

10 May 2004

Dear members of TAC on WEEE & RoHS

We, Japan Business Council in Europe (JBCE) <sup>1</sup>, are the organisation representing Japanese companies with significant operations in Europe. Our members are among leading multinational corporations in the world.

This paper is our concern of battery selective treatment required in WEEE Directive.

We are more than happy if you could take this paper into consideration in the discussion of new exemption at TAC meeting .

If you have any questions, please feel free to contact our secretariat or myself.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Takashi Sugiyama', is written in a cursive style.

*Takashi Sugiyama*  
*Chairman, Environmental Committee*  
*Japan Business Council in Europe*

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<sup>1</sup> For details, including a list of its member companies, please refer to the following website: <http://www.jbce.org>

## Japan Business Council in Europe

### *Position Paper regarding Selective Treatment of Battery*

Brussels, May 2004

The member companies of the Japan Business Council in Europe would like to bring the problem of “battery selective treatment” to the attention of the European Commission and the members of the Technical Adaptation Committee.

JBCE and its member companies are of the opinion that this is sufficient and convincing grounds on which to grant the exemption.

#### **Selective treatment of batteries and capacitors**

The WEEE Directive requires (in its Annex II.1) that batteries are removed from WEEE and treated separately before the WEEE is to be treated further. The same has to happen with capacitors that contain substances of concern and that are bigger than 25mm in height and 25mm in diameter.

These requirements are not technology neutral and have a negative impact on the technology choice of manufacturers of mobile phones, digital camera's and other portable devices.

The choice of manufacturers is between a small battery and a capacitor. Both are used as a source of back-up power and are fixed onto a printed circuit board (PCB). However, the capacity of a capacitor is very small in comparison with a battery of the same size. Therefore a battery is more likely to be used for long time backup storage of data and for watch functions. For instance, mobile phones with the i-mode function require more back-up power and time than a regular mobile phone. This is why its manufacturers exclusively opt for small but more powerful batteries instead of capacitors. It is not realistic to require that those batteries would have to be replaced by capacitors, because capacitors that would need to provide the same level of power as the batteries would probably need to be 60 times bigger in size.

Currently two-thirds of mobile phones that need back-up power use small batteries. Use of a backup battery in mobile phones in the world currently is clearly on the rise because of the need for the longer backup time along with the multiple functions of the phone. As it happens, capacitors are mainly used for lower end applications.

Only small capacitors are currently exempt from the selective treatment requirement.

JBCE requests that small size batteries are also exempt from the selective treatment requirement. The following amendment to Annex II.1 3<sup>rd</sup> indent is therefore suggested:

“-batteries (height >5mm, diameter >25mm or proportionately similar volume)”

