QUESTIONS AND ANSWERS ON THE BATTERIES DIRECTIVE (2006/66/EC)

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1. A NEW BATTERIES DIRECTIVE – A NEW SCOPE

Why did we need a new Directive on batteries?

Previous Community legislation on batteries (Directive 91/157/EEC) has failed to adequately control the risks posed by batteries in the waste stream and to create a homogeneous framework for battery collection and recycling.

For example, in 2002, approximately 45.5 % of the total amount of portable batteries sold in the EU-15 (i.e. 72 155 tonnes) went for final disposal, i.e. landfilling/incineration.[1] Also, many spent batteries, which were collected, were disposed of instead of being recycled.[2]

Moreover, a homogeneous framework for battery collection and recycling was needed, in particular as regards financing, in order to avoid free-riders on the market and to create a level playing-field for all the actors involved.

What is the scope of the Batteries Directive 2006/66/EC?

The Directive applies to all batteries and accumulators placed on the Community market. In line with Article 2(3) of the WEEE Directive,[3] batteries and accumulators used in equipment connected with the protection of the essential security interests of the Member States are excluded from the scope of this Directive. Also, equipment designed to be sent into space does not fall under the scope of the Directive.

Why does Directive 2006/66/EC apply to all batteries and not just to hazardous ones?

Directive 2006/66/EC applies to all batteries because:

– all batteries contain substances which are more or less harmful to the environment;

– experience with the previous Directive (91/157/EEC) on hazardous batteries (batteries containing mercury, cadmium or lead)[4] showed that 'all battery' collection schemes are more efficient than separate schemes for certain types of portable batteries;[5]

– all batteries contain metals which are recyclable,[6] so the collection and recycling of all batteries help save resources in conformity with Article 174 of the EC Treaty.

[1] Extended Impact Assessment by the European Commission SEC (2003)1343, p.11
[2] Extended Impact Assessment by the European Commission SEC (2003)1343, p.12
[3] Directive 2002/96/EC on waste electrical and electronic equipment (WEEE)
[4] Commission Decision 2000/532/EC
[5] Extended Impact Assessment by the European Commission SEC (2003)1343, p.19
[6] Extended Impact Assessment by the European Commission SEC (2003)1343, p.20

2. CONTENT OF DIRECTIVE 2006/66/EC

2.1. Objective

What is the objective of the Directive?

The objective of the Directive is twofold:

1. To contribute to a high level of environmental protection

2. To contribute to the proper functioning of the internal market.

What are the environmental problems[7] addressed by the Directive?

There are a number of environmental concerns which arise when dealing with the waste management of batteries and accumulators. These relate for the most part to the metals contained in these batteries.

Mercury, lead and cadmium are by far the most problematic substances in the battery waste stream. Lead batteries, Ni-Cd batteries and mercury containing batteries are classified as hazardous waste by Commission Decision 2000/532/EC.

Other metals commonly used in batteries, such as zinc, copper, manganese, lithium and nickel, may also constitute environmental hazards.

When batteries are incinerated, the metals used in them contribute to air emissions and pollute incineration residues. When batteries end up in landfills, the metals can contribute to the leachate from landfills. Moreover, on a resource management level, batteries are considered as a source of secondary raw materials. Thousands of tonnes of metals, including valuable metals such as nickel, cobalt and silver, can be recovered if batteries are recycled.

How are these environmental problems addressed?

The Directive aims to avoid the final disposal of batteries and accumulators by enhancing their collection and recycling. The Directive also contains restrictions on the substances used in batteries and accumulators.

The Directive establishes:

– restrictions on the use of mercury in all batteries and restriction on the use of cadmium in portable batteries with certain exemptions;

– collection requirements for all batteries, as well as collection targets for portable batteries;

– the requirement that all batteries and accumulators collected must undergo sound treatment and recycling (with possible exemptions for portable hazardous batteries);

– a ban on the landfilling/incinerating of automotive and industrial batteries;

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[7] Extended Impact Assessment by the European Commission SEC (2003)1343, p.6

– the requirement that battery recycling processes must meet minimum recycling efficiencies.

What is the internal market problem addressed?

Many national battery collection and recycling schemes do not operate efficiently and have not been able to benefit from the internal market. There has been no clear framework for the functioning of these schemes, which has led to different applications of the producer responsibility principle at Member State level and diverging marketing requirements.

How is this internal market problem addressed?

