

Public consultation on the evaluation of the Batteries Directive

Fields marked with * are mandatory.

Introduction

The Batteries Directive 2006/66/EC lays down rules on placing batteries and accumulators on the market and their treatment in the EU (the terms 'batteries' and 'accumulators' are considered synonyms and used interchangeably).

Apart from a few exemptions, it applies to all batteries and accumulators regardless of their chemical nature, size or design.

The Directive's overarching objective is to ensure that spent batteries are safely collected and disposed of, preventing their disposal as mixed municipal waste. In particular, the Directive sets minimum national targets for the collection of waste portable batteries and the minimum performance of recycling facilities. The Directive restricts the use of some hazardous substances and requires that users be properly informed of these products' characteristics.

The evaluation is the first step of a review process, in which the Commission assesses whether the Directive meets its objectives and contributes to the general objectives of the EU environmental policy.

Personal Information

*** 1. Please select the statement that best applies to you**

- You are an interested citizen with only a general interest in the domain of batteries
- You have specific knowledge and/or interest about batteries

Please choose one of the statement above in order to get access to the survey (question1)

*** 2. In what capacity are you responding to this consultation?**

- As an individual in a personal capacity
- As an individual in a professional capacity
- On behalf of an organisation or institution

3 Where are you based?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

If other (non-EU), please specify:

* 4. Which category best describes you or the organisation you represent:

- Industry association
- Business
- Consumer association
- Non-governmental organisation (NGO)
- Trade union
- Government or public authority
- Intergovernmental organisation
- Academia or a research institute/educational institution
- Other

* If other, please specify

* **5. If industry association, please specify the sector (select one or more answers):**

- Manufacturers
- Research and development
- Importers
- Retailers
- Large selling brand
- Collectors (of spent batteries)
- Recyclers (of spent batteries)
- Other

* If other, please specify:

6. In which country is your organisation or institution located?

- Austria
- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czech Republic
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovak Republic
- Slovenia
- Spain
- Sweden
- United Kingdom

If other, please specify:

***7. Please indicate below if you want your contribution to remain anonymous**

- I give permission for my contribution to be published with my personal information: I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.
- My contribution can be published provided that I remain anonymous: I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

Please find below the Commission's guidelines regarding how your personal data is protected. Please note that your answers may be subject to a request for public access to documents under Regulation (EC) No 1049 /2001.

Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication :

Privacy statement

[Privacy statement Batteries.pdf](#)

*** 8. Is your organisation or institution registered on the EU Transparency Register?**

- Yes
- No
- Do not know

Click below to view the EU Transparency Register:

<http://www.test.ec.europa.eu/transparencyregister/public/homePage.do?redir=false&locale=en>

09. Please provide your registration number

10. Please provide us with your full name.

11. Please provide us with your email address

Questionnaire for citizens with a general interest on batteries and waste batteries

1. Did you know that there is EU legislation governing many factors related to batteries?

- Yes
- No

2. What do you use batteries for (select one or more answers)?

between 1 and 5 choices

- Hand-held and portable devices (e.g. phones, laptops, wearables)
- Home appliances, including for leisure (e.g. vacuum cleaners, games)
- Cordless power tools
- Mobility (e.g. e-bikes, electric cars, other vehicles)
- Local energy storage (e.g. powerwalls)
- Other:

If other, please specify:

3. The Directive distinguishes between various types of batteries (portable batteries, automotive batteries, industrial batteries).

What batteries do you use (select one or more answers)?

- Button cells
- Common cylindrical batteries (e.g. AA or AAA)
- Batteries used in communication devices (e.g. mobile phones, laptops, etc.)
- Batteries used in other electrical and electronic appliances (electric toothbrushes, hand-held vacuum cleaners, cordless power tools etc.)
- Batteries used in vehicles for starting, lighting or ignition (lead-acid batteries)
- Traction batteries used in e-vehicles, wheelchairs, airport vehicles, e-bikes, etc.
- Batteries used in local energy storage systems (e.g. for emergency power supply and back-up or energy storage from renewable energy applications)
- Batteries used in measuring devices, hand-held payment devices, barcode readers etc.
- Other

4. To what extent do you agree with the following statements on portable batteries?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
Batteries are safe to use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is no risk to the environment in using batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
There is no risk to human health in using batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The lifespan of portable batteries is adequate	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spent portable batteries are properly collected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Spent portable batteries are properly recycled	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide examples to support your views:

	Issue	Example
Safety		
Environmental risks		
Health risks		
Lifespan		
Performance		
Collection		
Recycling		

5. Did you know that EU legislation stipulates that it should be possible for end-users or qualified professionals to remove batteries from appliances?

