



**British Battery
Manufacturers Association**

**Response by the BBMA to the
Government's Consultation of
22 December 2008
on the
Implementation of the
Waste Battery Collection and Recycling
Provisions of
Directive 2006/66/EC**

13 February 2009

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1 Introduction

1.1 BBMA

This response is submitted on behalf of the British Battery Manufacturers Association (BBMA). The BBMA's members are Duracell, Energizer, Panasonic and Rayovac. These four companies represent the majority (around 60%) of manufacturers¹ of portable consumer batteries marketed in the UK.

The response has been prepared in consultation with the members, by holding meetings to discuss the Association's policy position and by seeking comments on a draft of the report. Its contents represent the collective view of the membership.

1.2 Overview

In some ways, it is difficult for the BBMA to comment on this consultation and the draft regulations. In line with many other stakeholders (particularly from the producer community and local authorities), our response to the previous DEFRA consultation was that the compliance system should be based upon either a single compliance scheme, or multiple compliance schemes with a coordinating body. Contrary to that advice, DEFRA chose to go ahead on the basis of multiple schemes with no coordinating body.

The principal reason for our position was one of efficiency and cost. We took the view that the most effective way of meeting the requirements of the Directive would be for there to be competition where this would drive up efficiency and drive down cost, and cooperation where this was necessary to drive efficiency. We recognise that the challenge of meeting even the initial collection target of 25% is very demanding beginning, as we do, from a very low base of current collection. It remains our view that many different collection routes will be required and that cooperation and coordination between schemes at this level would increase efficiency reduce cost, and reduce negative environmental impact.

DEFRA has suggested that we should agree to disagree. The issue is too fundamental for that. HMG's position seems to be based upon the mantra that competition reduces costs and increases efficiency. In a perfect market, that is, of course, correct. But this is far from a perfect market. We are in a position where, at least in the early years, the likelihood is that BCSs will be chasing too few used batteries from a wide variety of sources, some of which may be contracted with BCSs and some not.

The result of this, in market terms, is that:

- Greater market power will attach to the suppliers of used batteries, particularly those unattached to specific schemes, thus forcing up the price or cost of BCSs gaining access to those batteries. In its consultation document, DEFRA concedes that some BCSs will have more ready access to used batteries than others by virtue of their membership. We regard this in itself as objectionable: it is wrong that legislation should disrupt the current commercial balance in the market. But it is also further evidence that market power will be with collectors of batteries and not producers. This inevitably means that collectors of batteries will be able to drive up prices—prices that will eventually be paid by consumers—higher than would otherwise be the case. We also believe that this inequitable balance in market power will make it more likely that some businesses—which may be BCSs or not—may enter the market just to collect and trade used batteries or, in the case of BCSs, compliance evidence.

¹ Including own label.

- There will be duplication of battery collection coverage leading to duplication of BCSs providing transport for those collection points. This will lead to greater environmental cost due to transport than need otherwise be the case with a single scheme or a coordinating body, in contravention of Article 7 of the Directive.

We submit, therefore, that, even at this late stage, DEFRA should reconsider this fundamental point and institute a system either with a single compliance scheme that all would need to join, or provide for a coordination body to work with multiple compliance schemes to aid efficiency in the collection of batteries—specifically to match market power with battery collectors—and possibly in other areas such as communication.

Competition would remain at all other levels of the system, and we foresee the same range of contractors and providers being involved on a competitive commercial basis as with unfettered multiple compliance schemes. The difference would be more cost-effective collection and less environmental cost due to transport. We recognise that the first consultation was split on this point. We note, however, that those in whose interests it would be to keep down costs for themselves and consumers—ie, the manufacturer / producer community—were unanimously in favour of a single scheme or coordination of multiple schemes. Those who argued the contrary case may be thought to be reflecting different commercial objectives.

2 Summary

It remains our view, therefore, that the Government's approach is deeply flawed and that it will unnecessarily increase costs to consumers and to the environment. We believe that the Government should think again on the grounds we outline above.

