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**Employers Organization of Polish Copper position on modernising the EU's batteries legislation**

**Inception impact assessment (Batteries - modernising EU rules)**

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Employers' Organization of Polish Copper welcomes a European Green Deal to put Europe on the right track to a sustainable future and is prepared to take the necessary measures to make it the world's first climate neutral continent.

We and our member companies (in particular KGHM, a leading mining and energy sector company and the significant producer of copper and silver) are pleased to welcome the EC's initiatives taken to adapt BD legislation in order to accept the assumptions of the European Green Deal.

Nowadays, this EC initiative is crucial for lowering the environmental impact of increasing batteries consumption accelerated by the growth of electronic devices and electric vehicles sectors.

Undoubtedly, care for the natural environment and the improvement of working conditions (in H&S aspect) in our industry (mines, processing plant, smelters) stimulates our interest in the development of electro-mobility also in the area of heavy machinery. We observe considerable effort and progress in these types of applications, and we cooperate with machine manufacturers to test such solutions. In the future, we are counting on improving the quality of air in the excavations and reducing the costs of mine ventilation.

Nevertheless, heavy mining machines require a power supply from large battery systems, which causes problems with the disposal of used/exhausted batteries. The development of the market for the reuse of such batteries will reduce the negative environmental impact of hazardous substances.

In addition, our members companies (e.g. KGHM) are developing renewable energy generators (the most modern levels) and in this area it will be worth developing legal regulatory mechanisms to promote energy storage systems for regulatory purposes between renewable sources and a grid. It will bring benefits in the economy and sustainable use of electric energy.

Looking ahead, we would like to draw the EC's attention to the following issues:

- Development of regulations promoting reuse of batteries in stationary applications,
- Implementation of legal regulations dedicated to the growing market of battery electricity storage systems (BESS), facilitating the cooperation of distributed generational sources (e.g. photovoltaic farms) with the power grid,
- Batteries Directive (BD) modification for the effective identification and segregation of used batteries for the purpose of regeneration or recycling (e.g. introduction of electronic passports with coded information on battery life (type, changes of owner, degree of wear, etc.).

Yours sincerely,

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