

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: Ana Cristina Carrola
- Email: ana.carrola@apambiente.pt
- Country: Portugal
- Organisation: Portuguese Environment Agency
- 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:

The evaluation should include the following aspects:

- *Report – the need for adapting and clarify that report periods consist of calendar year*
- *Recycling efficiencies – the need to create a Community-wide database in order to obtain information from recyclers outside the national territory*
- *Small producers - how it is being implemented the prerogative of small producers provided for in Article 18*
- *Waste collection rate of portable batteries and accumulators*
 - *The need to reconsider the adaptation of the formula to calculate the collection rate, in particular as far as placing on the market is concerned, since the availability of portable batteries on a commercial surface does not translate directly to the respective acquisition and use by the consumer*
 - *The need to reconsider the evolution of the market, taking into account that the increased use of rechargeable batteries helps to prevent, but may compromise the performance, meaning a worse collection rate level achieved*
- *Free-riders – how have the registration entities been contributing at Community level to combat the free-riders*