



Brussels, 12 August, 2014.

REF: Electric Vehicle Regulatory Reference Guide.

Prepared for: The United Nations Economic Commission for Europe (UNECE)
Electric Vehicles and the Environment Informal Working Group (EVE IWG)

Prepared by: The EVE IWG, with support from FEV, Inc. and Energy Solutions

Proposal from RECHARGE for contributions to the Path Forward, new EVE mandate Part A.

We thank the EVE IWG for the excellent work accomplished during the preparation of the EVE Regulatory Reference Guide and its publication. RECHARGE's Members believe that it is important to complement this initial piece of work by a more in-depth analysis of the Recommendations outlined in Chapter 5 of the EVE Ref. Guide.

RECHARGE would like to contribute to the following Recommendations as requested by the EVE IWG in the message of Thursday, August 7th, 2014.

5.3. Battery Performance and Durability.

RECHARGE has been selected by the EU Commission to evaluate and recommend the Product Environmental Footprint (PEF) of Rechargeable Batteries, in particular, Lithium-Ion batteries that are used in Electric Vehicle applications (Ref.1 and Ref.2).

As the scope of work of § 5.3. is covering battery durability, it will include some of the considerations on which the PEF is based. Indeed the environmental impact parameters under consideration in the PEF project include, among others, the CO₂ emissions. The necessity to recommend a global methodology to evaluate the useful life of a battery is a critical step in the evaluation of the technical and environmental performances of a battery for the EV application.

In addition RECHARGE has been following closely the issue raised by the re-use or the second use of EV batteries at the end of their service life. RECHARGE has communicated his position to the EVE IWG on the absence of regulation regarding the conditions of re-use and second use of rechargeable batteries. In particular there is a need to develop a legislative or regulatory framework regarding the Producer Responsibility when these batteries are entering a second service life.

RECHARGE would like to assist the leader of the working group in addressing the issue of Battery Performance and Durability.



5.4. Battery Recycling.

The development of Recycling Standards is currently undertaken by the European Battery Recyclers Association (EBRA). The criteria for the development of such standards are currently under discussion at the level of EUROMETAUX in a sustainability working group.

There is a need to develop such standards in order to create an harmonized playing field between industrial recycling actors on a worldwide basis.

RECHARGE's Members include the largest EU recyclers of Lithium batteries used in EV applications. RECHARGE is also in contact with the North American Association of Battery Recyclers as well as with the Battery Association of Japan, the Korean Battery Industry Association, and some Asian recyclers.

In this context, RECHARGE would like to play a key role in leading the working group on Battery Recycling or in assisting the leader of this working group.

Conclusion.

RECHARGE believes that it is important to give the appropriate follow-up to the recommendations suggested by the EVE IWG and is ready to support the activities listed in § 5.3 and 5.4. of the call for interest of August 7th, 2014.

RECHARGE aisbl.

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Ref.1. http://ec.europa.eu/environment/eussd/smgp/pef_pilots.htm

Ref.2. High specific energy rechargeable batteries used as a main source of energy for mobile application. Report supplied as an Annex 1.

RECHARGE aisbl is established in Brussels from 1998 as a Non Profit Association.

RECHARGE's Members are representatives of the full Life Cycle of a rechargeable battery: batteries manufacturers, original equipment manufacturers, rechargeable batteries recyclers and suppliers of raw materials to the rechargeable battery industry.

RECHARGE's mission is covering the socio-economic importance of rechargeable batteries in our society.

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