

FEAD welcomes the new European Commission's proposal for Regulation concerning batteries and waste batteries

Press release

Brussels, 11 December 2020 – FEAD welcomes the [European Commission's proposal for a Regulation on batteries and waste batteries](#), fully in line with the Green Deal and the new Circular Economy Action Plan.

From a waste management perspective, FEAD is convinced this proposal is following the right course of action to achieve the circular economy with more and more ambitious targets in terms of quantity and quality. Having a strong battery value chain is of strategic value and importance for Europe as well as for our industry. Recycling in a safe manner is an important activity in this value chain, from an economic and resource point of view. In particular:

- concerning **recycled content**, FEAD welcomes the introduction of an EU-wide roll out of mandatory recycled content for industrial batteries, electric vehicles' batteries as well as automotive batteries, with levels of 12% cobalt, 85% lead, 4% lithium and nickel. The latter are set to increase in 2030, towards 20% cobalt, 85% lead, 10% lithium and 12% nickel by 2035. The introduction of mandatory recycled content rules 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 give visibility and strengthen the demand, while triggering innovative investments in recycling. It will also decrease the environmental footprint of batteries and help ensure the strategic availability of critical raw materials in Europe.
- we consider the **new ambitious recycling targets for batteries**, for instance, a rate of 65% by 2025, and 70% in 2030 for industrial Li-ion batteries, as a significant move forward in comparison to the current target fixed at 50%. With regards to the future calculation and verification of recycling efficiencies and recovery of materials, FEAD stresses the **need to establish a performant data gathering system**, including the quality of recycling. This has the potential to create a level-playing field among recyclers in Europe. Low carbon footprint recovery processes should also be supported.
- we believe that the **increase of portable battery collection targets is a pivotal step forward**: from 45% (current) to 65% in 2025 and 70% in 2030. Although we would like to note that FEAD has previously called for an increased target of up to 80% - for all types of batteries, excluding automotive batteries for which the European collection targets of 100% should apply.

Moreover, **FEAD stresses the importance of Deposit and Return Schemes (DRSs)** under the form of take-back operations from retailers. Where appropriate, we stress the idea of establishing DRSs. In fact, there are currently problems of mis-disposal: if batteries have value, they are less likely to be subject to mis-disposal. Yet, to set up efficient DRSs, substantial work needs to be done on making the latter more feasible (i.e., registration of every battery). Thus, substantial investments should be devolved to this purpose.

- On **eco-design**, we would like to highlight that electrical and electronic equipment that can be operated wholly or partly on batteries or accumulators must be designed in such a way that waste derived from them can be removed easily, discharged without prior pack-disassembly, and permit easy access through a hole for a firehose.
- The **uniform marking of devices** is also crucial in helping consumers to use and correctly handle devices and accumulators, to safely remove batteries and to ensure a proper and ecologically sound disposal.
- Moreover, we welcome the effort **on the restriction of the use of hazardous substances in batteries**, to protect human health and the environment, while reducing the presence of such substances in waste. This will allow for safe recycling at reasonable costs.
- Regarding Extended Producer Responsibility schemes (EPR schemes), FEAD stresses **the necessity to duly take into consideration the existing and successful B2B schemes/contracts that provide for collection, sorting, treatment, and recycling of batteries**. The extension of EPR schemes to batteries should not be the “silver bullet” for all different types of batteries but should remain a tool for improving the collection and recycling of waste flows that are more difficult to capture (i.e., household waste). Collecting and recycling industrial batteries should remain under open market rules, which have proven to be efficient in delivering optimised investments and services.
- Finally, we believe that **enforcing the control of illegal movements of battery waste is crucial**. Thus, FEAD calls for an effective control and enforcement mechanism for the exports of used batteries to avoid illegal shipments.

FEAD Secretariat

info@fead.be