December 3 2025

To: Executive Vice-President for Prosperity and Industrial Strategy Stéphane Séjourné
Commissioner for Environment, Water Resilience, and a Competitive Circular Economy, Jessika Roswall

Call for urgent agreement on EU battery carbon footprint rules in support of Europe's battery industry

Dear Executive Vice-President, Dear Commissioner,

We, as companies and organisations working across the European battery value chain, write to you to express our serious concern over the ongoing stalemate on the EU Batteries Regulation carbon footprint methodology. We urge you to reach an agreement, which supports the development of a sustainable and competitive domestic battery sector in Europe, as soon as possible.

The European battery industry is experiencing a true make-or-break moment. Now is the time for strong policies which can create investment certainty for battery projects and ensure Europe captures value across the supply chain. If gotten right, battery carbon footprint rules can serve as a key lever in this regard, rewarding local manufacturing. However, instead, significant delays are leading to stalled investments in Europe where companies need visibility to take final investment decisions and scale battery factories effectively. In the meantime, blocked negotiations only serve to divide both EU member states and the industry.

The key objective of the battery carbon footprint should be to capitalise on the increasingly clean EU grid in order to improve the competitive position of EU battery manufacturing as a whole. These rules should not only drive greener batteries but also incentivise local battery manufacturing, where the EU's average grid is at least a fifth cleaner than China's.

The EU's battery carbon footprint methodology should be unblocked by using the EU-wide average grid CO2eq/kWh vs other regions' grids. This approach would allow all Member States and the European battery sector as a whole to take advantage of the carbon footprint tool to boost their competitiveness vis-a-vis batteries made in third countries, addressing the key challenge they are currently facing.

No national competition (via Member State national grid averages) or market mechanisms e.g. Power Purchase Agreements (PPAs) should be foreseen. National grid averages severely distort the internal market and PPAs undermine the EU's competitive advantage vis-a-vis other parts of the world. These options risk an own goal on local production, whilst also opening the door to significant greenwashing.

With this in mind, we are calling on Member States and the European Commission to agree to a fair and ambitious compromise that can support the development of Europe's battery value chain, as soon as possible. We, the signatories, propose using the EU electricity grid average as a compromise between all sides, and in support of the wider EU cleantech industrial agenda.

We would be very keen to meet with your teams to discuss in further detail and we remain at your disposal for any further information.

Sincerely,