

**Eurobat position on capacity marking for automotive batteries  
- following the publication of the BIO Intelligence Service final report -**

Eurobat wishes to reiterate its position on capacity marking for automotive batteries in the framework of the Battery Directive 2006/66/EC, following the publication of the BIO Intelligence Service recommendations for capacity determination and labelling rules.

Eurobat fully supports the provision of accurate and thorough information to consumers on the products they purchase. Therefore, Eurobat stresses the importance of the provision of information on the performance of batteries rather than their capacity. **To provide consumers with consistent and comparable information on performance, the labelling should indicate the cold cranking amperes (CCA) rather than ampere-hours.**

**The marking of automotive batteries should therefore include only the performance indication**, meaning the cold cranking capability of a battery (capability to start an engine, in particular under adverse conditions, e.g. low temperatures), **as contained in Option 2 for Label Design** (Simplified textual labelling) of the BIO final report<sup>1</sup>.

Capacity in the technical meaning applying to electrical components and measured in ampere hours is not the most important element of information to provide to consumers. The information enabling consumers to effectively choose batteries in an objective way is related to the capability of a battery to start the engine of their vehicle, known as cold cranking amperes (CCA).

The capacity of a battery measured in ampere-hours varies according to the discharge rate used. The discharge rate can be set to 1, 5 or 20 hours. The capacity of a battery measured with this method varies in a non-linear way. Each type and model of automotive battery has different capacities at different discharge rates. The setting of an arbitrary discharge rate used for all batteries would therefore not enable the provision of objective and accurate information to consumers and substantially limit the design of new and more efficient models of automotive batteries.

An automotive battery fulfils many different functions. The main function is to start the engine. Besides this main function, a battery mounted on a vehicle supplies energy for many additional uses vital for the functioning of onboard electric and electronic devices. There is a significant difference in terms of energy required for these functions: to start the engine a battery must provide a high intensity discharge for a short time whereas other functions require low intensity electric energy over longer periods of time.

Moreover, Eurobat wishes to confirm that the current battery labelling practice by means of adhesive labels visible on the automotive battery is in compliance with the relevant implementation requirements<sup>2</sup> of the Battery Directive.

**Eurobat calls upon the European Commission and the Members of the Technical Adaptation Committee discussing the labeling recommendations provided by the BIO report to choose for implementation Option 2 (Simplified textual labeling), as the option which will lead to the highest level of consumer information and be workable for the manufacturers of automotive batteries.**

This Eurobat position has been agreed with EPBA and RECHARGE.

<sup>1</sup> BIO Intelligence Services – Final Report – Battery capacity determination and marking, Chapter 5.2.3.3 Automotive Batteries, page 128

<sup>2</sup> Battery Directive, Art. 21.2: “capacity of all (...) automotive batteries and accumulators is indicated on them in a visible, legible and indelible form”.

**Eurobat is the representative association for automotive and industrial battery  
manufacturers and their suppliers, the collective voice of over 30 European operations  
employing around 30,000 professionals in Europe.**

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