

# Introduction

- “the initiative will modify the Directive or a proposal for a new Regulation repealing the Directive will be prepared, to notably encompass end-of-life and sustainability requirements. (... Q4 2020)” 2020 CWP
- Information from
  - Studies and consultation underpinning the assessment and evaluation of the Directive,
  - Studies and consultation carried out in the context of the ‘eco-design’ process,
  - Extensive consultation processes during and following up to the Strategic Action Plan on Batteries,
  - Two specific studies,
    - *Feasibility of measures addressing shortcomings in the current EU batteries framework system,*
    - *Study addressing particular topics on batteries (legal statuses, restrictions, etc).*

# Proposed approaches and measures

- Taken from
  - EU institutions
  - Stakeholders' proposals
  - Technical and scientific publications
- Disclaimer

This document is part of a study which is being prepared for the European Commission. However, the information and views set out in this report are those of the authors and do not necessarily reflect the official opinion of the Commission. The Commission does not guarantee the accuracy of the data included in this initial presentation of results.

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# Batteries Directive 2006/66/EC

## Initial results of the study in support of the assessment of the Batteries Directive

Measure 12: Fair practice minimum standards for PROs



# COLLECTION

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## Measure 12

# Fair practice minimum standards for PROs

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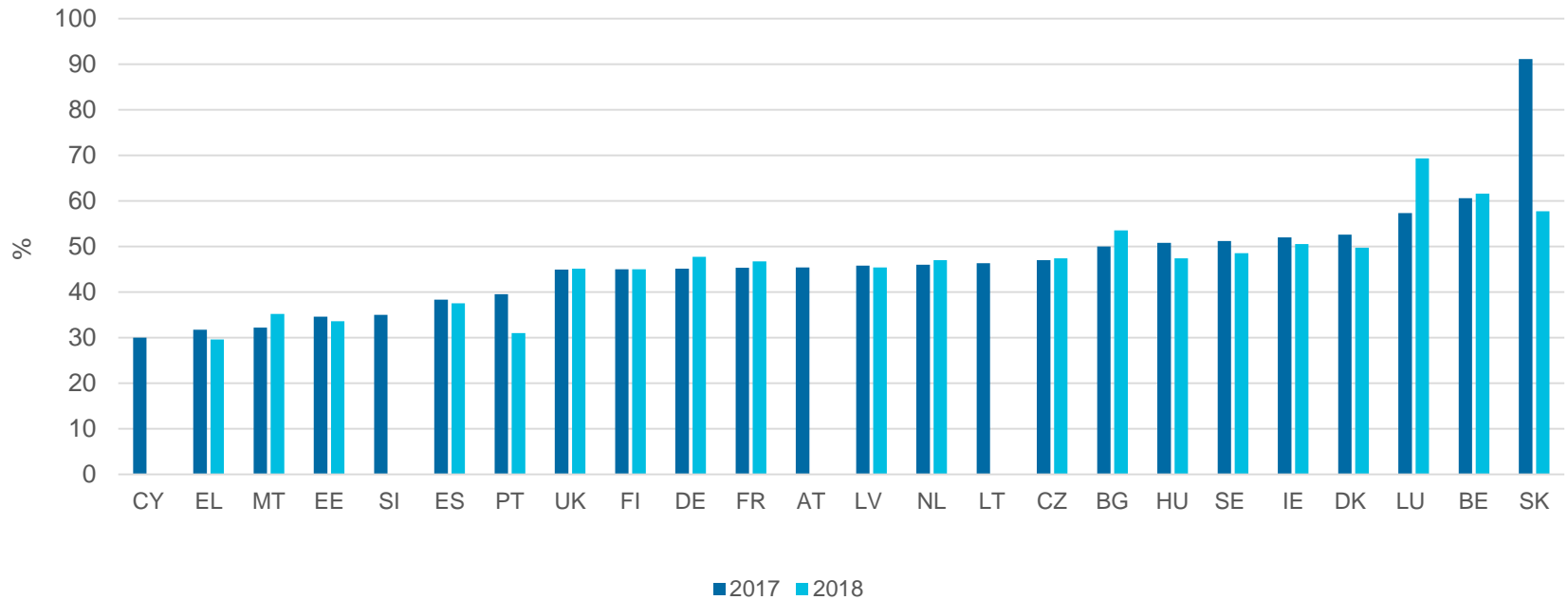
V Initial conclusions

# Measure 12 – Fair practice minimum standards for PROs (Ia)

## Problem description

- There are a variety of collection rates across the EU-28, as shown below.

