

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

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

Feedback:

Please find hereby 2 comments:

1/ Timing reporting

For Batteries the reporting deadline is 6 months after the reporting year for which data are collected. This means that in year x the deadline for reporting would be 30 June and the data on year x-1 should be reported.

Please include an evaluation of the reporting regime in the evaluation roadmap:

In other directives, ie. WFD, LD, PPWD, WEEE and ELV a reporting regime is proposed whereby Member States have to report data within 18 months of the end of the reporting year for which data are collected. So in year x the deadline for reporting would be 30 June and the data on year x-2 should be reported. This clearly reflects the requirement in the Statistics Regulation EC/223/2009 where also 18 months appears. Consistency between reporting would be appropriate.

We have experienced that the battery reporting deadline of 6 months is very tight to gather all requested information on battery collection and recycling. A reporting deadline of 18 months would provide more time for a thorough monitoring/control of the received data on battery collection and recycling, and/or to request additional information if needed.

2/ Receiving reports on recycling efficiencies from recycling processes located in different Member States, we have noticed that the European Regulation for the calculation of recycling efficiencies 493/2012 is not equally applied by recycling processes in different Member States. The quality of this reporting could be improved,

if an European regulated validation / verification of the calculation (for each recycling process) would be provided. Could this topic be included in the evaluation?