- Yes
- No

6. In your experience, is it easy to remove batteries from appliances?

- Yes, always
- Yes, in most cases
- In few cases
- No, never
- Don't know

7. When buying portable batteries, do you check whether they fit with the requirements such as size/shape of the appliance in which they are to be used?

- Yes, always
- Most of the time
- Rarely
- No, never
- Don't know

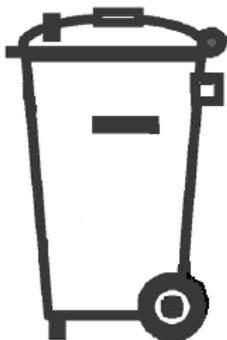
8. Do you bring your spent (waste) batteries to battery collection points?

- Yes, always
- Most of the time
- Rarely
- No, never
- Don't know

9. The Directive requires that all collected batteries undergo recycling. Do you think that this requirement is respected?

- Yes
- No
- Don't know

Please explain why



10. Do you know what this symbol above means?

- At the end of its life, the battery should be disposed of in waste bins specially designated for battery collection
- At the end of its life, the battery should be disposed of in normal waste bins
- None of the answers above
- Don't know

11. Are the characteristics of portable batteries clear from the labelling on the battery and/or the battery packaging?

- Yes : there is the right amount of information
- No : there is too much information
- No : there is not enough information
- Information is not clear
- Don't know

If the information is not clear, please specify:

12. Are the instructions on using portable batteries clear from the labelling on the battery and/or the battery packaging?

- Yes : there is the right amount of information
- No : there is too much information
- No : there is not enough information
- Don't know

13. In terms of collecting and recycling spent batteries, to what extent do you agree with the following statements:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
I know what to do with spent batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is easy to return spent portable batteries to collection points	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It is easy to return spent automotive batteries to collection points	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The way in which spent batteries are collected reduces risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The way in which spent batteries are recycled reduces risks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information publicly available on the results of battery collection is sufficient	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The information publicly available on the results of battery recycling is sufficient	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Questionnaire for citizens and organisations with specific interest and knowledge on batteries and waste batteries

1. To what extent do you agree with the following statements:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
The concepts and definitions used in the Batteries Directive are in line with the meaning they have acquired over time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The scope of the Batteries Directive covers all common battery types on the market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered 'disagree' or 'strongly disagree' to one of the previous questions, please provide examples

2. To what extent do you agree with the following statements:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
The objectives established by the Directive are still relevant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The requirements established by the Directive are still relevant	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

3. Please provide examples of where the Batteries Directive has adapted well/not so well to changing societal needs and technological developments:

To changing societal needs:

To technological developments

4. To what extent did the following battery features change since the Directive was adopted in 2006?

	1) A great deal	2) Quite a bit	3) No change	4) Very little	5) Not at all	6) Don't know/no opinion
Lifespan	<input type="radio"/>					
Number of charging cycles for rechargeable batteries	<input type="radio"/>					
Safety requirements	<input type="radio"/>					
Performance	<input type="radio"/>					
Consumer-related features	<input type="radio"/>					
Other	<input type="radio"/>					

If other, please specify:

5. Are you aware of any problems/issues related to batteries, including their impact on the environment and human health that the Batteries Directive does not address?

- Yes
- No
- Don't know

If you answered 'Yes', please provide some examples.

6. To what extent has the Batteries Directive been effective in achieving the following objectives?

	1) Very effective	2) Somewhat effective	3) Neither effective nor ineffective	4) Somewhat ineffective	5) Very ineffective	6) Don' t know
Protecting human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a well-functioning internal market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Boosting innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. To what extent do you agree with the following statements on the use of heavy metals and dangerous substances in batteries?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
Nowadays, batteries contain lower amounts of mercury	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nowadays, batteries contain lower amounts of cadmium	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nowadays, batteries contain lower amounts of lead	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nowadays, batteries contain lower amounts of other dangerous substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered 'disagree' or 'strongly disagree' to the statement on amounts of other dangerous substances, please specify which one:

8. On collection and recycling, to what extent do you agree with the statements below:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
The number of waste portable batteries collected is higher today than in the past	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Directive's broad scope ensure economies of scale in collection and recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Recycling processes (for all batteries) within the EU are more efficient than in the past	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The recycling of (all types of) batteries carried out in the EU takes place in an environmentally-friendly way	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Directive's broad scope ensures optimum resource savings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

9. To what extent do you agree with the statement that the Batteries Directive is properly enforced by the responsible authorities in your country (or at EU level if you are answering for an EU stakeholder)?

