

Dear [REDACTED],

It's a great pleasure to get introduced, warm greetings from London.

You asked my colleague [REDACTED] for concrete input on the EU digital simplification agenda and batteries regulation, which we are happy to provide. In short:

**AI Act:**

- The EU's 'regulate first' approach is a global outlier – the US, UK, Japan, India, Singapore, and Switzerland are enabling AI innovation first, before regulating it away.
- The AI Act creates particular challenges for German industry – e.g. compliance costs are prohibitive for SMEs integrating AI into production – as well as for international tech innovators, who are committed to and investing in Germany. It is holding back European AI growth and makes investment into AI training infrastructure virtually impossible.
- German industry leaders are calling for radical reform – Siemens CEO Dr. Roland Busch has publicly warned that Germany is losing its status as a competitive industrial hub.
- The current Digital Omnibus proposal does not go far enough – we call for a pause on implementation and a comprehensive review; our concrete amendments are set out in the attached Digital Omnibus position paper.

**Batteries Regulation (Article 11):**

- Article 11 of the EU Batteries Regulation requires all portable batteries to be removable and replaceable by the end-user from February 2027. While this was likely a well-intentioned requirement and may make sense for household appliances, it poses a serious problem for wearable technology.
- AI wearables must be small, light, and comfortable – batteries occupy 40-60% of internal volume, therefore changing the design to account for removable batteries results in bulkier, less capable devices. This regulation does not account for technological and design realities in the industry.
- Mandating removability is counterproductive – weaker batteries result in more e-waste, which contradicts the environmental goals of the regulation.
- The requirements furthermore create safety risks (e.g. water leaks and electrical hazards) that are especially serious for users of AI glasses as they are worn directly on the face.
- The implementation timeline is unworkable – we are now just one year away from Article 11 coming into force and companies still have no clarity on the products in scope. This is a regulatory cliff-edge.
- Wearables represent one of the few innovation sectors in which European companies are currently global leaders; e.g. [Siemens will deploy Meta AI glasses to increase the efficiency of factory workers](#). Wearables would be a significant boost for European innovation, but it may become another example of Europe losing its strong position and falling behind because of regulation. The AI wearables market, which is expected to reach \$138.5B by 2029 globally, may simply relocate and thrive elsewhere.
- **Solution:** Implement a delay and review of Article 11 of the EU Batteries Regulation through the ongoing Environmental Omnibus process; kindly find attached a detailed description of the European wearables opportunity and regulatory guardrails around Article 11.

Please also find enclosed a condensed version of current regulatory overreach and digital files in need of material review.

Kindly reach out with any question anytime. We look forward to continuing our dialogue and I would be happy to meet you in person, either at the Munich Security Conference (in case you happen to attend), or in Berlin in the near future. My contact details are below.

Sincerely,

A solid black rectangular redaction box covering the signature area.