

ENVIRONMENTAL CONTRIBUTION FOR HOME BATTERIES AS OF 2022

Everything you need to know about the new contribution



2021 saw a significant increase in home batteries being used to store energy, mainly for solar power. As a producer, importer or installer, are you contributing to this upward trend on the Belgian market? If you are, then you also know that you are required to comply with the statutory take-back obligation. In other words, you are responsible for what happens with these home batteries once their initial life has come to an end. Because their story doesn't end there: these batteries can be used to recycle scarce and valuable raw materials. They can also be repurposed and put to good use in other applications.

In any event, these batteries need to be collected, transported and processed with great care. "Handle with care" is the message.

Are you a producer, importer or installer of home batteries?

Then you are responsible for what happens to those batteries after their first life.

It has to be said: the first life of home batteries is usually a long one. So is their processing and recycling something "to worry about tomorrow"? How do you prepare for costs that won't happen for 8 to 10 years? Do you pass on these future processing costs to your customer at the time of purchase, or do you pay for it later yourself?

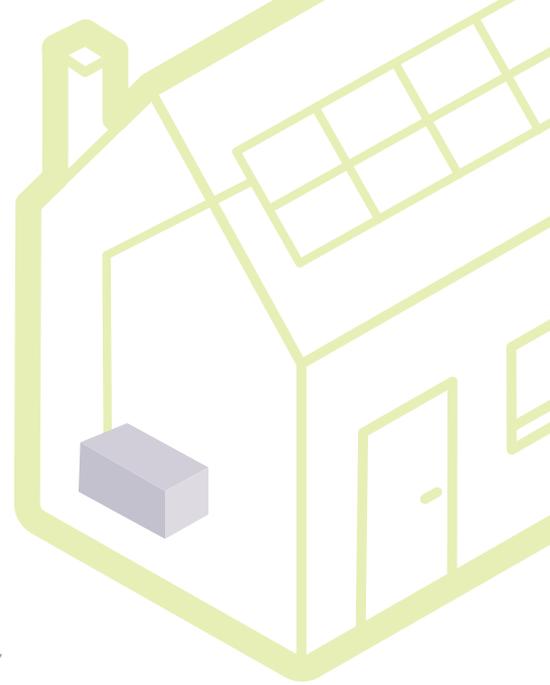
The answer to these questions is now much more simple: **from 1 January 2022** Bebat has introduced an **environmental contribution** for Energy Storage Systems (ESS) or domestic batteries.

As a participant in the Bebat scheme, you pay this environmental contribution at the time you place the home battery on the Belgian market. This means that the subsequent processing and recycling of the discarded battery is assured.

