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Opinion of the European Economic and Social Committee

Communication from the Commission Battery Booster Strategy

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1. Conclusions and recommendations

1.1. The EESC supports efforts to reinforce the business case for European battery production and build a battery value chain fully made in Europe, and the Battery Booster Strategy comes at a critical time. The Committee believes it requires a more credible and longer-term financing plan, clearer prioritisation, a stronger focus on battery types beyond electric vehicles, stronger implementation tools and a more holistic approach.

1.2. The EESC stresses that 'Made in Europe' must be synonymous with high quality products, and strong social and environmental standards. Specific measures to implement this in the battery sector must be developed with relevant stakeholders, including the social partners.

1.3. While welcoming the strong emphasis on mobilising financial support to reinforce the European battery manufacturing ecosystem, the Committee stresses that to deliver real 'booster' effects, the Strategy must be backed by significantly stronger and better-targeted EU financing. Member States and the Commission should reinforce the funding of the Battery Booster Strategy, including through the next multiannual financial framework.

1.4. The EESC underlines that the Strategy must combine timely funding, proportionate and practical conditionalities, and equal treatment and enforcement measures for EU and non-EU products and components placed on the EU market. Aligning financing, permitting and market-access tools, and implementation, will help convert projects into competitive giga-scale output, strengthen strategic autonomy and sustain high-quality industrial jobs.

1.5. The EESC highlights the importance of supporting small and medium-sized enterprises, suppliers and recycling operators, as well as large-scale production facilities, to strengthen their integration into the EU battery ecosystem. Such an inclusive approach can strengthen industrial ecosystems, foster innovation and broaden employment opportunities.

1.6. The EESC believes that the Strategy could generate substantial employment across the battery value chain, including manufacturing, research, recycling and associated services. Its success will depend on Europe's ability to translate innovation into industrial deployment that is economically viable, socially responsible and safe for workers. All public financial support must be conditional on quality employment, full compliance with EU standards and alignment with the objectives of the European Pillar of Social Rights.

1.7. The EESC stresses that the EU must develop relevant frameworks – including attaching technology transfer and local content conditions to State Aid, procurement and subsidies – to guarantee such transfers and build local expertise.

1.8. The EESC emphasises that boosting battery production must cover the urgent need for enhanced dismantling and recycling capabilities to handle future waste flows and produce high-quality secondary materials. This requires investment to scale recycling infrastructure with targeted funding in next-generation recycling technologies, strengthening and enforcing collection systems, including harmonisation across the Member States, and measures to make recycling economically attractive.

1.9. R&I programming (Batt4EU, SET Plan, Horizon Europe) should prioritise pilot/first of a kind lines for battery critical chemicals (precursor synthesis/coating, electrolyte production/solvent recovery, recycling chemistry) and EU made machinery. Sodium batteries should also be included in Pillar V, and Battery Booster funding should be expanded to include non-lithium chemistries.

1.10. The EESC recommends dedicated workstreams on battery material safety, such as pack-level propagation and electrolyte flammability tests, to set clear procurement and conformity standards. Collaboration with industry, including the social partners, and alignment with EU and international rules would improve safety, reduce market fragmentation and support efficient manufacturing.

1.11. The EESC believes that the rapid scaling-up of battery production envisaged under the Strategy increases the need for robust health and safety management systems. Expansion of production capacity must be accompanied by adequate staffing, training and investment in preventive measures. Special account must be taken of migrant and mobile workers. Adequate manuals and information about dangerous materials are essential to increase knowledge and prevent accidents, coupled with adequate labour inspections to ensure compliance.

1.12. The EESC underlines the essential role of workers and their representatives in preventing occupational risks. Social dialogue and worker participation are key to identifying hazards, particularly when new technologies, materials and production methods are introduced.

2. **General Comments**

2.1. The European Commission's *Battery Booster Strategy* ('the Strategy'), presented within the Automotive Action Plan, aims to strengthen the competitiveness, resilience and sustainability of the European battery value chain, as a key element of Europe's strategic autonomy and 'Made in Europe' production. The Strategy rests on six interlinked pillars which form a comprehensive framework to strengthen Europe's battery ecosystem by linking investment, supply chain resilience, innovation and demand creation in support of sustainable industrial development.

