

# **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:**

*when the Batteries Directive 2006/66/EC came into force the most important technologies of batteries were the chemical systems*

- *lead-acid for automotive batteries,*
- *lead-acid and nickel-cadmium for industrial batteries and*
- *zinc-carbon, alkali-manganese, lithium-ion, lithium-metal, nickel-cadmium or nickel-metal-hydride for portable batteries.*

*In the meantime, lithium-ion batteries were introduced in different applications of automotive batteries as well as of industrial batteries. These applications can be found in the fields of*

- *industry (e. g. lithium batteries for small forklifts),*
- *households (e. g. lithium batteries for renewable energy storage) and*
- *vehicles (e. g. automotive lithium batteries for sports-cars).*

*Therefore, some basic assumptions of Directive 2006/66/EC have to be amended to take on board these new developments and to ensure the safety of collection, transport and recycling of the different types of batteries, in particular:*

- *Batteries Directive as “the” core-directive for batteries*
- *Color-labelling for identification of chemistry*
- *Batteries for end-consumers are no industrial batteries*
- *Take-back of industrial and of automotive batteries according to the type/chemical composition and quantity brought on the market*
- *Application of UN Manual of Tests and Criteria 38.3*
- *Full application of all safety requirements for “2nd-Life-Batteries”*
- *Removability of batteries and accumulators to be regulated in the ecodesign*

*directive*

*In addition the batteries directive and the WEEE-directive should be aligned in fields where batteries must be looked at in conjunction with electrical and electronic equipment, e. g. in the sector of carriage of dangerous goods.*

*With a view to the forthcoming review of the batteries directive please find in annex a position paper of ZVEI - Zentralverband Elektrotechnik- und Elektronikindustrie e. V. who represents the shared interests of the electrical industry and the associated service companies in Germany.*

**Feedback file:**

[ZVEIPosition\\_BatteriesDirective\\_20160714\\_final.pdf](#)