The Directive harmonises product requirements for batteries:

– it restricts the use of mercury in all batteries and of cadmium in portable batteries, with certain exceptions;

– it establishes labelling requirements for batteries: (i) chemical symbols Hg, Pb or Cd, (ii) crossed-out wheel bin and (iii) capacity labelling.

The Directive states that Member States cannot prohibit the placing on the market of batteries that meet the requirements of this Directive.

In addition to this the Directive lays down minimum rules for the functioning of national battery collection and recycling schemes, in particular with respect to the financing of these schemes by producers. In order to avoid free-riders, Member States should keep a register of producers who place batteries on the national market.

2.2. Preventive measures

What are the preventive measures in the Directive?

The Directive restricts the use of mercury in all batteries.

Furthermore, the Directive restricts the use of cadmium in portable batteries with a list of exemptions (batteries intended for use in emergency and alarm systems, including emergency lighting, medical devices and cordless power tools).

In addition to this, Member States are required to promote research and encourage improvements in the environmental performance of batteries through their life-cycle and encourage the marketing of batteries which contain less polluting substances (in particular substitutes for mercury, cadmium and lead).

2.3. Collection

What are the proposed battery collection requirements?

The Batteries Directive aims at as much collection of spent batteries and accumulators (portable, industrial and automotive) as possible. To this end it specifies the following collection requirements:

– Consumers should be able to bring back portable batteries to collection points in their vicinity, free-of-charge and without obligation to buy a new battery;

– Distributors should take back waste portable batteries when supplying portable batteries (unless it is proven that the existing alternative schemes are as effective);

– Producers of industrial batteries, or third parties acting on their behalf, are obliged to take industrial batteries back from end-users;

– Producers of automotive batteries, or third parties, should set up collection schemes for waste automotive batteries not collected through collection schemes set up under the Directive on end-of-life vehicles (ELV Directive).[8] For waste automotive batteries from non-commercial vehicles, these schemes should be free-of-charge for end-users and without obligation to buy a new battery.

What are the proposed collection targets?

The Batteries Directive establishes an overall collection target for all spent portable batteries of 25% to be achieved by 2012 and 45% by 2016.

Why is there no collection target for industrial and automotive batteries?

The combination of the legal obligations on the take-back of these batteries and accumulators and the ban on landfilling and incineration aims to ensure the collection of these batteries.

Unlike spent portable batteries and accumulators, spent industrial and automotive batteries are less likely to be disposed of in the municipal solid waste stream (a) because they are large and (b) because their users are professionals and are likely to appreciate the economic value of recycling.

With current practice, the collection of industrial and automotive batteries is already close to 100%:

– lead-acid batteries are collected because of the value of recycled lead;

– nickel-cadmium batteries are collected because there is a well-developed collection system in place.

[8] Directive 2000/53/EC

2.4. Recycling

Why should we recycle batteries?

Battery recycling helps to save resources by allowing for the recovery of valuable metals such as nickel, cobalt and silver.[9]

The use of recycled metals in batteries requires less energy consumption.[10]

What examples are there for energy savings related to the use of recycled metals in batteries?

Using recycled cadmium and nickel requires respectively 46% and 75% less primary energy than the extraction and refining of virgin metals.

For zinc, the ratio of the energy needed for recycling to the energy needed for extraction of primary resources is of the order of 2.2 to 8.[11]

What are the recycling requirements in the Directive?

All batteries collected should be recycled.

However, with respect to waste portable batteries containing mercury, cadmium or lead, Member States may put them in landfills or underground storage in two cases:

– when this is part of a national strategy to phase out heavy metals and an impact assessment shows that landfill/underground storage is a better option than recycling; or

– when no viable end-market is available.

In addition to the requirement to recycle all batteries collected, the Directive also specifies recycling efficiency levels focusing on the quality of the recycling process.

What are the recycling efficiencies in the Directive?

Battery recycling processes have to meet the following recycling efficiencies by September 2011:

– Lead-acid batteries: recycle lead as far as technically feasible, and recycle a minimum of 65% of batteries by average weight;

– Nickel-cadmium batteries: recycle cadmium as far as technically feasible, and recycle a minimum of 75% of batteries by average weight;

– Other batteries: recycle a minimum of 50% of batteries by average weight.

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[9] Extended Impact Assessment by the European Commission SEC (2003)1343, p.13
[10] Extended Impact Assessment by the European Commission SEC (2003)1343, p.13
[11] Extended Impact Assessment by the European Commission SEC (2003)1343, p.13

Are there any requirements for the treatment of waste batteries in the Directive?

