



Industry briefing

Waste portable batteries: responsibilities and regulations

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Contents

3 key takeaways

E-waste and the issue of waste batteries

Battery producer responsibilities

Products containing batteries

Distributor and retailer responsibilities

Who is Material Focus?

3 key takeaways

Waste portable batteries responsibilities

3 key takeaways



Producers, importers, and trade bodies

Battery producers have a legal responsibility to finance the costs of collection, treatment, recovery, and environmentally sound disposal of old batteries.



Retailers and distributors

Battery sellers and distributors have a legal responsibility to take back customers' old batteries for recycling - and to tell their customers that they offer this.



Consumers

Consumers need to know that they should always recycle rather than bin their old batteries.

E-waste and the issue of waste batteries

The issue of waste batteries

- Batteries contain toxic chemicals and are classified as **hazardous waste**.
- Used batteries pose a significant **fire risk** in the waste stream when not disposed of properly.
- There are hidden batteries inside electricals - when these electricals are thrown away in household bins, the batteries get crushed in bin lorries and recycling centres and can cause fires.
- Data from 2024 found that over 1,200 fires were caused by batteries in the last year, an increase of 71% from 700 in 2022.
- It also found that 1.6bn batteries were thrown away in the last year, over 3,000 a minute - including over 1.1bn electricals containing hidden lithium-ion batteries.

Anything with a plug, battery, or cable should always be recycled at a minimum and should never be binned. This includes the plugs, cables, and batteries themselves.

Laws requiring producers and retailers to finance and support collection and recycling of electrical and portable battery products at end-of-life have been in place in the UK since 2007.

In the UK, batteries and accumulators are regulated to help protect the environment through the [Waste Batteries and Accumulators Regulations 2009](#).

Source: [Material Focus research](#)



Used batteries pose a fire risk in the waste stream when not disposed of properly.

Who are the key players?

Enforcement bodies across the UK

- Environment Agency (EA) - England.
- Natural Resources Wales (NRW) - Wales.
- Northern Ireland Environment Agency (NIEA) - Northern Ireland.
- Scottish Environment Protection Agency (SEPA) - Scotland.
- Office for Product Safety and Standards (OPSS) - enforces the regulations for distributors and retailers of portable batteries.

Other agencies

- The Chartered Trading Standards Institute - product safety and compliance.

Battery producer responsibilities

Summary for producers



Producer responsibilities

- Being a battery producer means you manufacture, resell, or import portable batteries in the UK.
- Battery producers must comply with UK producer regulations.
- Producer responsibilities involve financing the collection, treatment, recycling, and disposal of waste batteries.



Register as a producer

Battery producers must register as a producer annually, depending on the type and amount of batteries you put on the UK market in the previous calendar year.

- **1 tonne or less** - register as a small producer with your national environmental regulator.
- **More than 1 tonne** - join a battery compliance scheme (BCS).



Additional responsibilities

You must also comply with:

- WEEE producer obligations - if you place products containing batteries on the UK market.
- Distributor obligations - if you are selling portable batteries directly to consumers.



Battery producers are responsible for minimising harmful effects of waste batteries on the environment.

Who are battery producers?

You're a battery producer in the UK if you:

- Have a UK presence and you're the first person in your selling chain (including importers) to make batteries available for supply or sale on the UK market.

Different types of batteries

Types of battery include:

- Portable batteries.
- Vehicle and other automotive batteries.
- Industrial batteries.

To check which type of battery you place on the market, see [Waste batteries and accumulators: technical guidance](#).

Source: [Battery producer responsibilities GOV.UK](#)

What you must do as a portable batteries producer:

Register as a producer annually

This depends on the type of battery you sell and the amount of batteries you put on the UK market in the previous calendar year (also known as a compliance year).