2.2. The Strategy responds to intensifying global competition, rising production costs and persistent strategic dependencies, while supporting the transition to clean mobility and the achievement of climate neutrality. A dedicated Battery Booster facility with EUR 1,5 billion allocated from the Innovation Fund to support European battery cell producers during the critical ramp-up phase, supplemented by EUR 300 million to scale up critical raw material production to boost the supply chain, is planned.

2.3. While supporting the Commission's intention to strengthen the EU battery value chain, the EESC calls for a more credible and longer-term financing plan, clearer prioritisation, stronger implementation tools and a more holistic approach. A stronger focus on battery types beyond electric vehicles is needed: stationary battery energy storage system (BESS) is a rapidly growing demand segment that is strategic for energy security and grid stability as renewable capacity additions rise, and should be part of the Strategy.

2.4. The Strategy comes at a critical time. The European battery industry is central to the EU's efforts to meet its industrial and climate goals and boost its economic resilience, energy security and preparedness. At a time when the global geopolitical and economic rules-based order is increasingly being challenged and trade is being weaponised, the EU must reduce external dependencies and boost its own production capacities.

2.5. The EU's efforts towards greater strategic autonomy in battery production will not only increase its overall security, but are also expected to produce economic benefits through new greenfield investments that could generate quality jobs, while ensuring that production adheres to its strict environmental standards.

3. **Financial Support, Green Jobs and Investment**

3.1. The Strategy places strong emphasis on mobilising financial support to reinforce the European battery manufacturing ecosystem. The Committee believes that to deliver real 'booster' effects, it must be backed by significantly stronger and better-targeted EU financing.

3.2. The current EUR 1,5 billion package – provided mainly as interest-free loans – remains modest compared with the large-scale, upfront investment needed to accelerate gigafactory deployment, shorten time-to-market and close cost gaps with global competitors. A genuine booster requires EU programmes capable of supporting major industrial investments quickly and predictably, creating reliable demand signals across the full battery value chain, including raw materials, chemical components, cells and recycling. The EESC urges the Member States and the Commission to reinforce the funding of the Battery Booster Strategy, including via the next multiannual financial framework.

3.3. To achieve strategic independence and capture added value in Europe, the EU should prioritise CRMA strategic project status and RESourceEU financing for chemical refining and precursor plants relevant to battery materials (lithium, nickel, cobalt, manganese, graphite). The Raw Materials Mechanism should aggregate demand and de-risk offtake not only for mined inputs but also for chemical intermediates. In parallel, publishing mass-balance accounting guidance for battery materials by Q2 2026 would unlock investable circular chemistry (including solvent recovery, salt regeneration and precursor re-use) and align the Batteries Regulation implementation with the forthcoming Circular Economy Act. These actions will accelerate sustainable scale-up across the EU while ensuring consistent, proportionate application to imported products and components.

3.4. To restore competitiveness in battery-critical chemicals and ensure coherence across value chains, the EU should urgently address the very high energy costs impacting EU industry, re-include NACE 20.14 and, where relevant, NACE 20.16 in ETS indirect cost compensation, and improve access to PPAs/CFDs for energy-intensive chemical plants. Targeted and proportionate support – aligned with fair competition and equivalent requirements for non-EU imports – should also extend to upstream battery chemical activities such as CAM/AAM precursor chemistry, electrolytes, solvent recovery, binders, separators, salts and black mass refining.

3.5. The EESC emphasises the importance of a policy framework that secures local benefits and strengthens European expertise, requiring foreign investment in strategic battery manufacturing – including chemical facilities – to follow measures on governance, technology sharing, workforce skills and supply chain integration. The Commission should strengthen the Foreign Subsidies Regulation and related instruments to address distortions, ensuring fair competition across the single market and equivalent treatment for EU and non-EU operators. Dedicated EU funding tools, including the Innovation Fund, should be used to de-risk investment in battery cell and component manufacturing.

3.6. The EESC underlines that small and medium-sized enterprises – which constitute a significant part of the sector and primarily serve as critical suppliers of machinery, robotics, components and recycling solutions – must receive targeted support to strengthen their integration into the EU battery ecosystem, ensuring resilience across the entire value chain beyond large-scale cell manufacturing. Such an inclusive approach can strengthen industrial ecosystems, foster innovation and broaden employment opportunities.

