

## Feedback on Due Diligence Rules for Batteries and Omnibus IV – Public Consultation<sup>1</sup>

We welcome the stop-the-clock decision to postpone the implementation of the due diligence requirements of the Regulation (EU) 2023/1542 (EUBR), Chapter VII, for two years. While the need for the delay should not be interpreted as a lack of preparations by our member companies, it is needed to

- Adopt the Commission guidelines for the implementation of battery due diligence pursuant Article 48(5) EUBR to provide clarity for manufacturers;
- Appoint notifying authorities by all member states; and
- Harmonise the EUBR due diligence rules with the revised CSRD and CSDDD under Omnibus I.

In response to the Commission proposal for a Regulation on Simplification Measures for Small Mid-Cap Enterprises<sup>2</sup>, we seek further improvements to the Due Diligence rules for batteries in order to create fair level playing field for our members, and other battery manufacturers. As expressed in our earlier position paper dated 22 May<sup>3</sup>, we fully support a consistent set of rules to foster environmental and human rights standards for critical raw minerals. Our supply chains are no different to those for steel products; animal feed; brick colorants; fertilisers; brass and bronze production, chemically resistant materials; electrical conductors; etc. – nor should be the applicable Due Diligence requirements.

We take note of the current public debate about the Omnibus simplification package, notably the position of the Council on due diligence requirements<sup>4</sup>. To close the gap with the EUBR, we are proposing that

- Chapter VII of EUBR shall not apply to economic operators with less than 5,000 employees and EUR 1.5 billion net turnover.
- The scope of Chapter VII of EUBR shall be strictly limited to addressing risks in the battery supply chain such as the material operations of smelters/refiners, and of sourcing mines for raw minerals representing at least 10% of the battery producer's total raw materials value.
- The report of economic operators on their individual battery due diligence policies, as referred to in Article 48(1) EUBR, shall be reviewed and made publicly available every five years.

Furthermore, and in response to the Commission proposal for a Regulation regarding Digitalisation and the Alignment of Common Specifications<sup>5</sup>, we consider it crucial that the EU product legislation is aligned with the 'digital age'. We support the proposed changes for the conformity assessment procedures of batteries which would slightly reduce the administrative burden of the industry. Most importantly, we advocate also for the use of QR codes or URLs as a primary source of information about batteries, fully in line with the new rules on labelling of ingredients and nutritional values on wine<sup>6</sup>.



Kevin Rejent  
Chairman



Marco Baldoli  
General Secretary

## About EPBA – Consumer Batteries Europe

*We are 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. The sector employs around 4,000 people in Europe, and the VAT contribution amounts to approximately EUR 260 million. We are dedicated to advancing the sustainable, safe, and efficient use of portable batteries across Europe. Our mission is to advocate for innovation and environmental stewardship in the battery industry, promote best practices in manufacturing and recycling, and ensure compliance with stringent safety and environmental standards. We work closely with stakeholders, including the EU institutions, policymakers, and consumers, to safeguard and enhance our positive contribution to the EU economy, the environment, and the communities in which we operate.*

<sup>1</sup> Submission to the public consultation ending on [31 July 2025](#) or [3 September 2025](#), respectively.

<sup>2</sup> [COM\(2025\)501](#).

<sup>3</sup> [Statement on the Batteries Regulation Due Diligence and the Omnibus IV Initiative](#).

<sup>4</sup> [Press release about Council position on due diligence requirements to boost EU competitiveness](#)

<sup>5</sup> [COM\(2025\)504](#).

<sup>6</sup> [Commission Delegated Regulation \(EU\) 2023/1606](#).