That said, we have commented below on the specific questions posed in DEFRA's consultation. In summary, our key comments are that:

- The cost of the proposals is disproportionately high whilst the positive environmental impact of collection and recycling of batteries is low or even negative. The effort of public agencies and therefore the cost should be reduced to the minimum possible.
- Exemptions proposed for small producers need not be made as we believe that BCSs will make appropriate provision for them. If exemptions are to be made, they should be at a much lower level.
- We are concerned that the complexity of the BCS approval process, and that this could lead to producers being unable to join a BCS. There must be provision to enable "lost" producers to join a scheme. It will not be possible for the majority of individual producers to meet the requirements applied to a BCS.
- The reporting of data should be annual and not quarterly, and should be simplified, if possible based on historical performance and not a mix of historical and current.
- We are concerned that the provisions that HMG has made to prevent or discourage trading as a means of demonstrating compliance with the Directive are ineffective and potentially further distort the market.
- It should be clarified that distributors, economic operators and Competent Public Authorities may not charge BCSs for used batteries when using their right to require collection or receipt of collected batteries.

3 Other comments

We comment here on specific issues raised by the consultation not covered by the specific questions in the consultation document.

3.1 Definition of “industrial battery”

The transposition of the definition of “industrial battery” from the directive to the consultation document and the regulations is inaccurate in part. The directive defines an industrial battery as one “... designed for exclusively industrial or professional uses ...”, whereas the consultation and draft regulations refer to one “... designed exclusively for industrial or professional uses ...”. This changes the meaning.

3.2 Scope of producer responsibility

References to the scope of producer responsibility within the document are inconsistent. For example, paragraph 3.1 says wrongly that “The Batteries Directive makes producers of batteries responsible for funding these systems” [ie, collection of used batteries] whereas paragraph 3.3.2 correctly identifies that “The Directive requires (Article 8) that Member States establish a collection network”.

We have debated this at length with DEFRA and BERR and acknowledge that HMG has the discretion under the Directive to delegate the responsibility for the collection of used batteries to producers. DEFRA has told us that it has satisfied itself that it is reasonable to do so, though has advanced no arguments in this regard. The inconsistent wording gives rise to doubt that this issue has been properly considered.

More worryingly is the implication that ministers may not have been alerted to this decision and issue. We note that the “Evidence Base” in the consultation, which we presume is the basis for advising ministers, states that “The Directive sets out ... [that] ... Producers will pay for the collection [our emphasis], treatment and recycling of waste batteries”. This is wrong since this is a decision for government. We would welcome confirmation that ministers have been so advised.

4 Responses to consultation questions

4.1 Portable Batteries

4.1.1 What are your views on the proposed level of the small producer exemption?

The BBMA appreciates HMG’s concern not to place a disproportionately high financial or administrative burden on small producers. However, we oppose in principle any *de minimis* exemption given to any specific part or parts of the producer community since it would result in an increase in obligation on the rest.

Further, we do not accept that a lack of a small producer exemption would lead to the disproportionate burdens that HMG envisages. We believe that small producers would be attractive members for competing compliance schemes and that, to attract them, compliance schemes would set attractive terms for their membership. As an example, schemes might set a low fixed rate membership fee rather than higher fees for larger members pro rata to their size.

Notwithstanding these comments, we believe that the proposal to set the exemption level at 3 tonnes of portable batteries per year is far too high. Our calculations suggest that the current level would excuse 3-5% of the market. We note that, should HMG apply an

exemption, it would be easier to increase the threshold in the light of experience than decrease it. An initial limit of 0.1 tonnes would be an appropriate starting point.

If 1% of the market were to be exempted, that would be equivalent to 300 tonnes of batteries of a UK market of around 30,000 tonnes. 25% of that 300 tonnes would need to be collected, treated and recycled in 2012 paid for by other producers. This could equate to £75,000 to be met by other producers.

