BEBAT PARTICIPANTS' GUIDE

Answers to frequently asked questions about the take-back obligation, declarations, contributions and everything related thereto.





Dear participant,

First of all, thank you for having joined Bebat!

Together with all other companies affiliated with Bebat, you ensure that we are able **to collect and recycle** as many batteries as possible. This makes us a frontrunner in Europe.

As a Bebat participant, complying with your 'take-back obligation' is **much less onerous** than if you had to do it on your own. Also, because you can always **come to us** with questions.

Do the legal do's and don'ts sometimes cause uncertainty?

It will all be crystal clear to you, as in this guide we have set out the most important information. It also includes some of the questions participants often ask us.

Do you have any questions?

Then don't keep worrying. Send them to us and the answer will be forthcoming.

With kind regards!



TABLE OF CONTENTS

1. What is the take-back obligation?	4
2. Do I have to declare those batteries?	7
3. Which batteries are subject to the take-back obligation?	14
4. How and when should I submit a declaration?	16
What information do I need?	
The correct nomenclature numbers	
When do I have to submit a declaration?	
The retroactive declaration	
5. What contributions do I have to pay?	19
6. Do I have to mention the contributions on my invoices?	20
7. How can I become a Bebat collection point?	21
Six of the most frequently asked questions	22
• How do I log in to myBatbase?	
How do I deal with nomenclature numbers?	
• What is the difference between environmental and administrative contributions?	
Audits: what exactly do they involve?	
• What does Bebat do with the collected batteries?	

What does Bebat do with the contributions?

WHAT IS THE TAKE-BACK OBLIGATION?

Do you put batteries and/or products containing batteries on the Belgian market? As a producer, importer or installer of batteries purchased abroad?

In that case, you remain **responsible** for those batteries when they are end-oflife. The legislator provides that you are obliged to take those batteries back, also those from other producers or importers. In addition to the 'take-back obligation', you sometimes hear the terms 'extended producer responsibility'.

So you just accept waste batteries and that's it? No. The take-back obligation comprises a whole series of legal obligations you must comply with, largely summed up under three headings: **register**, **collect** and **recycle**.



But that's not all. In addition, you also have to **report** to the three regional authorities, **raise awareness** about batteries and do something about **prevention**.

Are you getting a little nervous now?

No need to. You are a Bebat participant, therefore we take over all these obligations from you in order for you to be fully compliant. So you can focus on your business and your clients with peace of mind.

What do you still need to do?

- Declare the batteries you have put on the Belgian market*.
- Pay the necessary environmental and administrative contributions.

*What exactly does 'putting on the market' mean?

The act by which a battery, whether in return for payment or free of charge, imported into or produced in Belgium is, for the first time in Belgium:

(i) offered for sale, sold, rented, leased or made available to a third party/consumer

(ii) or intended for own use.

Therefore, it means more than 'selling'.



There is also a take-back obligation for electrical and electronic appliances.

Please contact **<u>Recupel</u>** about this.



ENVIRONMENTAL AND ADMINISTRATIVE CONTRIBUTIONS

For **batteries** \leq **20 kg**, you pay an **environmental contribution** that includes the costs of prevention, awareness-raising, collection, sorting, recycling and reporting to the regional authorities.

If you put **large batteries > 20 kg** on the market, for example for energy storage or in vehicles, you pay an **administrative contribution** that **does not** include collection and recycling costs. If you want Bebat to take care of these for you, you can enter into an **individual agreement** with Bebat. That way, you have a ready tailored solution for damaged or waste batteries. And that means a huge worry less.



DO I HAVE TO DECLARE THOSE BATTERIES?

Sometimes, you have a doubt as to whether you are required to comply with the take-back obligation. Or your parent company abroad. Or the foreign producer of the batteries you install?

The principle is: whoever first puts the batteries on the Belgian market must declare them.

- On the **participants' platform myBatbase**, you will find a list of all companies affiliated with Bebat. <u>Please check</u>, because there is no need to duplicate registration and declaration.
- Is the **foreign company** from which you buy batteries affiliated with Bebat? Then check whether this company takes over your declaration obligation. In that case, you no longer need to do it. However, if your supplier is not affiliated, or does not take over your declaration obligation, you are subject to the take-back obligation in respect of these batteries.

