Recycled Materials Association

Sustainable. Resilient. Essential.

recycledmaterials.org

ReMA Position on Propulsion Battery End-of-Life Management [1]

The rapid expansion of hybrid and electric vehicles is driving a surge in large-format propulsion batteries reaching end-of-life. These batteries present both significant opportunities and challenges: they contain critical minerals essential to national security and the clean energy economy, but also pose health, safety, and environmental risks if mismanaged. These batteries are also attached to motor vehicles, of which there is a highly successful recycling market. Battery end of life management must not disrupt these marketplaces for batteries or vehicles or create burdensome obligations for a vehicle owner. As a key supplier of recycled raw materials back into battery manufacturing, the recycled materials industry brings vital expertise to ensuring these batteries are handled safely and responsibly.

When managed responsibly, end-of-life propulsion batteries represent a vital source of recoverable resources that can be reused, repaired, remanufactured, repurposed, and recycled; when mishandled, they endanger workers, disrupt markets, and permanently waste critical resources. To ensure the responsible end-of-life management of these batteries as well as ensuring the ability and marketplace for recycling the end-of-life vehicles associated with these batteries, ReMA therefore supports a policy framework that prioritizes safety, clearly assigns responsibility, enables market-driven solutions, and strengthens U.S. capacity for battery reuse and recycling.

States are exploring policies to extend battery life and ensure safe handling, but some proposals create concerns—insufficient guardrails, limited education, inadequate safety protections, unintended effects on ownership and value, and barriers for dismantlers and recyclers.

ReMA urges policymakers to reinforce—not replace—existing, effective systems by establishing clear, market-supportive policies. A successful framework should encourage collaboration, support business-to-business practices, and promote safe, economically sustainable recovery of critical minerals.

- **Covered Batteries** means batteries used to propel electric and hybrid vehicles – often referred to as propulsion or vehicle traction batteries - when they are in operation within a vehicle as well as after they have been removed from a vehicle for reuse, repair, remanufacturer, or repurposing, until they are ultimately recycled at end of life. This does not include lead-acid batteries, other batteries that may be located within the vehicle, and/or small or medium format batteries.

- **Designated Responsibility** for a covered battery should be determined by its use and handling. Responsibility is first borne by the battery or vehicle producer that initially distributes the battery into the marketplace under their name or brand. If the covered battery is removed and intentionally modified by a non-OEM approved third party or repurposed for an application other than its original intended use, then that party assumes responsibility for end-of-life management. A defective or unintentionally damaged covered battery - either during use in a vehicle or during removal from the vehicle for transport - does not constitute intentional modification.

- **The Battery Management Hierarchy** for covered batteries should support the reuse, repair, remanufacture, or repurposing of covered batteries when feasible. Entities

[1] As adopted by the ReMA Board of Directors on December 8, 2025.

should strive for these options, but if those options are not viable, the battery should be recycled. This hierarchy maximizes resource efficiency, extends product life, ensures safe recovery of critical materials, and reduces environmental impacts.

- **End-of-Life Management Programs** should allow for a responsible end-of-life management hierarchy while providing a responsible party-managed system for covered batteries where the current owner may notify the responsible party that there is a covered battery in need of management. A battery stewardship organization may not be necessary to execute a program.

- **Funding** for covered batteries surrendered to the end-of-life management program should fully cover the responsible end of life management for covered batteries that have no viable market, including stranded, orphaned, or abandoned batteries.

- **A Secondary Handler** that receives a vehicle containing a covered battery installed as a component of that vehicle may choose to have the responsible party take ownership for the transportation and removal costs of the battery. At the option of the secondary handler, if the responsible party requests that the covered battery be transported as part of the whole vehicle and the secondary handler agrees to the request, then both parties must agree on the fair market value of the vehicle in its current condition. If agreement is not reached on the fair market value for the vehicle, the responsible party remains obligated for the end-of-life management of the covered battery which shall include responsibility for the cost of removal and transportation of the battery without the vehicle.

- **Education** is key to handling large format batteries safely and ensuring collection and proper end of life management. Public education should focus on where to take vehicles at end of life, how to contact any End-of-Life Management Program in case of a stranded battery or vehicle, and the dangers of attempting to handle covered batteries without proper training.

- **Certified Training Programs** for first responders, vehicle repair businesses, dismantlers, and recyclers should be used to ensure safe response, removal, handling, transportation, and storage of covered batteries.

- **State Oversight and Reporting** should include communications of new requirements to pertinent parties in a reasonable timeframe. Additionally, the State should consolidate and aggregate reported information to notify the number of batteries recycled in the state annually. The State shall not disclose proprietary or confidential business information.

- **Design for Recycling** should be encouraged for battery manufacturers and producers to ensure that batteries are not only safe during operation, but also able to be safely removed and reused, repaired, remanufactured, repurposed, or recycled at end of life by the appropriate parties.

Other ReMA Positions with overlapping principles to propulsion battery end-of-life management include:

- ReMA Position on Non-Embedded Small and Medium Format End-of-Life Battery Management
- ReMA Right to Reuse Position
- ReMA Policy on Free and Fair Trade
- ReMA Position on Flow Control
- ReMA Position on Product Stewardship
- ReMA Position on Design for Recycling – Promoting Environmental Sustainability