Fédération Européenne des Activités de la Dépollution et de l'Environnement
European Federation of Waste Management and Environmental Services
Europäische Föderation der Entsorgungswirtschaft

FEAD reply on Roadmap Batteries - modernising EU rules

FEAD welcomes the EU initiative of modernizing the EU rules on Batteries in line with the Green Deal and other sustainability-related policies like the new Circular Economy Action Plan.

From a waste management perspective, in order to improve the circular economy which requires more and more ambitious targets in terms of quantity and quality, we would like to stress the following needs:

- **Update and harmonization of definitions**

It is essential to have a harmonized legal framework on definitions at EU level: regarding the definitions of batteries, an actualisation is necessary in order to integrate new types of batteries (for instance for e-bikes). The current differentiation according to industrial or portable batteries is not practicable and a distinction between the different chemical-types of batteries would be more accurate.

It should therefore be distinguished between Lithium-batteries and all other types of batteries. Regarding Lithium batteries, a further sub-distinction could be made between Li-Ion batteries and Li- primary batteries.

There is also a need to align the definitions among the Waste Framework directive list of waste, the Batteries directive and the Waste Shipment Regulation.

- **Boost European batteries' industry**

We recognize a huge need to boost the batteries industry within EU in order to increase environmental, economic sustainability and self-sufficiency.

There is also the need to build up a stable and competitive market for recycled materials in Europe. This can best be achieved by an EU-wide introduction of mandatory recycled content in products, as well as sustainable ecodesign for batteries and labelling requirements for a better return flow of materials.

Having a strong battery value chain is of strategic value and importance for Europe as well as for our industry.

- **Mandatory Recycled Content**

Mandatory recycled content in products is essential for the creation of a stable and competitive market for recycled raw materials in Europe. The mandatory integration of recycled content in batteries will boost the recycling market in Europe, foster investments in innovative recycling technologies and decrease the environmental footprint of batteries.

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Mandatory recycled content will also help to ensure the strategic availability of critical raw materials in Europe. In order to guarantee a level-playing field, minimal recycled content should also be mandatory for imported batteries.

- **Ecodesign**

Electrical and electronic equipment that can be operated wholly or partly on batteries or accumulators must be designed in such a way that waste batteries and accumulators can be removed easily, discharged without prior pack-disassembly and accessed to a hole for the fire-hose.

Uniform marking of devices containing high-energy accumulators by producers should be made compulsory. Consumers should also be instructed on the correct handling of the devices and accumulators concerned already at purchase and later upon disposal. Each producer should be obliged to label electrical and electronic equipment containing a battery or accumulator in such a way that information is provided on the type of battery and the chemical content of the battery or accumulator.

In addition, information must be included which informs the end user about their safe removal, the dangers of improper handling of the battery or accumulator and the consumer's contribution to proper and ecologically sound disposal.

Moreover, there are acknowledged hazardous substances in batteries that must be phased out and should not be recycled, e.g. cadmium. When setting the recycling targets and the ecodesign measures, this must be taken into account.

Li-ion batteries are currently not covered by the Ecodesign Directive. The Ecodesign Directive and any other relevant EU legislation should support the design for safe recycling.

- **Increased collection**

Due to the rapidly increasing number of batteries put on the market in Europe in recent years, fatal misdirected lithium-ion batteries have led to more and more dangerous fires in European waste processing plants. In order to avoid such fires mainly caused by mis-disposal, it is necessary to considerably improve the return flow of batteries into the systems.

In order to achieve higher collection rates, FEAD requests an increase of the current European collection targets of 45% to 80% for all types of batteries, excluding for automotive batteries for which European collection targets of 100% should apply.

In order to guarantee a higher return flow of batteries, FEAD also claims for the introduction of a Europe-wide harmonized deposit and refund system on batteries.

- **EPR schemes**

FEAD calls for the extension of extended producer responsibility beyond the current scope of portable batteries to all different types of batteries. In the same time, FEAD stresses the necessity to duly take into consideration the existing and successful B2B schemes/contracts that provide for collection, sorting, treatment and recycling.

- **Enforcing the control of illegal movements of battery waste**

The EU should set up an effective control mechanism for the exports of used batteries in order to avoid illegal shipments and to ensure proper environmentally sound recycling/recovery processes outside EU.

- **Increase the recycling targets for batteries**

The current general target recycling rate of 50% is too low for industrial Li-ion batteries. There should be a separate and higher target rate for Li-ion batteries in the near future. In the first place however, it is necessary to establish a more transparent and harmonized data gathering including the quality of recycling in order to create a level-playing field among recyclers in Europe. Low carbon footprint recovery processes should be supported.