The answer to the question whether you should declare them depends on where you are located, where you bought the batteries and where you sold them.

With the **'decision trees'** that follow, you can easily find out whether or not you have to submit a declaration.



MY COMPANY IS LOCATED IN BELGIUM



- states the environmental or administrative contribution to Bebat on the invoice, or

- is affiliated with Bebat (see list of participants on myBatbase) and confirms they they will take on your obligation to declare to Bebat.



Which batteries should you declare and how do you find out exactly how many you have put on the market?

- If you only sell with invoices, submit a declaration based on your sales.
- If you only work with cash receipts or a combination of invoices and cash receipts, the declaration must be made on the basis of your purchase details.
- You don't have **anything to declare** for the past period? In that case, you still have to **submit a zero declaration in time**.

To do so, log on to <u>https://mybatbase.bebat.be</u> and:

- **1.** Click on 'Declarations ► Enter declaration ► Declaration'.
- **2.** Select the declaration period concerned and click on 'Submit' at the bottom.
- **3.** As a final step, answer 'YES' to the question 'Are you sure you want to declare O batteries'.

Let us now focus on the first two possibilities.



Option 1: Declaration based on sales

• To be included in your declaration

Batteries you have sold in Belgium and that you have produced yourself and/ or purchased from a foreign supplier which does not take over your declaration obligation to Bebat.

• To be deducted from your declaration

- Batteries you have sold abroad and purchased in Belgium.
- Batteries you have sold abroad and purchased abroad from suppliers which take over your declaration obligation to Bebat.

• Not to be declared

- Batteries you have sold and purchased in Belgium.
- Batteries you have sold abroad and that you have produced in Belgium or purchased abroad from suppliers which do not take over your declaration obligation to Bebat.

HOW CAN YOU BE SURE...? Whether your foreign supplier takes over your declaration obligation to Bebat?

This is the case when he:

- indicates the environmental or administrative contribution to Bebat on his invoice,
- or, is affiliated with Bebat (see list of participants <u>on myBatbase</u>) and confirms that he takes over your declaration obligation to Bebat.

Option 2: Declaration based on purchases

• To be included in your declaration

Batteries you have purchased abroad from suppliers which do not take over your declaration obligation to Bebat or that you have produced in Belgium.

• To be deducted from your declaration

- Batteries purchased in Belgium and sold abroad.
- Batteries you have purchased abroad from suppliers which have taken over your declaration obligation to Bebat and that you sell abroad.
- Batteries you have purchased abroad from suppliers which do not take over your declaration obligation to Bebat, or batteries that you have produced in Belgium and that you sell abroad, provided that you have included these batteries in your declaration at the time of purchase or production.

• Not to be declared

- Batteries purchased in Belgium and sold in Belgium.
- Batteries purchased abroad from suppliers which do not take over your declaration obligation to Bebat, or batteries that you have produced in Belgium and which are sold abroad, provided that you have included these batteries in your declaration at the time of purchase or production.



MY COMPANY IS LOCATED OUTSIDE BELGIUM



'This means batteries sold separately as well as those included in or sold with a device, vehicle, bicycle...

Which batteries should you declare and how do you find out exactly how many you have put on the market?

- Are you a foreign Bebat participant? Then you should submit a declaration based on your sales of batteries to Belgian customers. These customers can be Belgian companies from which you take over the declaration obligation to Bebat or Belgian private individuals in the case of remote sales.
- You don't have **anything to declare** for the past period? In that case, you still have to **submit a zero declaration in time**.

To do so, log on to <u>https://mybatbase.bebat.be</u> and:

- **1.** click on 'Declarations ► Enter declaration ► Declaration'.
- **2.** Select the declaration period concerned and click on 'Submit' at the bottom.
- **3.** As a final step, answer 'YES' to the question 'Are you sure you want to declare O batteries'.
- **Starting a webshop?** Then read <u>here</u> about your take-back obligation.