In addition to the recycling efficiencies, the Directive also specifies treatment requirements, the minimum being removal of fluids and acids. Conditions for treatment and storage are also described.

2.5. Financing/producer responsibility

Who will pay for the collection, treatment and recycling of batteries?

In line with the producer responsibility principle, battery producers have to finance the cost of the collection, treatment and recycling of waste batteries. Producers and users of industrial and automotive batteries may conclude agreements stipulating alternative financial arrangements (Art. 16(5)). Producers are also responsible for financing the costs of public information campaigns on the collection, treatment and recycling of waste portable batteries.

Member States must make sure there is no double-charging of producers where batteries are collected under Directive 2000/53/EC on end-of life vehicles and Directive 2002/96/EC on waste electrical and electronic equipment.

What is the definition of "battery producer"?

According to the definition in Article 3 of the Directive, the 'producer' is the person in a Member State who supplies or makes available to a third party batteries or accumulators (including those incorporated into appliances or vehicles) within the territory of that Member State for the first time on a professional basis. This definition applies irrespective of the selling technique used and irrespective of whether the batteries are made available in return for payment or free of charge. This includes import into the customs territory of the Community.

Who is the "battery producer"? - Examples

- *A battery manufacturer or a domestic importer sells batteries to a retailer who in turn sells them to end-users in the same Member State*
  In this case, the battery manufacturer or the domestic importer is the producer in that Member State, as they are the ones placing the batteries on the market for the first time.

- *A retailer sells batteries in a Member State; the batteries were bought outside that Member State*
  A retailer sells batteries to end-users in a given Member State which he bought in another country. In this case, as the retailer is placing these batteries on the market for the first time in the given Member State, the retailer is the producer.

- *An equipment/car manufacturer buys batteries within a Member State; these batteries are then sold together with the equipment/car in the same Member State*
  A battery manufacturer or domestic importer in a Member State sells batteries to an equipment or car manufacturer in the same Member State who will then put the battery into equipment or a car and sell it on the market of this Member State. In this case, the

battery manufacturer or domestic importer is the producer in this Member State as they are placing the batteries on the market for the first time.

– *A car/equipment manufacturer buys batteries outside a Member State, then incorporates them into equipment/a car and sells this in the Member State*
The car/equipment manufacturer or domestic importer sells cars/equipment in a given Member State with batteries incorporated. The batteries for the car/equipment were bought outside this Member State. Since in this case it is the equipment or car manufacturer or domestic importer who places these batteries on the market of the Member State for the first time, they are the battery producers in this Member State.

– *A company imports batteries from a non-EU parent company for its independent subsidiary located in a Member State*
In this case the independent European subsidiary is the producer, as it is the subsidiary which places the batteries on the market in that Member State.

– *Batteries or battery cells are sold in a Member State to a battery pack assembler and are then sold within the same Member State*
In this case the battery pack assembler is the producer, as it makes the battery pack available on the market for the first time on a professional basis within the territory of the Member State.

How does the Batteries Directive deal with small producers?

The Batteries Directive allows Member States to exempt small producers from the financial producer responsibility obligations on the condition that this does not impede the proper functioning of the battery collection and recycling schemes.

The Batteries Directive also provides for harmonisation of the procedural requirements for producer registration among Member States, on the basis of a comitology procedure. A harmonised system will reduce the administrative burden of registration.

How does the Batteries Directive deal with the "free rider" problem on the batteries market?

Member States must keep a national register of all battery producers/importers. The procedural requirements for registration will be harmonised on the basis of a comitology procedure.

2.6. Labels/End-user information

What labelling requirements apply to batteries?

– Crossed-out wheeled bin applies to all batteries;

– Chemical symbols (Hg, Cd, Pb), indicating the heavy metal content of batteries, apply to batteries containing more than a given amount of these substances;

– Portable and automotive batteries must be labelled with a capacity label after 26 September 2009.

How will end-users know what to do with the waste batteries?

The Directive includes obligations to inform end users of:

– the potential environmental and health effects of substances used in batteries;

– the desirability of not disposing of batteries as municipal waste, but collecting them separately;

– the collection and recycling schemes available;

– consumers' role in contributing to the recycling of waste batteries;

– the meaning of labels.

Who is responsible for informing the public?

Member States must ensure that the public is informed. Battery producers are responsible for financing public information campaigns on collection, treatment and recycling of waste portable batteries. Economic operators may be required to provide end-users with information on the issues mentioned under the previous question.

