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Requirements for design of appliances (BAT)

Dansk Producentansvar, June 2022

DPA is short for Dansk Producentansvar (Danish Producer Responsibility). DPA is in charge of administrative tasks associated with the rules on producer responsibility under Danish environmental law regarding waste from electrical and electronic equipment, end-of-life batteries and accumulators, and end-of-life vehicles.

Producer responsibility for these waste types has authority in the Danish Environmental Protection Act. This Act translates into three statutory orders for the different waste types: the WEEE Order, the Battery Order, and the End-of-life Vehicles Order (the current statutory texts can be found on www.producentansvar.dk).

The Danish Statutory Orders take offset in three EU directives for the same waste types: the so-called WEEE Directive, the Batteries Directive, and the ELV Directive. Also these directives with exact titles and dates can be found on www.producentansvar.dk.

Producer responsibility rests on the principle that each producer or importer assumes responsibility for collection and management of WEEE, waste batteries, and end-of-life vehicles to the effect that products becoming waste are managed in an environmentally correct manner, with the highest possible utilisation of resources contained in such products.

Producers and importers are in the following referred to as *producers* as the rules applying to both types are the same.

In general, the following abbreviations are used: WEEE for waste electrical and electronic equipment, BAT for batteries and accumulators, and ELV for end-of-life vehicles.

In pursuance of the rules on producer responsibility for WEEE, waste batteries, and ELV this document describes general requirement as well as associated exemptions regarding design of appliances containing batteries and accumulators.

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Requirements for design of appliances to allow for removal of batteries and accumulators

The Battery Order, section 39 (EU Directive article 11), contains a requirement that appliances must be designed in such a way that batteries and accumulators can be readily removed from the appliance.

General requirement

According to the general requirement the battery or the accumulator must be readily removable from the appliance. The purpose of this provision is that batteries and accumulators can be treated environmentally correctly and recycled separately without contaminating scrap from the equipment in which the battery/the accumulator was originally contained.

Exemptions from general requirement

These provisions do not apply where for

- safety
- performance
- medical or
- data integrity reasons

...continuity of power supply is necessary and requires a permanent connection between the appliance and the battery or accumulator.

Furthermore, the above general requirement for design of appliances in such a way that batteries and accumulators can be readily removed from the appliance does not apply in cases where:

- Other rules decide how to remove batteries and accumulators
- Other rules decide that batteries and accumulators must not be removable

However, in any case batteries and accumulators must be removable without being damaged when the electrical appliance is to be discarded and recycled.

Duty of information associated with design of appliances containing batteries and accumulators

Appliances into which batteries and accumulators are incorporated must be accompanied by instructions with the following information:

- Information to end-user about who can remove the battery/accumulator (professional reprocessing company or end-user)
- Description of how the battery or accumulator can be removed safely
- Description of danger, if any, during removal of battery or accumulator in other ways than the one described above

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