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To:

- Mr. Frans Timmermans, First Vice-President of the EU Commission.
- Mr. Virginijus Sinkevičius, Commissioner Environment, Oceans and Fisheries.
- Mrs. Adina Vălean, Commissioner Transport.
- Mr. Thierry Breton, Commissioner Internal Market.

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**Ministry of Infrastructure  
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**Ons kenmerk**  
IENW/BSK-2020/119660

Date 23 June 2020  
Subject Netherlands perspectives on the revision of the Batteries Directive

Dear Commissioners,

Dear Executive Vice-President Timmermans, Commissioner Sinkevičius, Commissioner Vălean and Commissioner Thierry Breton,

With reference to the European Green Deal, and more particularly to the forthcoming revision of the Batteries Directive (2006/66/EC), I would like to address the following challenges and opportunities [together with representatives of the Dutch electric vehicle (EV) sector].

Transport has a key role to play in achieving the EU's climate goals. I therefore welcome your initiative to develop policies for sustainable and smart mobility, as well as a zero pollution ambition, and to modernize the EU automobile transport systems. With this letter I would like to address these aspects in the context of the forthcoming proposal for a new regulatory framework for batteries based on the recent evaluation of the Batteries Directive.

The Netherlands strives for optimal use and reuse of EV batteries in support of resource efficiency and a circular economy, for instance by facilitating reuse to increase the product lifespan and by enabling connection of EV batteries to the electricity grid for energy storage.

For these purposes I would like to highlight the importance of transparency on EV battery data and the need for European legislation to make data from batteries universally accessible and readable, as well as the importance of technical specifications and data of battery charging cycles being freely accessible.

Data from batteries need to be accessible and readable to all stakeholders, in order to be able to make optimal use of EV batteries in the electricity grid (energy services), and to properly determine the quality and lifespan of batteries (and thus the value of a vehicle or the value for another application). The availability of data and state of health from the battery management system is also important for third parties who, for example, want to offer mobility-as-a-service, sell or buy used EV cars and for research and development. This is also crucial for consumers and the development of a market for (used) electric cars. In general the accessibility of this data offers opportunities for sustainable economic growth.

Open access battery data is also crucial for properly functioning smart charging. This means that data on the state of charge of a battery must be available to all

parties in the charging chain who need that information, including charging point operators, service providers, electricity suppliers, leasing companies, network operators, automotive retailers and consumers.

Blocking the exchange of various data streams may be understandable from an individual manufacturer's perspective for the short term, but it is highly undesirable for the sake of public interest and our climate efforts. That is why I advocate quick legislative action on all aspects as mentioned above. I was pleased to see that the Commission has recently established that many private and public parties in the EU also want this<sup>1</sup>. I also welcome your emphasis on sustainability and transparency requirements for batteries, considering among others reuse, repurposing and recycling in the new Circular Economy Action Plan.

Apart from the issue of transparency on EV battery data transparency I would like to emphasize the importance of improved collection and recycling rates for all battery types, with collection targets going beyond the current category for portable batteries. To achieve this a revision of the battery categories is needed with due consideration for the increased use of lithium-ion batteries in consumer goods, and the impact of this development on resource efficiency and fire hazards in household waste treatment.

In this letter I feel supported by various automotive, trade and consumer organizations<sup>1</sup>.

I faithfully await your response, and will gladly provide more information for your consideration or discuss these matters in more detail.

Yours sincerely,

THE STATE SECRETARY FOR INFRASTRUCTURE AND WATER MANAGEMENT,

S. van Veldhoven - Van der Meer

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<sup>1</sup> The Dutch association of automotive companies (used cars) ([www.bovag.nl](http://www.bovag.nl)).  
The Dutch association of automotive consumers ([www.anwb.nl](http://www.anwb.nl)).  
The Dutch association of Leasing companies ([www.vna-lease.nl](http://www.vna-lease.nl)).  
The Dutch knowledge platform for charging infrastructure ([www.nkl.nl](http://www.nkl.nl)).  
The Dutch trade association of energy system operators (<https://www.netbeheernederland.nl>).  
The Dutch Electric Riders Association ([www.evrijders.nl](http://www.evrijders.nl)).  
The Dutch Nature and Environment Foundation ([www.natuurenmilieu.nl](http://www.natuurenmilieu.nl)).  
The Dutch hydrogen Platform ([www.opwegmetwaterstof.nl](http://www.opwegmetwaterstof.nl)).