- If you place **1 tonne or less** of portable batteries on the UK market in a compliance year, you can register direct with your environmental regulator as a small producer.
- If you place **more than 1 tonne** of portable batteries on the market, you must join a batteries compliance scheme (BCS).
- The **BCS then takes on your duties** to pay for the collection, treatment, and recycling of waste portable batteries.

Information and records

- Battery producers must accurately record the tonnage and chemistry of batteries placed on the UK market.
- Keep **records for at least 4 years** of the amount of batteries in tonnes (including total and by chemistry type) put on the market.
- If you supply distributors or business end-users, put your battery producer registration number (BPRN) on any paperwork like invoices, contracts, or delivery notes.

Product design

Producers have responsibilities to improve the design and manufacture of new batteries.

- Batteries must be labelled with a **crossed out wheelie bin symbol** and all chemical labelling on batteries must be visible, legible, and indelible.
- Follow the Batteries and accumulators: placing on the market regulations guidance.

Source: Battery producer responsibilities GOV.UK

More than 1 tonne - join a battery compliance scheme (BCS)

- If you placed **more than 1 tonne of portable batteries on the UK market** you must join a BCS.
- You must do this by **15 October each year** - before the start of the compliance year (calendar year).
- If you enter the UK market after 15 October, you must join a BCS within 28 days of putting portable batteries on the market.
- You pay the BCS an annual fee and it takes on your duties.

Source: [Battery producer responsibilities GOV.UK](#)

Battery compliance schemes

See a [list of approved BCSs](#) and check which services meet your needs.

The BCS will charge an annual fee for its services including the collection and treatment costs of waste portable batteries on your behalf.

What the BCS does on your behalf

The BCS takes on your obligations to finance the collection, treatment, recovery, and recycling of waste portable batteries. The BCS will:

- Register you annually with the correct environmental regulator.
- Pay the environmental regulator £600 annually for each member.
- Send information to your environmental regulator about the batteries you placed on the market in the previous 2 years and the current year.
- Get evidence notes for the collection, treatment, and recycling of waste portable batteries.
- Send information to your environmental regulator about the waste batteries they collect and deliver for treatment and recycling.

Tell your BCS within 14 days if:

- You need to make changes to your registration details.
- You are no longer a large portable batteries producer.

Source: [Battery producer responsibilities GOV.UK](#)



You must join a BCS if you place more than 1 tonne of batteries on the UK market in a compliance year.

Approved battery compliance schemes

- **BatteryBack**

Contact: complianceservices@wastecare.co.uk

Website: www.batteryback.org

- **Recycling Lives Compliance Services Limited**

Contact: enquiries@recyclinglives-services.com

Website: www.recyclinglives-services.com

- **ERP UK Ltd**

Contact: uk@erp-recycling.org

Website: www.erp-recycling.co.uk

- **REPIC**

Contact: info@ecogenesys.co.uk

Website: www.ecogenesys.co.uk

- **Valpak Ltd**

Contact: info@valpak.co.uk

Website: www.valpak.co.uk

Source: [*Public register of battery compliance schemes*](#)

www.materialfocus.org.uk



1 tonne or less - register as a small producer

- If you place **1 tonne or less** of portable batteries on the UK market in a compliance year, **register with your environmental regulator as a small producer.**
- Register via the National Packaging Waste Database (NPWD).
- You must submit the tonnage and chemistry on the NPWD each year by 31 January to confirm how many batteries you placed on the market in the previous year.
- The annual charge is £30.
- Tell your regulator if you're no longer a small portable batteries producer within one month of the change.

Source: Battery producer responsibilities GOV.UK

Registering as a small producer

Business location

You must register with the environmental regulator of the UK country where your registered office is.

You will be asked for your business location and the system will identify the relevant regulator depending on your location.

- Environment Agency (England).
- Natural Resources Wales (Wales).
- Northern Ireland Environment Agency (Northern Ireland).
- Scottish Environment Protection Agency (Scotland).

Type of batteries placed on the market

When you register, you need to specify the type of batteries you placed on the market in the previous calendar year. These include:

- Portable batteries.
- Vehicle and other automotive batteries.
- Industrial batteries.

