



March 2026

Chemistry for Batteries Europe input to the draft Commission Decision on the Battery Booster Facility

General Feedback (≤2 500 chars)

We support the establishment of the **Battery Booster Facility** as an **Innovation Fund** window providing **interest free loans** to accelerate **ramp up to largescale production** of battery cells in the EU. This is a necessary bridge after IF24 Battery grants and before larger envelopes under the next MFF. To maximise impact, we recommend four improvements: **speed, scale, upstream integration, and proportionate delivery**. First, publish a **call calendar** with an early **2026 launch**, clear time to decision targets (≤6 months), and, if feasible, **rolling cutoffs**, given the market's quarter to quarter dynamics. In parallel, pilot a Loan-as-a-Service with Member States, mirroring existing **Grants-/Auctions-as-a-Service**, so national top-ups can be channelled rapidly under common terms while keeping a single EU selection and timeline. Second, recognising the Innovation Fund's finite envelope (~€40bn to 2030) and the **€5.2bn** already allocated to the 2025 calls (grants and auctions), treat **€1.5 bn** as a **floor**, not a cap; and allow **seamless** blending of Battery Booster **loans** with **InvestEU/EIB** and compatible national instruments to crowd-in capital while preserving speed. Third, reflect the **full value chain**: even if eligibility centres on **cell producers**, award design should **reward integration between EU and selected third country supplier integration** for **battery critical chemicals** (CAM/AAM precursors, electrolytes, binders, separators, salts, solvent recovery, black mass refining) via simple evidence (e.g., offtake/framework agreements). This strengthens **resilience** consistent with NZIA style objectives and ensures Facility benefits spill over to **stationary and industrial storage**, not just EVs. Fourth, keep **monitoring/reporting admin-light**, aligned with the Financial Regulation and Innovation Fund practice (KPIs on yield/scrap/energy intensity/capacity), and anchor OSH in existing EU law while ensuring **equal enforcement for imports** via market surveillance. These adjustments would materially improve competitiveness outcomes while staying fully within the draft Decision's scope and legal basis.

Recitals (≤1 500 chars)

Please add a recital clarifying that, while the Facility supports **EV cell ramp up, upstream chemical inputs** are **cross application** and investments enabled by the Facility are expected to **benefit both EV and non-EV markets** (e.g., stationary storage) through shared supply chains. Also add a recital encouraging **complementarity/blending** with **InvestEU/EIB** and Member State tools, and noting that the Facility acts as a **bridge** pending future scaling under the **next MFF**. This will set expectations for implementers and evaluators without widening legal scope.

Whereas the Innovation Fund operates within a finite budget and multiple 2025 calls totalling €5.2bn are underway, it is appropriate to maximise leverage by enabling combination with

InvestEU/EIB instruments and by establishing a Member State contribution window for loans under the Facility, mirroring the existing Grants-/Auctions-as-a-Service approach.

Article 1: Subject Matter (≤1 500 chars)

Support as drafted. Consider adding a sentence: “The Facility shall be implemented in a manner that **reinforces EU supply chain resilience**, including through recognition of **EU based and selected third countries (for instance those recognised as made in EU) upstream supplier integration** in project evaluation.” This keeps eligibility on cells, but signals that **supply chain linkages** are an explicit policy purpose.

Article 2: Definitions (≤1 500 chars)

Add a definition for “**Upstream battery-critical chemicals and materials**” to mean **inputs used in cell manufacturing** (including **CAM/AAM precursors, electrolytes, binders, separators, salts, and recycling intermediates such as black mass**). This definition would only serve **evaluation clarity**; it does not extend eligibility but helps implement the resilience intent in award criteria.

Article 3: Objective (≤1 500 chars)

Endorse the objective to support **ramp up to largescale, commercially viable production**. Add wording that **projects demonstrating secured EU supplier including with suppliers from selected third countries (for instance those recognised as made in EU) integration** (e.g., **binding offtake** or framework agreements for **battery critical chemicals**) contribute to the Facility’s **resilience and strategic autonomy** aims and may be **preferentially scored** under Article 8.

