

Brussels, 3 February 2021

## **Industry Comment: Standardization Request for Batteries from the European Commission, Notification under Article 12 of Regulation (EU) No 1025/2012**

Following the publication of the Batteries Regulation 2020/353 (COD) proposal on December 10<sup>th</sup>, 2020, [RECHARGE – the industry association of the advanced rechargeable and lithium batteries value chain in Europe](#) – would like to comment on the European Commission's draft standardization request for batteries (SReq batteries).

While we welcome that the technical implementation of articles 9, 10, 12 and 59 of the draft Batteries Regulation have been subjected to Regulation (EU) No 1025/2012, we regret that the multiple rounds of comments submitted by our industry's national and European technical experts have – to a large extent - not been considered to date. The areas of concern cover technical limitations, technological bias and safety deficits, as well as discrimination against European manufacturers, their intellectual property and innovation potential. The absence of relevant industry input in the current standardization request is set to result in the development and implementation of ill-targeted standards, with the risk to impair the overall effectiveness of the Batteries Regulation.

It is in the context of the [cooperation guidelines between standardization organizations and the European Commission](#) that we call upon the European Commission to revise the standardization request and help ensure a consensus-driven, fit-for-purpose standardization process. To that end, we recommend postponing the adoption of the SReq to the March 2021 Committee on Standards (CoS) meeting in order to open a new round of comments based on the now released Batteries Regulation text.

European standardization organizations have a key role to play in establishing technically robust and broadly acceptable industry standards, and therewith contributing to environmental protection and product safety while strengthening European know-how. A key stakeholder in the Batteries Regulation file, RECHARGE wants to emphasize their commitment to continue to accompany the standardization process with relevant field expertise and technical know-how.

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