Appendix: 2027 Fee developments for e-bike batteries

In this letter, we inform you about the 2027 fees for the collection and processing of e-bike batteries. To comply with stricter European regulations and stringent safety requirements, adjustments to our operational structure and the associated financing are necessary.

The fee for 2027 has been set at €1.55 per kilogram. By using accumulated reserves, the Board of Stichting EPAC has been able to limit the actual fee increase for participants. Without this financial buffer, a cost-covering fee of €1.74 per kilogram would have been required.

Below, we explain the main factors driving this fee adjustment.

1. Stricter European legislation and higher requirements

The main reason for the changing cost structure is the new European Batteries Regulation. For batteries used in light means of transport (such as e-bike batteries), a statutory collection target of 51% applies by the end of 2028, increasing to 61% by the end of 2031. To achieve these targets, Stichting OPEN, on behalf of Stichting EPAC, will invest in targeted action plans and extensive awareness campaigns in 2027.

In addition, greater emphasis will be placed on addressing **unregistered waste streams**. These are discarded batteries that currently end up outside the official collection system. Together with the relevant authorities, efforts will focus on stricter enforcement to ensure that these batteries enter the safe and circular waste management system.

2. Rising operational costs per battery

In addition to the statutory obligations, the entire waste management chain is facing structurally higher costs per battery collected:

- **Stricter fire safety requirements:** The safe collection, storage, transport and processing of e-bike batteries require specialised collection equipment, additional safety measures and adapted operating procedures.
- **General cost increases:** Transport companies, sorting facilities and recyclers are facing higher energy, labour and other operating costs.
- **Declining revenues from recovered materials:** The market value of recovered and recycled materials has decreased, resulting in higher net processing costs per battery.

3. Use of Stichting EPAC's reserves

The financial system for Extended Producer Responsibility (EPR) operates on a fully funded basis. When an e-bike battery is placed on the market, a fee is paid to cover future processing costs and ensure the long-term continuity of the system.

Due to the new European Batteries Regulation and significantly stricter fire safety requirements, the actual costs per battery are now higher than previously anticipated. As a result, the funds accumulated under this system are no longer sufficient to fully cover future costs.

In previous years, Stichting EPAC built up a financial reserve to absorb unforeseen circumstances. Given the continued challenging market conditions, the Board of Stichting EPAC has decided to use this reserve to limit the fee increase from the cost-covering level of €1.74 per kilogram to **€1.55 per kilogram**.