

EGMF comments on the Inception Impact Assessment to modernise the EU legislation on batteries

8 July 2020

EGMF members produce a very wide variety of equipment covering a large range of products, in terms of size and usage, for landscaping, forestry, turf maintenance and food production. Within our product portfolio, a wide range of products are battery operated, such as hedge trimmers, leaf blowers, brush cutters, chainsaws, shrub shears, robotic and walk behind mowers and golf carts.

Driven by innovation, our industry has been developing new solutions to limit the environmental impact of its products for many years. Our companies have been ahead of the curve to develop high performing battery equipment, enhancing the electrification of the garden and outdoor power equipment sector.

As an industry close to nature, the garden machinery industry supports the European Commission's objective to develop more sustainable batteries in Europe. We also support a European legislation addressing challenges posed by the increasing number of batteries placed on the European market.

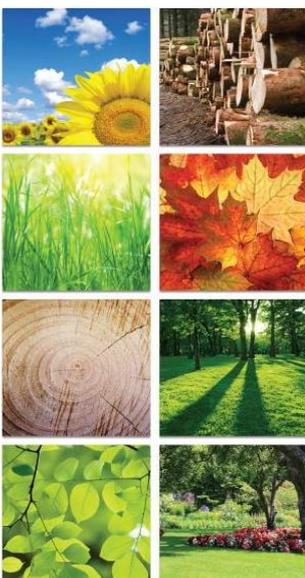
We welcome the opportunity to comment this initiative. In this context, we would like to highlight key elements the future legislation should consider:

1. The existing battery categories (portable/industrial/automotive) should be maintained, but further clarification on the scope is necessary, particularly between portable and industrial batteries. We strongly discourage such a differentiation by the introduction of weight thresholds as it would create arbitrary distinctions between batteries which are essentially the same.
2. Collection targets should be calculated based on the amount of batteries available for recycling instead of the amount of batteries placed on the market. This is particularly necessary for batteries which are used in products with long lifetimes and experiencing rapid growth such as the ones in our industry.
3. Measures on substances used in batteries should avoid overlaps with existing chemicals legislation. Any new restrictions should be adopted under the REACH Regulation.
4. Communicating information to waste recyclers on battery chemistry is necessary. There are existing standards within our industry such as EN 62841-1 Annex K and EN 62133/ EN 61960 for this purpose. Colour coding schemes on casing should be discouraged as it could merge with the company branding and therefore be indistinguishable.



5. The limitation of primary batteries is a positive goal. However, the European Commission should differentiate between non-reusable portable batteries such as D (Mono), C (Baby), AAAA, AAA (Mikro), AA (Mignon), etc. Within our industry we use non-reusable primary batteries which are designed to last the entire product lifetime, such as batteries integrated in circuit boards. The existing legislation should therefore not penalise these long-lasting and high performance non-reusable batteries.
6. In the development of more sustainable goods, we strongly support the reparability of garden and outdoor power equipment, including the replacement of batteries. However, we would like to draw attention to the important safety risks associated with disassembly / reassembly of batteries linked to fires and overheating.
7. Increasing the amount of recycled content in batteries is a positive goal but it should be aligned with existing market realities. A key barrier to the uptake of recycled content is the quality, purity and availability of secondary raw materials. Before introducing requirements in this respect, it should be ensured that the secondary raw materials are suitable and do not pose any technical and safety risks for the end-users.
8. Lastly, we welcome the initiatives to improve the sustainability requirements for batteries. We note that however some of these requirements, such as interoperability, could stifle innovation while competition should remain the main driver of technological progress.

For further information, please contact: secretariat@egmf.org



The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.

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