4.1.2 What are your views on the proposals for approval of portable Batteries Compliance Schemes?

As HMG knows, we are concerned that a rogue company could become a BCS in order to exploit battery producers. We have in mind a scheme that had ready access to significant quantities of used batteries and whose business model would be to collect these and sell them to other schemes which might struggle to meet their collection targets.

The high cost of entry may be designed to put off speculative schemes such as this, but this cost may be acceptable to a company whose business plan is based around just this sort of activity unless firm action is taken to prevent companies such as this becoming BCSs.

We are also concerned that the two stage process may not allow the EAs to make clear judgments. For example, expressions of interest by specific producers at the first stage may not be translated into firm membership at the second stage. That could pose significant difficulties for putative schemes having to change their business plans at the last moment.

Further, we are unclear what would happen to a producer who had signed up in advance with a BCS which did not then gain approval at either stage, but more seriously perhaps at the final. Since the business plans of BCSs will be predicated on being able to meet the obligations of its members, it is unlikely that any significant producer which found itself in this position would be able to find an alternative BCS.

It is equally (or even more) unlikely that a producer in that position would be able to meet its obligations, particularly with regard to collection. It is common ground between most or all stakeholders that meeting the collection targets will be an extremely onerous task. BCSs will have between them tied up the easy or cheap sources of used batteries. Without a requirement for BCSs to accept producers as members, we fail to see how a producer in these circumstances would be able to meet his obligation.

4.1.3 What are your views on the proposed requirements on portable Batteries Compliance Schemes?

4.1.3.1 Frequency of data reporting

The reporting of data by BCSs should be on an annual basis, not quarterly. This would meet HMG's needs and reduce costs. Indeed, we understand that the likely costs included in the consultation paper are based on Valpak's estimates for annual reporting. Quarterly reporting would quadruple the cost whilst adding no significant extra value.

We recognise that HMG feels that more frequent access to data on collection rates during the initial two years may be necessary to allow tracking of performance during the year to take place so that remedial action may be taken with BCSs that are not likely to meet the targets. We appreciate this point, and suggest that (1) HMG / the EAs seek to agree with BCSs the most cost effective way of doing this (maybe on the basis of an alert system?); and that (2) annual reporting be adopted as the norm thereafter. Finally, the EAs may choose to put a greater reporting requirement on schemes that under perform.

4.1.3.2 Basis of data reporting

We are concerned that 2008 sales data may be difficult to obtain and therefore suggest that the targets for 2010 are based on 2009 data alone.

Going forward, we are concerned that the proposal to set annual targets based on an average of sales for the previous two years and the current one introduces unnecessary and debilitating uncertainty into the system. Setting the target based on the previous two or three years' sales would give producers and BCSs a clear and unambiguous target to meet. If the target is set on the basis of the two previous and current years' sales, BCSs and their members wouldn't be clear on their targets until after the year's work had been completed. This sort of uncertainty is extremely unhelpful and has been debilitating in WEEE.

We note that the Government is required to report to the European Commission on the basis of the average of two historical years and the current year, but there is nothing to prevent HMG setting producers' targets on the more certain but broadly equivalent basis we propose. The difference between the two targets overall is between 0% and 3% based on EPBA data, but it could be much more considerable for specific BCSs or producers.

(Alternatively, HMG could seek a derogation in the light of the current economic climate. This (1) makes the uncertainty for producers more concerning, a benefit in the current climate; and (2) the current downturn means that, in the near future, targets based on the previous three years' sales would be likely to be higher than one set based on the previous two plus the current year.)

4.1.3.3 Chemistry reporting

BBMA supports the proposals for reporting of different chemistries proposed by the EPBA: paper at Annex.

4.1.3.4 Trading

BBMA has consistently opposed proposals that rely on or permit trading of evidence as a significant means of demonstrating compliance. We understand that HMG's proposals aim to minimise trading as a principal means of meeting the requirements by ensuring, so far as is possible, that schemes collect very close to the requirement they face due to their membership.

