



ADVANCED RECHARGEABLE & LITHIUM BATTERIES ASSOCIATION

## RECHARGE Comments to the Public Consultation on the Chemicals Strategy for Sustainability

June 2020

*“Chemicals play a fundamental role in modern societies. They have contributed to our current well-being, longer life expectancy and comfort, and are crucial for many manufacturing industries... Moreover, they can play an important role to develop and deploy technologies necessary to achieve a circular and climate-neutral economy”.*

Indeed, chemicals are essential to our industries, and societies as such: To reduce greenhouse gas emissions from human activity while safeguarding our way of life, we depend on smart and viable technological answers based on advanced, sophisticated and complex products. High-density batteries in energy storage or electric mobility, smart grids, advanced communication and transmitting devices, all these products are built to meet the needs of a changing world. And they depend on materials that can meet the needs of a changing world.

It is in this context, that the advanced rechargeable and lithium batteries industry in Europe, as represented by RECHARGE, calls for a chemicals policy framework that effectively combines the EU’s various sustainability and technological leadership objectives on a strong scientific evidence base. RECHARGE welcomes the Commission’s reference to more harmonization between the different legislative pieces and better coherence with other EU policy areas. We especially appreciate the Commission’s ambition to implement a sound chemicals, product and waste management legislation that simplifies the current framework, reduces overlaps and helps drive long-term industrial investments.

The *one substance – one assessment* approach will be pivotal to this ambition, as will be the *Better Regulation* principle always opting for the regulation that has proven to best protect health and the environment from potential risks stemming from chemicals.

RECHARGE also welcomes the promotion of strategic autonomy for chemicals that can be sourced and produced in the European Union. Representing the entire battery value chain, we support increased efforts in fostering sustainable materials extraction and chemicals manufacturing based in Europe.

These sectors could indeed boost economic growth and job creation, as suggested by the Commission's Chemicals Roadmap.

We applaud the Commission to not limit the Chemicals Roadmap to European chemicals and products but to create a level playing field with imports.

Within the context of the Commission's zero-pollution ambition, the advanced rechargeable and lithium batteries industry in Europe supports the non-toxic environment initiative when focused on limiting direct harm to health and the environment from final products using chemicals. We want to caution against an unrealistic ambition to phase out chemicals because of their simple classification, however.

Substitution of substances is often technically not feasible. In fact, in most applications the substances used are selected because of their unique chemical properties. Substitution must therefore be limited to areas where this is technically feasible at industrial scale.

Our industry is particularly concerned by the belief that non-chemical alternatives could increase the safety of certain products. In fact, many non-chemical alternatives are highly engineered materials. Long-term monitoring of their impact on health and the environment is often completely missing.

In turn, the advanced rechargeable and lithium batteries industry exemplifies a sector that brings more than 100 years of successful chemicals use to the debate. Our products use different substances, including hazardous ones, to generate the electro-chemical features needed for decarbonized energy storage, electric mobility, everyday communication devices, satellites and robots. The chemicals are safely contained within the sealed units of our products and are increasingly managed by sophisticated electronic management systems. Using these products does not pose a risk to human beings and the environment. Risks associated with the potential exposure to chemicals are exclusively limited to the workplace, either at the manufacturing or waste treatment stage. Here, the high standards for worker and environmental protection as well as advanced factory design have already contributed to the achievement of an unsurpassed emission and dissipation control system, mitigating any risks from substances of concern.

At RECHARGE we believe that the European chemicals strategy should therefore better differentiate between exposure at the workplace, and exposure to consumers and the environment during the use phase. To continue to enable a European chemicals industry and the deployment of products depending on chemicals, a risk control approach must be at the center of this strategy. The current chemicals management approach neglects mitigation and hazard-control measures to a large extent.

RECHARGE calls upon the European Commission to consider legislative measures that are balanced, comprehensive, meaningful and indeed apply to both imported as well as European batteries. The EU's chemicals framework should support both a prosperous European industry and environmental leadership.

A supporter of the sustainability agenda of the European Commission, RECHARGE will continue to participate with strong evidence and industry knowledge in the respective institutional work programs to help establish an adequate regulatory framework. We look forward to continuing having constructive dialogues with all relevant institutions and actively participating in the EU stakeholder consultations and workshops.

#### **FOR MORE INFORMATION**

For more information on our policy recommendations for a sustainable EU chemicals framework, please consult our respective [position papers](#).

#### **ABOUT RECHARGE**

RECHARGE is the European industry association for advanced rechargeable and lithium batteries. Founded in 1998, it is our mission to promote advanced rechargeable batteries as a key technology that will contribute to a more empowered, sustainable and circular economy. RECHARGE's unique membership covers all aspects of the advanced rechargeable battery value chain in Europe: From suppliers of primary and secondary raw materials, to battery, equipment and original equipment manufacturers (OEMs), to logistic partners and battery recyclers.