# Batteries labelling: nudging consumers towards European and sustainable materials

The European Advanced Carbon and Graphite Materials Association (ECGA) thanks the Commission for the opportunity to contribute to the regulation setting labelling requirements for batteries. ECGA represents European producers of advanced carbon and graphite materials, including battery-grade graphite for lithium-ion batteries. Our members are committed to supplying the European battery value chain with sustainably produced materials that meet the highest environmental and social standards. Our core message is the following:

**European battery-grade graphite offers demonstrably superior sustainability performance compared to imports**: lower carbon emissions from cleaner energy grids, full regulatory compliance, transparent supply chains, and respect for labour rights. However, **the current draft implementing act does not enable consumers, manufacturers, or public authorities to identify and reward these advantages**. Without targeted amendments, labels will fail to differentiate between responsibly sourced European graphite and imports with significantly higher environmental and social footprints.

Battery-grade graphite accounts for approximately 15% of a lithium-ion cell by weight and 30% by volume. It is classified as both a critical and strategic raw material under the Critical Raw Materials Act. Yet today, according to our consultancy Wood MacKenzie, more than 95% of battery-grade graphite consumed in the EU is imported from China.

Our members' proposition is to both reduce this dangerous reliance on Chinese graphite and improve the sustainability of the graphite used in European batteries. Indeed, our producers operate under stringent EU environmental, health, and safety regulations, such as REACH, the Industrial Emissions Directive, and soon the Corporate Sustainability Due Diligence Directive (CSDDD). Yet, price-wise, they have to compete directly with Chinese imports which are not subject to the same constraints.



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From our perspective, the labelling framework represents an opportunity to support European strategic autonomy and incentivise sustainable sourcing. We urge the Commission to seize this opportunity. In the sections below, we identify three significant gaps in the current draft that will undermine the competitive position of European battery-grade graphite producers and, more broadly, the EU's circular economy and sustainability objectives.

# A No Raw Material Origin Disclosure

The draft regulation requires disclosure of "the place of manufacture (town; region; country/jurisdiction)" for batteries (Annexes I–III, Part A, point III). However, this refers exclusively to where the **battery** is assembled, not where the **critical raw materials** originate or are processed. Consequently, a battery assembled in Germany using graphite mined in Xinjiang, processed in China, and coated in South Korea will bear the same label as one using graphite extracted and processed entirely within the European Union.

We recommend to **amend point X in Part A of Annexes I, II, and III to require not only the identification of critical raw materials but also their geographic origin at the extraction and processing stages**. This information could be provided online via the QR code only to avoid label overcrowding, following the priority logic established in Article 1(7) of the draft.

Alternatively, the Commission could introduce a **supplementary origin symbol or indicator** for batteries containing a minimum threshold (e.g., 50%) of European-sourced critical raw materials. This would reflect the goals of the Critical Raw Materials Act and align with the Automotive Action Plan's emphasis on European resilience.

# B Aggregated Carbon Footprint Disclosure Only

Annex V establishes a carbon footprint label that displays only a **single aggregated figure** for the entire battery lifecycle. There is no breakdown by material, component, or supply chain stage. We strongly support carbon footprint disclosure, and would like to emphasise that the carbon intensity of battery-grade graphite varies enormously depending on where and how it is produced:

| **Production Route** | **Typical Carbon Footprint** |
|---|---|
| Synthetic graphite (China, coal-heavy grid) | 15–35 kg $CO_2$-eq/kg |


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| Production Route | Typical Carbon Footprint |
|---|---|
| Synthetic graphite (EU, renewable energy | 2–6 kg $CO_2$-eq/kg |
| Natural graphite (EU mined and processed) | 1–5 kg $CO_2$-eq/kg |
| Recycled graphite (EU) | <1 kg $CO_2$-eq/kg |

These differences have a strong impact on the total footprint of the battery. Thus, for a 60 kWh EV battery containing approximately 50 kg of graphite, **the choice of graphite source alone can swing the battery's footprint by 1500 kg $CO_2$-eq.** This is equivalent to driving several thousand kilometres. We therefore recommend that the Commission requires the **battery passport** (accessible via QR code) to include a **disaggregated carbon footprint breakdown** by major component category. This would minimally include cathode active materials and anode active materials, such as, in particular, graphite.

Furthermore, this addition would make our members' efforts to produce **recycled battery-grade graphite,** a sector where they are global leaders, finally visible to end-customers. Our members have invested substantially in graphite recycling technologies (including projects such as Bastille and Graphirec). These investments support the EU's circular economy objectives but will generate no market recognition unless labelling allows customers to distinguish recycled content.

The granular data necessary for the above requested disclosures already exists, as it is required to calculate the aggregated figure under the delegated act on carbon footprint methodology. Making it accessible would impose no additional data collection burden while substantially improving transparency and market incentives.

# C No Human Rights or Due Diligence Transparency

The Batteries Regulation establishes comprehensive due diligence obligations for economic operators. Yet, the draft implementing act contains **no requirements** for disclosing supply chain due diligence practices, responsible sourcing certifications, labour practice information, conflict mineral status, or any form of information on the labour standards used in the supply of raw materials. This is a missed opportunity. If this information, which will be collected by battery manufacturers, is not reflected in consumer-facing labels or the QR-accessible battery passport, the market cannot reward compliant operators.


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Meanwhile, our members, being European, are de facto compliant with all relevant EU labour regulations. Our members implement collective bargaining frameworks, REACH chemical safety requirements, existing and upcoming diligence obligations, and they are subject to the national environmental permitting regimes.

By contrast, graphite imports from jurisdictions with weaker enforcement may benefit from lower costs while externalising social and environmental harms. This means that responsible European operators compete on an uneven playing field.

**We recommend that the Commission adds a new point to Part A of Annexes I, II, and III.** Disclosure (via the QR code) of the following elements should be mandatory:

- **Links to the company's due diligence policy and audit reports, where publicly available**
- **Identification of any third-party responsible sourcing certifications (e.g., IRMA, RMI, ASI)**

# D Conclusion: Ensuring Labels Drive Sustainable Choices

The EU Battery Regulation represents the world's most comprehensive framework for sustainable battery production. Its success depends on effective implementation. That includes labels that genuinely inform market choices.

In their current states, the proposed labels will fail to differentiate between batteries that support European strategic autonomy, environmental protection, and human rights, and those that do not. Besides, our amendments impose minimal additional burden on operators: most of the underlying data is already collected under existing or forthcoming Batteries Regulation requirements.

| Gap | Recommendation |
|---|---|
| No raw material origin disclosure | Require geographic origin of CRMs (extraction + processing) via QR code |
| Aggregated carbon footprint only | Provide disaggregated carbon footprint by component category in battery passport |
| No human rights transparency | Require due diligence compliance disclosure and certification links via QR code |


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