

EUROMOT

The European Association of Internal
Combustion Engine and Alternative
Powertrain Manufacturers

POSITION PAPER

Draft Commission Delegated
Regulation Establishing the
Methodology for the Calculation
and Verification of Recycled
Content in Batteries

11 September 2026





The European Association of Internal
Combustion Engine and Alternative
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EUROMOT POSITION

DRAFT COMMISSION DELEGATED REGULATION ESTABLISHING THE METHODOLOGY FOR THE CALCULATION AND VERIFICATION OF RECYCLED CONTENT IN BATTERIES

11 SEPTEMBER 2026, BRUSSELS

1. General Remarks

EUROMOT supports the objectives of the Batteries Regulation to promote circularity, increase the use of secondary raw materials and strengthen the resilience of the European battery value chain. We welcome the Commission's efforts to establish a harmonised methodology for calculating and verifying recycled content in batteries.

2. Accounting of Recycled Content Originating in the EU

EUROMOT notes that the proposed Delegated Regulation introduces a correction factor of 1.3 for recycled lithium, nickel and cobalt originating from recycling operations carried out within the European Union until 31 December 2036.

EUROMOT recognises the Commission's objective of strengthening the European recycling industry, incentivising the recovery of critical raw materials within the Union and improving the resilience of the European battery value chain. We understand that the proposed correction factor seeks to support these policy objectives



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At the same time, questions remain regarding how the correction factor should be interpreted and communicated where the declared recycled-content value differs from the physical recycled content contained in the battery. This raises important considerations regarding transparency, battery passport information, substantiated environmental claims and the communication of recycled-content information to customers, authorities and other stakeholders.

EUROMOT, therefore, invites the Commission to clarify how the proposed correction factor is intended to interact with existing transparency and anti-greenwashing frameworks, how recycled-content values should be communicated in practice, and which recycling and recovery activities are intended to qualify for application of the correction factor.

3. Supply Chain Verification and Conformity Assessment

EUROMOT recognises the importance of ensuring that compliance data is accurate and reliable throughout the battery value chain. At the same time, manufacturers typically have visibility only over their direct suppliers and cannot reasonably guarantee the accuracy of data generated by all upstream actors.

EUROMOT therefore considers that responsibility for data and calculations should remain with the economic operator that generates them. Verified supplier declarations should be accepted throughout the value chain, enabling downstream operators and notified bodies to rely on already verified information without duplicating assessments. This would help avoid duplicate reporting obligations, reduce administrative burden, enhance the efficiency of verification activities, and safeguard commercially sensitive information shared within the supply chain.

In addition, notified bodies should primarily assess the manufacturer's compliance management system, including governance, traceability, supplier management, and internal controls. Once system conformity has been demonstrated, subsequent reviews should be integrated into regular surveillance audits. Reassessments should be required only where significant changes affect the battery model, production site, supply chain configuration, or calculation methodology.

4. Recommendation

EUROMOT recommends that the Commission provide further clarification on:

- **the rationale and practical application of the proposed 1.3 correction factor for EU-origin recycled materials;**
- **how recycled-content declarations and battery passport information should be communicated where a correction factor is applied;**
- **how the proposed approach aligns with EU transparency, sustainability reporting and anti-greenwashing objectives; and**
- **which recycling and recovery activities are intended to qualify for application of the correction factor.**
- **the allocation of responsibility for compliance data generated by different economic operators**
- **the criteria triggering reassessment and re-declaration requirements.**



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5. Conclusion

EUROMOT supports the Commission's objective of strengthening the European battery value chain and incentivising recycling within the Union. To support effective implementation, further clarification would be welcomed regarding the practical application of the correction factor, the communication of recycled-content values and the interaction with broader EU transparency requirements. In addition, EUROMOT encourages a risk-based and efficient verification framework that clearly allocates responsibility for compliance data to the economic operator generating it, allows reliance on verified supplier declarations throughout the value chain, and avoids unnecessary duplication of assessments and reporting obligations.



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THIS IS EUROMOT

EUROMOT, the European Association of Internal Combustion Engine and Alternative Powertrain Manufacturers, represents the key manufacturers of internal combustion engines and alternative powertrains installed in industrial non-road mobile machinery, marine and stationary applications that are operating in Europe and worldwide.

Founded in 1991, we provide an unparalleled heritage and hub of expertise for businesses, authorities, regulators, and public stakeholders worldwide. In partnership with major sector associations and institutions, it is our mission to drive smart regulation and sustainable innovation.

Delivering dependable power for society at high energy conversion efficiency with low emissions remains a key objective of EUROMOT member companies. EUROMOT asserts internal combustion engines and alternative powertrains are a key enabler to address the additional societal need for decarbonisation across multiple industry sectors. This can be achieved by continuing to advance the development of highly efficient energy conversion systems capable of operating on low and net-zero Greenhouse Gas (GHG) energy carriers.

Headquartered in Brussels, EUROMOT is a European interest group, and our profile is registered in the EU Transparency Register under the identification number 6284937371-73. We have been granted consultative status at the United Nations IMO (International Maritime Organization, London) and United Nations ECE (Economic Commission for Europe - Geneva) and other relevant stakeholders.

OUR MEMBERS



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