




➤ Guidebook for electrified vehicle battery producers

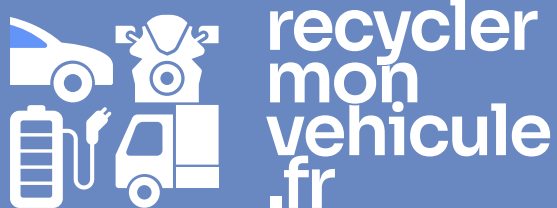


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1

We turn your obligations into opportunities

Editorial

Battery producers, the battery industry enters a new era.

Since August 2025, the Extended Producer Responsibility (EPR) also applies to batteries sold on the French market. You are now responsible for their end of life (collection, processing, reuse and recycling), but also for enhancing the sustainability of their design.

This is a major step towards enhancing circularity in the electric mobility market. Electric and hybrid vehicle batteries are an essential cornerstone of the energy transition, and a key answer to challenges such as sustainability and industrial sovereignty.

As a key actor in this field, **Recycler Mon Véhicule** both drives and supports this transformation. Thanks to a wealth of experience of the automotive and motorcycle industries and to our proven expertise in end-of-life vehicle management, we have obtained a category 5 government approval relating to electric and hybrid vehicle batteries. With **Recycler Mon Véhicule**, you

don't just outsource your producer's responsibility, you influence and shape the entire sector. Non only do we take care of your batteries' collection, processing, documentation and follow-up, you also contribute to your industry and actively engage in all strategic decision making. Our members have a voice in the governance of our Producer Responsibility Organisation (PRO), allowing them to become actors involved in shaping the regulations rather than spectators putting up with them.

This is a turnkey solution, which is also collaborative, democratic and fully transparent in order to promote a sustainable and efficient mobility sector.

Why this guidebook ?

This guide aims to help you understand your responsibilities and to choose the best solution for your needs.

It includes :

- a clear explanation of the regulatory framework,
- a reminder of your obligations as a producer,
- a list of the real benefits of subscribing to **Recycler Mon Véhicule**,
- and all practical steps to join and register your products on the market.

Our goal is to support you every step of the way towards a smooth and compliant battery EPR process that will add value to your business.





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Overview of the battery EPR : what you need to know

A new responsibility for the producers

The Extended Producer Responsibility relies on one simple principle: a product's end of life is the responsibility of whoever sold it.

In other words, from now on, all battery producers, importers and dealers must take care of the collection, processing, reuse and recycling when they reach their end of life.

This principle is included in the Environmental Code (section L.541-10-1) and applies to all types of batteries, from button and cell batteries to EV batteries.

Major environmental and industrial challenges

Batteries, and more specifically hybrid and electric vehicle batteries, have a key role to play in the energy transition, but managing their life cycle comes with various environmental and economic challenges:

- Production: requires the use of critical mineral resources, such as lithium, cobalt, nickel or copper,
- End of life: must be rigorously managed to minimise the risk of contamination and appropriately reuse strategic minerals,
- Reuse and recycling: a major industrial opportunity.

Clearly, battery EPR goes way beyond recycling. It is part of a collective effort towards circularity, which starts with promoting reuse and recycling, as well as encouraging eco-designs to make sure tomorrow's batteries are more and more sustainable.

What the regulation says

The battery EPR relies on three additional regulations :

- EU regulation 2023/1542 of July 12, 2023, which defines the obligations shared by all member states and introduces a digital passport for batteries
- French decree 2024-1221, which translates the above regulation into French law
- French decree dated 27 March 2025 which details the specific requirements applicable to Producer Responsibility Organisations (PRO) and to individual systems.

These responsibilities have been a legal requirement for all battery producers since August 18, 2025. They relate not only to supporting the batteries' end of life, but also to traceability, to annual reporting and to national collection and recycling goals.

Category 5 batteries for electric and hybrid vehicles

The EU regulation defines 5 different catégories of batteries, depending on their use :

1. Portable batteries
2. Batteries used in small transportation (bicycles, scooters)
3. Starting, Lighting, Inition (SLI) batteries
4. Industrial batteries
5. Batteries used in electric and hybrid vehicles – i.e. category 5

In the last category, **Recycler Mon Véhicule** is approved by the public authorities to :

- Provide compliance support and guidance of producers
- Manage the collection and processing of used batteries across the region
- Follow up, report and disclose to the relevant authorities
- Promote reuse and innovation to achieve a more sustainable, circular economy.

Remember...

The battery EPR is a legal requirement since August 2025.

Producers are now responsible for their batteries end of life.

It defines ambitious goals in terms of collection, recycling and sustainable design.

The Producer Responsibility Organisation (PRO) **Recycler Mon Véhicule** is approved for category 5, dedicated to electric and hybrid vehicles.



