The European Association for Electromobility

EV Batteries Exemption from PFAS Restriction



1) AVERE's Position

Include exemption for battery cell manufacturing process

- No viable alternative to PFAS for cell manufacturing process of lithium-ion batteries
- AVERE calls for derogation for all PFAS substances used in battery production

Introduce explicit tracking of PFAS emissions

 Better and explicit tracking
requirements of PFTE and PFAS would lead
to improved capture
and destruction of
PFAS through
complementary
abatement
technologies Include EVs in derogations for PFAS used in MAC

 Complete and unlimited derogation for maintenance and refilling for mobile air conditioning (MAC) of any vehicle before entry into force of the restriction —> no differentiation between EVs and ICEs

2) Use case - Water-based Cathode Processing for BEV Applications

State of the Art





Present (2024): R&D phase

+ 3 years: For commercial cells to be produced (earliest 2027 if performance issues were resolved today)

+ 10 years:

For new chemistries to proliferate in early-adopter use cases and be evaluated for safety in a vehicle use case (earliest 2037 if cells were commercialized by 2027)



+ 3 years:

For vehicle design, plant retooling, homologation, and manufacturing (earliest 2040 if all preceding steps occurred on these timelines)

AVERE's Asks

Derogation for 13.5 years for BEV use cases of PVDF, fluoroethylene carbonate (FEC), PTFE



Complete and unlimited derogation for maintenance and refilling for MAC of any vehicle before entry into force of the restriction - **To be** equal for BEVs and ICEs

3) Why a BEV Derogation is Needed



BEV derogation necessary if EU wants to participate in EV market ECHA's proposed restriction to have a negative impact on the entire battery value chain:

- By 2032, 6.7 mln BEVs would be affected
- Battery value chain estimated to generate annual demand in the EU of EUR 250 bln from 2025 onwards
- 800,000 direct jobs and up to 3 mln indirect jobs to be impacted

Job creation prospects in the European battery value chain by 2030:

- 150,000 direct jobs
- 735,000 if indirect employment effects are taken into account



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Contact:

Raphael Héliot Policy Manager raphael@avere.org Gabriele Ferrara Policy Officer gabriele@avere.org

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