WHICH BATTERIES ARE SUBJECT TO THE TAKE-BACK OBLIGATION?

The answer to that question is simple: all batteries.

Or rather, there are two types that escape this rule: batteries intended for equipment to be sent to space and batteries for specific military purposes.

All other batteries are subject to the take-back obligation. Therefore, also the small button cell in the greeting card that plays 'Happy birthday to you', AA or AAA batteries, batteries in electric drills, batteries for emergency lighting, batteries for hybrid and electric vehicles, stationary batteries...

Batteries weighing up to 20 kg are collected via our network of almost 23,000 collection points. For batteries above that weight, we provide (after agreement) a tailor-made solution for collection, recycling and processing.

You don't know exactly what kind of batteries are involved?Rest assured, that may happen. There are huge numbers of batteries
in circulation. Many batteries are marked with an international
battery code, the I.E.C. code (ex. LR6, LR03, CR2032, R6, R03,
LR44...). This code simplifies your declaration. Other batteries do not
nention anything.For the legislator, there are three categories:1. Portable
batteries2. Industrial
batteries2. Industrial
batteries3. Automotive
batteriesCourse of the courseCourse of the course of the courseCourse of the courseCourse of the course of the courseCourse of the courseCourse of the course of the course of the course of the courseCourse of the courseCourse of the course of the course of the course of the course of the courseCourse of the courseCourse of the course of the courseCourse of the course of the courseCourse of the course of the cours

Which batteries are they? This decision tree will help you find out quickly!



HOW AND WHEN SHOULD SUBMIT A DECLARATION?

Thanks to the **myBatbase participants' portal**, you can enter your declaration **online**.

The first time it might involve some research, but after a few times you will get the hang of it and you'll be able to say, just like participant <u>ED&A</u>, that the declaration only takes you 2 minutes every month.



Properly preparing the declaration is half the job.

In addition to determining which and how many batteries you put on the market (see point 2), you also need to know the following details:

- What is the chemical composition of each battery? (zinc-carbon, alkaline...)
- The weight of each battery (in grams)

You can't find that information on the packaging or the batteries themselves? Then ask the supplier. Or check their website, it often contains product information.

Button cell batteries and starter batteries for vehicles are easy to recognise. **Rechargeable lithium batteries** deserve extra attention. In this category, the variations in pricing are greatest and it's important that you classify them under **the correct nomenclature number**.

THE CORRECT NOMENCLATURE NUMBERS

As we said, the declaration must be submitted **by nomenclature number**. The list of such numbers is subdivided into sections recognisable by letter:

A stands for batteries sold separately (with the exception of starter batteries);

- **B** stands for built-in or supplied batteries (with the exception of starter batteries);
- SA stands for built-in starter batteries; and
- **SB** stands for starter batteries sold separately.

For **annual declarations** (fewer than 10,000 batteries/year) via myBatbase, these nomenclature numbers are already in the declaration. It's therefore easy to search which category of batteries you need. You can find an overview of these numbers <u>here</u>.

For **monthly declarations** (more than 10,000 batteries/year), extra attention must be paid. You can use the search function to enter certain characteristics in order to find the correct nomenclature number. Many batteries have an international IEC code, which simplifies the search. However, built-in batteries sometimes don't have such codes. You can find an overview of nomenclature numbers <u>here</u>.

Have you collected all this info? Then you are ready to start your declaration.

WHEN DO I HAVE TO SUBMIT A DECLARATION?

The answer to that question is simple:

- If you sell **fewer than 10,000 batteries** per year, one **annual declaration** suffices.
- If you sell **more than 10,000 batteries** a year, you have to submit a declaration **every month.**

What do you do if you find that you have exceeded the 10,000 mark? In that case, you don't have to do anything. Bebat automatically switches you to monthly declarations.

And what if you haven't sold any batteries in the past year? In that case, you still have to submit a **zero declaration in time**. How? You can read about that earlier on in this brochure.

