Dear Readers,

For the past 20 years, the non-profit organization Stiftung GRS Batterien has been extremely successful in sustainably and proactively improving battery collection in Germany, and making this a top priority. By establishing numerous activities that go well beyond the legal minimum, manufacturers in the joint collection system have set up one of Europe’s leading collection and safety standards for waste batteries. Yet it is precisely in 2018, our anniversary year, that we face some difficult decisions.

For some time, we have seen how the Stiftung GRS Batterien (GRS) is being systematically disadvantaged in comparison with producers’ own systems. This relates, firstly, to several years of factually incorrect specifications for calculating collection quotas. Secondly, it’s about the inadequate monitoring of producers who have abandoned the GRS solidarity system and are supposedly taking responsibility for their own products.

The Stiftung GRS Batterien is legally obliged to take back any waste batteries from retail, municipal collection and initial treatment facilities. This means that over the coming year, we will probably have to accept 1,500 tons more of waste batteries than the quantity of batteries which we are responsible for putting into circulation. Sadly, the German Batteries Act, as it stands, has no mechanism for compensating such imbalances.

Furthermore, the law stipulates that Stiftung GRS Batterien must pass on to its users any additional costs that arise. This means that the additional costs of the mandatory responsibilities stipulated only for the joint collection system have to be shared among 3,500 GRS clients (mainly small and medium-sized companies).

We deeply regret this situation, but the law is forcing it upon us. In order to at least keep foreseeable price rises to a reasonable level, we have undertaken a strict saving programme. In real terms this means that over the next twelve months we will be ceasing any battery collections which go beyond the mandatory. This will reduce the total collected quantity by around 10%; the high disposal standards, which have been built up over many years in Germany, will also have to be restricted. These steps are contrary to what we believe our mission to be, but they are unavoidable under the circumstances described.

Of course, GRS will continue to fulfil its disposal mandate stipulated by the German Batteries Act, as well as all of the necessary environmental and safety standards in full. Still, the aforementioned restrictions will obviously be highly detrimental to battery collection in Germany.

The only thing that will remedy this is to amend the German Batteries Act soon, and eliminate the disadvantages suffered by GRS users. Until then we can only ask for people’s understanding for activities that are unpleasant for the environment, for consumers and for the producers concerned.

In the hope of a swift and positive change, including to the law, I would like to wish you all the best for the New Year.

Regards,

Georgios Chryssos
The Stiftung GRS Batterien has always been, and remains, a guarantor for the collection and recycling of waste batteries throughout Germany. Beyond our legal duties, we have also collected batteries at collection points at which there is no obligation to collect. As announced last summer, we can no longer provide these voluntary services because of the aforementioned distortion of competition, until collection burdens have been levelled out by regulations. Adapting our collection services to the terms of laws governing hazardous goods and waste disposal also means that obligated collection points will be affected by changes – which is why we have gathered together the latest collection terms and explained the differences between obligated collection points and voluntary collection.

**Obligated collection points** are places at which waste batteries are collected:

- Due to a legal obligation to collect from end users pursuant to § 9 BattG (retailers’ duties)
- On account of the handling of electrical appliances and used cars pursuant to § 12 BattG
- At municipal collection points as part of their collaborating in collection as used batteries pursuant to § 13 BattG

**Voluntary collection points** are places that are not legally obliged to collect batteries and not involved in collection on behalf of the municipal disposal authority.

We continue to offer all obligated collection points free collection of waste batteries taken back from end users.

Minimum collection quantities are a full collection barrel, three full collection boxes or one full GRS safety container for damaged, transport-critical lithium batteries.

Anybody who cannot or does not want to collect batteries until they reach the minimum quantity can instead hand in batteries at a nearby, qualified acceptance point. They are accepted without charged. You can find out about the nearest acceptance point at our Service Centre (+49 (0) 18 06 80 50 30*). We can also offer collection for a charge, if required.

Conventional and rechargeable batteries that are damaged or destroyed in the process of handling electrical appliances represent considerable safety and environmental risks and can only be disposed of properly by taking special, expensive safety precautions. That is why handing that kind of improperly waste batteries back to the joint collection system entails a charge.

There will be no more free collections as part of voluntary collection activities. The provision of collection containers and the collection of full containers now carry a charge. As well as paying for these services, voluntary collectors can hand in batteries at qualified acceptance points or collect used batteries and give them to an obligated collection point nearby.

Because we are very aware that this procedure is counterproductive to environmentally and consumer-friendly battery collection, we certainly hope that it is only temporary and that we will be able to offer free collection from every battery collection point soon.

