

Your Voice In Europe: ROADMAP feedback for Report and evaluation of Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators

User's data:

- Domain: Public authority
- Name: Johanna Alakerttula
- Email: johanna.alakerttula@ely-keskus.fi
- Country: Finland
- Organisation: Centre for Economic Development, Transport and the Environment
- Headquarter: select
- Size: select
- Scope: National
- Publication: can be published with your personal information

Related document: Report and evaluation of Directive 2006/66/EC on batteries and accumulators and waste batteries and accumulators

Feedback:

It is really important that the evaluation will pay particular attention to the new battery technologies. Strong growth of lithium batteries is seen already and there are many aspects like safety, reuse and recycling of lithium batteries that should be paid attention to. Second-use of vehicle batteries in households cause also a challenge because collection of industrial batteries is normally organized straight by companies and there are no collection network for those batteries.

Also classification of batteries into industrial and portable batteries is sometimes challenging when those batteries are meant to household use and consumer as an end user is obligated to take batteries to recycling. Typically these kinds of batteries are used in e-bikes and electric scooters.

There are also challenges of collecting the recycling efficiency information from other countries. Producers have faced problems of receiving proof of recycling companies. To ease the process it has been proposed that recycling plants would keep the public records of their recycling efficiencies in internet and national authorities would be obligated to supervise the recycling efficiency reporting of the plants.

Analysis of links and interactions between Battery Directive and WEEE Directive is important because producer definition as described in Battery Directive does not comply anymore with the evolution of the battery markets. Distance communication is growing and the similar need for authorized representative is seen as in WEEE. When considering the rise of the collection target of portable batteries it is good to remember that it is impossible to collect even near 100 % of batteries put on the market because plenty of batteries are

exported abroad in EEE for reuse.