3.7. While supporting the Commission's efforts to reinforce the business case for battery production in Europe and build a battery value chain in the EU, the EESC stresses that 'Made in Europe' must be synonymous with high quality products, and strong social and environmental standards. A plan to implement 'Made in Europe' in the battery sector must be developed with relevant stakeholders, including the social partners. Efforts to reduce production costs and administrative burdens must not weaken labour, social or safety standards and robust enforcement and monitoring mechanisms must accompany any simplification measures.

3.8. The Strategy could generate substantial employment across the battery value chain including manufacturing, research, recycling and associated services. All public financial support must be conditional on quality employment, full compliance with EU standards and alignment with the objectives of the European Pillar of Social Rights. The EESC calls for transparent monitoring of the social and employment impacts of financial support measures, including their effects on job quality, skills requirements and working conditions.

3.9. The Strategy also offers opportunities to support green jobs linked to recycling, second-life applications and circular economy solutions, activities that can reduce strategic dependencies while creating skilled employment in downstream segments of the value chain.

3.10. Public investment should also contribute to safeguarding Europe's industrial leadership and ensure sustainable industrial development and regional cohesion. The EESC calls for a balanced geographical distribution of supported projects ensuring that benefits are shared across Member States and regions and that existing industrial ecosystems are strengthened, within the framework of a comprehensive European industrial policy.

4. **Innovation and Technology**

4.1. The EESC recognises innovation as a cornerstone of the Strategy and a key driver of competitiveness in the European battery sector. Continued technological progress is essential to improve battery performance, sustainability and cost efficiency.

4.2. R&I programming (Batt4EU, SET Plan, Horizon Europe) should prioritise pilot/first of a kind lines for battery critical chemicals (precursor synthesis/coating, electrolyte production/solvent recovery, recycling chemistry) and EU made machinery. Materials level safety and sustainability R&I (for example, polymers and electrolyte formulations delivering high fire performance and recyclability), supported by standardisation and practical guidance and proportionate process safety training via Net Zero Industry Academies, will enable safe, efficient scale up across Europe.

4.3. The EESC has highlighted the benefits of developing a sodium battery manufacturing sector as a strategic complement to lithium batteries ([1]). Sodium batteries should be included in Pillar V, and Battery Booster funding should be expanded to include non-lithium chemistries.

4.4. Digitalisation and advanced manufacturing technologies offer significant opportunities to optimise production efficiency and quality. The Committee stresses that their introduction must be accompanied by appropriate training and adjustments to work organisation.

4.5. Skills development is a key enabler of innovation. The EESC underlines the need for continuous training and reskilling to meet evolving technological requirements and to ensure the safe operation of new processes and equipment.

4.6. Innovation policies should promote cooperation between industry, research institutions and training providers by fostering knowledge transfer and accelerating the industrial scale deployment of new technologies.

4.7. Standardisation and harmonisation of sustainability and performance criteria can further support innovation by creating predictable market conditions and encouraging investment in high-quality technologies. The EESC recommends dedicated workstreams on battery material safety, such as pack-level propagation and electrolyte flammability tests, to set clear procurement and conformity standards. Collaboration with industry, including the social partners, and alignment with EU and international rules, would improve safety, reduce market fragmentation and support efficient manufacturing.

4.8. The EESC notes that, in contrast with China and the US where strict conditions on intellectual property transfer, local R&D and workforce development exist, the EU currently has no rules or requirements for technology transfer, local content, or skills development in joint ventures or foreign investments. The EU must develop relevant frameworks, including technology transfer and local content conditions for State Aid, procurement and subsidies, to guarantee such transfers and build local expertise, so as to avoid the risk of becoming an assembly hub rather than a battery technology leader.

4.9. The EESC stresses the importance of innovation that improves sustainability and safety outcomes without adding additional administrative burden. Innovation must be aligned with broader industrial and social objectives ensuring that technological progress contributes to decent work, environmental protection and long-term competitiveness. It emphasises that innovation funding should support projects that integrate occupational health and safety considerations, including ergonomic workplace design and reduced exposure to hazardous materials.