THE RETROACTIVE DECLARATION

As soon as you join Bebat, you will also need to put yourself on track for previous years. Retroactively, with retrospective effect **up to 3 years prior to joining**. This is fair to all other participants who joined early and who have paid contributions since then.

In order to **simplify** this **retroactive declaration**, Bebat agrees that you declare the same numbers of batteries placed on the market for the three retroactive years. This is based on the number of batteries placed on the market in the year before you joined.

What happens to my declaration?

As a **participant in Bebat**, you - together with all other participants - finance the collective system by which Bebat collects, picks up, sorts, transports and recycles waste batteries, and reports thereon to the authorities.

Concretely, you pay an **annual flat rate of \in 60** for this, plus an environmental or administrative contribution per battery you put on the market.

On the basis of your declaration

- We calculate the environmental contribution you owe.
- We **report** the total number of batteries declared by the participants to the regional authorities, broken down by chemical family, separate or built-in, and weight.
- The regions determine the **collection targets** for Bebat. In Flanders, this is **45%** of all portable batteries sold, in Brussels and Wallonia it's **50%**.

Good to know: together with Bebat, Belgians consistently far exceed this target. Belgium is even top of the European class in terms of the number of batteries collected per inhabitant. Timely - and correct - declaring is simply crucial if we all want to exceed these targets once again.



Are you still having trouble completing your declaration?

Take a look at the FAQ on <u>myBatbase</u> or watch our <u>explainer videos</u>. Or ask us, we will be happy to help you! **participants@bebat.be - +32 (0)16 76 88 91**

WHAT CONTRIBUTIONS DO I HAVE TO PAY?

In addition to an annual flat rate of 60 euros (excl. VAT) for your participation in Bebat, you pay:

- An all-inclusive environmental contribution per battery up to and including 20 kg (lead batteries up to and including 3 kg);
- An **administrative charge** per **battery over 20 kg** (lead batteries over 3 kg). Collection and recycling are not included in this contribution. For large batteries, Bebat will examine with you what service you would like to receive for the collection and recycling of these waste batteries. This will be provided for in an **individual agreement** with a customised rate.
- **Retroactive declarations** are subject to the environmental or administrative contribution valid at the time you put the battery or battery-powered appliance on the market.



DO I HAVE TO MENTION THE CONTRIBUTIONS ON MY INVOICES?

ENVIRONMENTAL CONTRIBUTIONS

You must always state the **environmental contributions** with the amounts on your **sales invoices to professional customers**.

This is a legal obligation. It allows the regional authorities and your clients to check whether you are a Bebat participant and to charge through the environmental contribution.

In principle, it is not permitted to state on invoices that the Bebat contribution is included, without further specifications. The amount of the contributions must be a separate item/line on the invoice.



Invoices to end-users (private individuals) are not allowed to show the environmental contribution separately for portable batteries.

ADMINISTRATIVE CONTRIBUTIONS

For administrative contributions, you are free to choose whether or not to state this contribution on the invoice.

HOW CAN I BECOME A BEBAT COLLECTION POINT?

Do you have used batteries of \leq 20 kg (lead \leq 3 kg)?

As a point of sale of batteries in Belgium to private individuals, you are obliged to take back used batteries. This means that you must accept batteries from anyone and without any purchase obligation. You can have these batteries picked up free of charge by Bebat when you become a Bebat collection point. <u>Here</u> you can find more information and <u>register as a collection point</u>.

Do you have used batteries > 20 kg (lead > 3 kg)?

Bebat can provide a tailored solution. Please contact one of our specialists at

participants@bebat.be or on

(()+32 (0)16 76 88 91



SIX OF THE MOST FREQUENTLY ASKED QUESTIONS

1. How do I log in to myBatbase?	23
2. How do I deal with nomenclature numbers?	24
3. What is the difference between environmental and administrative contributions?	29
4. Audits: what exactly do they involve?	30
5. What does Bebat do with the collected batteries?	31
6. What does Bebat do with the contributions?	32

HOW DO I LOG IN TO MYBATBASE?

Open <u>https://mybatbase.bebat.be</u> and click on *"log in"* at the top right.

