



EBRA Key Messages Eurobat Forum 2017

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May 2017

Recycling Efficiency (RE)

EBRA prefers not to modify the requirements related to the RE

Justification:

- The RE reporting is only implemented since a couple of years: not enough feedback available. On the other hand chemistries like Li-ion are still changing themselves, so need for flexibility.
- It does not make sense to change the definition as long as there is no clarity on the definition of:
 - When a fraction is considered as recovered
 - The End-of-waste criteria
- Increasing the level of RE is not necessarily improving the Health and Environment (risk of having adverse effect on the environmental footprint). Another issue is to favour uprecycling and not downrecycling.
- Increasing the tonnage of batteries sent for recycling has a much stronger impact on the protection of HH and the Environment than increasing the RE, chiefly on the secondary ones.

Collection Rate

EBRA is open to changes in the collection target or calculation methodology as long as the overall results is a net increase of the quantity of batteries sent for recycling.

Justification:

- The actual Collection Target (45%) is not achieved everywhere across Europe
- The effective collection of rechargeable (secondary) batteries is too low and should increase as those batteries represent a higher EHS risk and contains critical raw materials.
- The overall benefit of the Battery Directive in terms of protection of human Health and the Environment is best achieved when considering the whole chain:

Quantity collected * Recycling efficiency

In this respect, increasing the quantity has a more significant impact than increasing the recycling efficiency (chiefly for portable secondary batteries, representing a higher EHS risk)

Level Playing Field and Certification

The new revised Battery Directive must ensure a level playing field for the recyclers. More particularly, EBRA is in favour of a certification system regarding the calculation method of the Recycling Efficiency for batteries, including for non-European recyclers

Justification:

- Ensuring a level playing field avoids any distortion of the competitive landscape and make sure the overarching objectives of the battery directive are met, including regarding human health and the environment.
- The rules for calculating the recycling efficiency should be transparent and verifiable.
- They must also apply to non EU recyclers (ensuring equivalent conditions).

Reporting and statistical material

A harmonized reporting of the collection and recycling efficiency across Europe is welcome. The harmonized reporting should improve the quality of the European statistics regarding collection and recycling of batteries.

Justification:

- Reporting lines should be harmonized among all Member States, streamlined and standardized, without unnecessary country-specific information;
- Data reporting should be robust and transparent, leading to more reliable figures and information for a better monitoring of the implementation of the battery directive.

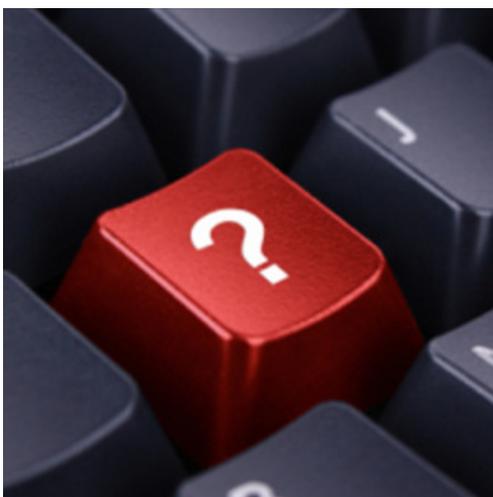
Second Life and Recycling

EBRA asks for a clear definition of the EPR duties for secondary batteries undergoing a second life, more particularly to ensure their recycling (technically and financially).

Justification:

- Providing a second life to batteries is a normal market evolution.
- The life cycle of batteries having a second life will be extended in time
- New actors are entering the market for second life. They need to contribute to the EPR too, including the collection of end-of-life batteries and the financing of their recycling.

Any questions?



EBRA is the association of the European battery recycling and sorting industry. We represent the interests of actors involved with sorting, treating and recycling all kinds of consumer, industrial or automotive spent batteries (at the exception of lead-acid automotive batteries).

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