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Does the battery EPR directive concern you as a producer?

The battery EPR regulation applies to any company that brings batteries for the first time to the French market, whether they are sold as stand alone items or incorporated into a product, either new or remanufactured. In other words, if you bring a battery to the market for the first time – directly or indirectly – you are a producer according to the regulation.

Who is a producer ?

According to French decree 2024-1221, a producer is defined as any individual or organisation who professionally :

- manufactures and sells batteries in France, in their own name or under their own brand,
- imports or otherwise brings to the French market batteries manufactured in another member state or third-party country,
- retails third-party batteries under their own brand,
- brings back to market batteries that have been prepared for reuse, refurbishment or remanufacture,
- sells batteries online or remotely, from another country, to final users in France.

If you meet any of the above criteria, you are legally responsible for the battery EPR obligations.



Vehicle integrated batteries

In the context of the EPR, there is no distinction between a stand-alone battery and a battery integrated into a product, such as an electric or hybrid vehicle.

Vehicle producers and importers are therefore directly responsible for all legal EPR obligations relating to the batteries used in their vehicles.

Reconditioned and remanufactured batteries

In the EU, regulation 2023/1542 (article 56, section 2) specifically extends the EPR to reconditioned, refurbished or remanufactured batteries.

Any battery that has been repaired, reconditioned or reused for a different purpose (such as static energy storage) is considered the same as a battery newly brought to market. The remanufacturer becomes the producer in terms of battery EPR and is therefore responsible for the associated legal obligations.

This initiative aims to encourage the use of second-hand batteries whilst ensuring appropriate processing, traceability and follow-up reporting within a secure framework.

➔ Remember...

Any battery brought to market comes with a responsibility.

The EPR applies to new and to remanufactured batteries, be they stand-alone or integrated into another product.

This concerns you if you import or sell electric, hybrid or rechargeable hybrid vehicles (including micro-hybrids).

Recycler Mon Véhicule is your one-stop partner to help you comply with the category 5 battery EPR and ELV EPR (hybrid and electric vehicles).



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Your legal obligations : What the law says What it means

A clearly defined responsibility

Producers are fully responsible for the end of life of all batteries they bring to market. Based on the French environmental law L.541-10-1, the principle relies on the extender producer's responsibility. This means that the organisation who brings a product to market is responsible for managing or funding the management of the waste associated with its end of life.

This responsibility applies to the entire life cycle of each battery, from conception to collection, recycling and reuse.

Your obligations in real terms

To be compliant, the producer must :

- Register on the ADEME's website and obtain a unique identification number (UID)
- Submit a yearly report on all products introduced to the market (quantities, battery types, chemical types)
- Finance and manage the collection, processing and reuse or recycling of all used batteries
- Ensure traceability of all products and divulge accurate and precise data to the authorities
- Contribute to the national and european collection, reuse and recycling targets (as per EU regulation and the French 27 March 2025 decree)
- Integrate eco-friendly criteria into your design to promote sustainability and ensure batteries are easy to repair, dismantle and recycle
- Finance or take part in R&D (research and development) projects and studies aiming at bettering the sector's environmental performance and, more specifically, at promoting eco-friendly designs and better reuse and recycling practices



Two options to comply

1. Become a member of an approved PRO : Recycler Mon Véhicule

Becoming a member of **Recycler Mon Véhicule** allows you to transfer your legal obligations and responsibility to a category 5 approved organisation (electric and hybrid vehicle batteries).

We will take care of all regulatory and compliance requirements on your behalf: collection, processing, reporting and administrative follow-up. Enjoy the peace of mind of a simple, secure and efficient process and remain focussed on your core activity.

Recycler Mon Véhicule does not only support you through a turnkey solution, it also makes financial sense :

- Economies of scale: all costs are shared between our subscribers, which drastically reduces the financial burden on each organisation.

- Reduced subscription for all products managed directly : if you take care of collecting or processing part of your batteries, your subscription is reduced.
- No financial guarantee required: unlike individual systems, you don't need to provide a deposit to the authorities (which is generally used to cover the battery management costs should the approved business cease its activity or its approval not be renewed).

Recycler Mon Véhicule is a sustainable and economically optimal solution which gives subscribers total peace of mind through complete compliance, a secured structure and shared management costs.



2. Create your own individual system (IS)

You can choose to apply for approval from the authorities in order to manage your own obligations.

It is perfectly legal to create your own in-house system. This requires an infrastructure similar to what an approved business can offer and implies access to substantial human, technical and financial resources (contracts with and management of logistical operators, conformity reporting). These are time-consuming, complex and legally binding tasks.

