

Evaluation of the Directive 2006/66/EC

Initial results of the evaluation study

No 6: Labelling

Trinomics / Oeko-Institut / E&Y

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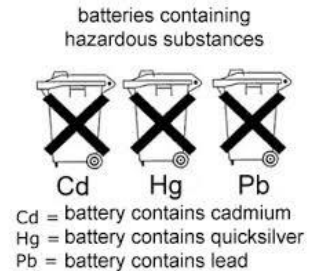
Agenda

1. Current Status
2. The effectiveness of battery labelling
3. Initial conclusions
4. Discussion

1. Current status

Batteries must be labelled as follows (Art. 21):

- The 'separate collection' symbol needs to be marked on **all** batteries
- Contents of mercury, cadmium and lead above certain thresholds needs to be marked on **all** batteries
- Battery capacity needs to be marked on **portable and automotive** batteries



The purpose of the labelling system is to provide transparent, reliable and clear information on batteries and their heavy metals content to end-users.(recital 20)

The role of end-users in the management of waste batteries (in support of collection) is relevant, too. (recital 20)

The **labelling of hazardous** content as means to support **sorting of batteries** is **not** specified as an **intention** in the Directive.

2. Effectiveness of battery labelling (1)

- General: Some stakeholders state that the meaning of battery labelling is not sufficiently clear to end-users as is the significance of their role regarding separate collection.
- The *crossed-out wheel bin symbol* is still considered necessary, though it seems not to suffice for providing consumers with information.
- Stakeholders states in relation to crossed-out wheel bin symbol:
 - Consumers familiar with the meaning of the symbol respect the label.
 - Those that don't do not separate batteries.

2. Effectiveness of battery labelling (2)

Capacity labelling

- *Capacity* labelling - Regulation 1103/2010 sets rules for portable rechargeable and automotive batteries:
 - An assessment of harmonized rules for primary portable is recommended in recital.
- CENELEC assessed feasibility of capacity labelling of primary batteries in 2012 and found it not feasible:
 - missing standardization,
 - does not allow consumers to evaluate the battery performance
- Although multiple stakeholders require the provision to be revised, primary batteries are still legally required to be capacity labelled.

2. Effectiveness of battery labelling (3)

Capacity labelling

Industrial batteries

- For industrial batteries used by end-users (e-bikes), the relevance of capacity labelling should be investigated.

Automotive batteries

- Multiple stakeholders have mentioned that the labelling requirements for starter batteries require a capacity indication according to International Electrotechnical Commission (IEC) with an accuracy of +/-10%.
- However, the IEC standard is stricter.
 - The Directive's requirement is inconsistent in relation to IEC.

2. Effectiveness of battery labelling (4)

Labelling contents of *chemical substances* – Hg, Cd, Pb

- According to stakeholders labelling is understood to be important for providing end-consumers information on chemical content.
- A few MS stated that labelling is helpful in hand-sorting.
- Many stakeholders see a need to adapt chemistry labelling in order to ensure safe handling during sorting and recycling processes.
- Li-ion and NiMH were given as examples for safety risks related to false sorting.
- Considerations to address insufficiencies on labelling of chemical content included:
 - System should be internationally recognized and standardized;
 - Possible options: color coding such as that of Battery Association of Japan; barcode (not consumer friendly); black and white code;
 - Where should label be located: on battery pack, battery cell, etc.

3. Initial conclusions

- The labelled aspects provide consumers with information, but explanatory information (campaigns, web-based info) is needed to enhance understanding.
- There may be room to revise capacity labelling:
 - some batteries used by private consumers are not covered (e.g. e-bikes):
 - capacity labeling is not available for primary batteries (label specifications also not provided in BD);
 - capacity labeling for automotive batteries needs to be consistent with IEC standard;
- There may be room to revise chemical content labelling
 - to complement available information for consumers and
 - to support sorting of certain electro-chemical systems

4. Discussion





Points for Discussion

Points for discussion

- What is needed to ensure clarity for consumers?
- Is a revision of capacity labelling provisions needed (primary batteries, industrial batteries, automotive batteries)?
- No capacity labelling is required for portable rechargeable batteries incorporated in appliances before being provided to end-users?
- Should the current chemical labelling revised to:
 - ensure sufficient information for end-consumers?
 - support better sorting/safe recycling, particularly in relation to Li-Ion sub-chemistries (labeling of heavy metals vs. labelling of electro-chemical systems)?

Is such a revision relevant for all batteries or mainly for batteries used by private end-users?

Thank you for your attention!

Any further questions?



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