Enforcement carried out by the responsible authorities is...

- Very effective
- Somewhat effective
- Neither effective nor ineffective
- Somewhat ineffective
- Very ineffective
- Don't know

10. To what extent do you agree with the following statements on the availability and reliability of information on batteries in your country (or at EU level if you are answering for an EU stakeholder)?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
Information is available on the production of batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the production of batteries is reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is available on buying/selling batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on buying /selling batteries is reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is available on the collection of spent batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the collection of spent batteries is reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information is available on the recycling of spent batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the recycling of spent batteries is reliable	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To what extent do you feel that the Directive sufficiently addresses resource efficiency/circular economy issues? (waste prevention, reusability, recycling)

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
The Directive's broad scope should ensure economies of scale in battery collection and recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Directive's broad scope should ensure optimum resource savings	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered 'disagree' or 'strongly disagree', please explain why:

11. Are there specific requirements in the Batteries Directive that have led to significant costs for you or your organisation? Please consider both monetary and non-monetary costs.

- Yes
- No
- Don't know

Please provide examples of requirements in the Directive leading to significant costs

12. To what extent do you agree with the following statements on the costs and benefits of the Batteries Directive:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
It has improved the corporate image of the different sectors involved (manufacturers, producers, collectors and recyclers)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has led to innovation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has led to improved environmental performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has led to market opportunities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has levelled the playing field for all operators involved within the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has helped protect the environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has helped protect human health	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
It has reduced costs for the sector (e.g. due to harmonised rules and facilitation of intra-EU trade)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The costs involved in implementing the Directive are justified given the benefits that have already been achieved	<input type="radio"/>					
The costs involved in implementing the Directive are justified given the benefits that will be achieved in the longer term	<input type="radio"/>					

13. Which of the following sectors contribute the most to bearing the costs involved in implementing the Directive:

- Manufacturers
- Research and Development
- Importers
- Large selling brands
- Retailers
- Collectors (of spent batteries)
- Recyclers (of waste batteries)
- Consumers
- Other:

If other, please precise: In your opinion, which of the following sectors benefit the most from the Directive:

- Manufacturers
- Research and Development
- Importers
- Large selling brands
- Retailers
- Collectors (of spent batteries)
- Recyclers (of waste batteries)
- Consumers
- Other:

14. To what extent do you agree with the following statements on the labelling requirements set out in the Batteries Directive:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
Labelling requirements are clear	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling requirements are sufficient to inform users about the characteristics of the battery, also in terms of recycling later on	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling requirements are sufficient to inform users about the potential risks involved in using the battery and collecting or recycling it at the end of its life	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Labelling is sufficient for all type of batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The labelling requirements help improve both sorting and recycling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you answered 'disagree' or 'strongly disagree', please explain why:

15. Please indicate any gaps, overlaps, inconsistencies or discrepancies in the provisions of the Directive and/or between the Batteries Directive and other EU legislation. Where you have indicated specific gaps, overlaps and/or inconsistencies, please explain their impact.

	1) Within the provisions of the Batt
Gaps	
Overlaps	
Inconsistencies/discrepancies	

16. To what extent are the policies below supported by the provisions of the Batteries Directive?

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don' t know
Resource efficiency / Circular Economy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
e-mobility	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy storage	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hazardous waste	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

17. To what extent do you agree that the Batteries Directive has made it easier to buy or sell batteries, spent batteries and recycled products within the EU:

	1) Strongly agree	2) Agree	3) Neither agree nor disagree	4) Disagree	5) Strongly disagree	6) Don't know
Buying/selling of batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Buying/selling of spent batteries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Buying/selling of recycled products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

To support your views, please provide examples where the buying/selling of batteries, spent batteries or recycled products has improved or has been made more difficult as a direct result of the Batteries Directive

18. Without the Batteries Directive, i.e. if measures had been taken at national level only, what would it be like in your country (or on average at EU level if you are answering for an EU stakeholder) in terms of:

	1) Much better	2) Better	3) The same	4) Worse	5) Much worse	6) Don't know
Protecting human health	<input type="radio"/>					
Protecting the environment	<input type="radio"/>					
Functioning of the internal market	<input type="radio"/>					
Innovation	<input type="radio"/>					
Environmental performance	<input type="radio"/>					

Additional comments

If you have any additional comments you would like to make, please add them here. If you wish to submit a document, please send it to both ENV-WASTE-BATTERIES@ec.europa.eu and Batt-eval-study@oeko.de at the latest by 28 november 2017.