We applaud this as a principle, but we recognise that HMG's detailed proposals for the period 2010 – 2012 in particular when trading is not allowed could mean that good schemes were penalised by having to recycle more batteries than their less efficient competitors. However, trading increases the risk of rogue operators distorting the system to their own profit and benefit outside of the scope of the Directive's objectives. This was why we originally proposed that there should be competition where it aided efficiency, but concerted action where it did not.

During the period 2010 – 2012 when no trading would be allowed and when the interim targets were not mandatory there would be no incentive for BCSs to exceed—or in a difficult environment meet—the interim targets, particularly against an assumption that it will be very difficult for most schemes to meet the initial targets. Schemes that exceeded the target or which collected proportionately more than others would be faced with higher logistics and recycling costs than their less efficient competitors with no prospect of managing their liabilities through trading evidence.

Not only is this inequitable, it would mean that the "trial" period of 2010 – 2012 would not be a true test of BCSs' abilities. Lesser considerations apply after 2012. We are aware that a range of ways of dealing with this issue may have been proposed by others, including making the interim targets mandatory; applying penalties to BCSs; and introducing some

form of balancing mechanism. Only one proposal gained general support throughout the membership: that of allowing schemes to carry over excess batteries into the next compliance year. This would maintain the incentive to collect and enable BCSs to manage their costs. We therefore support this.

4.1.4 What are your views on the provisions on publicity for consumers?

We welcome the Government's commitment to undertake general awareness communications to alert the public to the availability of battery collection and recycling. We believe—as we understand to be the case—that this should continue beyond 2009. This will help, but we are aware that good communication will not make a bad system work.

We are also aware that some previous public comments by HMG about battery recycling have made inaccurate comments about batteries—for example, describing them as “dangerous”—that were unhelpful to the industry. It is important that comments about batteries and, in particular, their environmental impact are accurate and not sensationalist.

Alongside the background of the Government's proposed national awareness campaign, we do not dissent from HMG's proposal to make the BCSs responsible for their own communications programmes. If BCSs are to target different waste streams, this makes sense.

However, to have maximum impact, a strong degree of common messaging, 'look and feel' should be used by the BCSs, to increase impact and recognition. The consultation document acknowledges that this is a preferred outcome, but does not make firm proposals on how best to achieve it. We propose that it should be a condition of approval of BCSs that they would cooperate and position their communication in this way or that the coordination body that we continue to propose should be asked to achieve this.

4.1.5 What are your views on the proposals for the issue of evidence of portable batteries treatment and recycling?

We note that the consultation document proposes that any producer that belonged to a BCS that had its approval withdrawn should have 28 days to join a different scheme. We remain concerned, as we express elsewhere, that it may not be possible for a producer to find a BCS that would accept it into membership; and that it would be impossible for the producer to establish its own scheme. There must be some requirement for BCSs to accept new members under these conditions of *force majeure*, and appropriate flexibility introduced in BCSs' approvals so that they and their members are not disadvantaged in doing so.

Consistent with our opposition to trading of used batteries or evidence, we believe that it should be explicit that ABTFs should not be able to trade compliance evidence on the open market. We propose that ABTFs should only be able to supply evidence to the BCSs with which they are contracted to prevent the operation of a totally new layer of evidence trading.

4.1.6 What are your views on the proposed interim targets in the draft regulations?

See 4.1.3.4 above.

4.1.7 What are your views on the proposed exemption for small distributors?

This is supported by the BBMA in principle, but applying a weight limit is potentially difficult for retailers to meet since they would not be able to judge the weight of batteries they had sold. We also feel that the proposed limit of 16kg/year is too low, representing less than one pack of AA batteries per day sales. It could lead to a requirement for BCSs send out vans around Britain collecting insignificant amounts of batteries from small shops.