Collection rates by Member State – 2017 and 2018



# Measure 12 – Fair practice minimum standards for PROs (Ib)

## Problem description

- Part of the cause could be the lack of detail on the level and focus of effort by PROs in the Directive. It does not provide a harmonised approach or a level playing field.
- As a result, practices for collection schemes vary greatly across the different Member States. Also influenced by other factors, e.g. culture and infrastructure.
- Establishing minimum standards for PROs beyond that of the Batteries Directive and Waste Framework Directive (WFD) might help
- The previously identified issue of free-riding producers trading in weigh-in slips has been mostly resolved due to Articles 8 (a) (3a – 3b) of the WFD.
- Particularly with regard to public awareness campaigns, information in some MSs is still often lacking for consumers. Such campaigns have been proven to raise collection rates.
  - The requirements of public awareness campaigns (funding amount, frequency per year) are not specified by the Directive or by Member States.

# Measure 12 – Fair practice minimum standards for PROs (IIa)

## Alternative options

### Baseline

- Article 8 and 20 currently decide collection scheme issues in the Batteries Directive.
- After the Waste Framework Directive (WFD) rules are applied, however articles 8a from the WFD will be applied:
  - *3. Member States shall take the necessary measures to ensure that any producer of products or organisation implementing extended producer responsibility obligations on behalf of producers of products:*
    - *(a) has a clearly defined geographical, product and material coverage without limiting those areas to those where the collection and management of waste are the most profitable;*
    - *(b) provides an appropriate availability of waste collection systems within the areas referred to in point (a);*
    - *(c) has the necessary financial means or financial and organisational means to meet its extended producer responsibility obligations;*
- However more detailed points from section 4. of this article do not apply to the Batteries Directive (such as minimum financial standards for consumer awareness campaigns)



# Measure 12 – Fair practice minimum standards for PROs (IIb)

## Alternative options

### Option 1: Minimum consumer awareness-raising campaign standards

- Increase minimum standards of Article 20 to include some or all of the following:
  - **Minimum number of campaigns** (e.g. 2 per year), **minimum coverage** (geographically, consumer type etc.), **minimum funding** (e.g. €0.5 - €1 per capita of a PROs market coverage)
  - Clear information on where collection points are, visible collection box designs and school campaigns seem to be the most effective approaches.
  - BEBAT for example had a 55% – 70% increase in Belgium's collection rate owing to strong programme of campaigns (school/public competitions, tv/radio advertisement)

### Option 2: Minimum density of collection points

- Provided a minimum number of collection points required by population density:
  - For example: 500 per 1 million inhabitants or 10 per 100km<sup>2</sup> (based roughly on EUCOBAT average figures) and ensuring that Member States take into account regional variation.

# Measure 12 – Fair practice minimum standards for PROs (IIIa)

## Impacts of the options – initial results

### Environmental impacts

- The data on the environmental effects due to an increased collection rate will be covered in greater depth under Measure 5 on the higher collection rate for portable batteries.
  - This data is referred to in this section.

### Baseline

- Varied EU-wide collection rates and continued improper disposal – **assumed total 45% collection across all EU countries**, however over half of countries not meeting 45% target.
  - As a result of a varied citizen understanding of the importance of disposal and the location of collection points.
  - Varied collection point density by Member State.

# Measure 12 – Fair practice minimum standards for PROs (IIIb)

## Impacts of the options – initial results

### Environmental impacts

#### Option 1: Minimum consumer awareness-raising campaign standards

- Increased collection rates across EU countries of up to 15% as a result of consumer awareness-raising campaigns (based on BEBAT 2016 increase from 55% – 70%).
  - Under this assumption it could increase collection between 45% to 60% collection across the EU.
  - For alkaline batteries, an increased collection of 55% would decrease emissions by 11000 CO<sub>2</sub>eq t/a (compared to baseline).
- A minimum funding of €0.5 cents per capita shows an increased possibility for high (+50%) collection rate.
- However, this is highly dependent on the Member State context (e.g. public attitudes, existence of infrastructure, number of PRO schemes).
- Flexibility and adaptability to different contexts is paramount to achieve the greatest success, while simultaneously setting minimum standards.
- Increased collection would require greater transportation for PROs. This will slightly increase transportation emissions.

# Measure 12– Fair practice minimum standards for PROs (IIIc)

## Impacts of the options – initial results

### Environmental impacts

#### Option 2: Minimum density of collection points

- Consumer convenience has a large influence on collection rates (1/3 of batteries are collected in retail stores).
  - However Member State size and infrastructure is a key component to better understand the minimum requirements required in this area. A “**one size fits all**” approach is not regarded as credible – likely to be a reduction for some (though if it’s a minimum, this should not occur) but a very large increase for other MSs.
  - If the total number of collection points goes up the total collected should increase, even if the additional points are in areas of lower population density, where the amount collected per point will be lower.