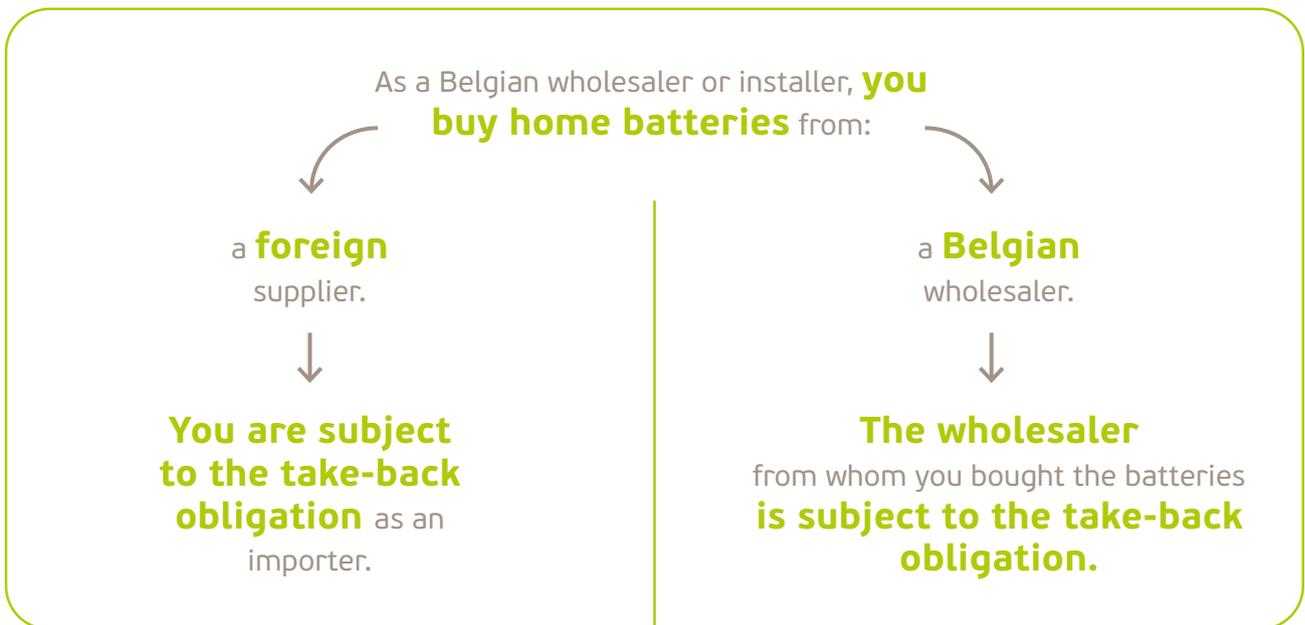


1 WHAT EXACTLY IS CHANGING?

The **take-back obligation**, also known as the 'extended producer responsibility', is crucial for you as a producer or importer of home batteries. After all, you are the first to put these batteries on the Belgian market.



What does this mean for you as a wholesaler or installer of home batteries?



What does the take-back obligation entail as a producer or importer - in a nutshell?

- As soon as a home battery no longer works properly, the responsibility for the **collection** and **processing** of this battery lies with you.
- You are obliged to run **prevention and awareness-raising campaigns about batteries**. In addition, you must report on this to the 3 regional authorities.
- Finally, you also have **administrative obligations** towards the regional authorities. You must register with these authorities and report all home batteries sold.



When you join Bebat, the scheme will relieve you of most of the worries about all this.

More information on <https://www.bebat.be/en/b2b/take-back-obligation>

BEFORE

Until 1 January 2022, for batteries over 20 kg, there was an **administrative contribution fee** of 0.057 EUR (excl. VAT) **per home battery**. This was a necessary, if modest contribution, but it did not cover the cost of processing and recycling. To cover those costs, you could conclude an individual tailor-made contract with Bebat and set aside provisions for future costs for take-back, processing and recycling within the so-called “pay-as-you-collect” system.

NOW

As a result of the **introduction of an environmental contribution**, this old system of administrative contributions and additional individual contracts for home batteries is now a thing of the past. All costs are included in the new environmental contribution.

THE OLD SCHEME

Administrative contribution per battery. It covers:

- ✓ prevention
- ✓ awareness-raising
- ✓ communication
- ✓ reporting

An **individual contract with Bebat** could be concluded according to the needs regarding:

- ✓ collection
- ✓ dismantling
- ✓ recycling

The processing costs to be paid **at the end of the life cycle**, upon collection of the battery.

THE NEW SCHEME AS OF 1 JANUARY 2022

Environmental contribution per kg.

It covers:

- ✓ prevention
- ✓ awareness-raising
- ✓ communication
- ✓ reporting
- ✓ **collection**
- ✓ **dismantling**
- ✓ **recycling**

No individual contract.

Environmental contribution to be paid **at the beginning of the life cycle**, so when the battery is put on the market.

2 WHY IS THERE AN ENVIRONMENTAL CONTRIBUTION FOR HOME BATTERIES?

The previous regulations were often **unclear**, both for the producer/importer/installer and for the end customer. There were **no unequivocal regulations** for the take-back of discarded batteries. This created difficulties on the market.