The following information is requested when logging in:

- User name
- Participant's number
- Password

Once Bebat has processed your company's/organisation's registration as participant, each contact person will receive an **email** with the subject "*myBatbase: creating your profile and logging in*".

Important: you can only set your username and password via this email.

In this email, you will find a link "*click here to create your user profile*". This link will take you to our portal where you can enter your own username and password.

- You are free to choose your username of at least 6 characters. Preferably choose a username that you can easily remember (e.g. your first name and surname, or your email address).
- Your password must have a minimum of six and a maximum of 128 characters:
 - 4 letters (a to z) of which 1 with a capital letter
 - 1 digit
 - 1 special sign (for example !, \$, #, %).

HOW DO I DEAL WITH NOMENCLATURE NUMBERS?

Have you created your profile on myBatbase? Check! Have you added up your amounts per type of battery? Check!

ANNUAL DECLARATIONS

Do you submit a declaration once a year? In that case, we have already prepared a few things for you.

- Click on the categories of batteries you are going to declare. The corresponding nomenclature numbers will then appear.
- Now enter the correct amounts per battery type.

Attention: with some nomenclature numbers you have to indicate the amount of batteries, as well as the weight.



These videos will guide you through your annual declaration.

EXAMPLE: ANNUAL DECLARATION AA BATTERIES

Suppose you have sold 436 alkaline AA batteries in remote controls.

The following instructions also apply to common batteries such as button cells, AAA batteries and 9-volt batteries.

This case does **not** apply to electric bike batteries, starter batteries or batteries for electric vehicles, but to **other batteries**.

- Click to open that category. You will also see that it isn't a Li-ion or lead battery, but an alkaline battery.
- **2.** So click to open the subcategory 'Button cells, Zinc Alkaline, Nickel metal hydride, Nickel cadmium and Lithium Primary'.
- 3. Now look for the correct number in the nomenclature list.

Each nomenclature number starts with a corresponding letter:

A stands for batteries sold separately (with the exception of starter batteries);

- **B** stands for built-in or supplied batteries (with the exception of starter batteries);
- SA stands for built-in starter batteries; and
- **SB** stands for starter batteries sold separately.

The alkaline AA battery in this example is incorporated into remote controls, so choose a nomenclature number that begins with B.

- **4.** Now choose the **correct nomenclature number** from the list. Look at the weight class: an AA battery belongs to the under 20 kilograms class of batteries. So the nomenclature number you are looking for is BZZZZZ01.
- **5.** Now enter the total amount of batteries of this type in the declaration line of that number in column 3, i.e. 436

Do you have several batteries of the same type, but of different weight? Then you will have to include the same nomenclature number again in your declaration. You can do this simply by clicking on **the 'copy' icon** next to the relevant nomenclature number.

MONTHLY DECLARATIONS

If you make monthly declarations, you need to look up the correct nomenclature numbers yourself.

In this case, you have **two possibilities** to find the correct nomenclature number:

- Log in to myBatbase and go to 'Declarations' and then to 'Search nomenclature'. Fill in the search criteria using the IEC code (e.g. LR6, CR2030...), separate or built-in, chemical family, weight.
- **2.** In <u>this Excel list</u>, you can search for the correct nomenclature number using filters.



These videos will guide you through the monthly declaration, with various examples.

EXAMPLE: MONTHLY DECLARATION LR44 BATTERY

1. Click on 'Add Nomenclature' and fill in the search criteria.

In this case, you have the international battery code or IEC code, LR44. Other examples of IEC codes include LR6, LR03, CR2032, R6... If you know the IEC code, you can immediately find the corresponding nomenclature number.

Please note that the battery is either built-in, supplied or sold separately. Also remember that each nomenclature number starts with an associated letter:

- A stands for batteries sold separately (with the exception of starter batteries);
- **B** stands for built-in or supplied batteries (with the exception of starter batteries);
- **SA** stands for built-in starter batteries; and
- **SB** stands for starter batteries sold separately.
- **2.** In myBatbase, select the correct line by clicking on it.
- **3.** Click on the '*add*' button at the bottom. A new line appears in the declaration table. Fill in the number of batteries to be declared.

