



Regulatory landscape for lead

Dr Andy Bush, Executive Director, ILA

October 2025

Agenda



1. 'Competitiveness': the mantra that trumps everything (*aka a more favourable regulatory environment for business in both the USA and Europe*)
2. Key European Legislatives Files
3. US Regulatory Environment
4. LB360 Certification

‘Competitiveness’: the mantra that trumps everything (Regulatory Simplification)



“The EU is determined to strengthen its long-term competitiveness, while also protecting its economic, social and environmental goals. A simpler regulatory framework with reduced administrative burden is a key component of this”



Since February 2025, in response to the request from the European Council, the Commission has presented a series of simplification proposals, also referred to as ‘omnibuses’

25%
reduction in administrative costs and reporting for all businesses

€37.5
billion
saved on administrative costs

35%
reduction in administrative costs and reporting for SMEs

US Executive Order 14192 of January 31, 2025
Unleashing Prosperity Through Deregulation “for each new regulation issued, at least 10 prior regulations be identified for elimination”



“Today is the greatest day of deregulation our nation has seen. We are driving a dagger straight into the heart of the climate change religion to drive down cost of living for American families, unleash American energy, bring auto jobs back to the U.S. and more,” said EPA Administrator Zeldin.

U.S. Environmental Protection Agency announced plans to slash its budget by **\$300 million** in fiscal year 2026, reduce staffing to 1980s levels

Current key EU regulatory files for lead



EU Battery Regulation



EU ELV Regulation



EU REACH Regulation



EU Binding Occupational Exposure Limits



EU Industrial Emissions Directive

Current key EU regulatory files for lead



EU Battery Regulation

- Published 2023
- Many pieces of implementing legislation still to be enacted
- Responsible sourcing (*delayed*)
- Minimum recycled content (*delayed*)
- Carbon footprint (*delayed*)
- Digital passport

Current key EU regulatory files for lead



EU Battery Regulation

- Published 2023
- Many pieces of implementing legislation still to be enacted
- Responsible sourcing (*delayed*)
- Minimum recycled content (*delayed*)
- Carbon footprint (*delayed*)
- Digital passport



EU ELV Regulation

- Trilogue's beginning this Autumn
- Recycled content for plastics
- Design for circularity
- Digital vehicle passport
- Export controls on ELVs
- Restrictions/exemptions on use of 12 V Pb batteries transferred to Battery Regulation?

Current key EU regulatory files for lead



EU Battery Regulation

- Published 2023
- Many pieces of implementing legislation still to be enacted
- Responsible sourcing (*delayed*)
- Minimum recycled content (*delayed*)
- Carbon footprint (*delayed*)
- Digital passport



EU ELV Regulation

- Trilogue's beginning this Autumn
- Recycled content for plastics
- Design for circularity
- Digital vehicle passport
- Export controls on ELVs
- Restrictions/exemptions on use of 12 V Pb batteries transferred to Battery Regulation?



EU REACH Regulation

- Revision delayed. Proposal expected by end of 2025
- Changes to candidate list and authorization process
- New testing requirements for low volume chemicals
- 10-year validity for dossiers

Current key EU regulatory files for lead



EU Binding Occupational Exposure Limits

- New more protective binding OEL for Pb published in 2024
- 0.03mg/m³ Pb in air
- 15µg Pb/dL Pb in blood
- Member States have until April 2026 to adopt into national legislation

Current key EU regulatory files for lead



EU Binding Occupational Exposure Limits

- New more protective binding OEL for Pb published in 2024
- 0.03mg/m³ Pb in air
- 15µg Pb/dl Pb in blood
- Member States have until April 2026 to adopt into national legislation



EU Industrial Emissions Directive

- IED 2.0 came into force in 2024 with Member States having 22 months to transpose into national law
- Included stricter emissions limit values, streamlined permitting, a European Innovation Centre for Industrial Transformation and Emissions and commitment to develop new BAT Reference documents for mining of metals and battery manufacturing

