



Attachment: development of rates for Discarded E-bike Accumulators

Batteries must always be collected and recycled separately after disposal. This ensures a safe waste chain, conservation of resources, avoids CO2 emissions, and contributes to a circular economy. This is regulated through the Producer Responsibility. Since 2024, Stichting OPEN fulfills the producer responsibility for E-bike Accumulators through an extensive network of Wecycle collection points at, among others, bicycle dealers and (municipal) recycling centers.

In this attachment, we provide further explanation of the rates for 2025.

The merger leads to a decrease in indirect costs:

On January 1, 2024, the executing organization for Batteries and E-bike Accumulators, Stichting Stibat Services, merged with Stichting OPEN. Since that date, Stichting OPEN, on behalf of Stichting EPAC, has also taken on the producer responsibility for Discarded E-bike Accumulators, in addition to Electrical and Electronic Equipment and Lamps. The merger has resulted in efficiency gains. For example, offices have been consolidated, and IT systems are being integrated. Many marketing campaigns are being executed jointly, and lobbying efforts to the government are centrally coordinated. These efficiency gains from the merger have led to a reduction in indirect costs.

Despite these realized savings, the rates for 2025 will increase by 8.5%. This increase is entirely attributed to the rise in operational costs for collection, sorting, and processing. We explain the main causes in more detail.

Increase in the quantity of collected E-bike Accumulators due to a higher collection target:

The higher legal collection requirements mean that the collection of E-bike Accumulators must be further increased. As a result, the total costs for collection, sorting, and processing are rising. Stichting OPEN is working to control costs by, among other things, bundling volumes to secure stronger purchasing positions with transporters, sorters, and processors.

Investment for the safety of collection and sorting:

As a result of stricter regulations, substantial investments are required in (steel) collection and transport equipment to ensure safe collection and sorting of E-bike Accumulators.

A key component of the processing cost is **the revenue from the raw materials** recovered in the processing. The lower revenues from cobalt and nickel result in higher processing costs.

Rate developments from transporters, sorters, and processors lead to higher costs:

The rates charged by transporters and sorters have increased, partly due to an increase in minimum wages. Additionally, capacity issues at processors are putting pressure on the rates.





In conclusion:

Stichting OPEN, on behalf of Stichting EPAC, is doing its utmost to unburden you of fulfilling your producer responsibility at the most optimal possible costs. We also continue to work towards creating a level playing field. Stichting OPEN is actively implementing a freerider policy to ensure that all producers join and pay a waste management contribution, thus sharing in the producer responsibility.