



European Commission

Wädenswil/Switzerland, 26 February 2021

**Input to Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) No 2019/1020**

Dear Madam,  
Dear Sir,

OceanCare welcomes the initiative of the European Commission to minimize batteries' harmful effects on the environment and would like to seize the opportunity to provide some input to the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) No 2019/1020.

It is crucial that origin of raw materials is addressed appropriately within the regulation in order to avoid use of raw materials from unsustainable sources. OceanCare, due to its mandate to protect the ocean, is concerned with growing interest in mining the seabed for minerals important for battery production and its potentially enormous detrimental impacts on the marine environment.

The European Parliament<sup>1</sup> as well as the European Commission<sup>2</sup> both call for a moratorium on deep-sea mining until such time as the effects of deep-sea mining on the marine environment, biodiversity and human activities at sea have been studied and researched sufficiently and all possible risks are understood and the technologies and operational practices are able to demonstrate no serious harm to the environment (in line with the precautionary principle) as well as according advocacy of the EU in international negotiations. In consistency with this policy and positioning, we urgently advocate for including a thorough discussion of the potential future origins of raw materials, such as deep-sea mining, while debating the Proposal for a REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL concerning batteries and waste batteries, repealing Directive 2006/66/EC and amending Regulation (EU) No 2019/1020.

Consumers should be able to make an informed decision when buying batteries. In order to enhance transparency of origin of raw materials we suggest the following amendment (bold and underlined part):

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<sup>1</sup> Resolution of 16 January 2018 on international ocean governance: an agenda for the future of our oceans in the context of the 2030 SDGs (2017/2055(INI), para. 40 and 42)

<sup>2</sup> Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the regions on the EU Biodiversity Strategy for 2030 (COM(2020) 380 final, para. 46)



- Annex VI Labelling requirements, Part A General information about batteries, No. 8: "critical raw materials contained in the battery **and origin of raw material**"

as well as additional amendments, as appropriate, to address the issue of transparency of origin of raw materials, including potential future origins.

Thank you very much for taking our suggestion into consideration.

Sincerely,

Fabienne McLellan

Co-Director International Relations at OceanCare