Companies that were prepared for the future and had already charged the processing and recycling costs to the end customer had a competitive disadvantage compared to companies that were not thinking ahead. The latter will get into trouble in the future when they are faced with processing costs that they never passed on to the customer as part of the take-back obligation. There was a risk that, due to the take-back obligation in force, companies would not only have to take back the batteries they sold themselves but also those of other players who are no longer active at that time.

That is why, at the request of the sector, Bebat introduced **an environmental contribution from 1 January 2022**, which makes the regulations simpler and more transparent.

There is now one clear-cut rule: Every company, member of Bebat, that manufactures or imports home batteries and puts them in Belgium on the market will pay an **environmental contribution per kilogram**.

Transparency is key, as the environmental contribution must be visibly stated on invoices to professional customers with the amounts indicated. You can also charge the contribution to end customers, as a separate category on the invoice.

This way, all parties involved are certain that no unexpected costs will follow later.



3 FOR WHICH BATTERIES HOW MUCH ENVIRONMENTAL CONTRIBUTION?

The environmental contribution is introduced for energy storage batteries weighing up to and including 200 kg that are connected to a decentralized electrical power production facility (e.g. solar panels), regardless of where they are installed (ESS or Energy Storage Systems). In other words, it applies to the well-known lithium-ion or saltwater-based “home batteries”.

Batteries that are primarily used for backup purposes, so-called UPS batteries, are not subject to this scheme.

Charges 2022

€ 2,39 / kg (excl. VAT)

for lithium-ion-based Energy Storage Systems (ESS)

€ 1,27 / kg (excl. VAT)

for saltwater-based Energy Storage Systems (ESS)

The new environmental contribution covers the costs of **registration, prevention, awareness-raising, collection, dismantling, processing, recycling, reporting to the authorities and research & development** to find out whether the batteries can be given a second life. In other words, all costs are covered.

This means that at the time of take-back at the end of the batteries' life cycle (8 to 10 years), you should not expect any more costs.

Keep in mind that lead-acid batteries remain subject to the administrative contribution.

Did you have an **individual contract** with Bebat for home batteries? In principle, the new environmental contribution makes this contract superfluous. Bebat will contact you to check whether you want to cancel the contract.



Perhaps you are wondering why the environmental contribution for Energy Storage Systems (ESS) or lithium-ion home batteries is so high and how it is calculated? [Read more about it here](#) or scan the QR code to the right.

TRANSITION PERIOD

The changes apply **from 1 January 2022** for sales between professionals (manufacturers, importers, wholesalers, retailers and other professional clients).

As with every previous change to charges, there is again a **transition phase in place that runs until 1 April 2022 at the latest** for sales to consumers. This means that existing stocks of home batteries that were put on the market before 01/01/2022 can still be sold to consumers for 3 months at the contribution rates for 2021. However, Bebat will invoice the new environmental contribution for all home batteries put on the market from 01/01/2022. The date when it is put on the market is the invoice date.

In which cases does this transition period apply? We explain it to you using concrete situations.

1 You are a wholesaler (selling to professionals).

- The transition phase does not apply to sales between professionals as of 01/01/2022.

2 You are an installer and you sell to professional customers.

- The transition phase does not apply to sales between professionals as of 01/01/2022.

3 You are an installer and you sell to consumers/individuals.

- You bought home batteries in **2021** from a Belgian wholesaler without the Bebat environmental contribution and you sell them to consumers between 01/01/2022 and 01/04/2022. **The transition period applies here.** Since you have not yet paid the environmental contribution to your supplier, you are not allowed to invoice the environmental contribution to the consumer.
- You bought home batteries in **2021** from a foreign supplier and you sell them to consumers between 01/01/2022 and 01/04/2022. The transition period **does not apply** here. You have to pay the environmental contribution to Bebat upon the sale and you can invoice this environmental contribution to the consumer.
- You bought home batteries in **2022** from a Belgian wholesaler and you sell them to consumers between 01/01/2022 and 01/04/2022. The transition period **does not apply** here. You can invoice this environmental contribution to the consumer.
- You bought home batteries in **2022** from a foreign supplier and you sell them to consumers between 01/01/2022 and 01/04/2022. The transition period **does not apply** here. You have to pay the environmental contribution to Bebat upon the sale and you can invoice this environmental contribution to the consumer.



