



Brussels, 13 October 2016

Battery Industry position paper on draft report by Simona Bonafè

Proposal for a directive of the EP and Council amending Directives 2000/53/EC on ELV, 2006/66/EC on batteries and accumulators and waste batteries and accumulators and 2012/19/EU on WEEE

The representatives of the undersigned associations representing the battery industry in Europe are writing to express their concern on the direction the discussions are taking in the European Parliament's Environment Committee which is currently looking into the partial revision of the Batteries Directive 2006/66/EC.

The initial proposal of the European Commission had as objective to streamline the reporting requirements between the Member State level and the European level. The current amendments which have been proposed in the Environment Committee, however, are making the scope of the review going beyond what the Commission initially had intended.

As the battery industry, we do not oppose as such a discussion on including circular economy thinking in the batteries directive or harmonizing the definitions and measures between the WEEE and Battery directives. Although we do have serious questions on the viability of some of the proposed amendments, we are of the opinion that it is not the most opportune time to discuss these proposed changes. For instance, some amendments tabled are proposing economic measures for Member States to promote a shift to the circular economy. We believe that this type of measures need to be submitted to careful evaluation and a full impact assessment. A similar approach is needed to evaluate the practicalities of the amendments which propose end-users to be informed about the environmental performance of each type of batteries and accumulator throughout their entire life cycle.

As you will know, the European Commission has formally started the process of having a comprehensive evaluation of the Batteries Directive. This was announced through the publication of the roadmap ([link](#)). This Commission document sets out the content and scope of the planned evaluation and looks into the relevance, coherence, effectiveness and efficiency of the legislation. The roadmap refers explicitly to considering including the key-principles of circular economy in the revision of the battery directive.

The evaluation [...] will consider all relevant aspects, i.e. legal (e.g. legal base, internal coherence, consistency with other legislation in approaches, terminology and legal concepts), environmental (e.g. main environmental impacts of batteries along the whole life

cycle of batteries, efficiency of measures), economic and social (e.g. access to (critical) raw materials, costs and benefits).

[...]The evaluation will take into account recent evolutions of technical aspects and of the use of batteries (e.g. second-use of vehicle batteries in stationary power storage installations), and consider how the reuse, recycling and collection of batteries can be enhanced.

For this reason, we recommend that you oppose the amendments to the Batteries Directive which go beyond the initially intended modifications by the European Commission. The postponement of these discussions will allow for much more in-depth discussions on integrating circular economy thinking into the Battery Directive. Any changes which were to be adopted now would also result in an unnecessary burden on the national authorities which will have to deal with the transposition and implementation of a policy which will be fully revised in the coming years.

About EBRA

EBRA, the European Battery Recycling Association, represents the interests of actors involved with sorting, treating and recycling consumer, industrial or automotive spent batteries (at the exception of Lead-Acid automotive batteries).

About EPBA

The European Portable Battery Association is the authoritative voice of the portable power industry. It supports the common interests of its members regarding portable batteries and battery chargers with European institutions and other leading international bodies to provide consumers with complete power solutions which are sustainable across their life-cycle.

About EUCOBAT

Eucobat aisbl is the European association of national collection schemes for batteries. They assure that all waste batteries are collected and recycled in an ecological sound way, and contribute this way to a better environment and to the circular economy.

About EUROBAT

EUROBAT is the association for the European manufacturers automotive, industrial and energy storage batteries. EUROBAT has 52 members from across the continent comprising more than 90% of the battery industry in Europe. The members and staff work with all stakeholders, such as battery users, governmental organisations and media, to develop new battery solutions in areas of hybrid and electro-mobility as well as grid flexibility and renewable energy storage.

About RECHARGE

RECHARGE aisbl is the Advanced Rechargeable and Lithium Battery Association. RECHARGE is representing the specific interests of the Rechargeable Battery Industry in Europe. RECHARGE's mission is to promote the value of rechargeable batteries through their life cycle. RECHARGE's Membership includes Rechargeable Battery Manufacturers, Original Equipment Manufacturers, Rechargeable Batteries Recyclers and Raw materials suppliers to the Battery Industry.