2.7. Removability of batteries from appliances

What requirement does the Directive contain regarding the removal of waste batteries from appliances?

Article 11 of Directive 2006/66/EC requires that 'manufacturers design appliances in such a way that waste batteries and accumulators can be readily removed' and that 'appliances into which batteries and accumulators are incorporated shall be accompanied by instructions showing how they can be removed safely'.

Exemptions to these requirements are allowed for appliances where, for safety, performance, medical or data integrity reasons, continuity of power supply is necessary and requires a permanent connection between the appliance and the battery or accumulator.

What does "batteries and accumulators can be readily removed" mean?

End-users or professionals (e.g. appliance service centres, waste treatment facilities) should be able to remove batteries from appliances. The instructions showing how the batteries can be readily and safely removed should also specify who, in the view of the manufacturer, is the best person to safely remove the battery.

The instructions should also describe any dangers of not complying with the battery removal instructions.

Where there is more specific legislation applying to specific products (e.g. toys) on how the batteries should be removed, these products should comply with those specific rules.

When should waste batteries and accumulators be removable from appliances?

Waste batteries should be removable from the appliances during the lifetime of the appliance if the batteries normally have a shorter lifetime than the appliance, or at the latest at the end of the life of the equipment, as applicable.

2.8. Export of waste batteries

What requirements need to be fulfilled if batteries are exported for recycling?

When waste batteries are sent for recycling to another Member State or exported for recycling outside the Community, they must comply with waste shipment laws as specified in Article 15 of the Batteries Directive, noting that as Regulation No 259/93 was repealed on 12 July 2007, the transfer of the waste should comply with the new Regulation No 1013/2006 on shipments of waste.[12]

When waste batteries are exported outside the Community, Member States should ensure that sound evidence is provided that the recycling operations taking place outside the Community meet equivalent conditions as set out in this Directive, including those on recycling efficiencies by 2011.

2.9. Implementation of the Directive

How long do Member States have to transpose the requirements of this Directive?

Member States have until 26 September 2008 to transpose the requirements of this Directive.

What is the legislation that batteries placed on the EU market and battery manufacturers/producers must comply with before and after 26 September 2008?

Batteries placed on the European Union market and battery manufacturers/producers have to comply with the national legislation transposing Directive 91/157/EEC until 25 September 2008. Batteries placed on the EU market and battery manufacturers/producers will have to comply with national legislation transposing Directive 2006/66/EC from 26 September 2008.

However, in order to ensure better protection for the environment, the Commission encourages battery manufacturers/producers to comply with the requirements of the new Batteries Directive as soon as possible.

[12] Especially Article 49 of Regulation 1013/2006 should be considered.

Can Member States transpose the provisions of Directive 2006/66/EC into their national law now?

Yes. Member States can already transpose the requirements of Directive 2006/66/EC. This transposition must be finalised by 26 September 2008 at the latest. However, the transposed national legislation shall only take effect from 26 September 2008.

Can the Directive be transposed on the basis of environmental agreements with industry?

Yes. Member States can conclude environmental agreements with economic operators to transpose provisions on the collection of waste batteries, the export of waste batteries, and information for end-users.

By when do collection targets for portable batteries have to be met?

The collection target for portable batteries of 25% has to be met by 26 September 2012. Experience in those Member States that have developed collection schemes has shown that collection schemes need 4 to 5 years to become efficient, so this gives Member States with underdeveloped collection schemes sufficient time to set up efficient battery collection schemes.

The higher collection target of 45% should be achieved by 26 September 2016.

When do the recycling requirements enter into force?

– By 26 September 2009 all batteries collected should be recycled (with Member States having the possibility to landfill/store portable hazardous batteries under certain conditions);

– By 26 September 2011 battery recycling processes should meet minimum recycling efficiencies of 65% (for lead-acid batteries), 75% (for nickel-cadmium batteries) and 50% (for other batteries) with the best lead and cadmium recycling possible.

Are Member States encouraged to use economic instruments to implement the Directive?

Yes. The Directive specifies that Member States can use economic instruments to promote the collection of waste batteries and the use of batteries containing less polluting substances.

3. SUMMARY OF THE MEASURES IN THE DIRECTIVE ACCORDING TO BATTERY TYPE

What are the different types of batteries?

The Directive distinguishes between three battery types: portable batteries, industrial batteries and automotive batteries.

– Portable batteries:

Portable batteries are batteries that are sealed, can be hand-carried and are neither industrial nor automotive batteries.

