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NOTE

From:	General Secretariat of the Council
To:	Delegations
Subject:	AOB for the meeting of the Council (Environment) on 16 December 2025 The dangers posed by lithium batteries and the feasibility and potential benefits of introducing an EU-wide battery deposit system - Information from Austria, supported by Germany and Lithuania

Many lithium-ion batteries, some of which are built into daily-use electronic devices, are carelessly disposed of in residual waste or through other inappropriate disposal channels. As a result, mechanical handling of the collected waste — for example, in collection vehicles or recycling facilities — can lead to fires, particularly when batteries are damaged, causing the remaining charge to ignite. The undersigned Member States are increasingly concerned about the growing number of fire incidents which are caused by improperly disposed lithium waste batteries in waste management and recycling facilities. During the summer of 2025, several major fires occurred in Austria and other Member States, each resulting in damages amounting to millions of euros – despite state-of-the-art fire prevention measures and infrastructure in waste management industries. These incidents highlight a significant and escalating safety risk for workers, severe environmental damage, and substantial economic losses for waste management operators.

Many Member States operate efficient and well-established systems for the separate collection of waste batteries and fully meet the collection targets prescribed under EU legislation. However, despite public awareness campaigns and a functioning collection infrastructure, large quantities of used waste batteries continue to be disposed of incorrectly — frequently in residual waste or other unsuitable collection streams, such as those for waste plastics or waste paper.

This improper disposal creates a serious and growing fire hazard throughout the waste management chain, which is increasingly struggling to obtain insurance coverage that remains economically feasible. Given the increasing number of incidents and the associated risks for essential infrastructure, we consider that additional and coordinated measures at EU level are urgently needed to effectively prevent fires caused by lithium batteries.

Article 63 of the EU Batteries Regulation requires the European Commission to assess, by 31 December 2027, the feasibility and potential benefits of introducing European deposit systems for batteries. We strongly believe that this assessment is of high priority and should be undertaken without delay. Accordingly, the European Commission is requested to expedite the assessment of EU-wide deposit systems, given that the findings of this report — including the possible adoption of legislative proposals — may have a substantial impact on subsequent measures taken by Member States. This particularly concerns the question of a European deposit scheme or other potential regulatory approaches, such as the expansion or remodeling extended producer responsibility (EPR) schemes.

National unilateral actions to introduce deposit systems may be less practical and efficient, given the implications for the internal market and the cross-border movement of batteries and battery-powered products. We reaffirm our commitment to supporting the implementation of the EU Batteries Regulation and to contributing to the development of effective solutions for the safe and sustainable management of lithium batteries.

The Member States need timely clarification regarding whether the European Commission intends to submit legislative proposals.

Our shared objective must be to establish, as swiftly as possible, effective and harmonised measures across the European Union to:

- Prevent the improper disposal of lithium batteries,
- Reduce the associated fire risks in the waste management sector; and
- Protect human health, the environment, and economic assets
- Support for achieving collection rates for waste batteries,
- Securing critical raw materials (such as lithium) through recycling.

The undersigning Member States therefore call upon the European Commission to:

- Conduct the feasibility assessment of European deposit systems for batteries well before the currently foreseen deadline of December 2027.
- Include an examination of financial incentives and their suitability for improving collection in this assessment.
- Examine alternative or complementary measures that could effectively prevent fires, such as improved labelling, in any case, the labelling of chemistry on the battery itself, in particular lithium, enhanced consumer information campaigns.
- Address the issue of financing for the remediation of unavoidable damages resulting from fires caused by lithium batteries, including potential mechanisms under extended producer responsibility (EPR) schemes.
- Enforce oversight and (product) compliance with EU laws of e-commerce platforms.
