

Appendix: Development of 2026 Tariffs for Bicycle Batteries

With the introduction of the European Batteries Regulation, manufacturers and importers of bicycle batteries are legally responsible for the entire waste phase of their products. Under this producer responsibility, batteries must always be collected and recycled separately once discarded. This ensures safety within the waste chain, preserves scarce raw materials, limits greenhouse gas emissions, and contributes to a circular economy.

Through an extensive network of **Wecycle** collection points at, among others, bicycle dealers and civic amenity sites, Stichting OPEN has been fulfilling the producer responsibility for discarded bicycle batteries on behalf of Stichting EPAC since 2024. In this letter, we briefly look back, explain the tariffs for 2026, and outline the expected developments for the coming years.

Review 2025

As of 1 January 2024, the operational organisation of Stichting Batterijen merged with Stichting OPEN. In addition to electrical and electronic equipment and lamps, Stichting OPEN now also manages producer responsibility for discarded bicycle batteries on behalf of Stichting EPAC.

The merger has resulted in a more stable and lower cost level for the office organisation than before. In 2025, the focus was on the safety of collection and processing, and investments were made in collection materials to ensure the safe collection, transport and sorting of bicycle batteries.

Developments in 2026 Tariffs

Despite stable and lower organisational costs, tariffs for 2026 will need to rise. This increase is entirely attributable to higher operational costs for collection, sorting and processing. The main causes are explained below.

1. Increase in collected bicycle batteries with lower revenues

The number of collected bicycle batteries is increasing significantly, leading to higher total costs for collection, sorting and processing. At the same time, revenues from processing contributions by producers are declining, and recovered raw materials such as cobalt, nickel and lithium yield less on the global market. In addition, transporters, sorters and processors have raised their costs due to inflation and rising minimum wages.

2. Lower income and additional costs to meet collection targets

In 2025, income from the processing contribution declined due to disappointing bicycle sales and "free riders" such as unregistered suppliers of fat bikes. Despite the increase in discarded bicycle batteries, the rise in collection is still insufficient to meet future legal targets. Therefore, substantial additional efforts are being made:

- To register manufacturers and importers of bicycle batteries with Stichting EPAC, ensuring that a processing contribution is paid for all bicycle batteries.
- To motivate consumers to hand in old bicycle batteries through an awareness campaign.
- To increase the collection of discarded bicycle batteries by expanding the network of participating bicycle shops. These shops are also informed of their legal obligation to ensure that discarded bicycle batteries handed in by consumers are responsibly



transferred via Stichting OPEN and not given to parties that cannot guarantee that transport and processing are carried out legally, safely and responsibly.

Effect on 2026 Tariffs and Future Projections

Results 2025 and Outlook

The financial system for producer responsibility for bicycle batteries is based on a capital funding model: at the point of sale, payment is made in advance to cover future collection and processing costs. In principle, an annual inflation adjustment to the tariffs should be sufficient to keep the system financially balanced. However, due to the developments described above, a tariff increase of approximately **50%** would be needed in 2026 to cover all costs.

Given the current volatile situation in the Dutch bicycle market and the expected effects of mitigation measures, the Board has decided to use part of the reserve built up through 2025 to moderate the tariff increase for 2026. As a result, the increase will be limited to **8.2%** in 2026 compared to 2025.