- Applies to recyclers receiving waste batteries
- Methodology for calculation and verification will be in Delegated Act published by **Feb 2025**



## Articles 77- Battery Passport

- From **18 February 2027** each LMT battery, each industrial battery with a capacity greater than 2 kWh and each electric vehicle battery placed on the market or put into service must have an electronic record (**'battery passport'**).
- The battery passport will contain information relating to the battery model and information specific to the individual battery as set out in Annex XIII of the Regulation.
- Some information in the battery passport must be accessible to the general public, other information only to the notified body and/or repairers, remanufacturers, second-life operators and recyclers
- The battery passport will be accessible through the battery QR code
- The battery passport shall cease to exist after the battery has been recycled





- The new EU Battery Regulation is the first Global policy instrument to address all aspects of a batteries lifecycle
- It is designed to secure the sustainability and competitiveness of EU battery value chains that will support the green energy transition and zero-emission mobility
- The Legislation is complex and many operational aspects will need to be defined through delegated acts over the next decade
- Only when fully implemented will we be able to assess whether additional costs related to increased administrative resources required by battery producers will deliver economic and environmental benefits

