



EUROPEAN BATTERY RECYCLING ASSOCIATION

To whom it may concern

Commissioner of DG Growth and DG Environment
Member State Representatives

The European Battery Recycling Association (EBRA) wish to inform the European Union and competent authorities of the many difficulties (present and future) of its members due to the COVID-19 pandemic.

Deliveries of end-of-life batteries and other needed supplies for recycling them are decreasing. Consequently, the operational capabilities have significantly reduced, leaving our members confronted to huge financial losses. On the long term, treatment sites could face closure...We understand that the entire chain of supply is facing difficulties, but the downstream actors of the battery recycling chain are more severely impacted.

Therefore, EBRA call upon you to take your share of responsibilities in protecting the European recycling infrastructure. The activities of EBRA recyclers is crucial to the protection of the environment and human health. The recycling of batteries should therefore be classified as an 'essential' sector in all MS and its activities allowed to restart to their full level as soon as possible.

Regarding portable batteries, consumers are asked to keep their batteries at home and not to bring them in the collection systems. This could result in improper disposal and loss of an important volume of batteries for recycling. This is in contradiction with the objectives of Battery Directive 2006/66/EC and all actors in the recycling chain should make sure this is not happening.

With regards to the current situation, EBRA requests that the following measures be taken into consideration:

- In the interest of protecting workers in this industry, EBRA ask the help of the competent authorities to facilitate the distribution of sufficient personal protective equipment (PPE) in time for the industry to safely conduct operations in accordance with national and European requirements associated with COVID-19.
- Collection should not stop, and the municipalities of individual member states are to ensure adequate protection and protocols.
- Contracts with collection schemes must include temporary compromises on recycling costs for the fluctuation of battery volumes.
- Intra EU movement of waste must be maintained, and for hazardous waste batteries, the validity of existing notifications should be extended. More than ever, the digitization of the waste shipment document is proving its added value. This process must be simplified without the need for original documents and/or signatures. Paper-based exchanges between facilities and carriers must be temporarily ceased due to the associated infection risk.
- EBRA members need compensation and immediate financial support. The sudden slow down or interruption of operation lead to a drop in cash flow and reduction of company's income in a sector already facing intense competition.

The battery recycling industry need to be supported in order to prevent a crisis that would have an impact on two important objectives:

EBRA (European Battery Recycling Association) ivzw/aisbl

ARCADIS Building, Rue Royale 80 Koningsstraat, B-1000 Brussels, Belgium - Reg. Nbr/VAT: BE0471.306.469

T: +32 492 97 23 30 E: info@ebra-recycling.org W: www.ebra-recycling.org



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- Guaranteeing a better protection of the Human Health and the environment as stated in the Battery Directive 2006/66/EC.
- Delaying or even impeding the development of a full battery value chain in Europe from battery manufacturing to recycling by delaying the recovery of much needed battery materials.

Therefore, EBRA is willing to work with all the EU stakeholders with the aim of maintaining and/or improving the battery waste value chain, taking all the advantages from the COVID-19 situation and at the end, saving the recycling industry.

We count on you and on your solidarity. Together we can overcome this crisis.

About EBRA

EBRA is the leading European professional organisation defending the interests of companies involved with sorting and recycling all kinds of batteries (portable, consumer, industrial, all chemistries apart from lead-acid). Our mission is to develop the highest standards of professionalism in the battery sorting and recycling industry by promoting best practice in health, safety and environment and by preserving natural resources while respecting the European regulatory framework.

Contact: Dr.Ir. Alain Vassart, Secretary General | info@ebra-recycling.org | M: +32 492 97 23 30 | www.ebra-recycling.org.