TRANSITION PERIOD

CONCLUSION:

Practically speaking, only a very limited number of home batteries will fall under the transition period regulation, due to the major shortage of home batteries that occurred last year.

However, Bebat will invoice the environmental contribution for all home batteries put on the market from 01/01/2022 onwards. The date when it is put on the market is the invoice date. Companies that join Bebat **after 01/01/2022** will retroactively pay the environmental contribution for the batteries put on the market **from 01/01/2022** onwards.



4 HOW TO DO DECLARATIONS TO BEBAT FROM 1 JANUARY 2022?

As of 1 January 2022, as a participant, you are required to submit a **monthly declaration** for all **home batteries** you put on the market.

You have to make this monthly declaration before the end of the following month. For example, you have to file your declaration for the month of February before the end of March.

For which batteries do you have to make a declaration to Bebat?

Our handy schematics explain it to you:

- [Companies based in Belgium](#)
- [Companies based outside of Belgium](#)

For the declaration of home batteries, there are **new nomenclature numbers** to be used in your declaration. Find all nomenclature numbers [on the website](#).



Provide the number and weight per battery via the participants' platform [MyBatbase](#). Bebat will also soon ask for the serial numbers.

How do you make a monthly declaration? [Find out here](#).

How to determine the weight?

- To determine the weight of the battery, use the weight of the battery/module on which the serial number is mentioned, including the casing if there is any.
- The inverter and BMS (Battery Management System) need only be included if these components are integrated into the housing.
- Bebat has drawn up a list of home batteries in conjunction with the sector organisation, stating their weight, chemical family and the amount of the environmental contribution. **This list is available on the Bebat website and may be viewed by everyone.** The list is not exhaustive and will be supplemented with information that we receive from participants.

5 HOW TO MENTION THE ENVIRONMENTAL CONTRIBUTION ON YOUR INVOICE?

PROFESSIONALS

- ✓ The environmental contribution must be stated visibly on invoices to professional customers.

CONSUMERS

- ✓ You can also charge the contribution to end customers, as a separate category on the invoice.
- ✓ This way, all parties involved are certain that no unexpected costs will follow later on.
- ✓ We recommend always stating all serial numbers from the batteries/modules on the invoice.



6 IS THERE ANY CHANGE TO YOUR TAKE-BACK OBLIGATION?

With all these changes, you might almost think that the take-back obligation is also a thing of the past. For the sake of clarity: this is absolutely not the case.

The take-back obligation is and remains applicable for all manufacturers, importers or installers of batteries who put batteries on the Belgian market. In order to meet this take-back obligation, you have a choice:

- Either you submit an individual plan yourself to the regional authorities for their approval.
- Or you join Bebat.

So, doing nothing is not an option.

Participants who put home batteries on the market and have an own collection system and want to keep this system will have to submit an individual scheme with authorities for all the categories of batteries (portable, industrial, automotive) they put on the market.

Joining Bebat is far and away the simplest solution.

Bebat ensures that all of the parties involved, including consumers, are notified of the new environmental contribution.

Once the environmental contribution has been paid to Bebat, the take-back of the home battery is assured and professional customers and consumers have nothing to worry about later.

Bebat records via the serial number every home battery that you declare as a participant and for which an environmental contribution has been paid. Bebat informs consumers about the environmental contribution so that the benefits can also be made clear to them, too: not only are they given security for the future, but they also are making an important contribution to a better environment and a more sustainable society!

