

To: Executive-Vice President of Prosperity and Industrial Strategy
Stéphane Séjourné
European Commission
Sent by email to: Stephane.SEJOURNE@ec.europa.eu
In CC: Bertrand.L-HUILLIER@ec.europa.eu

Brussels, 6 February 2025

Subject: The case for including the Batteries Regulation within the upcoming omnibus proposal

Dear Executive-Vice President Stéphane Séjourné,

First, we would like to warmly congratulate you on your appointment as Executive Vice-President for Prosperity and Industrial Strategy. We are reaching out to you to advocate for an inclusion of the EU Batteries Regulation in the Omnibus Simplification Package.

Who we are:

EPBA – Consumer Batteries Europe is the leading organisation of quality manufacturers of portable batteries and power solutions in Europe. It comprises of a total of seven member companies, along with several associated members. In 2023, our members sold 5.5 billion batteries i.e. Alkaline, Zinc Carbon, Lithium coin and other button cells, and rechargeable batteries, along with two million chargers in Europe; and roughly 47 % of the batteries placed on the market in the EEA are collected for recycling. Our members employ approximately 4,000 people in Europe, and the VAT contribution amounts to approximately EUR 260 million.

Our call for action:

EPBA – Consumer Batteries Europe is a key stakeholder in shaping Regulation (EU) 2023/1542 concerning batteries and waste batteries and is currently engaging with the European Commission and other stakeholders regarding its implementation. As an association, we have consistently promoted the harmonisation of the different due diligence requirements as determined by the Batteries Regulation and the Directive (EU)2024/1760 on corporate sustainability due diligence (CSDDD). Specifically, the chain of custody and third-party verifications provisions should allow manufacturers to implement one practice to comply with both.

In view of the declaration of intent made by President von der Leyen in Davos for “far-reaching simplification of due diligence rules,” we are in favour of adding the Batteries Regulation to the scope of this exercise. Once the relevant rules of the CSDDD will be adjusted, the requirements for the Batteries Regulation should be as well. In this context, time is of the essence; the due diligence guidelines of the Batteries Regulation will be released in February 2025 and enter in effect in August 2025. As a result, a broad swath of actors across several sectors will need to quickly adjust systems, which may need to be further adjusted by updates to the CSDDD. Therefore, a swift reaction is required to assure the implementation timeframe is extended to allow for harmonisation with the provisions of the CSDDD.

EPBA – Consumer Batteries Europe believes that the Omnibus Simplification Package provides a valuable opportunity to reduce the regulatory burden for producers of portable batteries. Less duplicity

of rules results in less administrative requirements for companies. This fosters the business climate in the EU and positions Europe as an attractive global investment location.

We are keen to engage with you and your teams in an open dialogue on how to minimise the regulatory burden and help business flourish in the European Union.

Warm regards,



Kevin Rejent
Chairman



Carole Bachman
General Secretary