

Summary of eco-design and prevention plan 2024



Regulatory reference

Art. L. 541-10-12 of the Code of Environnement (Art 72 of the AGECL Law)

- **The company that puts on market must elaborate an individual or common “prevention and eco-design plan” (PEP) and (PRO)**
- Any producer **send it to his Producer Recycling Organization** defined in the Article L. 541-10-1 is required to draw up and implement a prevention and eco-design plan for :
 - reducing the use of non-renewable resources,
 - increasing the use of recycled materials
 - increase the recyclability of its products in the treatment installations located on the national territory.
- This plan is revised every five years. It can be individual or common to several producers.
- It includes an assessment of the previous plan and defines the objectives and the prevention and eco-design actions that will be implemented by the producer over the next five years.
- The PRO set up by the producers can write a common plan for all of its members. The individual and common plans are sent to the eco-organization set up by the producers, which publishes a summary of them accessible to the public, after presentation to the stakeholders in the sector.



General approach

› 3 axes determined by the regulation

› 12 sub-axes proposed by COREPILE to guide members' thinking

1. Reduce the use of non-renewable resources	Engagements to optimise the ratio weight/power
	Engagements for lifetime increase
	Optimization of processes and used resources
	Other
2. Increase the use of recycled materials	Engagements of training / sensibilization
	Technological and regulatory watches - R&D
	Products' conception
	Other leads
3. Increase the recyclability of products and waste in treatment installations located on the national territory	Reduce the use of hazardous substances limiting the material recycling capacity
	Training / sensibilization of teams concerning end-of-life issues
	Design considering the end of life
	Other



Representativity of the PEP received

Source	Nb PEP received	POM 2022 / T	% Market share
WITHOUT FACILITATOR	148		52,64%
WITH FACILITATOR	1499		
	1647	12 399,38	55,05%

- In total the received PEPs represent 1,647 members out of a total of 3,323 active members in mid-2023, i.e. 49.6% of members sent an individual PEP or an PEP sent jointly with other members.
- Of these 1,647 members, 148 are members who have returned an individual PEP. The others are grouped under facilitators who have set up joint PEPs.
- The 148 members who sent an individual PEP represent 52.64% of all products placed on the market.
- All of the PEPs received represent 55.05% of the orders placed on the market.



Representativity of the PEP received

- 37 PEPs were selected on the basis of their representativity and relevance to a detailed study.
 - 31 of these are individual PEPs and come from COREPILE's largest members
 - 2 other PEPs are special in that they are joint plans proposed by two major Chinese facilitators representing 320 and 1,187 members respectively
 - The remaining PEPs have been selected for their particular interest (significant companies in their sector)
- In total, the PEPs surveyed account for almost 50% of all new products put on the market, and the individual respondents (i.e. excluding PEPs from facilitators) are all "key accounts", i.e. major companies in their market.
- They are among the 70 largest members of COREPILE (representing 26.6% of MSM declarations).
- **CONCLUSION**
 - The PEP received are therefore representative of Corepile's members.



Reminder Objectives (for COREPILE)

- › **Framing and fine-tuning rather than firm, concrete commitments**
 - › Identify existing good practices that can be incorporated into the PEP
 - › Identify opportunities for future work/reflection that could be incorporated into the PEP
 - › Identify the level of maturity of certain practices, the priorities of members, the possibilities for implementation, measurable objectives and associated indicators...



Take out

Axis 1 : Reduce the use of non-renewable resources

› Lower power-to-weight ratio and longer service life

Little room for manoeuvre / Optimisation & standardisation is a permanent area for improvement in the battery sector

› Optimising industrial and logistics processes

Use of decarbonised energy (primary energy such as wind power / photovoltaics - but also "green steelworks" using "green" hydrogen rather than fossil fuels)

→ For distributors/integrators

› Strategy/responsible purchasing (quality/performance of batteries)

› Make users aware of the correct use of batteries and encourage rechargeable batteries (except for applications where single-use batteries offer very long operating times - e.g. TV remote control).



Take out

Axis 2 : Increasing the use of recycled materials

› Product design

For the time being, no member seems to have dugged into this area. It should be remembered that the European regulation sets quantified targets for manufacturers in this area from 2028.

› Training / awareness

Training/awareness and R&D, market research (availability, quality, price of recycled materials) are currently the main priorities for members.

→ For distributors/integrators (Manufacturer dependant).

- › Consult battery suppliers about the inclusion of recycled materials in their batteries, their eco-design policy, etc.
- › Purchasing strategy - specifications (battery quality criteria, recyclability, integration of recycled materials, etc.)



Take out

Axe 3 : Increase the recyclability of its products at processing facilities located in France

› **Reducing the use of hazardous substances**

The producers brought into line with regulations

› **Training/raising awareness of end-of-life issues among teams**

Training/awareness-raising in eco-design and end-of-life issues (in-house) + improving understanding of recycling issues are key to making progress in this area.

› Reflection on objectives and relevant indicators

→ **For distributors/integrators**

- › Guaranteeing the extractability of battery
- › Raising user awareness of recycling
- › Continue to develop collection points



CONCLUSIONS

- › **Correct representativity of respondents (nature, sectors and sales)**
- › **Members seemed taken by surprise by this new obligation**
 - › Many general commitments that should be integrated into the company's overall PEP strategy
 - › Lack of quantified targets and associated measurement indicators.
- › **Some commitments are interesting but need to be evaluated regularly.**

The enthusiasm generated by the PEP among members is encouraging. It would be beneficial to build on this momentum by calling on members every 2 or 3 years (rather than the statutory 5 years) and specifying the objectives more clearly.



Next steps

- › Finalisation of the report with the inclusion of the last major manufacturers (January 2024)
- › CPP information - regulatory (Q1 2024)
- › Publication of summary on website and information for members - regulatory (Q2 2024)
- › DGPR ADEME information - voluntary information (Q2 2024)
- › Consultation with the EEE sector for joint implications (T3 and T4 2024)
- › Inclusion in battery french State approval 2025
- › Similar approach to be implemented with light means of transport (LMT) players.
- › Establishment of any follow-up / follow-ups or targeted at 5 years (at the latest)

