



## **Main Impacts draft BattReg on WEEE Recyclers**

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



# Conventions

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New or modified Measure	Preferred option	Comments
	The preferred option from the Commission. Let's see what the Council and the EU Parliament will propose.	My personal comments

New or modified Measure	Preferred option	Comments
Significant impacts for WEEE Recyclers		

# Main new measures of the draft BattReg (1)

New or modified Measure	Preferred option	Comments
Classification and definition	<ul style="list-style-type: none"> <li>• New category for EV batteries</li> <li>• Weight limit of 5 kg to differentiate portable from industrial batteries</li> </ul>	<ul style="list-style-type: none"> <li>• New category = new requirements</li> <li>• Some e-bike batteries = portable batteries (→ collection)</li> </ul>
Second-life of industrial batteries	<p>At the end of the first life, used batteries are considered waste (except for reuse). Repurposing is considered a waste treatment operation. Repurposed (second life) batteries are considered as new products which have to comply with the product requirements when they are placed on the market</p>	<ul style="list-style-type: none"> <li>• Companies doing refurbishing/repurposing must be license waste operator.</li> <li>• Recycling step starts at this stage (→ see recycling targets)</li> </ul>
Collection rate for portable batteries	65% collection target by end 2025 and 70% by end 2030	<ul style="list-style-type: none"> <li>• Increasing over time (more EoL batteries from WEEE?)</li> <li>• Beware of batteries sorted out from household waste (poor quality for sorting &amp; recycling)</li> </ul>
Collection rate for automotive and industrial batteries	New reporting system for automotive, EV and industrial batteries	<ul style="list-style-type: none"> <li>• A first step in the right direction (→ improving collection?)</li> </ul>

## Main new measures of the draft BattReg (2)

New or modified Measure	Preferred option	Comments
<p>Recycling efficiencies and recovery of materials</p> <p>For all types of batteries (consumer/portable, industrial, EV...)</p> <p>Note: NiMH?</p>	<p>Lithium-ion batteries and Co, Ni, Li, Cu:</p> <ul style="list-style-type: none"> <li>Recycling efficiency lithium-ion batteries: 65% by 01/01/2025 (70% by 01/01/2030)</li> <li>Material recovery rates for Co, Ni, Li, Cu: resp. 90%, 90%, 35% and 90% by 01/01/2025 (95%, 95%, 70% and 95% by 01/01/2030)</li> </ul> <p>Lead-acid batteries and lead:</p> <ul style="list-style-type: none"> <li>Recycling efficiency lead-acid batteries: 75% by 01/01/2025 (80% by 01/01/2030)</li> <li>Material recovery for lead: 90% by 01/01/2025 (95% by 01/01/2030)</li> </ul> <p>Other waste batteries:</p> <ul style="list-style-type: none"> <li>Recycling efficiency : 50%</li> </ul>	<ul style="list-style-type: none"> <li>Modification of recycling processes needed (chiefly regarding Li)</li> <li>No targets for anode materials</li> <li>Increased overall RE: low value fractions will need to be recycled (→ process changes)</li> <li>Increased recycling costs (covered by EPR)</li> <li>Need to define: <ul style="list-style-type: none"> <li>how to report (calculation methodology)</li> <li>EoW criteria</li> </ul> </li> </ul>
<p>Carbon footprint for industrial and EV batteries</p>	<p>Mandatory carbon footprint declaration</p>	<p>Low contribution from recycling, not much impact expected.</p>

