

FEAD's recommendations for EU Guidance on EPR schemes: Additional remarks on WEEE and batteries

In addition to general recommendations on EU guidelines on EPR schemes, **FEAD members wish to put forward several additional remarks on WEEE and batteries**, as follows:

- **Foster the creation of eco-design measures**

FEAD stresses the need for eco-design measures; a relevant example to this regard are Li-batteries which create a high risk of fire outbreaks within WEEE treatment installations, due to growing concentrations of lithium. Measures such as incapsulating or adding protection gels are a substantial contribution to reduce this risk. In order to ensure a proper handling of lithium batteries and accumulators from production to recycling, it is necessary to introduce more far-reaching measures. One effective measure could be the adjustment of the regulations for the product conception, for instance by designing the electronic equipment in a way that the batteries and accumulators can be retrieved by the end user. Moreover, labeling and information requirements need to be introduced. A uniform labeling of devices with high-energy accumulators such as lithium batteries is an effective measure to inform consumers on the correct handling of the batteries. Another promising measure could be the introduction of a mandatory deposit on lithium batteries.

Eco-modulation should incentivise producers to implement such measures, as crucial factors in enhancing safer and increasing recycling.

- **Enhance cost-efficiency**

EU guidelines should contain a list of tasks and references, as well as recommendations, for benchmarking best practices as a basis for collection and treatment services. Additionally, compliance rules for EPR schemes should be enforced to strengthen cost-efficiency. Alignment on lower costs practices is not a risk, but a reality, particularly for WEEE. This element must be avoided with rules imposing a comparison based not only on costs but also on performance, security of collection, transport and storage. For instance, this is the case of the Netherlands, for WEEE, where collection is not yet part of the legal obligations to follow *Weelabex*. Under this system, small equipment is collected in large containers, often loaded or compacted with cranes, leading to a high risk of damaging Li-ion batteries and thus causing outbreaks of dangerous fires. Best practices rather than lowest costs should be the reference: for instance, the collection in Belgium and France is based on the use of pallet boxes or cages, which is a far safer but more expensive method. The collection and transport must be carried out in such a way that lithium batteries and accumulators, but also used electrical equipment containing high-energy lithium batteries, are not damaged.

- **Increased collection**

Performing EPR schemes should incentivise increasing battery collection rates. With this goal in mind, **FEAD believes that increased collection can be successfully reached if EPR schemes are demanded to devolve the extra collected fee to this purpose.**

Yet, as of now, EPR schemes are still lacking incentives to increase collection. This results in many member states not reaching collection rates' targets laid down by the WEEE directive. In fact, increased collection leads to enhanced costs for recycling and collecting. As a matter of fact, the recycling fee that we are currently paying as consumers when buying new equipment does not cover the cost as if a higher rate would be collected.

For additional information on FEAD 's position on EPR schemes guidelines