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## Feedback from: Toyota Motor Europe NV/SA

**Feedback reference**  
F3467091

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### User type

Company/business

### Organisation

Toyota Motor Europe NV/SA

### Organisation size

Large (250 or more)

### Transparency register number

5378003762-62 (<http://ec.europa.eu/transparencyregister/public/consultation/displaylobbyist.do?id=5378003762-62&locale=en>)  
Batteries for electric vehicles – carbon footprint methodology ([/info/law/better-regulation/have-your-say/initiatives/13877-Batteries-for-electric-vehicles-carbon-footprint-methodology\\_en](/info/law/better-regulation/have-your-say/initiatives/13877-Batteries-for-electric-vehicles-carbon-footprint-methodology_en))

### Country of origin

Belgium

As one of the world's largest automotive companies who have pioneered the development of electrified vehicles, Toyota welcomes the opportunity to feedback on various items we find critical to address in the "Batteries for electric vehicles - carbon footprint methodology". On paragraph 2.1 Functional Unit, unfortunately the updated proposal has been drafted having only Battery Electric Vehicles (BEV) in mind, which are large batteries with a typical capacity of 30kWh-100kWh for a passenger car, and with a specific usage profile. However, it must not be forgotten that the Carbon footprint declaration requirements also apply to non-externally chargeable mild and full hybrid batteries (NOVC-HEV, e.g. Toyota Yaris hybrid), with a typical capacity of 0.5kWh-1kWh for a passenger car, and completely different technology and charge-discharge profiles compared to a BEV. To use a FEQC of 60 for such batteries is not representative and not technically justified, drastically and incorrectly reducing the functional unit of NOVC-HEV batteries. This is not in-line with the prerequisites in the draft delegated act recital #4 and regulation EC 2023-1542 Annex II, which justify a different approach for these batteries. Therefore, we consider that FEQC of NOVC-HEV batteries shall be defined based on Paragraph 2.1 subparagraph (b) (iv) without restricting the number of cycles to those on paragraphs (i-iii). Should it be needed, we are keen to provide additional data and technical argumentation to the European Commission for this category of vehicles. While the scale of error/ concern introduced for NOVC-HEVs is the most critical, it must be also noted that the current approach does not address in a technically robust manner the number of discharge cycles of PHEV batteries, which depend on the % of EV and HEV driving for those vehicles. Our last comment about functional unit relates to the definition of energy capacity. Batteries with narrower SoC windows will simply do more charge/ discharge cycles per year, but as the number of cycles is fixed in the calculation, we do not see the justification of the current energy capacity definition within the E<sub>total</sub> formula. We would see nominal capacity as a more proper term in this case. On other paragraphs: - 2.2.1 (c) - Distribution: We would ask to revert to the formulation in the JRC report. Transport emissions of batteries once fitted in vehicles are counted as vehicle transportation, which is part of vehicle LCA and out of scope of the battery regulation. - 2.2.3: for practical reasons, we believe the 1% cut-off rule should apply not only for mass but also for energy, including cell/module/pack assembly processes. - 2.3.1 Mandatory company specific processes: while this regulation is mainly addressing battery suppliers, the declaration requirements are usually in the shoulders of vehicle OEMs, who place the batteries into the market once integrated into the vehicle. This poses IP/ confidentiality challenges for detailed data exchange between OEMs and battery

suppliers. Therefore, we seek to have as an alternative the possibility for Tier-1 suppliers to send to vehicle OEMs their cradle-to-gate company-specific-datasets, already certified by their own notified body. -2.4 Electricity modelling: workable rules and Investment certainty shall be considered. We judge the general method defined by JRC to be a balanced approach, promoting the usage of clean energy but without drastically restricting geographically the locations for battery manufacturing facilities, even within EU. Certificates shall be accepted when issued by an organization audited by a recognised authority, which guarantee that applicable criteria are met.

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