

RECHARGE STATEMENT TO SEAC-59 meeting

RECHARGE is the association for advanced rechargeable and lithium batteries representing over 60 members spanning the entire battery value chain¹. RECHARGE would like to highlight:

1. Errors in the Restriction Proposal published 22 March 2023 and
2. A PFAS restriction without derogations for batteries will seriously limit the Green Deal and prevent Europe from achieving a net zero economy by 2050.

Errors in the Restriction Proposal

Contrary to what is stated in Annex E (page 416), solid state batteries and lead acid batteries **are not potential** non-PFAS alternatives to Lithium ion batteries. This is because:

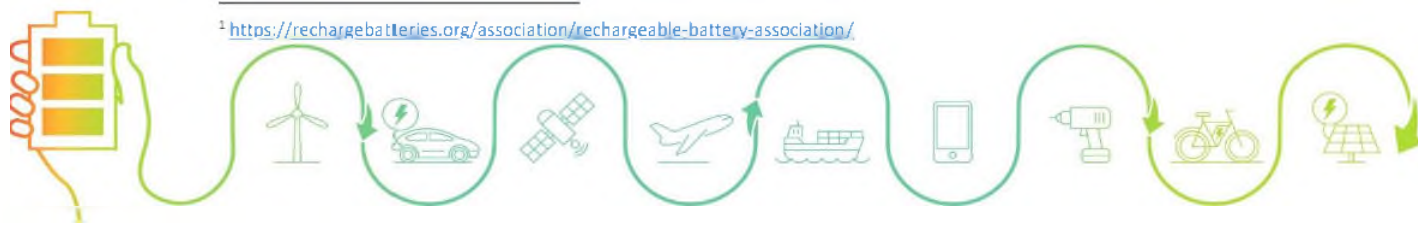
- Solid state batteries use PFAS, specifically PVDF and PTFE:
 - in the binder within the active material
 - in solid electrolytes and
 - in gel polymer electrolytes.
- Although lead acid batteries do not use PFAS, they are not a technically feasible solution, because they have a low energy density and cannot be used in applications which require high energy, high power, very long life, superior reliability, and the ability to withstand extreme temperatures. In addition, lead compounds used for battery manufacturing and lead metal have been recommended by ECHA for authorization under REACH Annex XIV. Lead acid batteries cannot be used for technologies such as smartphones, tablets, power tools, hearing aids, defibrillators, and many other portable applications used by EU citizens today. They cannot be used for powertrain systems in mobility solutions such as electric vehicles, fork-lift trucks, e-bikes and e-scooters.

The points above are further explained in RECHARGE's first submission to the consultation ([Ref. 3925](#)).

A PFAS restriction without derogations for batteries will seriously limit the Green Deal and prevent Europe from achieving a net zero economy by 2050

The European Green Deal is one of the world's most ambitious climate policies to usher the European Union and its Member States into a net zero economy by 2050 by decoupling economic growth from fossil fuel dependency. The Green Deal relies on batteries to achieve objectives for low-emission mobility, decarbonized energy generation and digitalization.

¹ <https://rechargebatteries.org/association/rechargeable-battery-association/>



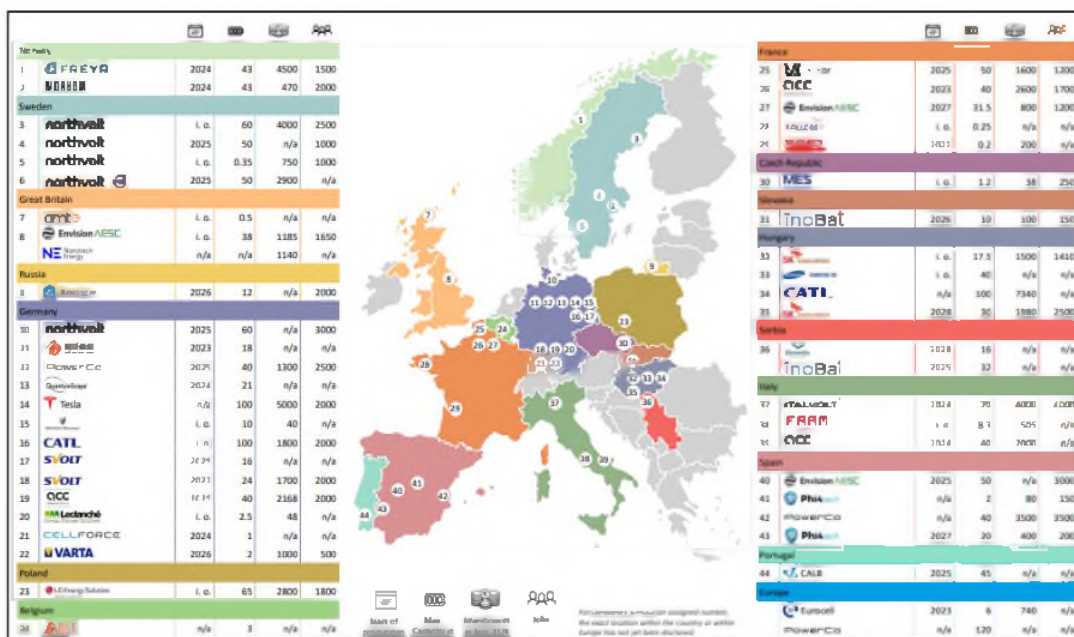
Batteries have been identified by the European Commission as a strategic value chain. The Commission states:

'Batteries are thus an important source of energy and one of the key enablers for sustainable development, green mobility, clean energy, and climate neutrality'².

Batteries are critical to enable electric vehicles to replace sales of new combustion engine vehicles by 2035. On 29 June 2022, all climate ministers of the 27 EU Member States agreed to the European Commission's proposal (part of the 'Fit for 55' package) to effectively ban the sale of new internal combustion vehicles by 2035. Most EU Member States have also signed up to the COP26 declaration on accelerating the transition to 100% zero emission cars and vans in leading markets by 2035.

Approximately 45 battery cell production sites in Europe that are in planning, under construction or partly already in operation represent 56 billion Euros of investment and 43,000 jobs³ (See Figure 1). This will aid Europe to become self-sufficient in battery cells as early as 2028 as an integrated value chain. **Without PFAS derogations for batteries, these battery production sites will stop operating in Europe.**

Figure 1: Indicative overview of cell production sites in Europe⁴



² Page 4, Provisionally agreed Battery Regulation,

https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CONSIL:ST_5469_2023_INIT&from=EN

³ Figures include EU Member States and European Economic Area countries – therefore Russia, UK & Serbia have not been included in our calculations. Figures obtained from IPCEI Market Analysis Q4 2022,

https://www.ipcei-batteries.eu/fileadmin/images/accompanying-research/publications/2023-02-BZF_Kurzinfo_Marktanalyse_Q4_22-ENG.pdf.

⁴ Source: Figure 2, Ibid