## Main new measures of the draft BattReg (3)

New or modified Measure	Preferred option	Comments
Performance and durability of rechargeable industrial and EV batteries	Information requirements on performance and durability	Important for 2 <sup>nd</sup> Life, not really on final recycling step
Non-rechargeable portable batteries	Technical parameters for performance and durability of portable primary batteries	Future restriction on primary batteries in the future?
Recycled content in industrial, EV and automotive batteries (above 2 kWh)	Mandatory declaration of levels of recycled content, in 2025 By 01/01/2030: 12%Co, 85% Pb, 4% Li, 4% Ni  By 01/01/2035: 20% Co, 85% Pb, 10% Li, 12% Ni	2 challenges for recyclers: <ul style="list-style-type: none"> <li>• Technically feasible ? (average age of those batteries: 15-20y after 1<sup>st</sup> POM / technical innovation in design new batteries)</li> <li>• How to report recycling content for metals?</li> </ul>
Extended producer responsibility	Clear specifications for extended producer responsibility obligations for industrial batteries Minimum standards for PROs	A positive point for EoL management chiefly when considering increased costs and life span of batteries

# Main new measures of the draft BattReg (4)

New or modified Measure	Preferred option	Comments
Design requirements for portable batteries	Strengthened obligation on removability	More batteries from WEEE to be removed and sent to battery recyclers?
Provision of information	Provision of basic information (as labels, technical documentation or online) Provision of more specific information to end-users and economic operators (with selective access)	→ Battery passport (See Digi TF)
Supply-chain due diligence for raw materials in industrial and EV batteries	voluntary supply-chain due diligence	No impact expected for recyclers

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- **Art 52: Obligations of treatment facilities**

Operators of waste treatment facilities subject to Directives 2000/53/EC and 2012/19/EU shall hand over waste batteries resulting from the treatment of end-of-life vehicles and waste electrical and electronic equipment to the producers of the relevant batteries or, where appointed in accordance with Article 47(2) of this Regulation, producer responsibility organisations acting on their behalf or to waste management operators with a view to their treatment and recycling in accordance with the requirements of Article 56 of this Regulation. The operators of waste treatment facilities shall keep records of those transactions.

- **Art 51(3): Obligation of end users**

Waste portable batteries incorporated in appliances that are readily removable by the end user without the use of professional tools shall be removed and discarded by end users in accordance with paragraph 1.

- **Art 56: Treatment and Recycling**

In addition to Article 51(3), where batteries are collected while still incorporated in a waste appliance, they shall be removed from the collected waste appliance in accordance with the requirements laid down in Directive 2012/19/EU.

Note: Dir 2000/53/EC (ELV) and Dir 2012/19/EU (WEEE)



## Some definitions

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- **Recycler:** means any natural or legal person established in the Union who carries out recycling processes in a permitted facility
- **Permitted facility:** means any facility that is permitted in accordance with Directive 2008/98/EC to carry out the treatment or recycling of waste batteries;  
[Dir 2008/98/EC = WFD)
- **Recycling process:** means any recycling operation of waste batteries, excluding sorting or preparation for recycling, that may be carried out in a single or several permitted facilities

# Treatment and Recycling

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- The WEEE directive is currently not under revision and will not be adapted together with BattReg. The WEEE Dir and BattReg will not be fully harmonized.
  - WEEE recyclers must comply with both
  - WEEE recyclers can recycle batteries together with WEEE (art ?? WEEE Dir) but need to follow the new requirements of the BattReg regarding:
    - Storage (Annex XII, Part A)
    - Recycling Efficiency – RE (Annex XII, Part B)
    - Material recovery targets (Annex XII, Part C)
    - ~~Recycling content~~ (Only for industrial batteries, electric vehicle batteries and Automotive batteries)

# End of life information – Battery Passport

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## **Battery passport**

- A very important step forward, chiefly for industrial/EV/Automotive batteries, but also for portable/consumer batteries
- Important for choosing the right strategy to meet the recycling requirements

## **Reporting**

- Quantities of batteries ex-WEEE
- Reg (EU) 493/2012 on the calculation of RE will be reviewed
- A methodology to be developed for the reporting of material recovery target ...

# What can we do together?

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- Align ourselves regarding the batteries in WEEE (reporting, removability,..)
- Contributing to:
  - Storage procedures
  - Transport (ADR..)
  - Development of methodology for the calculation and reporting of RE
  - Development of the methodology for the calculation and reporting of material targets

# Any questions?

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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 (including Li-Ion EV and stationary batteries apart from lead-acid automotive batteries).

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