Search nomenclature

Nomenclature No	> Minimum Weight (g)	≤ Maximum Welght (g)	Average Weight (y)	Usage	Product Category	Apart/Built- In	Rechargeable	Button cell	Chemical Family	Sub Family	IEC Code	Format
Search	4	Clear fill	¥ er(s)		2.4	- LR4	4 🗸			•		
Chemical Family		Sub Family	v	Button		Apa IEC C		Form	nat			v
		Usage			t Category	Apart	Built-in	VVCR	aht (g)	RC	chargeable	·

Check and send

Is the declaration ready? Then be sure to check again for mistakes. After that, click on '*Submit*' and your declaration has been sent!

You will then be given the opportunity to download a copy of the submitted declaration in pdf or Excel format.

Have you made a mistake? Don't panic, just go back to '*Declarations*' and click on '*Enter declaration*' and '*Correction*'.

RETROACTIVE DECLARATIONS

For retroactive declarations (with retrospective effect), you proceed in the same way as for annual declarations (see above).



WHAT IS THE DIFFERENCE BETWEEN ENVIRONMENTAL AND ADMINISTRATIVE CONTRIBUTIONS?

THE ENVIRONMENTAL CONTRIBUTION

per battery sold is all-inclusive, as it covers all costs for managing waste batteries and accumulators

Costs for:

- collection, pick-up, sorting, processing and recycling
- prevention, awareness-raising and communication
- reporting to the 3 regional authorities

THE ADMINISTRATIVE CONTRIBUTION

you pay for larger batteries, those weighing **more than 20 kg** and for lead batteries over 3 kg. Think of batteries of hybrid and electric vehicles, batteries for storing energy from solar panels, etc. Included are the costs of prevention, awareness-raising, communication and reporting. **Please note** that this administrative contribution does not cover all costs. It **does not include** the costs for collection, pick-up, sorting, processing and recycling. Why not? Simply because it is not possible to set a single uniform price in this case, as the price depends on the weight, chemical family, packaging required and service requested.

Bebat can help you with the collection, pick-up and further processing of large batteries > 20 kg. **This is a tailored service** for which you are best advised to ask for more information and a **quote**.

Contact one of our specialists

participants@bebat.be
or by calling the number
+32 (0)16 76 88 91

AUDITS: WHAT EXACTLY DO THEY INVOLVE?

At least once every three years, you, as participant, are audited; this is a legal obligation. During the audit, a check is made that the declarations are in line with reality.

The check is often done via an **online questionnaire** on the participants' platform myBatbase. Sometimes, a **thorough on-site check** is performed by a specialised audit firm.

During the audit, the accuracy of the declaration will be verified. For Bebat, this is also a time to provide advice: you will receive good advice tailored to your specific situation.

At the end of the audit, we will send you a **report** with the main findings. As a participant, you will see how you have performed and what points for improvement there are.



WHAT DOES BEBAT DO WITH THE COLLECTED BATTERIES?

In a nutshell:

- We sort the batteries according to chemical composition into 8 different 'groups'.
- And then transport them to an approved recycling company.
- There, the valuable materials are extracted: iron, nickel, zinc, aluminium, copper, lithium... These raw materials are then reused for all kinds of applications.



WHAT DOES BEBAT DO WITH THE CONTRIBUTIONS?

With the contributions paid by the participants, Bebat fulfils all their obligations under the take-back obligation.

As a Bebat participant you will have peace of mind because we:



* For **batteries** > **20** kg (and for lead batteries > 3 kg) for which an administrative contribution applies, collection and recycling are not included in the contribution. However, for these, you can (as we said) enter into an individual agreement with Bebat for a tailormade service: collection, transport, recycling, etc.



DO YOU STILL HAVE A QUESTION YOU CAN'T (COMPLETELY) ANSWER?

Take a look at the FAQ (Frequently Asked Questions) at **mybatbase.bebat.be**

Don't hesitate to contact us via: participants@bebat.be - +32 (0)16/76 88 91

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