

To: Stéphane Séjourné, Executive Vice-President for Prosperity and Industrial Strategy, Jessika Roswall, Commissioner for Environment, Water Resilience, and a Competitive Circular Economy, Valdis Dombrovskis, Commissioner for Economy and Productivity; Implementation and Simplification, Director General Kerstin Jorna, DG Grow, Director General Florika Fink-Hooijer, DG Environment

CC: Joaquim Nunes De Almeida, Director, Mobility & Energy Intensive Industries, DG Grow, Stefano Sorro, Head of Unit, Net Zero Industries, Sustainable and Circular Products, DG Grow, Aurel Ciobanu-Dordea, Director for Circular Economy, DG Environment, Mattia Pellegrini, Head of Unit, From Waste to Resources, DG Environment

Subject: Urgent call to ensure swift and full implementation of EU batteries regulation due diligence obligations

17th February 2025, Brussels

Dear Executive Vice-President Séjourné, Commissioner Roswall, Commissioner Dombrovskis, Director General Jorna, Director General Fink-Hooijer,

We, as global civil society organisations, labour organisations and businesses, write to you to express our serious concern over potential delays to the implementation of the EU Batteries Regulation due diligence obligations.

Since the adoption of the EU Batteries Regulation in 2023, the need for sustainable batteries in Europe has only accelerated. The due diligence rules, set out in the regulation, will be a turning point for green and ethical batteries, and will help drive greater supply chain resilience. However, swift and full implementation of the rules is key. Many European companies have a strong history of corporate social responsibility practices when compared with competitors from outside the EU, and are already leading on numerous due diligence requirements. Therefore, any delays to implementation will not only risk securing sustainable supply chains critical for the net zero transition, but they will also risk jeopardising the crucial opportunity to give a competitive advantage to a strategic European industry.

Europe's battery value chain is being set up now, and we need to ensure the full entry into force of the due diligence obligations, no later than August 2025, in order to ensure a world-leading battery supply chain in Europe and a commitment to clean and ethical batteries. However, finalisation of the implementation guidelines as soon as possible will be vital to ensuring proper entry into force in August. In addition, this regulation is set to become a blueprint for other product-specific legislative initiatives as well as for other regions across the world to follow. Finally, businesses need certainty and are already in the process of preparing for the entry into force of the rules, including establishing effective battery supply chain due diligence management systems. On top of this, those businesses already preparing will be left at an economic disadvantage if the rules don't go ahead as planned.

As a result, we call on you to:

- **Ensure the full entry into force of the due diligence obligations**, as set out in the EU Batteries Regulation, on 18th August 2025, with notified bodies across all Member States ready to ensure compliance with the requirements laid out in the regulation. The battery due diligence rules, which are already being implemented by industry, must not be included in the current simplification agenda.
- **Finalise the guidelines for implementation of the due diligence requirements**, according to best practice and in line with existing international standards, as soon as possible and following meaningful consultation with stakeholders and rightsholders, including Indigenous Peoples. It is critical that the guidelines ensure that full responsibility for due diligence remains with the economic operator. Finalisation of the guidelines are crucial to ensuring full entry into force in August.
- **Establish robust criteria for recognising due diligence schemes, as foreseen under the Batteries Regulation, in consultation with stakeholders and rightsholders**. The criteria must ensure schemes can only be recognised if they demonstrate full alignment with the regulation, and must require that any recognised scheme includes multistakeholder governance, independent site-level audits, best practice environmental stewardship and full respect of human, Indigenous Peoples' and labour rights.

As civil society, Indigenous Peoples's organisations, labour organisations and businesses, we urge you to ensure the timeline set out in the EU Batteries Regulation is respected. 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,

Transport & Environment
IndustriAll European Trade Union
SOMO
ECOS
Batani Foundation
Earthworks
Focus Association for Sustainable
Development
Fern
Cultural Survival
SIRGE Coalition
The Sunrise Project
Mighty Earth
Rainforest Foundation Norway
Oxfam
Fair Finance International
Climate Rights International
Brot für die Welt

Heinrich-Böll Foundation
European Environmental Bureau
Human Rights Watch
Society for Threatened Peoples,
Switzerland
Public Citizen

Dutch Association of Investors for
Sustainable Development (VBDO)

Volvo Cars
Polestar



Polestar



EEB
European
Environmental
Bureau

V O L V O



Dutch Association of Investors
for Sustainable Development



R Rainforest Foundation
Norway



OXFAM



**MIGHTY
EARTH**



**CLIMATE
RIGHTS
INTERNATIONAL**

**SIRGE
COALITION**
SECURING INDIGENOUS PEOPLES'
RIGHTS IN THE GREEN ECONOMY



**Brot
für die Welt**



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