

# Recycling of End-of-Life Batteries of KOSTAL HELIVOR HV

## Recycling of End-of-Life Batteries

### 1. Disposal within the European Union (EU)

The disposal of industrial end-of-life batteries within the European Union is governed by the EU Batteries Regulation (EU) 2023/1542. This regulation applies directly in all EU Member States and is supplemented by national implementing provisions where applicable.

#### Responsibility

Within the European Union, the ‚manufacturer‘ as defined in Article 3(47) of Regulation (EU) 2023/1542 is responsible for ensuring the proper collection, treatment and recycling of industrial end-of-life batteries. This definition may also include wholesalers or importers where they qualify as manufacturers under the regulation.

#### EU Definition of “Manufacturer” (Regulation (EU) 2023/1542, Article 3(47))

For the purposes of the Batteries Regulation, a manufacturer is any natural or legal person who, in the course of a commercial activity, places batteries on the market in a Member State for the first time. This may occur through manufacturing, importing from another Member State or from a third country, or distributing batteries under their own name or trademark. In general, responsibility therefore lies with the entity that first places the batteries on the market in the respective Member State. That entity must ensure that the take-back and disposal of end-of-life batteries are carried out in accordance with the applicable legal requirements.

In Germany, KOSTAL is generally responsible. However, an exception applies where a wholesaler imports the batteries into Germany independently and places them on the German market for the first time. In such cases, the wholesaler is considered the manufacturer under the Batteries Regulation and is responsible for ensuring the legally compliant take-back and disposal of the end-of-life batteries. In this situation, the obligation lies with the respective wholesaler rather than with KOSTAL.

**Unlike in Germany, in other EU member states, the relevant manufacturer (wholesaler or installer)—that is, the first entity to place the product on the market in that country—is responsible for the collection and recycling of used batteries under the Battery Regulation (EU) 2023/1542.**

### 2. Competent Authorities in Selected EU Member States

Country	Battery Register / Competent Authority
Belgium	OVAM – OWD – BIM
Denmark	DPA-System
Germany	Stiftung elektro-altgeräte register (ear)
Estonia	Probleemtooteregistri (PROTO)
Finland	Centre for Economic Development, Transport and the Environment
France	SYDEREP
Greece	Hellenic Recycling Agency (HRA)
Italy	Registro P&A
Latvia	LETRA
Lithuania	Ministry of the Environment
Luxembourg	Ministry of Sustainable Development and Infrastructure (EMWELT)
Netherlands	Rijkswaterstaat
Austria	Umweltbundesamt EDM
Poland	Ministry of Environment
Portugal	Sistema Integrado de Licenciamento do Ambiente (SILiAmb)
Sweden	Naturvårdsverket
Spain	RII-PYA

The table on the left shows for various EU Member States which authority or register manufacturers, within the meaning of the Battery Regulation, must notify or register their batteries with.