

To:

Subject:

Meetings with EUROBAT and Recharge, 17 of February, flash report

We have had two calls yesterday, with representatives from EUROBAT [REDACTED] and from Recharge [REDACTED]. [REDACTED] from DG GROW and [REDACTED] from DG ENV attended the meetings.

Both organisations had been invited to get in touch with us to present questions or make suggestions. No written answers or comments have been submitted to them following the calls.

EUROBAT has already published two position papers on the proposal (attached). The meeting today was intended to gather additional information on some aspects of the proposal that remained unclear.

EUROBAT, along with other economic operators from the ENV side of the value chain, find it **difficult to understand some of the concepts/changes introduced in the proposal** now. The concept of '**producer**' is one of the cases, particularly regarding changes vis-à-vis the Directive and the responsibilities of producers of batteries incorporated in EEE or vehicles respectively, as well as **EPR in a 'transboundary' (between MS) context**.

Regarding technical issues, EUROBAT has some **doubts about the concept of 'battery'** proposed. According to them, large battery installations could be covered better by the concept '**battery pack**,' now removed from the legal text.

They also wanted to know the reasons underpinning some of the Commission's choices, as the **2 kWh limit** (that could not be useful as a demarcation line and that would present loopholes) or the characterisation of the sustainability criteria per **batches** (that would surely multiply the number of assessment and certification operations).

EUROBAT seems to consider that Article 59, about the **second life of batteries**, needs to be drafted more clearly. This includes better defining and distinguishing 'repurposing' and 'remanufacturing,' and including a clear statement on how the EPR regime is affected by repurposing.

The use of IT technologies was the focus of several questions. They are afraid that the several information requirements to be met through IT technologies incorporated into the proposal could result in an excessive burden for producers.

Recharge will publish its position paper in the coming weeks. The call was also intended to receive information for a better understanding of a couple of points of the proposal.

Recharge, also an ENV side usual actor, finds **difficulties assimilating some internal market provisions**. In particular, at the meeting, they tried to ascertain if and how producers' role could be made equivalent to the manufacturer one.

The **two-tier obligations** for producers concerning collection have surprised Recharge. They considered contradictory to set obligations both in terms of results (targets) and means (the 'arrangements to be put in place').

While praising the choice of the 5 kg limit to separate portable from industrial batteries, Recharge nevertheless finds the **definition of batteries for light means of transport** inconsistent.

That was all.



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