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Portable Battery Production Outside of IED Scope

Directive 2024/1785 amends the Industrial Emissions Directive (2010/75/EU – IED) to reduce emissions from large industrial installations. As it concerns batteries, the original proposal targeted only large-scale installations to produce batteries for electric vehicles (EV) in Europe, as these plants were expected to grow in number, see recital 13 of the Directive. It was only during the final stages of the legislative process, lacking a thorough stakeholder consultation, that the production of portable batteries was also made mandatory i.e., with capacity of min. 15,000 tonnes of battery cells per year.

The European sector for consumer batteries, notably alkaline cells, comprises exclusively of small and medium-size operations with sites of 20.000 – 40.000 m², and with approx. 200-400 employees. Contrary to the production of EV batteries, a large number of new installations is not expected.

Therefore, EPBA – Consumer Batteries Europe *is in favour of retaining the original proposal i.e., to* ***exempt the production of portable batteries from the (revised) scope of IED****; at least as it concerns existing production facilities. Below, please find a further outline of our position.*

Lower Environmental Impact of Consumer Batteries versus EV and Other Batteries

Portable batteries contain materials such as zinc, manganese dioxide, and potassium hydroxide. These minerals are not as harmful to the environment as those used in lithium-ion or lead-acid batteries.

While the revised IED aims at 40% lower emissions from key air pollutants e.g., PM2.5, SO2, NOx or NMVOC versus 2020, none of these are attributable to portable battery facilities. As the manufacturing of consumer batteries does not require clean room or dry room techniques, the energy consumption is significantly lower versus the production of lithium-ion cells.

The production of portable batteries does not generate large volumes of air or water pollution, hazardous chemicals, or heavy metals in significant quantities either. It is typically generating lower emissions compared to e.g., metal production; chemicals and petrochemicals; or other energy-intensive industries. Consumer batteries are produced in predominantly mechanical process steps i.e., mixing, filling, joining, crimping, pressing, sieving / screening, dosing, etc. These processes have been well established for many years, and major technology changes are not expected.

Furthermore, the chemical waste from manufacturing is limited in volume and can be usually managed by local waste treatment systems. Water consumption and discharge are in general not high either compared to other industry sectors.

High Administrative Burden for Low Impact

Directive 2024/1785 introduces a permit system designed for industries with significant emissions or environmental risks, requiring extensive monitoring of pollutants and regular reporting to authorities. In addition, the mandatory implementation of Best Available Techniques (BAT) can be technically demanding and costly.

For the comparatively cleaner process of producing consumer batteries, such requirements would result in an ***undue administrative burden with little environmental benefit***. For the reasons set out in section above, we consider the application process for a permit under the revised IED ***disproportionate versus the actual environmental risks arising***.

Kevin Rejent
Chairman

Carole Bachmann
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.