



Position Paper

Information Requirements in the Battery Directive

1. Information to end-users

Article 20 of the Battery Directive¹ 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 desirability 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.

2. Information to national producers

Most national importers of appliances with integrated batteries, which are considered as battery producers, don't dispose of the required technical information to report to the Member State or a collection scheme.

¹ 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

These national producers cannot be expected to open all types of imported appliances in order to verify the type of batteries or accumulators, as this would mean a serious burden for them.

Therefore, it is required that the instructions accompanying the appliances on how to safely remove the batteries and accumulators², also contains information on the types of battery or accumulator incorporated into the appliance (at least the chemical composition (e.g. LiMnO₂, LiFeS₂, ZnC, AlMnO₂,...) and the weight). By using an existing document, additional administrative burden for the manufacturers of the appliances is prevented.

3. Information to waste operators

In order to ensure an appropriate recycling of all collected batteries, an effective sorting of these batteries prior to the recycling process is required.

However, such sorting is today not feasible for a large amount of (mostly industrial) battery packs and/or individual cells from such battery packs, as the chemical composition of these battery packs and/or individual cells is not indicated.

Therefore, it is required that all battery packs and individual cells for battery packs are labelled with at least the chemical classification, in function of the recycling processes. This labelling should be the subject of standardization.

4. 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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September 2014

² Article 11 of the Battery Directive