

Chemistry for Batteries Europe

IAA AMENDMENTS

June 2026

Chemistry for Batteries Europe (CBE) - Proposed Amendments to the Industrial Accelerator Act (IAA)

Amendment 1 - Article 3 (24a) (new)

Text proposed by the Commission	Amendment
	(24a) “battery-defining subcomponents” means components or materials used in battery manufacturing that: (a) directly determine electrochemical performance or safety; (b) require qualification cycles typically exceeding 12 months; and (c) exhibit limited substitutability without requalification.
Justification This amendment introduces a functional and technology-neutral definition to identify upstream battery materials that are structurally decisive for performance, safety and industrial resilience. It provides a clear stopping rule that avoids broad scope expansion while enabling demand-side measures to capture battery-defining upstream chemistry, including cathode precursor materials (pCAM) and functional electrode materials such as polymer binders; lithium iron phosphate (LFP) as a cathode active material and its key precursor iron phosphate; electrolyte conductive salts such as lithium hexafluorophosphate (LiPF ₆) and lithium bis(fluorosulfonyl)imide (LiFSI). The definition is designed to remain applicable across battery value chains, recognizing that similar material dependencies arise across battery applications, including transport and battery energy storage systems (BESS). It is operational, enforceable and compatible with a component-based approach.	

Amendment 2 - Article 16 (2) (g) (new)

Text proposed by the Commission	Amendment
	(g) the existing domestic manufacturing capacities of the Union, including for battery-defining upstream subcomponents and materials.
Justification	

Chemistry for Batteries Europe

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When adopting delegated acts to amend Annex II or Annex III, the Commission should take into account the Union's existing domestic manufacturing capacities for strategically relevant battery value-chain segments. This helps ensure that components already produced in the Union, and exposed to distortive competition, can be safeguarded where appropriate. It introduces a preventive resilience dimension and reduces the risk of strategic segments being undermined despite domestic capability.

Amendment 3 - Article 16 (4) (new)

Text proposed by the Commission	Amendment
	4. The Commission shall within [X] months from the entry into force of this Regulation adopt delegated acts in accordance with Article 30 to supplement Annex III by: (a) identifying the battery defining subcomponents and categories of chemical input materials used in the production of the products listed in Annex III for which Union origin requirements may apply; (b) specifying the minimum shares of those materials that shall originate in the Union, where appropriate, and (c) establishing methodologies for the calculation and verification of those shares, including, where appropriate, the use of appropriate allocation methodologies.
Justification The amendment introduces an empowerment for the Commission to specify, through delegated acts, the categories of input materials and corresponding minimum shares subject to low-carbon and/or Union-origin requirements under Annex II and III. This ensures that the frameworks established in Annex II and III can be effectively implemented and adapted over time, taking into account the technical complexity and diversity of industrial value chains, in particular in sectors relying on chemical inputs. The current Regulation sets requirements at product level but does not sufficiently define how upstream materials contributing to those products should be treated, which may limit the effectiveness of demand-side measures. By enabling the Commission to define relevant input materials and applicable thresholds, the amendment strengthens the operability and enforceability of the Regulation, while preserving the necessary flexibility to reflect technological progress, market developments and data availability. This is particularly important for the chemical industry, where value chains are heterogeneous and where methodologies for tracking low-carbon and circular inputs are still evolving. The amendment also ensures that demand-side measures extend beyond final materials to the upstream inputs that determine their carbon footprint, thereby improving value chain integration and reinforcing the Regulation's objectives of industrial decarbonisation, resilience and reduced strategic dependencies.	

Amendment 4 - Article 16 (5) (new)

Text proposed by the Commission	Amendment
	Where Union-origin requirements apply to products incorporating batteries, the Commission shall, where appropriate, ensure that origin determination for battery-defining subcomponents reflects the key manufacturing step.
Justification For chemically intensive battery materials, customs-based origin rules alone do not reflect where industrial value, know-how and strategic capability are created. This amendment enables Union-origin requirements to be linked to the key manufacturing step (e.g. precursor synthesis, polymerisation), ensuring that demand-side measures capture upstream battery chemistry without imposing blanket requirements. It provides a minimum safeguard against compliance through assembly alone and supports technology-neutral implementation.	

