EUCOBAT

European Compliance Organisation for Batteries

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EUCOBAT Recommendation to include “black mass” as a key waste stream for Critical Raw Materials recovery

EUCOBAT welcomes the initiative under **Article 26 of the Critical Raw Materials Act (CRMA)** to identify priority **products, components, and waste streams** with high potential for critical raw materials (CRM) recovery. The inclusion of batteries, electrical and electronic equipment (EEE), and related components in the draft list is strongly supported.

To further strengthen the effectiveness and clarity of the initiative, EUCOBAT recommends the **explicit inclusion of “black mass”** as a standalone **waste stream** in the Annex.

Why “black mass should be included?

1. “Black mass” is the **central intermediate step in CRM and other raw materials recovery from batteries**. It is produced during the mechanical and thermal pre-treatment of lithium and alkaline batteries and contains **high concentrations of critical raw materials** such as:
    - Lithium
    - Cobalt
    - Nickel
    - Manganese
    - Graphite

    And other raw materials such as Zinc.

2. It is **a well-defined and traceable waste stream.**
    “Black mass” is already recognised and tracked within the battery recycling sector, and its transboundary movement is subject to notification procedures under the **Waste Shipment Regulation**.

3. Its **recovery potential** is central to meeting **EU strategic autonomy goals**.
    “Black mass” is the **gateway stream** to recovering high-purity CRMs at scale, and a growing number of hydrometallurgical and pyrometallurgical facilities rely on “black mass” as input.

4. Including “black mass” ensures **regulatory coherence**.
    The Battery Regulation (EU) 2023/1542 recognises “black mass” recovery as an essential step for meeting recycling and material recovery targets. Aligning the CRMA with this regulatory framework supports implementation consistency.

EUCOBAT would welcome further discussion with the Commission and stakeholders on how to ensure that the list of CRM-relevant waste streams is technically sound, operationally clear, and aligned with existing EU legislation.

About EUCOBAT

EUCOBAT is the European association of national compliance schemes for batteries. Representing not-for-profit organizations, EUCOBAT supports sustainable battery use, ensures proper recycling, and promotes environmental protection through efficient collection networks.

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