



E P P A

# EU Chemicals Policy

## Impact on the Battery Industry



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# *EU Environment Policy*

## *Operating environment*

- ◆ Reduced credibility of Industry / Increasing influence of NGOs
- ◆ Loss of trust in science / Politicisation of science
- ◆ Stricter controls / precautionary approaches
- ◆ Reversal of the burden of the proof
- ◆ From a production-oriented policy to a product-oriented policy
- ◆ One market, 15 countries: convergence vs diversity
- ◆ International dimension



# *EU Environment Policy*

## *Impact on Batteries*

- ◆ Choice of materials: more testing, authorisation, controls, phasing-out
  - ↳ 2000 White Paper on Chemicals
- ◆ Eco-design: re-engineering/designing products to improve collection and recycling : green standards, eco-labelling, life cycle analysis
  - ↳ 2000 Green Paper Integrated Product Policy and EEE project
- ◆ Energy efficiency: energy savings, new energy, standards,
  - ↳ 2001 European climate change programme



# *EU Chemicals Policy*

## *Chemicals White Paper - Key elements*

- ◆ “Chemicals”: any substance/basic materials used in products
- ◆ Precaution and Substitution
- ◆ A single regulatory framework - REACH System: registration evaluation authorization according to tonnage and toxic/hazardous character
- ◆ Producer's and user's responsibility to prove safety
- ◆ Providing information on chemicals to consumers
- ◆ Conformity with WTO rules



# *EU Chemicals Policy*

## *Main elements of concern*

- ◆ Potential shift away from risk-based decision-making towards regulation based on intrinsic properties;
- ◆ Potential abuse of precautionary principle and obligation to substitute.
- ◆ Cost and administrative implications for the industry and specifically downstream users;
- ◆ International trade aspects;
- ◆ Internal Market aspects: risk of re-nationalisation;



# *EU Chemicals Policy*

## *Impact on Batteries*

- ◆ Impact on battery legislation: choice of materials in batteries phasing-out and substitution. Focus currently on Cd but might policy can target other chemicals: Pb, Ni, Co, etc
- ◆ Impact on waste legislation: mandatory collection and closed loop
- ◆ Obligation to generate and deliver data on use of chemicals in batteries including risk analysis, life-cycle analysis, etc
- ◆ Effect on prices
- ◆ Impact on innovation