They can be:

– non-rechargeable batteries (e.g. zinc-carbon and alkaline manganese - 'general purpose batteries'), button cells, and lithium-oxide batteries; together these represent around 75% of the portable battery segment;[13]

– Rechargeable batteries (e.g. nickel-cadmium, nickel metal hydride, lithium-ion and lead-acid batteries), which represent about 25% of the portable battery segment.

– Industrial batteries:

Industrial batteries are batteries that are designed for exclusively industrial or professional uses or used in any type of electric vehicles.

Industrial batteries are for example[14]:

– lead-acid batteries (96% of the total industrial battery segment);

– NiCd batteries (2% of the total industrial battery segment).

– others (2%)

– Automotive batteries:

Batteries used for vehicle starting, lighting and ignition.

Do batteries used for agricultural purposes qualify as industrial batteries?

According to Article 3 of the Directive, industrial batteries are defined as batteries designed for exclusively industrial or professional uses or used in any kind of electric vehicle. If the agricultural equipment concerned is designed for exclusively professional agricultural use, its battery is an industrial battery.

Are batteries used in hybrid vehicles (vehicles that run on a combination of fuel and electricity) automotive or industrial batteries?

There is a battery in hybrid vehicles that is used as an automotive starter for lighting and for ignition power. This is generally a 12 V battery (usually lead-acid battery). This battery is an automotive battery.

There is another type of battery in hybrid cars used mainly for propulsion purposes and as a warm starter in (Lithium ion or a Nickel Metal Hydride battery). As this battery does not have

[13] Bio Intelligence Final report of July 2003, p. 8
[14] Extended Impact Assessment by the European Commission SEC (2003)1343, p.65

the function of automotive batteries, it does not fall under the definition of automotive batteries. It is used in a car that is partly powered by electricity, so it is used in some type of electric vehicle. It therefore qualifies as an industrial battery.

Which batteries are the most harmful?

According to the list in Commission Decision 2000/532/EC, lead batteries, mercury-containing batteries and nickel-cadmium batteries are classified as hazardous waste.

What specific measures apply to portable batteries and accumulators?

– Restriction on the use of mercury.

– Restriction on the use of cadmium (with exemptions for batteries intended for use in emergency and alarm systems including emergency lighting, medical equipment and cordless power tools).

– Efficient national collection systems have to be set up to allow consumers to return spent portable batteries free of charge in their vicinity with an obligatory role for distributors to take back portable batteries.

– A collection target for portable batteries of 25% (to be increased to 45%) has to be achieved.

– All portable batteries collected have to be recycled (unless Member States use the possibility to landfill/store hazardous portable batteries as part of a national strategy to phase out heavy metals or if no viable end-market is available).

– Minimum recycling efficiencies for battery recycling processes for lead-acid batteries (65%), for nickel-cadmium batteries (75%), and for other batteries (50%) have to be attained with best lead and cadmium recycling possible.

– Portable batteries have to be readily removable from appliances and appliances containing batteries have to be accompanied by instructions showing how batteries can be safely removed (with possible exemptions).

– Labelling to be used: crossed out wheeled bin, chemical symbol, capacity label.

What specific measures apply to industrial batteries?

– Restriction on the use of mercury.

– Producers of industrial batteries or third parties acting on their behalf can not refuse to take back waste industrial batteries.

– All collected industrial batteries must be recycled.

– Prohibition of disposal of industrial batteries in landfills or by incineration.

– Minimum recycling efficiencies for battery-recycling processes for lead-acid batteries (65%), for nickel-cadmium batteries (75%), and for other batteries (50%) have to be attained with best lead and cadmium recycling possible.

– Industrial batteries have to be readily removable from appliances, and appliances containing batteries have to be accompanied by instructions showing how the batteries can be safely removed (with possible exemptions).

– Labelling: crossed out wheeled bin and chemical symbols indicating the heavy metal content of the battery.

What specific measures apply to automotive batteries in the Directive?

– Producers or third parties have to set up collection schemes for those waste automotive batteries that are not collected on the basis of schemes set up under the ELV Directive.

– All automotive batteries collected must be recycled.

– Prohibition of disposal of automotive batteries in landfills or by incineration.

– Minimum recycling efficiencies for battery recycling processes for lead-acid batteries (65%), for nickel-cadmium batteries (75%), and for other batteries (50%) have to be attained with best lead and cadmium recycling possible.

– Automotive batteries have to be readily removable from appliances and appliances containing batteries have to be accompanied by instructions showing how the batteries can be safely removed (with possible exemptions).

