

Best Practice Guidelines for the use of Notified Bodies for the Carbon Footprint Declaration

Introduction

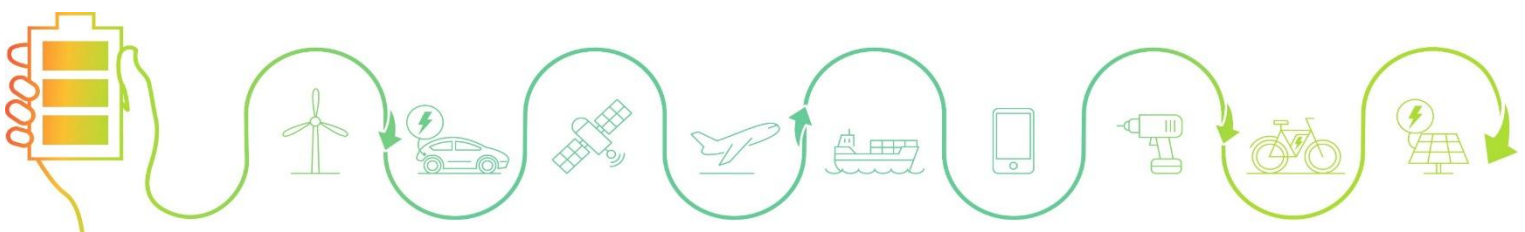
RECHARGE the advanced rechargeable and lithium batteries association welcomes that the Commission will soon present the Delegated Act on the Carbon Footprint (CF) methodology for EV batteries and thereby provide clarity on the calculation. This Delegated Act will provide a critical framework for the carbon footprint methodology for EV batteries in order to obtain the Carbon Footprint Declaration (CFD). Whilst the [draft Delegated Act](#) (DDA) clarifies much of the process, the responsibility of selecting Notified Bodies (NBs) requires further clarification.

The verification and validation of company-specific data by NBs are vital components of the CFD. To avoid inefficiencies, duplicative efforts, and potential incoherencies, RECHARGE proposes best practice guidelines to ensure a clear, consistent, and resource-efficient process across the battery value chain. The guidelines are based on the assumption that information flow and transmission of data along the supply chain towards the manufacturers/economic operators is guaranteed.

Identified issues and concerns

In the DDA, issues and concerns have been identified with the lack of clarity on Notified Bodies and their role:

- Lack of defined accountability
 - The roles and responsibilities for coordinating the verification process for the CFD remains unclear – who requests the NB to review and audit the CFD – the battery manufacturer or the supplier?
 - The supplier may receive multiple on-site audits for each product if the manufacturer defines the NB and audit requirements.
- Potential for duplicative and incoherent verification processes
 - A lack of clarity in the process, may cause suppliers to undergo multiple on-site audits for the same products if the manufacturer assumes the sole responsibility to choose the NB.
 - This could lead to multiple audits by multiple NBs for the same product of the supplier resulting in inefficient use of resources and causing inconsistencies within the value chain.
- Unclear NB qualifications
 - No single NB is expected to have expertise in all processes across the entire value chain. As a result, relying on the same NB for all steps may not always be the most effective or practical approach.
 - In certain cases, these knowledge gaps could lead to inconsistencies in verifying the calculated carbon footprint (CF).

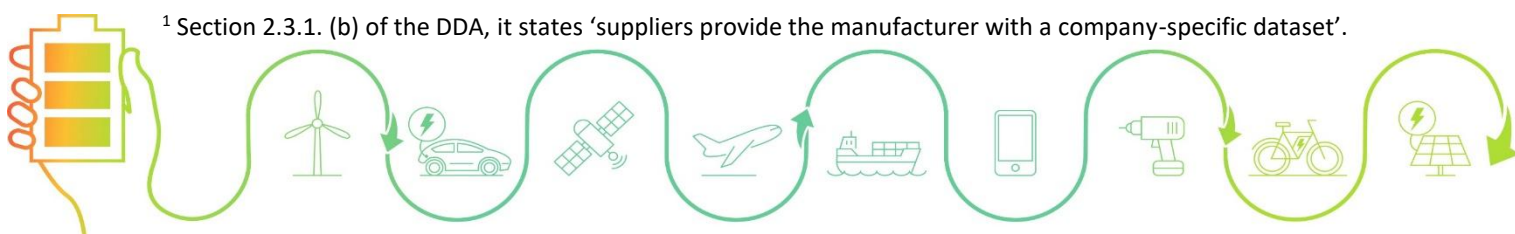


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To address these issues and align with the DDA requirements (notably section 2.3.1 (b)¹), RECHARGE recommends for the following best practice guidelines when selecting NBs across the battery value chain:

1. **Accountability** – Suppliers through selection of their own NB are responsible for the verification and validation of their own CF.
2. **Selection of NBs** – Suppliers select the NB from a defined list of approved NBs (according to the Batteries Regulation (EU) 2023/1542) and who are qualified in understanding the battery process in which they are verifying.
3. **Mutual acceptance of NBs** – The approved NBs accept each other's certificates and test reports.
4. **Independent audits by NBs** – Each participant in the battery value chain is responsible for ensuring the CF of their operations are conducted and certified by a NB. The battery manufacturer NB's certification responsibility is limited to verifying that certified upstream values from suppliers are properly considered by the battery manufacturer and that the manufacturer's own CF is certified.
5. **Verification approval process** – the NB provides time-stamped verification approval for a given product to the supplier.
6. **Data transfer to manufacturers/economic operators** – Suppliers provide carbon footprint (CF) data or datasets of their product, accompanied by the NB verification certificate (including validity period), to the battery manufacturer. The same verification certificate can be used to fulfill multiple requests from various manufacturers.
7. **Compilation of total carbon footprint for the CFD** – in addition to their own primary data for the various battery manufacturing stages and for the functional unit, the battery manufacturer compiles all the verified and validated data by the NB received from its suppliers.
8. **Harmonisation** – to ensure consistency, the Commission should consider developing a checklist for all NBs to clarify the criteria for data verification. This will help standardise the verification process and ensure harmonised implementation of best practices, regardless of the chosen NB.

¹ Section 2.3.1. (b) of the DDA, it states 'suppliers provide the manufacturer with a company-specific dataset'.



Conclusion

By following RECHARGE's best practice guidelines, this will create a streamlined and transparent process for NBs to verify and validate the company-specific data or datasets required for the carbon footprint declaration of EV batteries. By ensuring clarity in the roles and responsibilities of NBs, of manufacturers and suppliers, the proposed methodology will foster coherence, avoid duplicative efforts, and ultimately support the objectives of the much anticipated Delegated Act.

RECHARGE and its members remain committed to collaborating with the Commission to further refine and implement these best practice guidelines effectively.

