

Evaluation of the Directive 2006/66/EC

Initial results of the evaluation study

No 7: Battery removability

Trinomics/Oeko-Institut/E&Y

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Agenda

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2. Purpose of removability
3. Examples
4. Monitoring, enforcement, lack of information
5. Initial conclusions
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1. Current status (1)

Article 11:

MS to ensure that manufacturers design appliances so that waste batteries can be “**readily** removed”, either:

- by the end-user; or where this is not possible;
- by qualified professionals (independent of the manufacturer).

Exemption for appliances where continuity of power supply and a permanent connection between appliance and battery is necessary:

- for safety reasons;
- for performance reasons;
- for medical reasons; or
- for data integrity reasons.

Appliances with incorporated batteries are to be accompanied by instructions as to the safe removal of such batteries by the end-user or by independent qualified professionals.

1. Current status (2)

Article 12 (3): Where batteries are collected together with WEEE, batteries shall be **removed** from the collected WEEE.

Replaceability is not specified by the Directive 2006/66/EC as an objective:

- though enabled through the need to provide instructions for removal of the battery.
- It is an added value of the provision as mentioned in the FAQ Document of the EC (2014) “*removal ... facilitating ... extending the life time*”.

The old Directive 91/157 indirectly addressed replaceability: MS shall take measures to ensure that batteries cannot be incorporated into appliances unless they can be readily removed, **when spent**, by the consumer.

Stakeholders raise the relevance of replaceability to extending the lifetime of products and thus to resource efficiency and the circular economy.

3. Examples

EEE mentioned by stakeholders, from which batteries often non-removable:

- toys
- “soft cell”
- waterproof/ weatherproof products
- mobile phones, tablets, laptops.



Batteries removed from WEEE

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2. Purpose of removability (2)

- Non-removability of batteries from EEE is said to be increasing;
- Reasons raised for non-removability include:
 - Preventing children from swallowing batteries in e.g. toys (also stated that restricted access does not need to affect removability);
 - Soft cells could be mistreated (punctured) when removable by the end-user, leading to uncontrolled fire hazards;
 - Products designed to be waterproof/ weatherproof require hermetically sealed designs for these properties and to avoid safety issues;
 - Battery removability requires battery compartment and may result in bulky design – in small products significantly affecting size of EEE and use of resources;
- Criteria for establishing when continuous power supply is necessary for safety/ performance/ medical/ data integrity reasons not specified.
- Stakeholders warn that the Art. 11, paragraph 2 is misused to avoid removability.

4. Monitoring, enforcement, lack of information

There is **no official data** to allow estimating to what degree the removability provision is complied with:

- In product design (no criteria to estimate design shares of end-user removability/professional removability/non-removability);
- At EoL when the battery must be separated from WEEE (how many batteries removed, how many recycled with WEEE);

Rough estimations performed in the ProSUM study estimate 1-20% of batteries are removed from WEEE.

Organisations collecting batteries are often not able or willing to identify the share of waste batteries removed from WEEE in total collection volume.

There is no data as to how many batteries are sent from WEEE compliance schemes to battery compliance schemes.

5. Initial conclusions

- Battery replaceability is not directly spelled out in the Directive as a goal, but recognized as important to extend product lifetime and therefore (usually) in support of resource efficiency.
- Stakeholder input indicates that an increased share of EEE reaches EoL early because batteries cannot be replaced.
- Although data on the removal of batteries is lacking, it is observed that non-removability is increasing.
- The lack of detailed criteria to clarify when non-removability is justified increasingly gains importance.
- Additional monitoring and reporting on:
 - compliance of design with removability and
 - compliance with the requirement to remove batteries from WEEEwould at least allow estimating the degree of compliance.

6. Discussion



Points for Discussion

Points for discussion

- Is it enough to ensure removability or should battery replaceability also be required (in the Directive) with the objective of increasing resource efficiency and consumers' rights protection?
- Is compliance with the provisions in Article 11 on design for removability an issue of concern? Or is there a need to keep the exemptions to a more reasonable level?
- Is compliance with Article 12(3), the unconditioned obligation to remove batteries from WEEE an issue of concern? Any monitoring / inspection needed with this regard?

Thank you for your attention!

Any further questions?



Your contact

Yifaat Baron

Öko-Institut e.V.

Headoffice Freiburg
Merzhauser Straße 173
79100 Freiburg

Phone: +49 761-45295-0
E-Mail: y.baron@oeko.de