See guidance on how to [Check which type of batteries you place on the market.](#)

Amount of batteries placed on the market

You will need to state the amount of batteries you placed in the market in the previous calendar year. This includes:

- The total amount in tonnes.
- The amount in tonnes by reference to the chemistry type.

Source: [Battery producer responsibilities GOV.UK](#)

**Products
containing
batteries**

Waste electrical and electronic equipment (WEEE): batteries in products

If you place products containing batteries on the UK market, you will need to **record separately** the weight of:

- Electrical and electronic equipment (EEE) you place on the market without batteries, as part of your WEEE Regulations duties;
- Batteries in the EEE, as part of your Waste Batteries Regulations duties.

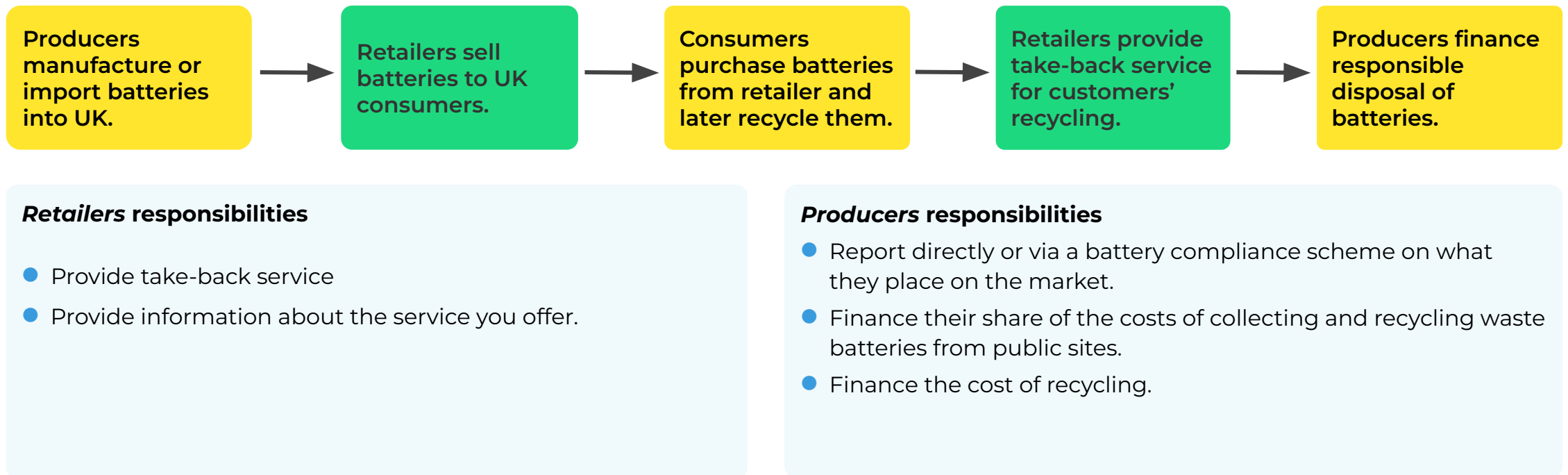
Even if your EEE does not fall under the WEEE Regulations you will still be a battery producer.

Source: Battery producer responsibilities GOV.UK

Distributor and retailer responsibilities

If you sell batteries direct to households in the UK...

You must also take on distributor responsibilities if you sell batteries direct to householders in the UK.



However, if you do both, then both producer and retailer responsibilities will apply.



**One pack of 4 AA
batteries per day
equals about 32kg per
year.**

If you sell or supply 32kg or more portable batteries a year...

You must offer **free collection ('takeback')** of waste or used batteries.

Collection point

- You must have a collection point at all premises from where you supply batteries.
- This applies if you run a shop, a chain of shops, or sell batteries online, by mail order or by telephone.
- Your collection point should be suitable for the safe storage of all kinds of portable batteries, not just the types you sell.
- You must let people know that you collect used batteries, for example by displaying posters in your premises or publishing it on your website.