4.10. Recycling is vital for Europe's environmental objectives and its strategic autonomy. The EESC notes that the EU lacks sufficient facilities and the necessary technology for battery recycling, notably regarding the end-of-life electric vehicle battery volumes projected by 2030. The European Court of Auditors has also warned that 'most EU recycling targets neither incentivise the recycling of individual materials nor encourage the uptake of recycled materials' and highlighted the bottlenecks that hinder the competitiveness of the EU's recycling industry ([2]). The EESC calls for a holistic approach to boosting battery production, also recognising the urgent need for scaling requirements to handle future waste flows and produce high-quality secondary materials.

4.11. The EESC underlines that classifying waste lithium-ion batteries and black mass as hazardous waste as of December 2026, and prohibiting exports to non-OECD countries, will only be effective if the EU ensures that these flows can be moved efficiently within the single market. Otherwise, the EU risks creating internal bottlenecks: stockpiling, treatment delays and perverse incentives, including illegal flows, despite the export ban.

([1]) EESC opinion on 'Enhancing EU strategic autonomy and developing a greener and bluer economy: the potential of the sodium battery manufacturing sector' (OJ C, C/2026/2542, 22.5.2026, ELI: http://data.europa.eu/eli/C/2026/2542/oj).

([2]) Special report 04/2026: Critical raw materials for the energy transition – Not a rock-solid policy.

4.12. The EESC calls for measures that facilitate compliant intra-EU shipments to permitted facilities, covering the full chain from collection and movement of end-of-life batteries to pre-treatment sites (disassembly, diagnostics, safe storage) and the onward movement of black mass to refining and recovery plants.

4.13. Ultimately, the EESC considers that the Strategy's success will depend on Europe's ability to translate innovation into industrial deployment that is economically viable, socially responsible and safe for workers.

5. **Health and Safety**

5.1. Occupational health and safety (OSH) must be a fundamental pillar of the Strategy and the development of the European battery value chain. While Battery-related activities including manufacturing, assembly, recycling and raw material processing are subject to well established occupational safety legislation, the EESC notes that rapid scaling of battery gigafactories has led to significant occupational risks ([3]), including accidents, in some Member States. It underlines that the ramping up of battery production envisaged under the Battery Booster Strategy increases the need for robust health and safety management systems. Expansion of production capacity must therefore be accompanied by adequate staffing, training and investment in preventive measures, taking specific account of mobile and migrant workers and ensuring adequate manuals and information about dangerous materials to increase knowledge and prevent accidents.

5.2. The Committee emphasises the need to consistently apply and enforce EU OSH regulations. It highlights the importance of making requirements clear and ensuring fair treatment for all products and operators, including imported batteries and components sold in the EU, notably to ensure that they comply with EU standards. To prevent market fragmentation and promote fairness, practical guidelines and mutual recognition of equivalent standards should be prioritised during implementation.

5.3. Risk assessment, including regarding emerging risks, is a cornerstone of prevention. The EESC supports risk assessment practices that reflect technological progress and evolving materials, while avoiding duplicative procedures. Guidance should promote efficient documentation and recognition of equivalent approaches, ensuring compliance certainty and competitiveness for EU manufacturers, with the same expectations for non-EU producers whose goods enter the Single Market.

5.4. Chemical safety continues to be addressed within established EU legislation (e.g., REACH/CLP and worker protection rules). Implementation should remain risk-based and proportionate, focusing on safe handling – especially of hazardous chemicals – storage and monitoring practices, and encouraging substitution, where technically feasible and performance appropriate. The EESC advocates linking innovation funding to projects that include ergonomic design and reduced exposure to hazardous materials, as well as developing the use of digital tools for real-time risk monitoring and predictive safety systems.

5.5. The EESC emphasises equal enforcement for all market participants, including imported batteries and components, to prevent competitive distortions and maintain high standards without imposing additional EU specific burdens.

5.6. The EESC underlines the essential role of workers and their representatives in preventing occupational risks. Social dialogue, including collective bargaining, and worker participation are key to identifying hazards, particularly when new technologies, materials and production methods are introduced. Workers must receive appropriate initial and continuous training tailored to their specific tasks.

([3]) For example, chemical exposure (e.g. NMP), dust, fumes, electrical hazards, fire risks and physically demanding tasks.

5.7. The EESC stresses the importance of enforcement, with adequately resourced labour inspectorates and competent authorities to ensure compliance with OSH legislation, particularly in new and rapidly expanding industrial sectors.

Brussels, 18 March 2026.

The President
of the European Economic and Social Committee
Séamus BOLAND