

Circular Economy Act: Effective, Fair Producer Responsibilities

[Brussels, 05 November 2025] *EPBA—Consumer Batteries Europe* fully supports the objectives of the forthcoming Circular Economy Act (CEA) to harmonise circularity rules, strengthen Extended Producer Responsibility (EPR), and enhance enforcement across the EU. Batteries are at the core of Europe's green and digital transition, and the sector already operates under the comprehensive rules of the EU Batteries Regulation. As the Commission is committed to simplify and digitalise EPR systems and to build a true Single Market for secondary raw materials, it is vital that the CEA complements—rather than complicates—the existing regulatory framework to ensure a level playing field among all market participants.

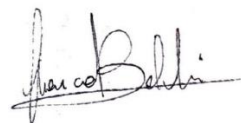
Today, the enforcement of EPR obligations for portable batteries remains uneven across Member States. Despite legal requirements, many manufacturers—particularly non-EU and online sellers—continue to place products on the EU market without appointing an authorised representative in each Member State. At the same time, several countries lack clear, functional manufacturer registries or shared “lists of producers.” This makes it impossible for authorities and supply-chain partners to verify compliance, resulting in free-riding and unfair competition for compliant EU operators. As EPR obligations might further expand under future CEA measures, these gaps risk undermining circularity targets and increasing administrative burdens for responsible companies.

EPBA—Consumer Batteries Europe calls on EU policymakers to leverage the CEA to establish a coherent, enforceable, and digitally-enabled EPR framework. This should include: **a harmonised EU approach to producer responsibility registration and authorised representation**; mutual recognition or single-entry registration for cross-border operators; **mandatory public producer registries** interoperable across Member States; and stronger enforcement tools to address non-compliant imports and online sellers. Ensuring that all actors—including foreign manufacturers—are easily identifiable and accountable is essential to combat free-riding and safeguard competitiveness.

Finally, the CEA should prioritise **consistency, proportionality and simplification**. Digital product passports, national registries, and EPR reporting systems must be interoperable, streamlined and aligned with existing battery legislation to avoid duplicated administrative processes. Efficient, transparent and enforceable EPR rules will foster investment, ensure fair treatment of compliant businesses, and strengthen Europe's battery value chain—enabling the CEA to deliver on its circularity ambitions while supporting innovation, consumer trust, and sustainable growth.



Kevin Rejent (Chairman)



Marco Baldoli (Secretary General)

About EPBA – Consumer Batteries Europe

We are the leading organisation of quality manufacturers of portable batteries and power solutions in Europe. It comprises of a total of seven member companies, along with several associated members. In 2023, our members sold 5.5 billion batteries i.e. Alkaline, Zinc Carbon, Lithium coin and other button cells, and rechargeable batteries, along with two million chargers in Europe. The sector employs around 4,000 people in Europe, and the VAT contribution amounts to approximately EUR 260 million. We are dedicated to advancing the sustainable, safe, and efficient use of portable batteries across Europe. Our mission is to advocate for innovation and environmental stewardship in the battery industry, promote best practices in manufacturing and recycling, and ensure compliance with stringent safety and environmental standards. We work closely with stakeholders, including the EU institutions, policymakers, and consumers, to safeguard and enhance our positive contribution to the EU economy, the environment, and the communities in which we operate.