– Labelling: crossed out wheeled bin, chemical symbols indicating the heavy metal content and capacity label.

4. LINK WITH OTHER PIECES OF LEGISLATION

What is the relationship between the Batteries Directive and the ELV Directive?

Scope

Directive 2000/53/EC on end-of life vehicles (ELV Directive) covers vehicles and end-of-life vehicles (categories M1 and N1 as defined in Annex IIA to Directive 70/156/EC and three-wheeled motor vehicles as defined in Directive 92/61/EEC) including their components, such as batteries. The Batteries Directive applies to all batteries, including automotive batteries, placed on the Community market.

Substance restrictions

Both the ELV and the Batteries Directive contain substance restrictions. The substance restrictions in Article 4 of the Batteries Directive (for the use of mercury and cadmium) indicate that these apply without prejudice to the ELV Directive, which means that the

prohibitions contained in Article 4 of the Batteries Directive do not apply to batteries covered by the ELV Directive.

The ELV Directive restricts the use of mercury, cadmium and lead in cars. However it allows a maximum concentration of mercury of up to 0.1% by weight and per homogenous material, there is an exemption for the use of cadmium in batteries for electric vehicles which expires on the 31 December 2008, and an exemption for lead in batteries without expiry date[15].

Producer responsibility

The Batteries Directive and the ELV Directive both establish the principle of producer responsibility. A car producer is also regarded as a battery producer in a Member State under the Batteries Directive if it places the battery on the market (inside the car) for the first time in that Member State on a professional basis. This is to ensure that there is a producer responsible for all batteries placed on the market. However, the Batteries Directive states that Member States should avoid any double charging of producers when car batteries are collected under the ELV Directive.

What is the relationship between the Batteries Directive and the RoHS/WEEE[16] Directives?

RoHS

The Batteries Directive and the RoHS Directive have similar substance restrictions. The RoHS Directive restricts the use of heavy metals, such as mercury and cadmium in electrical and electronic equipment, but does not apply to batteries.[17] The Batteries Directive restricts the use of mercury and cadmium in batteries.

WEEE

Batteries incorporated in WEEE can be collected on the basis of the WEEE Directive. However, after collection, they will be removed from the appliance (electronic equipment) and they will count for the collection targets of the Batteries Directive. They also have to be recycled as required by the Batteries Directive.

A producer of electrical and electronic equipment (appliance producer) is also regarded as a battery producer in a Member State under the Batteries Directive, if the appliance producer places the battery (inside an appliance) for the first time on the market in that Member State on a professional basis. This is to ensure that there will be a producer responsible for all batteries placed on the market. However, Member States should avoid any double charging of producers when batteries are collected with appliances under the WEEE Directive.

Does the RoHS or the Batteries Directive apply to the outer casings of battery packs?

Recital (29) of the Batteries Directive states that the RoHS Directive does not apply to batteries and accumulators used in electrical and electronic equipment. According to the

[15] Annex II of Directive 2000/53/EC
[16] Directives 2002/95/EC on the restriction of the use of certain hazardous substances in electrical and electronic equipment and 2002/96/EC on waste electrical and electronic equipment
[17] Recital (29) of Directive 2006/66/EC

Batteries Directive, battery packs are also batteries, so the Batteries Directive applies to battery packs, including their outer casings.

What is the relationship between the Batteries Directive and IPP [18]*?*

The IPP Communication has the objective of reducing environmental impacts from products throughout their life-cycle, using where possible a market-driven approach, that takes account of competitiveness concerns.

In line with IPP, the Directive requires Member States to promote research into and encourage improvements in the environmental performance of batteries throughout their life-cycle.

In addition to this, Member States shall encourage treatment facilities to introduce EMAS, which contributes to the reduction of life-cycle environmental impacts of batteries.

What is the relationship between the Batteries Directive and the Thematic Strategy on Sustainable use of Resources[19]*?*

The recycling requirements avoid the negative impacts of natural resource use. This is in line with the Thematic Strategy.

What is the relationship between the Batteries Directive and the Recycling Strategy[20]*?*

Putting waste back into the economic cycle is recognised by the Strategy as an important element of a comprehensive approach to resource management.

Moreover, the recycling efficiencies, which focus on the quality of the recycling process used, are also in line with this Strategy.

[18] Commission Communication on Integrated Product Policy (COM(2003)302)
[19] COM (2005)670
[20] Thematic Strategy on the prevention and recycling of waste (COM (2005)666)