Key US Regulatory Files for Lead



OSHA PEL and BLRL



NAAQS



TSCA Risk Evaluation

Key US Regulatory Files for Lead



OSHA PEL and BLRL

- Federal Lead Standard: Under review since 2016
- Formal process started in 2022 with ANPRM
- RFK eliminated NIOSH lead programs and uncertainty prevails on timing for completing the lead standard review
- Some US states moving ahead with developing own BLRLs in absence of progress at federal level

Key US Regulatory Files for Lead



OSHA PEL and BLRL

- Federal Lead Standard: Under review since 2016
- Formal process started in 2022 with ANPRM
- RFK eliminated NIOSH lead programs and uncertainty prevails on timing for completing the lead standard review
- Some US states moving ahead with developing own BLRLs in absence of progress at federal level

NAAQS

- Final version of Revised ISA published 2024
- Final Decision previously expected in 2026
- CASAC Committee disbanded in January 2025 and now uncertainty on new timings for the Pb NAAQS review

Key US Regulatory Files for Lead



OSHA PEL and BLRL

- Federal Lead Standard: Under review since 2016
- Formal process started in 2022 with ANPRM
- RFK eliminated NIOSH lead programs and uncertainty prevails on timing for completing the lead standard review
- Some US states moving ahead with developing own BLRLs in absence of progress at federal level

NAAQS

- Final version of Revised ISA published 2024
- Final Decision previously expected in 2026
- CASAC Committee disbanded in January 2025 and now uncertainty on new timings for the Pb NAAQS review

TSCA Risk Evaluation

- Frank R. Lautenberg Chemical Safety for the 21st Century Act published in 2016
- Lead one of the metals on the 2014 workplan for evaluation
- TSCA requires that at least 50% of all chemical substances on which risk evaluations are being conducted are drawn from the 2014 workplan
- Calls for TSCA review in 2026
- No metals currently slated for risk evaluation

Lead Battery 360



- Certification Program now **OPEN FOR MEMBERSHIP** to lead producers, battery manufacturers and recyclers
- It is the only ESG standard/certification program that specifically addresses risks of lead exposures and secondary raw material sourcing in the battery value chains
- Allows independent assessment of a site against key ESG issues that are aligned with the 7 guiding principles of LB360 adopted in 2019
- Annual membership costs of €15,000 per site with audits costing up to €14,000 (every 3 years)
- Governance through not-for-profit Foundation Board of Directors supported by multi-stakeholder Advisory Council
- Further details can be found at: <https://www.leadbattery360.org/assurance-2/>

