

From: [REDACTED] (MOVE)
Sent: Thursday 7 December 2023 14:03
To: [REDACTED] (MOVE); [REDACTED] (MOVE); [REDACTED]
(MOVE); [REDACTED] (MOVE); [REDACTED] (MOVE); [REDACTED]
[REDACTED] (MOVE); [REDACTED] (MOVE)
Subject: RE: Meeting with RECHARGE

Dear Colleagues, I have participated in a meeting with RECHARGE who has brought to our attention that PFAS restriction not only will affect hydrogen technologies but also battery technologies in EVs...
[REDACTED] – they came physically in the end – tried to call you in but without success.

Flash report: Meeting with RECHARGE on impact of PFAS restriction on Battery industry
Date: 07/12/2023

Present:
MOVE: [REDACTED]
RECHARGE: [REDACTED]

Summary:

- RECHARGE is a network of major battery producers (see slide 2 attached).
- They did mapping of **PFAS** use in battery technologies and found they are **used in many critical parts** (gaskets, separators, insulating washers, cathodes, anodes...)
- RECHARGE thinks that batteries are articles “with no intended release” and should not be considered in scope of the proposed REACH restriction on PFAS. They argue that there is no release of PFAS at battery production, use and disposal stage. [While battery production and use might indeed have marginal releases, much remains to be done to fully control emissions at end-of-life stage and upstream manufacturing of PFAS].
- RECHARGE asserted that the dossier itself created a lot of uncertainties in the sector, impacting investment decisions. They argue that introducing any clarity would help – eg. by prioritising some uses for discussion in EHCA - they does not understand why ‘PFAS is ski waxes’ will be discussed first...
- RECHARGE admitted that some alternatives have been found but only for certain elements of the batteries.
- I have suggested they continue to tour COM services (they have not yet been to GROW or ENER). I suggested investigate the question of alternatives and their impact on safety of batteries in EVs (as we discuss this at the new STF sub-group). I also suggested they investigate alternative risk management measures involving EOV Directive, ROHS and hazardous wastes legislation.