



## **Position Paper**

### **Responsibilities for the collection of portable batteries**

#### 1. The Battery Directive

Article 8.1 of the Battery Directive<sup>1</sup> stipulates that Member States shall ensure that appropriate collection schemes for waste portable batteries and accumulators are in place for consumers.

These collection schemes should enable end-users to discard waste portable batteries or accumulators at an accessible collection point in their vicinity, having regard to population density, without any charge or obligation to buy a new battery. Member States may require producers to set up such schemes.

As part of these collection schemes, distributors are required to take back waste portable batteries or accumulators at no charge when supplying portable batteries or accumulators, unless an assessment shows that alternative existing schemes are at least as effective in attaining the environmental aims of the Battery Directive.

#### 2. The Extended Producer Responsibility

OECD defines Extended Producer Responsibility as an environmental policy approach in which a producer's responsibility for a product is extended to the post-consumer stage of a product's life cycle.

However, while the policy mechanism is called Extended Producer Responsibility, it should be borne in mind that all actors in the product chain and in society must participate in order to optimise its effects. Sharing responsibilities across the product chain and society is an inherent part of EPR.

<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

### 3. The Eucobat position

Separate collection is a precondition for ensuring specific treatment and recycling of waste portable batteries and is necessary to achieve the chosen level of protection of the environment. Consumers have to actively contribute to the success of such collection and should be encouraged to return waste portable batteries. For this purpose, convenient facilities should be set up for the return of waste portable batteries. Distributors and municipalities have an important role in contributing to the success of the collection.

As the consumer convenience is one of the most important success factors for any collection scheme, distributors should provide for the collection, at retail shops or in their immediate proximity free of charge to end-users and with no obligation to buy a new battery, unless an assessment shows that alternative existing collection schemes are likely to be at least as effective.

While the internet sales, with the countless lorries driving around for the delivery of goods could in theory increase the consumer convenience and the collection of waste batteries, this potential does not become reality, as waste products are not taken back in reality.

Municipalities are an important actor in the selective collection of waste in some Member States. For this reason, it is recommended that in these Member States the municipalities are an integral part of the collection network for waste batteries. This will increase the consumer awareness and convenience.

**While the responsibility of distributors and municipalities is in practice already applied in most European countries, it is recommended to clarify this in the text of the Batteries Directive.**

**Information obligations for the internet sellers should be clearly defined in the legislation, including the takeback obligation at the occasion of the delivery of new batteries or products containing batteries. In particular, the website should indicate at least the available household collection points and contact information for questions related to the collection and recycling of waste batteries.**

### 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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