We recognise that there is no automatic right to this exemption in the Directive and that the Government's justification for an exemption such as this could be qualified under the need to avoid environmentally damaging transport: hence the proposed weight limit based on a perceived transport distance of 5km. However, we request that the Government provide guidance on the minimum weight of batteries BCSs should be asked to pick up from distributors.

In our view, an additional response to this issue should be the greater use of backhauling. HMG should make appropriate changes to the hazardous waste and transport of dangerous goods regulations to facilitate this.

4.1.8 What are your views on the proposal for schemes to accept batteries from economic operators and Competent Public Authorities?

This is an important area, and further clarity is required.

We appreciate that distributors must have a means of passing on collected batteries to BCSs—in the same way that we argue that producers must have similar certainty that they can participate in the collection and recycling system. However, the approval system proposed by HMG will require BCSs to adopt detailed business plans to meet their obligations (based on the collective obligation of their members), and they should, therefore, have a degree of flexibility to cope with either windfalls of batteries or increased obligations for reasons outside their control. This flexibility might be based around a limited ability to carry forward excess batteries to a following year, or similar flexibility to fall beneath their original target if required to add to their membership.

We believe that the proposal for a BCS to be required to set a date for collection from a distributor within 21 days of a request to do so should be clarified. It is unclear whether the 21 day deadline refers to the BCS agreeing a date for a collection with the distributor, or actually making the physical collection of the used batteries. It is important that the BCS—or a coordinating body—is able to manage collections from distributors in a way that minimises the environmental impact of transport and helps meet BCSs' obligations. To have a deadline for collection—if it is that, rather than a deadline for response—could result in the objectives of the Directive not being met. Equally, even if the intention is that the date should be set within 21 days, it should be clear that the BCS should have discretion to fix the collection at a time that minimises the environmental impact, in particular due to transport.

The consultation proposes that BCSs should work together to minimise this risk. And that the enforcement body (presumably that for distributors?) might act as a link between retailers and BCSs. This sort of coordination function is not appropriate for a body which is essentially a regulator. It is precisely the sort of function that should be carried out by the coordination body that we and other stakeholders proposed, and which DEFRA rejected. We urge DEFRA to reconsider this point.

It is our understanding and view that distributors should not be able to charge BCSs for collecting batteries from distributors. It seems wrong in principle for legislation to require collection by one operator or class of operator and then allow them to charge another operator or class of operator for those collected batteries. It is unclear from the consultation document and from the draft regulations whether this is the intention. We urge DEFRA to make clear that distributors cannot charge for batteries under these circumstances, or pass them on to any economic operator other than a BCS to avoid the possibility of other operators seeking to profit from a trade in used batteries outside of the scope of the Directive's objectives. Note that we see this as different from a voluntary agreement between a distributor and a BCS entered into as part of that BCS's business plan.

We leave it to potential compliance schemes to comment on the feasibility of their providing facilities at which economic operators and competent public authorities may deposit collected batteries. However, whilst the regulations make clear that BCSs should accept these free of charge, they should also make clear that economic operators and competent public authorities may not charge BCSs for them.

We support the proposal in the consultation that backhauling provides an effective method of collating collected batteries, and that it should be encouraged. As part of this encouragement, we propose that HMG should ensure that this is not hampered by the dangerous goods and hazardous waste regulations.

4.2 Charges (Portable Batteries)

4.2.1 Is the approach to recovering the costs of regulating schemes reasonable?

BBMA believes that the costs proposed are unreasonably high and were not sufficiently explained in the consultation. It is clear from the consultation itself and previous research work commissioned by DEFRA and BERR that the environmental benefit of collecting and recycling used portable batteries is very small, or negative. As such, a proportional response would generate the smallest possible cost.

This is even more so in the current difficult economic climate. Costs will inevitably be passed on to consumers. Whilst the cost of portable batteries is not great, they are essential items for many households. It flies in the face of the Government's overall approach to produce a scheme that would place unnecessary costs on ordinary families.