# Measure 12 – Fair practice minimum standards for PROs (III d)

## Impacts of the options – initial results

### Economic impacts

#### Option 1: Minimum consumer awareness-raising campaign standards

- In countries with high collection rates (+65%), funding for consumer campaigns is often greater than €1.5 per capita.
- Only covers five Member States – data not available/provided for others.

		AT	BE	FR	NL	CH
Portable batteries collected in tonnes	2011	1 738	2 406	17 397	3 385	2 375
	2016	-/-	3 153	13 677	3 946	2 804
Collection rate	2011	49%	52%	36%	42%	72%
	2016		70.7%	46.4%	49.0%	67.8%
Total fee in 1000 €	2011	1 987	21 810	11 300	5 400	12 050
	2016	-/-	17 674	15 586	8 610	14 231
Inhabitants in 1000	2016	8 772	11 268	66 940	16 979	8 402
Fee per inhabitant in € per year	2011	0.23	1.94	0.17	0.32	1.43
	2016		1.57	0.23	0.51	1.69

# Measure 12 – Fair practice minimum standards for PROs (IIIe)

## Impacts of the options – initial results

### Economic impacts

#### Option 1: Minimum consumer awareness-raising campaign standards

- The data below is varied and shows that situations depend on a several variables.
  - Countries with larger volumes of batteries to collect can achieve more with less funding.
  - Generally a funding minimum of €0.5 per capita is indicative of a higher collection rate.
- A minimum fund for PROs of €0.5 per capita would increase costs to manufacturers, where the majority pay less than this (a minimum total fund of €55,75 million).
  - This cost is assuming that there is only 1 PRO per country. In countries with multiple PROs costs would not be €0.5 per capita per PRO.
- Small increased administrative costs from a centralised authority / Member State to calculate minimum funding requirements per PRO and to audit and report that campaigns are happening.

# Measure 12 – Fair practice minimum standards for PROs (III f)

## Impacts of the options – initial results

### Economic impacts

#### Option 2: Minimum density of collection points

- Increased density of collection points would undoubtedly increase costs, arguably needlessly (if new collection points didn't result in a proportionate increase) (unclear on specific costs).
  - As the number of collection points goes up the costs of collecting from a higher number of points will be higher.
  - Administrative cost to report and audit that collection point density is being achieved.

# Measure 12 – Fair practice minimum standards for PROs (IIIg)

## Impacts of the options – initial results

### Social impacts

- Increased awareness amongst the public on how and where to dispose batteries > increased collection rate.
  - In Belgium awareness on battery disposal grew from 56% to 90% of citizens understanding proper disposal between 2010 and today.
- No clear data on impacts on consumers for minimum standards for collection points.
- **For Employment** - On the assumption that 25% of a fee on PROs of €0.5 per capita is being used for public awareness campaigns, it could provide between 1 033 – 1 171 jobs per year across the EU.



# Measure 12 – Fair practice minimum standards for PROs (IV)

## Comparison of options

Impact	Baseline	Option 1 (awareness raising)	Option 2 (collection point density)
Fair competition between recyclers	No /	n.a	n.a
Environmental benefits	No -	Likely increase in collection rates  ++	Some increase likely, but collection per point may decrease  (+)
Environmental burdens	Yes missing collection from lower awareness and density  --	Minor - Increased transport emissions as a result of higher collection rate  -	Minor – as 1  /
Additional savings (Euro)	n.a.	n.a	n.a
Additional costs (Euro)	No /	Yes, EUR 0.5 per capita from producers to finance schemes  --	Yes, more collection points will increase costs  -
Administrative burden (yearly)	No /	Low, reporting and monitoring  -	Low, reporting and monitoring  -
One-time administrative burden	No /	Low  -	Low  -

# Measure 12 – Fair practice minimum standards for PROs (V)

## Initial conclusions

- ✓ More detailed minimum standards could provide added value for collection rates.
- ✓ Difficult to fix / suggest appropriate specific standards (reflecting the wide variation in existing approaches and a lack of accessible data).
- ✓ Potential impact of the various minimum standard levels are hard to quantify
  - ✓ Potential to increase collection rates (up by a maximum of 15%).
  - ✓ Potential increase in consumer awareness (up by a maximum of 30%).
  - ✓ Could provide 1 000+ jobs through increase to campaign funding.
  - ✓ Increase costs of producer consumer awareness campaigns if below minimum standards.
- ✓ Collection point density standards may not provide added value (in terms of collection efficiency), but would improve accessibility and equity.