

Feedback on the Inception Impact Assessment on Sustainability requirements for batteries

RREUSE welcomes this commitment from the European Commission to take action towards an improvement of the sustainability requirements linked to batteries placed on the European market. This will be a necessary step to ensure that every product containing a battery can be easily repaired and re-used, providing benefits in terms of preservation of the environment, climate change mitigation and social impact.

In particular, RREUSE endorses the following statements included in the Inception Impact Assessment:

'The Commission's objective is to ensure that batteries developed and used in Europe are safe, efficient and follow the highest environmental and social standards at the level of production, use and disposal in the context of the circular economy'.

'It is additionally necessary to consider conditions for the efficient reuse and recycling of the batteries themselves or the scarce and valuable raw materials they contain'.

'Another aspect to be explored is the extension of the useful lifetime of the batteries with second life applications (e.g. a battery pack from an electric vehicle which can be re-used in stationary applications in households), as this will reduce as well the overall environmental impact of the product during its lifetime'.

'Batteries recycling (or re-using) after 2030 will depend on future technological and organisational developments. These days, it is estimated that, per thousand tonnes of lithium-ion batteries, 15 jobs are created for their collection, dismantling and recycling. The introduction of strict requirements related to e.g. the recyclability and disassembly of batteries or their ability to be re-used or re-purposed, in conjunction with existing and future collection schemes, can therefore only have a positive effect in related job creation'.

RREUSE would like to remind to the European Commission that, de facto and according to the waste hierarchy, waste prevention and preparing for re-use related activities are the most efficient ways to reduce the environmental impacts of waste batteries and electronic products. The easy and non-destructive removal of the batteries contained in energy related products is therefore an essential requirement to follow in order to guarantee the successful and cost-effective repair, refurbishment and re-use of both the batteries and the products in which they are contained.

RREUSE is aware that the [article 11 of the Directive on Batteries and Accumulators and Waste Batteries and Accumulators](#) already contains provisions on the removability of waste batteries. However, this article is not ambitious enough and provides some loopholes still allowing manufacturers to design



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products from which the battery is extremely difficult to remove without destroying the product or going through unnecessary steps.

Too many ICT products such as smartphones, laptops and tablets are still designed in a way which makes it difficult or even impossible to replace the battery with commonly available tools¹. Models with readily removable batteries do exist for these types of products and should become standards. This would give a shot in the arm of the developing second-hand sector for ICT products², reducing the amount of e-waste produced and creating local, green and inclusive jobs in the EU.

RREUSE therefore suggests to the European Commission to raise the ambition of the Directive on Batteries and Accumulators and Waste Batteries and Accumulators by making all the batteries **readily removable non-destructively by the end-user**. That would mean that, in the case of smartphones, laptops and tablets for example, all the products should contain batteries which would be removed without the need of proprietary tools, and in a limited number of steps. **Soldering or gluing the batteries to other parts should be banned**. For every type of product, if one model proves that it is possible to make the battery easily removable by the end-user, all the other models should follow.

RREUSE also encourages the European Commission to propose concrete and drastic actions against the manufacturers of products which would still not comply with these rules. Bans on importations and sales should be applied, and manufacturers should be properly fined.

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RREUSE is an independent non-profit organisation representing social enterprises active in the field of re-use, repair and recycling, with 26 members across 24 countries in Europe and the USA.

Our main vision is for Europe to support the role of social enterprise in a circular economy, providing meaningful work opportunities to thousands of vulnerable members of our community through innovative economic, social and environmentally beneficial activities.

RREUSE's primary mission is to help tackle poverty, social exclusion and a throwaway culture by promoting policies, best practices and partnerships that support the professionalism and development of social enterprises working in environmental services with high potential for local and inclusive job creation, notably re-use and repair.

¹ [iFixit](#), thanks to its ranking system, gives several examples of [laptops](#), [tablets](#) and [smartphones](#) in which the battery is not readily removable.

² Tom Kang, Counterpoint (2017), The Surprising Growth of Used Smartphones (Available [here](#))