Amendment 5 - Recital 19a (new)

Text proposed by the Commission	Amendment
	In defining Union-origin requirements and lead market measures for strategic technologies such as batteries, coherence should be ensured with Regulation (EU) 2024/1735 and its implementing acts, including Commission Delegated Regulation (EU) 2025/1463, which identify specific components primarily used for net-zero technologies based on their essential character, specific nature and role in the value chain.
Justification This amendment ensures coherence between the Industrial Accelerator Act (IAA) and the Net-Zero Industry Act (NZIA), which already establishes a Commission-approved methodology for identifying technology-defining components while maintaining scope discipline. Referencing the NZIA delegated act strengthens legal robustness, avoids duplication of methodologies and supports consistent treatment of upstream battery components across EU industrial policy instruments, without expanding the scope of the IAA beyond its intended mandate.	

Amendment 6 - Recital (new)

Text proposed by the Commission	Amendment
	In defining Union-origin requirements and lead market measures for batteries, it is important to ensure that such measures reflect value-chain dependencies across battery applications. While the provisions of this Regulation focus

	on batteries used in transport, similar value-chain dependencies and material requirements arise in other applications, including battery energy storage systems (BESS). The approach to identifying relevant components and subcomponents should therefore remain technology-neutral and applicable, where appropriate, across battery uses.
Justification This amendment clarifies that the value-chain approach underpinning the battery-related provisions is not limited to transport applications. Battery energy storage systems rely on similar upstream materials and components as traction batteries, including battery cells, active materials and functional inputs such as polymer binders. Ensuring that the framework remains applicable across battery uses strengthens consistency, supports industrial resilience, and reflects the structure of battery value chains without requiring changes to the core legal provisions.	

Amendment 7 - Annex II Part I (a) - Public procurement procedures

Text proposed by the Commission	Amendment
(a)...From [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific component that originate in the Union.	(a)...From [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific component and/or battery-defining subcomponent that originate in the Union.
Justification This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.	

Amendment 8 - Annex II Part II (a) - Battery energy storage systems (Auctions)

Text proposed by the Commission	Amendment
(a) ...For auctions published after [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage system shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific components that originate in the Union.	(a) ...For auctions published after [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage system shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific component and/or battery-defining subcomponents that originate in the Union.

Justification This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.
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Amendment 9 - Annex II Part III (a) - Battery energy storage systems (Other public intervention)

Text proposed by the Commission	Amendment
(a) ... For schemes set up or updated from [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific components that originate in the Union.	(a) ...For schemes set up or updated from [OP: Please insert the date = 3 years after entry into force of this Regulation], the battery energy storage systems shall originate in the Union and contain battery cells, a battery management system as well as one additional main specific component and/or battery-defining subcomponents that originate in the Union.
Justification This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.	

Amendment 10 - Annex III Part I (c) - Public procurement procedures of electric vehicles

Text proposed by the Commission	Amendment
(c) the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union;	(c) the vehicle's traction battery contains at least three main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, originating in the Union;
Justification This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.	

Amendment 11 - Annex III Part I (d) - Public procurement procedures of electric vehicles