Article 4: Union contribution (≤1 500 chars)

Member States may contribute national resources to fund additional Battery Booster loans awarded to projects located on their territory, using a Loan-as-a-Service arrangement operated by the Commission/CINEA under common terms and a simplified State-aid assessment, by analogy to Grants-/Auctions-as-a-Service.

Note that **€1.5 bn** should be considered a **minimum** envelope; invite the Commission to **retain flexibility** to **top up** from ETS revenues and/or via reprioritisation, and to **blend** with **InvestEU/EIB debt** to match the **CAPEX profile of giga scale manufacturing**. Clarify that underuse in early calls can be **reallocated swiftly** to subsequent cutoffs to preserve momentum.

Article 5: Implementation and form of support (≤1 500 chars)

Support **interest-free loans** for ramp-up. Encourage **admin-light blending** with **InvestEU/EIB** and national measures (e.g., PPAs/CFDs at Member-State level) without creating duplicative

documentation. Where appropriate, allow **phased tranches** linked to **operational KPIs** (e.g., yield/quality stability) to reward industrial learning curves typical of cell lines.

Loan operations under this Facility may be blended with InvestEU guarantees/EIB debt and compatible national instruments under a single set of documentation, ensuring admin-light delivery and predictable cash-flow for ramp-up.

Article 6: Eligibility (≤1 500 chars)

Keep **cell producers** as beneficiaries to ensure legal clarity and speed. To avoid unintended exclusion effects, specify that **eligible projects may present evidence of EU upstream supplier integration** (chemicals/materials) including with suppliers from selected third countries (for instance those recognised as made in EU) and **long-term offtake** as part of their application. This preserves the Facility's scope yet recognises the **cross-application value** of the upstream.

Article 7: Call for proposals (≤1 500 chars)

Publish a **2026 call calendar** with clear milestones (launch, evaluation, loan signature) and commit to **time-to-decision ≤6 months** where feasible. Consider **rolling cut-offs** or **two windows** in 2026 to account for investment timing. Provide an **evaluation handbook** in advance, including how **supplier integration** and **blending** evidence are assessed.

Where Member States opt into Loan-as-a-Service, CINEA may use the common EU ranking list to award additional loans to eligible-but-unfunded proposals, ensuring speed and consistent selection criteria.

Article 8: Award criteria (≤1 500 chars)

Add a **sub criterion under resilience/sovereignty: EU supplier integration**: extent to which the project secures **EU based** including suppliers from selected third countries (for instance those recognised as made in EU) supply of **battery critical chemicals and materials** (e.g., CAM/AAM precursors, electrolytes, binders, separators, salts, black mass), demonstrated via term sheets/LOIs/long-term offtake. Keep **light administrative** evidence requirements to ensure speed.

Article 9: Loan Agreement (≤1 500 chars)

Allow **milestone-based disbursements** linked to **ramp-up KPIs** (e.g., yield/scrap/quality stability/capacity achieved) while ensuring **predictable drawdown** for cash-flow planning. Permit **complementarity** and **pari passu** arrangements with **EIB/InvestEU** where relevant, to crowd-in private finance.

Article 10: Reporting and monitoring ($\leq 1\,500$ chars)

Use **harmonised, admin-light templates** aligned with Innovation Fund practice and the Financial Regulation. Focus on **industrial KPIs** material to ramp-up (yield, scrap, energy-intensity, uptime, capacity) and **avoid duplication** with national reporting. Reference OSH compliance by **anchoring in existing EU law** and **equal enforcement for imports** via market-surveillance, not by adding new burdens.

Article 11: Entry into force ($\leq 1\,500$ chars)

Support rapid entry into force. If possible, **pre-announce** the **call launch date** on the Facility web page upon adoption to enable promoters to mobilise internal approvals.
