July 17, 2026

California Air Resources Board
1001 I Street
Sacramento, CA 95814

Re: Joint Comments – Conforming Drive Forward battery labeling requirements to Colorado's EV Battery End-of-Life Management Act (SB 26-003)

We, the undersigned entities, represent automotive manufacturers, battery manufacturers, and recyclers that support building up North America's EV battery circular economy. Our groups worked together, in coordination with automotive dismantlers, to pass Colorado's Senate Bill 3, a first-in-the-nation law to require the responsible management of vehicle traction batteries when they are no longer suitable for use in a vehicle. As part of this law, automotive manufacturers are required to label their vehicle traction batteries with specified information, including:

- The name of the battery provider and its date of manufacture
- The battery's chemistry, including the cathode and anode type
- The rated capacity or energy
- The hazardous substances contained within the battery
- Product safety and recall information
- Safe disposal information

Colorado SB 3 also allows a battery provider to use a QR code that links to a website to provide this information as an alternative to putting it directly on the battery pack. We encourage the California Air Resources Board (CARB) to modify its proposed battery labeling requirements in Drive Forward to conform with the Colorado law and draft California bill (SB 615). We offer the following recommendations below to achieve this alignment:

I. Require module labeling only if modules are designed to be separated from battery packs for service or repair.

CARB's proposal would require manufacturers to place specified information on battery modules, even though the same information is already required on the battery pack and within the vehicle. In practice, many manufacturers design battery modules as integrated components of the battery pack that are not readily separable or replaceable during routine service or repair. As a result, it is unlikely that service

providers, recyclers, or other commercial entities would interact with individual modules independently of the battery pack or need to rely on module-level labels to access this information.

CARB addressed this issue in the Advanced Clean Cars (ACC) II regulation by requiring labels on individual battery components only when portions of the battery pack are designed to be separately removed for service or repair. We encourage CARB to adopt the same approach in the Drive Forward requirements. Doing so would ensure that critical information remains available whenever battery modules or subassemblies are intended to be handled independently, while avoiding unnecessary labeling requirements, administrative burden, and compliance costs for battery designs where modules are not intended to be separated from the pack. This targeted approach would preserve the utility of the labeling requirement while aligning it with real-world battery architecture and service practices.

II. Do not require the $Vmin_0$ pack or $Vmin_0$ cell to be specified.

The $Vmin_0$ pack information is rarely, if ever, used to control for discharge of a lithium battery. Providing this information on the label risks misleading an end user (e.g. secondary handler) that they only need to control for the minimum voltage at the aggregate level to maintain safe conditions for the battery.

The $Vmin_0$ cell is the more appropriate variable to control discharge and maintain safe conditions, but only if the end user (e.g. secondary handler) has specific knowledge of the battery management system. Manufacturers' packs are intentionally designed to not be opened by secondary handlers or other end users. Therefore, secondary handlers are unlikely to be working with individual modules or cells and will not need the $Vmin_0$ pack or cell information. These proposed labeling requirements add unnecessary information to the label that risks confusion for secondary handlers and could encourage them to open battery packs that were not designed to be separated. The state of charge of the battery will be available BEVs and PHEVs when the battery is in the vehicle, and it is the most accepted metric to measure when it is safe to touch the vehicle battery for end-of-life management.

Sincerely,

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