

## DEPOSIT REFUND SCHEMES FOR PORTABLE BATTERIES: INEFFECTIVE AND UNMANAGEABLE

**EPBA – Consumer Batteries Europe** and their members 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. 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.

**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.<sup>1</sup> Reducing collection networks to retail-only, which would be required with deposits, will set recycling rates back decades.

**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 basis<sup>2</sup>, 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.

**Consumer Education Most Effective Method to Improve Recycling.** 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.<sup>3</sup>

**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 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.

**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.

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

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

<sup>3</sup> Möbius "Verkenkend Onderzoek Inzameling Lithium-Ion Batterijen in Nederland" for Ministerie van Infrastructuur en Waterstaat published on 17.11.2020.

**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.

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.

#### **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.*