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Remissvar: Underlag till bilaga till förordningen om granskning av utländska direktinvesteringar

Northvolt welcomes the opportunity to submit comments on this topic. Our feedback relates to the selection criteria and definitions of battery-related products.

Clear selection criteria

The selection criteria of emerging technologies and other strategically protected technologies should be clarified together with the list to explain on which basis the technologies were chosen.

Definitions of battery-related products

The below mentioned definitions could be adapted to provide further clarity on what is covered:

- **Mobile Energy Storage (Mobil energilagring):** It would be beneficial to clarify (narrow) the definition of this, otherwise it can be interpreted very broadly.
- **Solid state batteries (batterier med fast elektrolyt):** There are many different next generation battery technologies that could revolutionize the battery market, solid state being just one of them. We would suggest either making this definition much broader or attempting to list a more comprehensive battery technology list.
- **Test methods and test models for testing battery cells (testmetoder och testmodeller för test av battericeller):** This can be interpreted very broadly as there are many different aspects to battery testing. If the intent with this item is to protect battery cell development in general, there could be multiple additional factors to consider such as for example cell modelling that assists cell design, IP on the cell designs themselves, etc..
- **Graphene for battery cell surfaces (grafen för battericellsytor):** There are multiple potential ways to use graphene in battery cells. If the aim is to cover all of them the scope should not be limited to cell surfaces.

For all of the above points, it would in general make sense to narrow the scope to only cover specific industries that are of strategic importance, not batteries broadly.