



## **Position Paper**

### **Communication & Sensibilisation**

#### 1. Information to end-users

Article 20 of the Batteries Directive<sup>1</sup> stipulates that Member States shall ensure, in particular through information campaigns, that end-users are fully informed of:

- a) the potential effects on the environment and human health of the substances used in batteries and accumulators;
- b) the desirability of not disposing of waste batteries and accumulators as unsorted municipal waste and of participating in their separate collection so as to facilitate treatment and recycling;
- c) the collection and recycling schemes available to them;
- d) their role in contributing to the recycling of waste batteries and accumulators;
- e) the meaning of the symbol of the crossed-out wheeled bin shown in Annex II and the chemical symbols Hg, Cd and Pb.

Consumers and other end-users play an important role in the collection schemes for batteries. It is therefore of the utmost importance that they are fully informed on the importance of separate collection and the available collection schemes.

Moreover, the labelling system should provide end-users with transparent, reliable and clear information on any heavy metals they contain.

However, given the small size of the batteries and in order to avoid an information overload, the information to the consumers and other end-users should be limited to the issues where he can have a real environmental impact.

For these reasons, Eucobat proposes the following wording for Article 20 of the Batteries Directive:

*“Member States shall ensure, in particular through information campaigns, that end-users are fully informed of:*

- a) the importance of separate collection of waste batteries and accumulators, of not disposing them as unsorted municipal waste in order to facilitate recycling;*
- b) the collection and recycling schemes available to them. “*

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<sup>1</sup> Directive 2006/66/EC of the European Parliament and of the Council of 6 September 2006 on batteries and accumulators and waste batteries and accumulators and repealing Directive 91/157/EEC

## 2. Consumer Awareness Campaigns

Consumers and other end-users play an important role in the collection schemes for batteries. It is therefore of the utmost importance that they are fully informed on the importance of separate collection and the available collection schemes.

However, it is not feasible to define the requirements for consumer awareness campaigns in a harmonized way for all countries, as there are substantial differences between them.

The required intensity of the specific awareness campaigns for the selective collection of waste batteries depends for a large part on the existing collection infrastructure for waste in general or for other specific waste streams, the awareness of the end-users concerning this infrastructure and the existing practices and attitude of the end-users related to waste and sorting for selective collection. The historical evolution in this field should be taken into account, as well as the national requirements.

The end-user must be informed of the significance of the selective collection of waste batteries and where he can find a nearby collection point. The content, the format and the size of the consumer awareness campaigns must be adapted to take into account all these elements and the national cultural sensitivities.

The financial and economic impact of the consumer awareness campaigns for the battery producers must also be taken into account, as the cost for the marginal increase of the consumer awareness might be excessive.

In case of multiple compliance organizations in one country, a nationwide coordination is required in order to optimize the effectiveness of consumer awareness measures, without distorting the competition between the schemes.

## 3. About Eucobat

Eucobat 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.

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