Send batteries to be recycled

- A battery compliance scheme (BCS) will collect your batteries free of charge - search online to find one.
- To transport batteries yourself, for example to a recycling plant, you must:
 - Get a waste carrier certificate.
 - Follow the law on moving and transferring hazardous waste.

Source: Battery retailer and distributor responsibilities GOV.UK

Batteries you must take back:

You must take back any type of sealed battery that can be carried without difficulty by an average person.

This includes (but is not limited to) AA, AAA, and 9v batteries, rechargeable batteries, and batteries from:

- Mobile phones
- Laptops
- Hearing aids
- Watches
- Portable cameras
- Torches
- Electric toothbrushes
- Razors
- Handheld vacuum cleaners

You do not need to take back car and motorbike batteries or batteries from industrial equipment.

Source: [Battery retailer and distributor responsibilities GOV.UK](https://www.gov.uk/government/publications/battery-retailer-and-distributor-responsibilities)

www.materialfocus.org.uk



If you sell or supply less than 32kg of portable batteries a year...

- Smaller retailers and distributors do not have to take back used batteries if they sell or supply less than 32kg of portable batteries a year.
- You can voluntarily take back batteries but you may have to arrange collection and transport yourself.
- Speak to a compliance scheme operator - they may offer a collection.
- You must follow the law on moving hazardous waste if you transport batteries yourself.

Source: Battery retailer and distributor responsibilities GOV.UK

Communications toolkit - batteries assets



Strut cards and bin stickers

Our [batteries communications toolkit](#) for retailers includes strut cards and bin stickers for battery recycling.

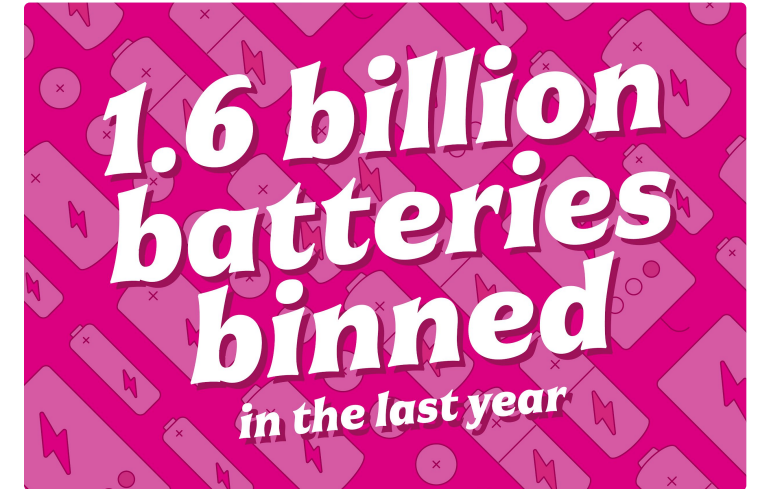
Assets are available in English and Welsh.



Internal comms support

Explain your battery recycling process to your staff using our internal comms copy.

Create your account for free and download the toolkit [here](#) from the gated section of the Material Focus website.



Social media posts and assets

Create social media posts using our [batteries communications toolkit](#). It includes ready-to-use social media assets with suggested copy.

Assets are available in English and Welsh.

Failure to follow the regulations and carry out your duties may result in prosecution and a fine.

Find out more about legislation and regulations here:

- [Waste Batteries and Accumulators Regulations 2009.](#)
- [Regulations: waste batteries](#)
- [Waste batteries and accumulators: technical guidance](#)
- [Waste batteries: producer responsibility](#)
- [Battery waste: retailer and distributor responsibilities](#)
- [Batteries and accumulators: placing on the market regulations guidance](#)

Who is Material Focus?

