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DEPOSIT REFUND SCHEMES FOR PORTABLE BATTERIES: INEFFECTIVE AND UNMANAGEABLE

The undersigned associations are committed to the principles of producer responsibility and therefore support safe and efficient battery collection programs that result in higher amounts of waste batteries being available and collected for recycling in Europe. However, the introduction of deposits schemes would result in an enormous decrease in the number of collection points, introduce significant logistical and practical complexities, and have little impact on safety.

Recent pilot findings on small WEEE and battery collection further support this conclusion. A broad deposit refund system should not be recommended for all EEE/WEEE categories and batteries due to the typology of the products in scope, their long lifetime, and the high complexity of implementation. Such a system could lead to financial and logistical challenges, consumer inconvenience, and the risk of creating an inefficient or burdensome system.

Diverse Collection Network Required. The Batteries Regulation (Regulation (EU) 2023/1542) sets forth ambitious goals regarding the percentage of waste batteries collected by recycling programs, with a target rate of 73% by 2030. A robust collection network is essential in this effort, with collection points in retail, commercial, governmental, and multi-family residential buildings. However, only a retail network would have the ability to collect and distribute deposits, significantly shrinking the current collection network. For example, in Belgium, which realized a collection rate of 60.3% in 2024, only 18% of its collection was from

retail locations.¹ Reducing collection networks to retail-only, which would be required with deposits, will set collection rates back decades.

The loss of collection points is the strongest argument against any kind of deposit system for portable batteries. If deposits effectively shift returns towards retail-only channels, many existing municipal, workplace, school, governmental, commercial and multi-family residential collection points would no longer be available in practice. This would create a serious risk that collection rates already achieved under existing extended producer responsibility systems would fall rather than improve.

Successful collection systems require well-designed and efficient infrastructure tailored to specific needs, built through cooperation among producers, producer responsibility organisations, retailers, municipalities and other collection points. Offering multiple return options, such as drop-off points at various retailers, home collection services and integration with existing municipal or retailer collection programs, provides greater flexibility and avoids weakening existing collection channels.

Batteries Dissimilar to Other Deposit Products. Deposit-return schemes give a monetary reward which is suitable for consumer products with a high turnover and short timeframe between placing on the market and the actual consumption, such as beverage bottles. Given the rather modest number of battery units a consumer might be able to bring back for collection on an annual basis², the economic reward would not be motivating enough to encourage action. Additionally, when viewed in combination with the time portable batteries stay in consumer homes, which exceeds 5 years for primary batteries and can go beyond 10 years for rechargeable batteries, maintaining a fund for deposit refunds would be impossible for collection systems and retailers.

Any deposit system would also need to handle refund requests many years after purchase, including where products have been resold, donated, repaired or transferred between users. The system would therefore need to identify products on which a deposit has been paid without relying on receipts or links to individual consumers, while preventing refunds for non-eligible items. It would also need to monitor the risk of generating large unused funds due to improper disposal and hoarding.

Consumer Education Most Effective Method to Improve Collection. Collection rates may be increased based on the development of the end users' perception of their responsibility, and not on a discharge by a payment. A 2020 [Möbius study](#) conducted for the Dutch Ministry of infrastructure found that the keys to improving the collection of waste consumer batteries are awareness raising and establishing proper collection systems.³

Long-term initiatives are more likely to improve collection behaviour than short-term measures, as they allow for iterative improvements, greater consumer education, and the building of trust and consumer habits. While incentives can stimulate participation, they are not the sole driver of successful collection. Effectiveness depends on the existing infrastructure, consumer engagement strategies, the role of partners, geography and the legislative context.

Experience from countries with high collection performance, such as Belgium and Switzerland, underlines the value of sustained education. Such campaigns can build a sense of personal responsibility by explaining resource preservation, waste minimisation, safety, and the potential negative effects of products being released into the environment. This type of behavioural change takes years, and in some cases decades, to become fully embedded, but it is more likely to deliver durable collection habits than a short-term financial trigger.

Safety Not Improved. The largest category of portable batteries that would be subject to deposits, primary alkaline, pose little to no fire risk. The greatest risk is posed by rechargeable lithium-ion batteries, which

¹ Bebat Annual report 2024: <https://www.bebat.be/en/annual-reports>

² On average, 22 portable batteries are purchased per capita based on data representing the EEA + Switzerland

³ Möbius "Verkenndend Onderzoek Inzameling Lithium-Ion Batterijen in Nederland" for Ministerie van Infrastructuur en Waterstaat published on 17.11.2020.

are contained in battery-imbedded devices and vapes, not sold as portable batteries. The risk posed by lithium-ion batteries is best addressed through improvements in the WEEE collection network and programs targeting vapes for recycling. Placing a deposit on products that pose little fire risk will give a false sense of security, raise consumer prices with no safety improvement, and misdirects resources that could be more effectively targeting lithium-ion fires.

For shorter lifetime and higher-risk product categories a specific study or longer pilot may be more appropriate than a broad deposit system for all portable batteries. This is clear example for the products like e-vapes. Targeted measures should focus on dedicated collection routes, strong promotional campaigns, safe removal of batteries, and clear rules for safe transport and disposal, including fire prevention protocols.

Deposits Complex for Retailers. Establishing and maintaining a deposit system will prove an incredibly complex undertaking for retailers and recyclers. Extra services must be set up at a return desk where the different categories of batteries would need to be sorted by battery category and chemistry for the users to be paid correctly. This requires instruction of the personnel who will have to be able to distinguish between the different categories and chemical composition of batteries. Additionally, as referenced above, the length of time between purchase and return is unlike more established deposit systems. The result would be that enormous funds will be built up that must remain available for a very long period of time, so that the deposit can still be refunded ten or more years after purchase.

Implementation would also require financial and administrative support for all involved stakeholders, including producers, producer responsibility organisations and retailers. Store staff would need to be trained on checkout procedures and product eligibility, and consumers would need guidance at collection points to understand the process and avoid disputes. These requirements confirm that a deposit system would not be a simple add-on to existing collection schemes, but a major operational and financial infrastructure project.

Deposit System Could Encourage Fraud. A deposit system within the current recycling framework would present a clear risk of deposit tourism which will require a clearing mechanism among Member States especially if the level of the deposit is different, as well as a method for denying deposits for batteries originating outside of the EU. Further, the system would need to account for deposit-free batteries, which are already in the market and batteries with deposits, which only entered the market later. This increases the complexity and administrative burden on retailers and collection points even more. Furthermore, it will be difficult to manage consumer expectations for historical batteries for which no deposits were paid but that nonetheless will need to be collected. Given the length of time between purchase and recycling, this mismatch would last for several years.

A robust identification system would be necessary to ensure that deposits are refunded only for eligible products. Without such a system, refunds for non-eligible items would increase costs for retailers and manufacturers. With such a system, however, the administrative burden, consumer-facing complexity and implementation costs would rise substantially. These costs are unlikely to be absorbed by retailers, producers or producer responsibility organisations indefinitely and would ultimately have to be reflected in product price without any guarantee of higher collection performance.

In conclusion, the substantial decrease of the collection network, outsized retailer and recycler effort, significant potential for fraud, and a long implementation phase that would accompany the establishment of a deposit system have no reasonable relation to increased collection rates and safety. To increase collection rates and safety, the most efficient ways are improved and wide-spread education for responsible behaviour, combined with an efficient and extensive collection infrastructure in all Member States.

EPBA – Consumer Batteries Europe

RECHARGE

APPLiA - Home Appliance Europe

EUCOBAT - European association of national collection schemes for batteries

EuroCommerce