

Brussels, May 29th, 2020

Dear Executive Vice-President Frans Timmermans,

Dear Vice-President Maroš Šefčovič,

Dear Commissioner Thierry Breton,

RECHARGE is a non-profit association representing the multifold interests of the advanced rechargeable and lithium battery industry in Europe.

The organisation is a strong supporter of the sustainability agenda of the European Commission. As such, it has participated with strong evidence and industry knowledge in the respective institutional work programs to help establish a regulatory framework that will enable European actors to execute on the technological, environmental and social leadership ambitions of the Strategic Action Plan on Batteries.

To this end, RECHARGE maintains a constructive dialogue with all relevant institutions, including the European Commission's DG Environment and DG Growth, and the European Parliament, and actively participates in EU stakeholder consultations and workshops. More recently, RECHARGE took part in the stakeholder workshops on the revision of the Battery Directive, organised by the Oeko Institut in April and May 2020.

Given the current preparatory work on the upcoming Sustainability Legislation on Batteries and the revision of the Battery Directive, RECHARGE would like **to point to two areas of concern that**, if introduced as currently suggested, would substantially hamper the support for the development of the battery industry in Europe.

1. Mandatory minimum recycled content: The European battery industry advocates the benefits of recycling and supports a circular economy. In that regard, our industry is working with the respective institutions to implement a recycling efficiency methodology in which the materials that can deliver a relevant impact are identified and recycled. **However, we want to caution against the substantial burdens associated with a minimum recycled content obligation** as it risks jeopardising the competitiveness of European batteries, and the benefits of applying recycled content obligations to batteries are very limited.

2. Restriction of primary batteries: At RECHARGE, we understand the trend to restrict single-use products, **but we want to highlight that many primary batteries are not disposable products with a short lifetime. They can last up to twenty years or are designed to serve for the entire use life of the appliance they power. Moreover, in many instances, replacing these batteries is technically not feasible and would not result in a better environmental footprint.**

Due to the substantial impact of the proposed legislative measures *Mandatory minimum recycled content* and *Restriction of primary batteries* on our industry, we request a more in-depth assessment. We would like to discuss our concerns in person with you.

Sincerely,



Claude Chanson

General Manager of RECHARGE



Patrick de Metz

Chairman of RECHARGE

