Towards a future-proof Batteries Regulation implementation - RECHARGE recommendations for improved Extended Producer Responsibility application

With the aim of paving the way for sustainable batteries for a circular and climate neutral economy, the proposed Batteries Regulation is the next step in delivering on the European Strategic Action Plan on Batteries.

With this infographic, RECHARGE proposes concrete industry recommendations for the producer definition to ensure (waste) batteries are placed under the responsibility of the right actor.

**Producer definition:**

The Extended Producer Responsibility (EPR) obligations are intended to ensure recyclable waste is correctly collected and recycled at the end of its life. It is key to assign the EPR responsibilities to the right actor along the batteries value chain.

Battery manufacturers have no information on the placing on the market (PoM) of the battery inside a vehicle or appliance, and are therefore unable to comply with the EPR requirements, particularly for back obligations. Therefore, producer responsibility needs to be with the economic operator that knows where exactly the batteries are placed and therefore able to comply with EPR requirements.

According to the industry proposal for the EPR or producer definition, any company is a “producer” when a green arrow is crossing the red line. The exception is the battery manufacturer selling directly to end users, or through distributors or importers.

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