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**Top meeting on product responsibility**

**G2 Conference: critical assessment**

“Three decades of product Responsibility”

One of Stiftung GRS Batterien Batterien’s most important duties is to promote the exchange of information and knowledge between all of the stakeholders so as to continually improve battery collection. A very successful instrument for this has always been our industry conferences, which we hold at regular intervals in collaboration with ‘stiftung elektro-altgeräte register’ (ear) and other partners. For this reason, we would like to build on the 2013 “G2 Conference” and this year’s industry conference entitled ‘Fulfilling and developing product responsibility’ and respond to multiple requests for a follow-up.

Top representatives and experts in product responsibility have answered our invitation and will step onto the stage of the G2 Conference entitled ‘Three decades of product Responsibility’ at the German Federal Environmental Ministry on 23 January 2018, under its patronage in Berlin. Alongside the European Commission’s Director-General for the Environment,
Top meeting on product responsibility

G2 Conference: critical assessment
“Three decades of product Responsibility”

Daniel Calleja Crespo, we are expecting Prof. Dr Klaus Töpfer as well as MinDir. Dr Helge Wendenburg and MinDirig. Dr Thomas Rummel of the German Federal Environmental Ministry. They will be looking not only at the milestones and obstacles of the past, but also at which opportunities we should take advantage of and which risks we need to avoid.

The producers’ points of view will be represented in lectures by participants such as Otmar Frey, ZVEI.

The subject of the final podium will be how our rivals are organised; this will be discussed by executive members of the bodies mandated for product responsibility, Stiftung GRS Batterien, elektro-altgeräte register (used electrical appliances register) and Zentrale Stelle Verpackungsregister (Central Packaging Register Foundation).

We look forward to receiving your registration. More information at www.g2-konferenz.de/.

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GRS continues to promote consumer communication

G2 project on uniform collection point labelling

The results of the “G2 communication project”, which investigated and developed control and communication activities aimed at improving collection results for electrical appliances and used batteries, and at ensuring the proper collection of products and the measurement of quantities, have shown that consumers would like collection points to be easier to find. Alongside proposals for the unification of collection point entries in Internet search engines, the labelling of collection points using a standardised logo was considered expedient.

With this in mind, we launched an initiative for standardised collection point labelling as part of the G2 project. Various logos were developed with the help of the G2 Advisory Committee and other retail industry associations. The criteria that were considered important included a distinctive design and the option of integrating the corporate design of collection point operators, which means public sector disposal authorities, retailers and commercial operators. Various interviews were conducted by a market research institution to ascertain the impact of different logos.

Although the standardised labelling of collection points is not mandatory at the moment, it is advisable for everyone who is obliged to collect batteries to use a standardised logo voluntarily. Using the logo on products according to the lock and key principle would also represent a major step forward. We will present the results of the investigation and the new logo early in 2018, and make the G2 information platform available to all collection point operators.
Amendments to the system

**New GRS transport container for e-bike batteries and website**

As batteries have progressed rapidly, and with the increasing number of lithium-ion systems, safety requirements for battery collection have become much more stringent in recent years. Because it is impossible to inspect many of the rechargeable e-bike batteries handed back in by end users thoroughly before they are transported away, their transport is subject to the conditions of Special Regulation 376 ADR.

In order to furnish retail collection points with compliant transport packaging, we will be introducing a new container system at the start of the year. Collection points for used rechargeable e-bike batteries will soon be receiving, in addition to a transport barrel, an adequate quantity of non-flammable filler material and PE bags in which the used batteries can be individually placed. If they have not already done so, distributors of e-bikes can register themselves as collection points for used rechargeable e-bike batteries at our Service Centre on +49 (0) 18 06 80 50 30*.

We will be publishing detailed information on the packaging process, as well as packaging instructions, on our new GRS Service GmbH website (www.grs-servicegmbh.de) when the switchover takes place. This website already provides comprehensive information about our industry solutions and the rest of GRS Service GmbH’s comprehensive range of products and services.

*20 cents per call from a German landline operated by Deutsche Telekom AG; prices may vary from mobile phones or if calling from abroad.

New at GRS Batterien

**Sabine Peltzer takes over commercial management**

In September 2017, Sabine Peltzer joined the team at GRS Batterien, where she is responsible for Finance, Administration, HR and IT at both the Foundation and the GmbH. After studying business, Sabine Peltzer worked firstly as a corporate consultant before spending over 18 years in various executive commercial posts and in a variety of industries.

We are delighted to have Ms Peltzer on our team and we wish her every success in her new position.

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**Legal**

**Stiftung GRS Batterien**

Heidenkampsweg 44
20097 Hamburg
Telefon: +49 (0) 40 23 77 88
Telefax: +49 (0) 40 23 77 87
info@grs-batterien.de
www.grs-batterien.de

Responsible under press law
Georgios Chryssos, CEO