

**Comments to the Report of the Chief Inspectorate
of Environmental Protection (GIOŚ) on batteries and accumulators
and waste batteries and accumulators management in 2011
(abridged version)**

The Report of the Chief Inspector for Environmental Protection on batteries and accumulators and waste batteries and accumulators management in 2011 was published on the GIOŚ website¹. Having read the report, we feel provoked to formulate some critical remarks.

Market characteristics in the light of the Report

The number of entrepreneurs who place batteries and accumulators on the market, entered into the register kept by GIOŚ, is continuously increasing; as at 31 December 2010, the total number of registered entrepreneurs amounted to 1,581, while as at 31 December 2011, that number increased up to 1,958. The volume of batteries and accumulators placed on the market in 2011 underwent significant changes as compared to the previous year (2010). Whereas in 2010, there were app. 352.8 million units of batteries and accumulators placed on the market with the total volume of 94,842 Mg, including 9,866 Mg (10.4% of the total volume) of portable batteries and accumulators, app. 68,137 Mg (71.8%) of automotive batteries and accumulators, and app. 16,838 Mg (17.8%) of industrial batteries and accumulators, respective figures for the last year (2011) were as follows: app. **406.6** million units of batteries and accumulators with the total volume of **91,789 Mg**, including app. **9,998 Mg** (10.9%) of portable batteries and accumulators, app. **48,848 Mg** (53.2%) of automotive batteries and accumulators, and app. **32,944 Mg** (35.9%) of industrial batteries and accumulators.

It should be noted that changes in the group of portable batteries and accumulators were, in fact, insignificant, their volume increased by 132 tons, and the share in the total volume placed on the market increased by 0.5%.

At present, two years after the commencement of data collection, we may state that the size of the Polish market of batteries and accumulators is adequately reflected in the Report. However, a part of the Report entitled “**Information on the volume of collected waste portable batteries and accumulators and the achieved collection level**” deserves a significantly different opinion.

According to the authors of the Report, app. **3,397 Mg** of waste portable batteries and accumulators were collected in 2011, which allowed Poland to reach the level of collection of waste portable batteries and accumulators of **34.20%**, while the required collection target for 2011 was **22%**.

¹ See: http://www.gios.gov.pl/zalaczniki/artykuly/raport_baterie_2011.pdf

The reliability of these data may easily be challenged, evidencing that the actual volume of waste portable batteries and accumulators collected in 2011 was much lower.

What was the volume of collected batteries?

The entrepreneurs placing batteries on the market who signed contracts with REBA placed 3,129 Mg of batteries on the market in 2011, representing 31.3 % of the market of portable batteries and accumulators; REBA, together with its 161 partners – battery collecting entrepreneurs, in the same 2011 collected 688.8 tons of such waste, reaching the collection level of 22.01%. It means that all the remaining entrepreneurs, who placed on the market the total volume of 6,869 Mg of batteries, “collected”² 2708.2 Mg of waste portable batteries and accumulators and reached (?) the collection level of **39,4 %** . If the above figures were real, it would signify that those entrepreneurs reached the total surplus of collection results over the statutory requirements at the level of app. 17%, and they had to cover the costs of collection and treatment of a large volume of “excess” batteries. That explains why these data should be precisely verified!

REBA collected batteries using almost 25 thousand of drop-off and collection points; it means that we managed to collect 27.5 kg of batteries per one drop-off point. We estimate that the number of drop-off points created by other entities amounts to app. 8,600; therefore, if, according to the Report, 2,708.2 Mg of batteries were collected at those points, as much as 315 kg of waste batteries would have to be collected per one point. Such a large amount may hardly be considered probable!

In Section 3, item 3.1, the volume of lead portable batteries and accumulators placed on the market is specified, amounting to 362.4 Mg, representing 3.6% of all batteries and accumulators placed on the market. On the other hand, a table at the beginning of Section 4 of the Report shows the volume of batteries and accumulators marked with the code 16 06 01*), amounting to **1,312 Mg**, representing 38.6% of all collected portable batteries and accumulators, and over 360% of the annual volume of lead batteries and accumulators placed on the market. In the light of knowledge about the life cycle of batteries and accumulators, this figure need to be verified; most probably, a certain volume of collected industrial and/or automotive lead batteries and accumulators was included into the volume of portable lead batteries and accumulators.

Due to the above mentioned inconsistencies and methodological deficiencies of the Report, its main final conclusion “*As compared to 2010, in 2011 we observed favourable changes on the market of batteries and accumulators and in waste batteries and accumulators management ...*” should be questioned.

We observed a significant decrease in the sales of automotive accumulators, which can hardly be considered a favourable change; it is rather a manifestation of a slowdown in economic growth.

² Or rather other entities collected for their benefit

It is more important, however, that the Report departs, to a higher extent even than in the previous year (2010), from the reality of collection and treatment of waste batteries and accumulators and presents a false picture of the reality. If that was true that almost 3,400 tons of waste batteries were collected in Poland , they would have to be stored somewhere or subjected to treatment and recycling in Poland (according to the GIOŚ Report, not more than 61.5 kg of portable batteries were transported abroad for recycling !).

It is possible to verify whether such a significant exceeding of the required collection limit was a true fact, however, it would require enormous determination and involvement on the part of inspection services; therefore, a chance for such a verification is small.

The above proves the need for fast amendments to the Act on Batteries and Accumulators and for the introduction of increased requirements both for recyclers, as well as for all entities which, like REBA, help battery producers to fulfil their statutory obligations. It is a necessary and urgent task, since this year Poland is to reach the first EU battery collection target established in Directive 2006/66/EC (which equals 25 %). Therefore, the GIOŚ Report next year will constitute the grounds for the preparation of the national report that will have to be sent to Brussels, where it will be analysed by the experts of the European Commission.

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