Text proposed by the Commission	Amendment
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(d) the vehicle's traction battery contains at least five main specific components of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union;	(d) the vehicle's traction battery contains at least five main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union; This approach may also apply, where appropriate, to batteries used in other applications, including battery energy storage systems (BESS), taking into account similar value-chain dependencies and material requirements. The Commission is empowered to adopt delegated acts in accordance with Article 31(2) to: (i) identify battery-defining subcomponents, including relevant precursor materials and other key chemical input materials necessary for the production of those components; and (ii) specify, where appropriate, minimum shares of such battery-defining subcomponents that shall originate in the Union.
Justification Union-origin requirements applied solely at the level of battery cells and selected final components risk anchoring assembly without addressing upstream dependencies. This amendment ensures that demand-side measures under Annex III can extend, where appropriate, to battery-defining upstream chemistry, including pCAM and functional electrode materials such as polymer binders; lithium iron phosphate (LFP) as a cathode active material and its key precursor iron phosphate; electrolyte conductive salts such as lithium hexafluorophosphate (LiPF₆) and lithium bis(fluorosulfonyl)imide (LiFSI). The delegated-act approach preserves flexibility and proportionality while preventing structural blind spots in the battery value chain. While the current provisions are anchored in transport applications, similar value-chain dependencies arise across battery applications. In particular, battery energy storage systems (BESS) rely on the same or equivalent upstream components and chemical inputs as traction batteries, including battery cells, active materials and related subcomponents. The proposed approach is therefore intended to apply across battery applications, including stationary energy storage systems, where relevant.	

Amendment 12 - Annex III Part I (2) (b) - Public procurement procedures of electric vehicles

Text proposed by the Commission	Amendment
(b) the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union;	(b) the vehicle's traction battery contains at least three main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, originating in the Union;

Justification
This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.

Amendment 13 - Annex III Part II (b)

Text proposed by the Commission	Amendment
(b) the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union;	(b) the vehicle's traction battery contains at least three main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, originating in the Union;
Justification	
This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.	

Amendment 14 - Annex III Part II (c)

Text proposed by the Commission	Amendment
(c) the vehicle's traction battery contains at least five main specific components of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union;	(c) the vehicle's traction battery contains at least five main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, the cathode active material, and the battery management system, originating in the Union; The Commission is empowered to adopt delegated acts in accordance with Article 31(2) to: (i) identify battery-defining subcomponents, including relevant precursor materials and other key chemical input materials necessary for the production the main specific components and the battery-defining subcomponents; and (ii) specify, where appropriate, minimum shares of such battery-defining subcomponents that shall originate in the Union.
Justification	

The battery requirements under the Industrial Accelerator Act are a crucial instrument for establishing a resilient and competitive European battery value chain. These objectives can only be achieved if demand creation measures cover the full value chain, including chemical precursors which are indispensable for battery production.

This amendment ensures that demand-side measures under Annex III can extend, where appropriate, to battery-defining upstream chemistry, including pCAM and functional electrode materials such as polymer binders; lithium iron phosphate (LFP) as a cathode active material and its key precursor iron phosphate; electrolyte conductive salts such as LiPF_6 and LiFSI . These materials are essential enabling inputs for EV batteries across multiple applications. These materials are critical for battery performance, safety and durability. Industrial production capacities for these substances already exist in Europe, providing a strong basis for domestic value creation.

However, due to structural cost disadvantages compared to other regions, such as China, and the absence of effective Union content-based demand incentives, these existing European capacities have often not been utilised or scaled up. Without addressing this gap, upstream production of battery precursors risks remaining economically unviable in Europe despite available industrial assets.

The delegated-act approach preserves flexibility and proportionality while preventing structural blind spots in the battery value chain.

Amendment 15 - Annex III Part II (2) (b)

Text proposed by the Commission	Amendment
(b) the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union.	(b) the vehicle's traction battery contains at least three main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, originating in the Union;
Justification This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.	

Amendment 16 - Annex III Part III (2) (b)

Text proposed by the Commission	Amendment
(b) the vehicle's traction battery contains at least three main specific components of batteries, among which the battery cells, originating in the Union.	(b) the vehicle's traction battery contains at least three main specific components and/or battery-defining subcomponents of batteries, among which the battery cells, originating in the Union;
Justification	

This amendment ensures that the component-based approach effectively captures upstream battery chemistry where value creation and dependency risks concentrate. Without coverage of battery-defining subcomponents, Union-origin requirements risk being met through assembly-focused compliance while upstream vulnerabilities remain unresolved.
