



## Information about the Transposition of the Batteries Directive in Germany.

Dear all,

The German Battery Law is mostly in line with the Directive. There are just three minor deviations.

1) *Marking of chemical symbols*

§ 17 (3) requires manufacturers to mark batteries with the chemical symbols Hg, Cd, Pb if certain thresholds are surpassed (as in the directive). § 3 (3) defines battery packs the same way as written in the Directive ('battery pack' means any set of batteries or accumulators that are connected together and/or encapsulated within an outer casing so as to form a complete unit that the end user is not intended to split up or open) Additionally, the German law states that, "battery packs are deemed to be batteries in the sense of this law."

Therefore battery packs do fall under the requirement of § 17 (3) and must be marked with the chemical symbols. But this requirement shall be in line with the EICTA / Recharge position on the chemical marking of battery packs.

2) *Information about type and system*

Article 2 of the Battery Law amends the German WEEE law to implement the requirement of easy removability of batteries in appliances. § 13 (7) obliges the manufacturer of EEE to supply the end user with instructions how the battery can be readily removed and about the type and system of the battery. I understand type as the geometrical form and system as the chemical composition. This is a slightly more demanding requirement as in the Directive which states that the information of the type has to be supplied, "where appropriate".

3) *Collection targets*

The collection target for 2012 is at 35% slightly higher than in the Directive. As the current collection rate is already at ~40% there's no problem.

The German Battery Law is expected to be published in mid 2009 and to enter into force six months later (Jan-Feb 2010). I will see if I can get an English version. A short summary is also available on the website of the German MoE. [http://www.bmu.de/english/current\\_press\\_releases/pm/43024.php](http://www.bmu.de/english/current_press_releases/pm/43024.php)

Best regards,  
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