

The draft on supplementing Regulation (EU) 2023/1542 of the European Parliament and of the Council by establishing the methodology for the calculation and verification of the carbon footprint of electric vehicle batteries

COMMENTS from Battery Association for Supply Chain - May 28, 2024

Battery Association for Supply Chain (BASC) would like to submit the following four comments to the draft.

1. Clarification of the CFP calculation method

In order to reduce the burden on operators for CFP calculation and the preparation of a study report, the implementation items for compliance with the regulations should be clarified and simplified. For instance, the description on the calculation method and scope of the CFP is unclear, making it difficult for businesses to know what and to what extent they need to do it.

For ensuring the compliance with the rules, manuals, case studies and data sets for correct calculation and reporting should be also clearly presented.

2. On functional units in section 2.1

A default value of the FEqC or different evaluation method for batteries in HEVs should be set separately because the value for FEqC in section 2.1 seems to be intended for BEVs and it is not technically appropriate to evaluate batteries with different functions, such as batteries in HEVs, using the same parameters.

Also, specific explanations on the calculation of CFP for batteries other than those for BEVs (batteries for HEVs and other types) are requests for better understanding on the rules.

3. On the date of Implementation

Since the schedule, including the lead time for verification by the notified body, is unclear, it would be considered desirable to see a minimum of two years between the entry into force of the delegated regulation and its implementation to ensure operators calculate CFP values and submit study reports. The current provision sets a period of one year for the preparation, and it is assumed that manufacturers dealing with a variety of batteries will not be able to respond in time.

4. Handling of energy certificates in the future

The draft rules do not allow the use of energy certificates, including GO, but provisions should be made to ensure that the certificates can be applied fairly to promote companies' CFP reduction activities. In order that global standards are needed for the handling and application of those certificates in the Regulation. The global standards should then be formulated by the major battery suppliers such as EU, China, South Korea and Japan, and reflected them in the EU regulation.

Battery Association for Supply Chain (BASC), established in April 2021, is a rechargeable battery industry association for domestic enterprise which have HQ located in Japan. More than 200 companies have involved and been engaged in with mission to enhance value chain of Japanese battery industry through policy advocacy and international standardization from mining to cell.