In the absence of any additional explanation of the costs by the EAs or DEFRA, we can only conclude that they are disproportionately high when set against the environmental benefit that the system overall may bring about, and that it is wrong of the Government to propose a system entailing such a high cost at a time when many families are struggling to make ends meet.

According to the impact assessment, the Environment Agencies require £626,000 annually from schemes to fund compliance monitoring of schemes, registration of producers, compliance monitoring of producers, and receipt and processing of data. In addition, it is proposed that they should receive £130,000 annually from the Government for identification of unregistered producers; checking the business and regulatory status of potential non-compliance; checking businesses through site visits and inspections by Area staff; and taking appropriate enforcement action against businesses which fail to comply. The following table illustrates the differences in the agencies charges for batteries and WEEE:

	Batteries	WEEE	Comment
Annual EA's receipts	£756,000	£2 million	1 category for batteries; 13 categories for EEE
Receipts/producer	£756,000	£400	1000 for batteries; 5000 for WEEE
Receipts/scheme	£189,000	£50,000	4 for batteries; 40 for WEEE
Receipts/t placed on market	£25.20	£2.00	30,000t for batteries; 1 million t for EEE

We believe that it is incumbent upon the Government to propose a revised system that entails less cost. In the absence of a more detailed explanation of how costs have been calculated, it is impossible for us to suggest our own changes to the system. However, as

one example, we understand that Valpak's calculations suggest that the EAs would have to spend 300-500 working days monitoring each scheme to justify the fee.

This is clearly far too intensive an effort given the extremely limited environmental objectives that can be achieved by this legislation. The costs should reflect no more than the EAs' own efforts, and they should be kept to a minimum commensurate with the least intervention necessary to ensure that BCSs are meeting their obligations. We propose that DEFRA should publish details of the EAs' proposals in this regard for review by all stakeholders, including producers and potential compliance schemes. As we have already proposed one way for the EAs to reduce their costs is to require producers to report sales data annual instead of quarterly and calculate their collection obligations on previous years' sales. This would also reduce the administrative burden on producers and schemes.

We do not believe that the initial high cost of entry for BCSs would deter speculators if they had confidence in their business plan. Neither do we believe that it is appropriate to use cost disincentive methods to achieve objectives which should be determined by the structure of the scheme itself. We are concerned that high cost of entry is being used in an attempt to make a flawed system better rather than by eradicating the flaws.

4.2.2 Is the approach to recovering the costs of regulating obligated producers of portable batteries reasonable?

Our comments on the previous question apply here. The costs of £5000 per obligated member again appear expensive. They need to be justified, and shown to be the minimum necessary.

4.2.3 Are the proposed thresholds reasonable? Would it be better to distinguish between lead/acid batteries and the rest, rather than between portable, industrial and automotive batteries?

We believe that these are reasonable.

4.3 Other legislation

4.3.1 We invite comments on the proposed level of offences and penalties in the regulations?

No comments.

4.3.2 What are your views on the Draft Scottish legislation?

No comments.

4.4 Impact Assessments

4.4.1 Do you agree with the costs and benefits for the UK of these provisions as set out in the partial impact assessments (Annexes C, D and E)? Please provide evidence to support your view.

We have no further comment beyond those in the body of this reply.

5 Conclusion

We hope that HMG finds these comments helpful. We remain at DEFRA's and BERR's disposal should a further discussion be beneficial.

Annex

REPORTING

The Batteries Directive requires the Reporting of quantity of **portable batteries** placed on the **Member State** end users market to fulfil the requirements of Annex 1, linked to Article 10 on Collection Targets and in particular its § 4.b.

Although the Directive does not require a harmonised approach, it is however important to ensure that the same method is used in the European Union. This would make the reporting more accurate and would ensure a better comparison of the available data.

The Producer has several possibilities for declaring the quantity of batteries placed on the market. This can be made according to the following procedures.

- a) A declaration to the national Authority if the producer operates its own individual scheme.
- b) A declaration to the collective compliance scheme that will report to the Authority consolidated data for all of its Members.

