

# Chemistry for Batteries Europe

Presidency of the Council  
Cc Antici Group

Brussels, 22 June 2026

Enclosure: Presidency Steering Note to the Antici Group (Simplification) meeting on 11 May 2026

## Subject: Contribution to discussions on Article 13 of the Batteries Regulation (EU) 2023/1542

Dear Presidency of the Council,

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Dear Presidency of the Council,

**Chemistry for Batteries Europe (CBE)** would like to contribute to the ongoing discussions on the proposed amendments to Article 13 of the Batteries Regulation (EU) 2023/1542, as outlined in the Presidency Steering Note to the Antici Group (Simplification) meeting on 11 May 2026.

We support the objective of improving transparency on substances in batteries. At the same time, we would like to emphasise the importance of ensuring that any additional requirements remain proportionate, implementable, and aligned with existing EU chemicals legislation, in particular Regulation (EC) No 1907/2006 (REACH) and Regulation (EC) No 1272/2008 (CLP).

The Presidency proposal would require labelling of substances of concern, as defined under Article 2(27), points (27)(a) and (27)(b)(i) to (vii) of Regulation (EU) 2024/1781, where present in batteries above 0.1% weight by weight.

While we support the objectives of the Regulation, such an approach would significantly expand current requirements and would oblige companies to investigate a very large number of substances across complex supply chains. This would create considerable challenges from an implementation and data collection perspective.

In this context, it is important to ensure that any labelling requirements provide meaningful and actionable information for users and the waste management chain, while remaining feasible for industry to implement in practice. Further clarification would be beneficial on how such requirements would be operationalised, including whether a prioritisation approach could apply.

CBE therefore supports an approach that builds on existing REACH frameworks, in particular focusing on substances already identified as Substances of Very High Concern (SVHC), for which supply chain communication obligations are already established under Article 33 of REACH.

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Even under the current REACH framework, collecting and communicating information on Candidate List substances across complex supply chains remains resource-intensive. Extending similar obligations to a significantly larger number of substances would create a disproportionate burden, particularly for SMEs.

At present, there is no obligation for companies to systematically collect and communicate information on all substances falling under Article 2(27)(b)(i) to (vii). Introducing such requirements would therefore represent a substantial shift in regulatory practice.

Should the co-legislators consider extending the scope beyond existing REACH frameworks, this should be supported by an impact assessment demonstrating the feasibility of supply chain data collection, the practical implementation of labelling requirements, and the added value for users and waste operators.

CBE remains committed to engaging constructively with the EU institutions to support the development of workable and effective solutions.

Yours sincerely,



Dave Brassington, Chair  
**Chemistry for Batteries Europe (CBE)**