



**EEB / Greenpeace response to industry attacks on the Blokland report  
on  
a directive on batteries and accumulators and spent batteries  
and accumulators (COM(2003)723)**

**VOTE 20 APRIL 2004**

19 April 2004

Dear Members of Parliament,

You might have received information from various industry groups that the adoption of amendment 23 in the Blokland report would lead to a large amount of batteries and accumulators being banned. The claims range from 35% (EPBA "key comments on the report of Mr Blokland") to 90% (SAFT "analyse et commentaires"), which in itself raises questions concerning their credibility. These unfounded claims seem to be mainly triggered by the restrictions on the lead content. Please find some clarifications below.

**First of all, amendment 23 cannot be seen in isolation, but only in combination with amendment 82, which contains a list of exemptions for both industrial and portable batteries.**

### **1. Industrial batteries**

In amendment 82, all industrial batteries are exempted. According to figures given by the Commission, these account for 54% of the total market of batteries and accumulators.

### **2. Portable batteries**

**a) Non-rechargeable batteries** (ca. 72% of market in 2002 - by far dominated by AlMn and ZnC)

- **Alkali-Mangan (AlMn):** AlMn batteries with less than 40 ppm lead are provided by many producers/retailers. 10 out of 13 batteries tested by OekoTest in May 98 had no lead or less than 40 ppm lead in them (inter alia Panasonic, Philipps, Woolworth, Big). In 2003, the biggest manufacturer in Europe, Gillette, shifted its entire production of Duracell Alkaline batteries to below 40 ppm lead. According to Varta, their entire production of portable batteries is free of cadmium and lead. Therefore, the ban as suggested in the committee report would not affect the biggest productions of AlMn batteries.
- **Zinc-Carbon (ZnC):** ZnC batteries are a cheaper alternative to AlMn batteries. According to Oeko-Test, they contain between 500 and 1400 ppm lead. Their price is about half compared to that of AlMn batteries, but their capacity is even less than half. Moreover, the energy efficiency of ZnC is 2,5 times less than that of AlMn batteries. ZnC would indeed be phased out if the ban adopted in committee became law, which would be to the benefit of the environment and consumers, as they are more damaging to the environment (lead content, less favourable energy efficiency) and in relative terms even more expensive.
- **Zinc-air and Silver-oxide batteries:** These are used in quantities far below AlMn and ZnC batteries. The proposed lead limit could be met by using nearly lead-free zinc powder.

**b) Rechargeable batteries** (ca. 28% of market in 2002)

- **Nickel-Cadmium (NiCd):** These batteries make up around one-third of portable rechargeable batteries (7% of total portable batteries, 3% of overall total). These would effectively be banned in various applications due to the cadmium limit of 20 ppm, unless exempted from the ban (e.g. in power tools or lighting equipment, representing more than two-thirds of the use of portable NiCd batteries).
- **Nickel-Metal Hydride (NiMH):** These batteries are very well established on the market as an alternative to NiCd batteries. They do not contain lead above 40 ppm.
- **Lithium-Ion (Li-Ion):** These batteries are very well established on the market as an alternative to NiCd batteries. They do not contain lead above 40 ppm.

**In summary, the phase out as suggested would lead to a substitution of portable non-rechargeable ZnC batteries in general and some applications of portable NiCd accumulators. The first can be replaced by AlMn batteries, the latter by NiMH or Li-Ion accumulators. Both these phase outs are fully justified due to the environmental problems associated with lead and cadmium, the less favourable energy efficiency (for ZnC), and the availability of safer substitutes.**

Therefore, the EEB and Greenpeace call for the European Parliament to **continue its good work on cadmium phase out by supporting the ban of marketing of batteries and accumulators containing more than 20 ppm of cadmium.**

The EEB and Greenpeace call on the European Parliament to vote for the following key amendments:

- 1) **A phase-out of use and marketing of batteries and accumulators containing more than 20 ppm of Cadmium,** 5 ppm Mercury and 40 ppm Lead with only those exemptions strictly necessary

**Please SUPPORT** amendment **23 (the phase-out - art.4)** and amendment **82** (annex II exemption list) with split vote removing blanket exemption from ban for power tools);

**Amendment 111 (specifying collection target is to be specifically achieved by NiCd batteries too - otherwise the collection target could be respected with zero NiCd batteries collected– art. 13)**

- 2) **An obligatory deposit system and facilitated end-user collection** to support ensure high levels of take back and collection of the (banned) batteries and **to address the hoarding** issue

**Please SUPPORT** amendments **110** (deposits to achieve closed loop - art.9.2).

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