1. Reporting Format.

Table I presented below details the reporting elements which are split according to the two major portable battery categories:

1. primary portable batteries
2. rechargeable portable batteries.

For each portable battery category of Table 1, the various chemical systems representatives of more than 95 % by weight of the EU market are listed.

Each Producer should fill this Table and report it to the Collective Scheme or directly to the Authority in case the producer operates an individual scheme.

The Collective Scheme will consolidate the information received from its Members and will communicate to the Authority a similar information as supplied in Table 1 but with consolidated data.

The Member State Authority will consolidate all data supplied by Producers acting individually and those supplied by the Collective Scheme(s).

The proposed reporting format ensures a workable approach and guarantees that all portable battery systems are captured. It is important to underline that table I is to be used for the reporting from the Collective system to the Authority.

The reporting from the producers to the collection organisation – in case they are member of a collective system - should be governed by the system itself. However, guidance can be

provided regarding the various types of standard size batteries placed on the EU market. It will help individual producers to fill in the global data to be supplied in TABLE 1. An example of such an excel sheet is supplied below in TABLE 2 for illustration. Since there does not exist one single coding system that will cover all battery types, it is recommended that the compliance organizations develop this further according to the specific national situation. Table 2 which refers to the IEC standards can be used as a basis for the communication of accurate data . Indeed the communication of weight ranges per battery category would not allow the accurate evaluation of the collection efficiency.

TABLE I: REPORTING FORMAT FOR YEARLY SALES OF PORTABLE BATTERIES ON THE END-USER MARKET. (Batteries Directive 2006/66/EC).

This document will be used for the reporting by the collective system and the individual system to the authorities.

- MEMBER STATE :
- REFERENCE YEAR :

CATEGORY 1. PORTABLE PRIMARY BATTERIES, PACKS AND BUTTON CELLS	Units placed on the market (incl. packs)	• WEIG HT IN KG
Quantity of Zinc Carbon		
Quantity of Alkaline Manganese		
Quantity of Lithium Primary		
Quantity of Primary Button cells		
Quantity of Other Primary Batteries		
SUB-TOTAL 1. Total Portable Primary Batteries Placed on the End User Market		
CATEGORY 2 PORTABLE RECHARGEABLE BATTERIES, PACKS AND BUTTON CELLS	Units placed on the market (incl. packs)	• WEIG HT IN KG
Quantity of Nickel Cadmium		
Quantity of Nickel Metal Hydride		
Quantity of Lithium-Ion		
Quantity of Lead-acid		
Quantity of Other Rechargeable Batteries		
SUB-TOTAL 2 Total Portable Rechargeable Batteries Placed on the End User Market		
TOTAL (SUB-TOTAL 1 + SUB-TOTAL 2) PORTABLE PRIMARY AND RECHARGEABLE BATTERIES PLACED ON THE END USER MARKET (IN KILOGRAMS)		

**TABLE II Example:
Uses of IEC Numbers for the Declaration of the Quantity of Battery Placed on the Market (Example of Zinc-Alkaline Batteries).**

This should be developed further on national level and is only to be used for the reporting from the manufacturers to the collective scheme. This information would not provide added value to the governments.

ID Number	Sub Family	IEC	Format	Height	Dimensions	Weight in grams	Units (Nb)	Weight(Kg)
A102010010	Alkaline	LR20	D	61.5	34.2	132	10	1320
A102010020	Alkaline	LR14	C	50	26.2	65	10	650
A102010030	Alkaline	LR6	AA	50.5	14.5	22	10	220
A102010040	Alkaline	LR03	AAA	44.5	10.5	10.2	10	102
A102010050	Alkaline	6LR61	9V	49	17,5x26	45	10	450
	TOTAL							2742

2. DATE and SIGNATURE

Registration form prepared in(CITY) (COUNTRY).

Date YEAR, MONTH, DAY

Company.

Represented by.....