We are an independent,
not-for-profit organisation **saving
valuable, critical and finite
materials from going to waste** by
making it easier for everyone
across the UK to fix, donate and
recycle their electricals.
We do this through..

Insights

We identify, produce and share insights to improve the UK e-waste system and inform policy decisions.

Investments

We identify and fund projects that make it easier to reuse and recycle; or that encourage circular design.

Inspiration

We inspire, educate and encourage the UK public to fix, donate, sell and recycle their unwanted electricals through our Recycle Your Electricals campaign.

Frequently asked questions

Q: How is Material Focus funded?

A: Our funding comes from UK WEEE Regulations Compliance Fees. These are paid by electrical producers if they don't meet annual recycling targets set by the government. The fees are set higher than the average costs of collections to encourage collections to take place. We manage spending of the fees to support reuse and recycling of electricals in the UK.

Q: Is Material Focus a regulator?

A: We are not a government body nor a regulator, and work separately to the regulators across the UK. But we will regularly share information with them to help improve the e-waste system - to make it as easy as possible for the public to reuse and recycle their electricals.

Q: Is your work across the UK?

A: We work across the UK. We are a not-for-profit organisation with expertise in the electrical waste sector. Our role is to help improve the UK e-waste system through improving the reuse and recycling rates of waste electricals - this includes working with organisations across the UK sector to increase awareness of obligations and how to meet them.

Q: Who are the regulators in the UK?

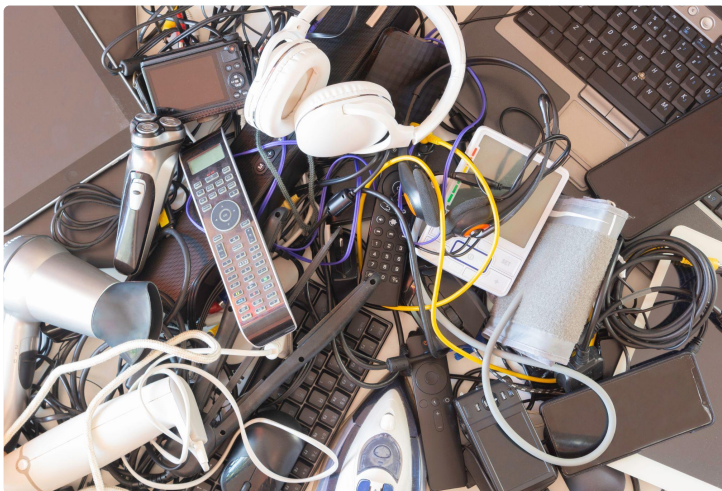
A: Your relevant regulator is dependent on your company registered address location:

- **Environment Agency (England)**
- **Natural Resources Wales (Wales)**
- **Northern Ireland Environment Agency (Northern Ireland)**
- **Scottish Environment Protection Agency (Scotland)**

Disclaimer: This document aggregates information from a number of sources and presents it as guidance to enhance understanding of the subject matter. It also provides a link to other third party sites where detailed information and guidance may be available. It is not intended to be a definitive report or a substitute for taking professional advice on regulatory, legal and other related issues.

Whilst Material Focus, as an independent not for profit organisation, will make all reasonable efforts to check the accuracy of the information provided, users should use their own professional judgment and discretion when assessing the implications for their organisation and should assume sole responsibility for results obtained and for conclusions drawn.

Explore our other industry briefings



Waste electricals: producer responsibilities and regulations

The environmental obligations for all UK producers of EEE and an explanation of the different responsibilities you have if you manufacture, resell or import electricals.

- [Read our producer briefing](#)



Retailer take-back: industry briefing for retailers

An explanation of the legal obligations for electrical retailers to help customers recycle their electricals and what retailers need to do to comply.

- [Read our retailer take-back briefing](#)



Vapes: briefing for producers, retailers and councils

How vape producers and sellers can comply with their legal environmental obligations and how local authorities can access support for vapes that they collect.

- [Read our vapes briefing](#)