best

LEAD, RECYCLING NEWS LITHIUM LEAD RECYCLING OTHER TECHNOLOGIES + EVENTS

Launch of international accreditation scheme for lead battery industry

© 21 Jan 2025 | [BII News](#) | By Andrew Draper

Lead Battery 360

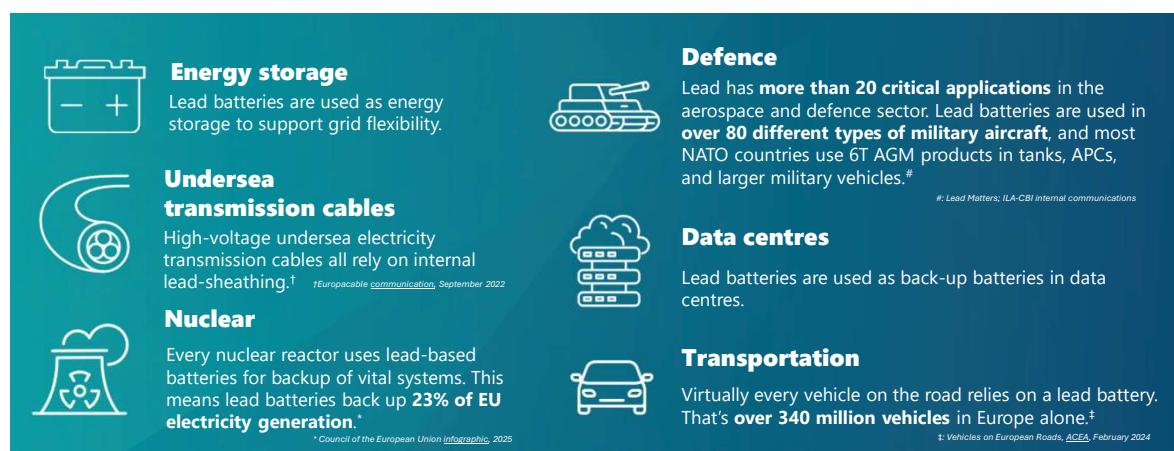


To date 9 sites have started the certification journey

- **Step 1: Pledge:** As a first step, to express interest in the Lead Battery 360 Assurance Programme, the site submits an application to the Secretariat and pays the participation fees and provides relevant information regarding its operations and ownership.
- **Sign a Letter of Commitment, becoming a 'Participant.'** The Letter of Commitment expresses the site's willingness to promote the Guiding Principles; to complete a site-assessment within 12 months of signing the letter of Commitment and to meet all the PEs of the Lead Battery 360 Code within 24 months of signing the Letter of Commitment.
- **Step 2: Self-Assessment:** The Participant completes a self-assessment, using the 'Lead Battery 360 Assessment Tool,' and collects evidence of conformance against the PEs as articulated in the Lead Battery 360 Code
- **Step 3: On-Site Assessment:** Lead Battery 360 requires that all applicable PEs are independently assessed on-site in order to maintain or obtain a Lead Battery 360 claim.
- **Step 4: Performance Improvement Plan (PIP):** If some PEs are rated 'partially meets' or 'does not meet' during their assessments, Participants are offered the opportunity to implement a PIP.
- **Step 5: Disclosure and Reporting of Key Performance indicators (KPIs):** To maintain their Lead Battery 360 claim, Participants must allow Lead Battery 360 to publicly disclose the outcome of the assessment process on the Lead Battery 360 website.
- **Re-Assessment:** Participants must demonstrate continued conformance through a full re-assessment (Step 3) every three years

Strategic role of lead in Europe

Infographic on strategic uses of lead and lead batteries



Our key messages

 1	Lead batteries are an economic and technical solution to achieving EU electrification, battery energy storage and low carbon goals	 5	Europe's lead and lead battery domestic industrial base is already well established and competitive on the world stage
 2	Lead and lead batteries offer a secure supply chain and domestic raw material security	 6	Lead batteries support a wide range of applications that are critical to the EU's industrial base and economic life
 3	Lead and lead batteries are essential for European security and defence	 7	Lead supports strategic applications and essential industrial needs from protection for undersea cables to enabling the efficient production and recycling of critical raw materials and other metals
 4	Lead batteries are the most recycled consumer product and provide a sustainable and circular solution to meet some of Europe's energy storage needs	 8	Europe is at the forefront of advanced lead battery innovation and research supporting next generation energy storage solutions

Our overall policy ask

Create the best possible conditions for the European lead and lead battery industries to invest, innovate and grow by ensuring:

- ✓ Proportionate risk-based approach to chemicals management and a coherent regulatory landscape
- ✓ Simplification of the regulatory landscape for lead producers, industries using lead for critical and strategic applications, and recyclers
- ✓ Revision of rules preventing taxonomy-based investment opportunities for essential and strategic industries using hazardous substances in which risks are properly managed
- ✓ Trade policies that protect critical and other essential raw materials necessary for the EU energy transition
- ✓ Removal of single market barriers to a circular economy by simplifying burdensome waste shipment notification procedures
- ✓ Enforcement of rules that require equivalent conditions regarding health & environmental protection of non-EU recycling facilities receiving exports of waste batteries and lead containing waste products
- ✓ A technology-neutral position to innovation funding available for Net-Zero technologies that acknowledges the potential of lead-based batteries



Thank you!



International
Lead Association