Any breach (launching a product undeclared or without registration, missed targets, breach of processing requirements, etc.) may lead to administrative and financial sanctions, as per articles R.541-87 and R.543-129 of the French environmental law). These breaches can lead to

class 5 penalties (up to 500 € per breach, doubled for repeat offences) or to court orders to enforce corrective measures.

Additionally, in-house systems don't benefit from shared costs or economies of scale. They require substantial financial, human and technical means as well as advanced legal knowledge in order to avoid compliance issues and to set up substantial financial guarantees (to cover the battery management costs should the approved business cease its activity or its approval not be renewed) as well as pay for the processing of the batteries.

➔ **In short**

Sign up to Recycler Mon Véhicule, to ensure your compliance, contribute to a specialised industry, share costs and promote sustainability.

Option	In-house (individual system)	Through an approved organisation (Recycler Mon Véhicule collective system)
Responsibility	Total responsibility for collection, processing, reporting, compliance	Transferred
Costs	High and variable, not shared, requirement to set up a financial guarantee with the relevant authorities.	Reduced costs (shared) + rebate from Recycler Mon Véhicule for all batteries collected by yourself + no financial guarantees required
Materials	Materials extracted from used batteries	Materials can be returned if you collect and process the batteries separately
In-house resources	High pressure on in-house resources	Low or no pressure on in-house resources. Your team only needs to keep in touch with the organisation
Communication	Independent communication legally required	Managed by the approved organisation + subscriber base
Legal risk	High (non-compliance, sanctions)	Managed through liability transfer



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Why choose Recycler Mon Véhicule ?

Recycler Mon Véhicule is the leading Producer Responsibility Organisation (PRO) in the automotive and motorcycle industries

Recycler Mon Véhicule is an approved PRO dedicated to managing category 5 batteries used in hybrid and electric vehicles.

Recycler Mon Véhicule was founded by producers and importers with a robust experience of the automotive and motorcycle industry, and who were determined to come up with a solution that met their specific needs.

Natural synergies with the ELV sector

Recycler Mon Véhicule subscribers benefit both from the support of a robust Producer Responsibility Organisation (POR) with a wealth of experience in the automotive industry, and from a network of dedicated experts in electric and hybrid vehicle batteries.

Recycler Mon Véhicule also offers two other advantages:

- ELV experience and network:**
 Approximately 73 % of ELV batteries will eventually be collected by a network of accredited ELV centres (ELVC).
 Thanks to our proximity to the vehicles' natural drop-off locations, the batteries can easily be collected from the vehicles of origin and benefit from a well-documented followed up, in accordance with the legal requirements associated with the EPR. We also work with a network of approved repairers who are affiliated with ELV stakeholders and key maintenance, diagnostic and replacement partners. Our connexions with these networks enhance the sector's efficiency and provide easy access to used batteries.
- Network of specialised partners in the battery sector:**
Recycler Mon Véhicule has created a network of dedicated qualified operators, assessed according to stringent safety, environmental and compliance criteria. They take care of the collection, the storage, the transport and the processing of all traction batteries according to legal requirements.

The combination of ELV expertise and battery mastery is what makes **Recycler Mon Véhicule** such a unique partner. We are able to guarantee, for all our subscribers, a fully integrated, optimised and compliant management of their EPR obligations.

Fair and transparent governance

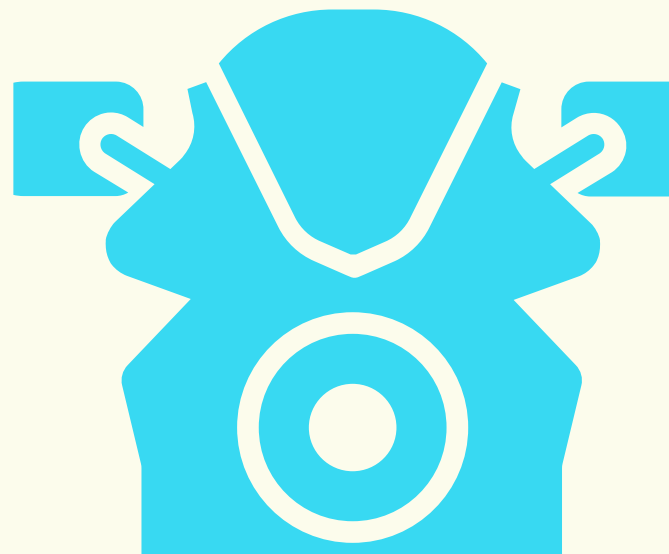
Recycler Mon Véhicule is a non-for-profit organisation.

Our governance is based on a simple principle :

1 subscriber = 1 vote.

All strategic decisions are made collectively, in the interest of all subscribers, regardless of their size or the volume of products they sell.

Producers are equally represented within our strategic council, who define the sector's strategic orientations and the allocation of resources.



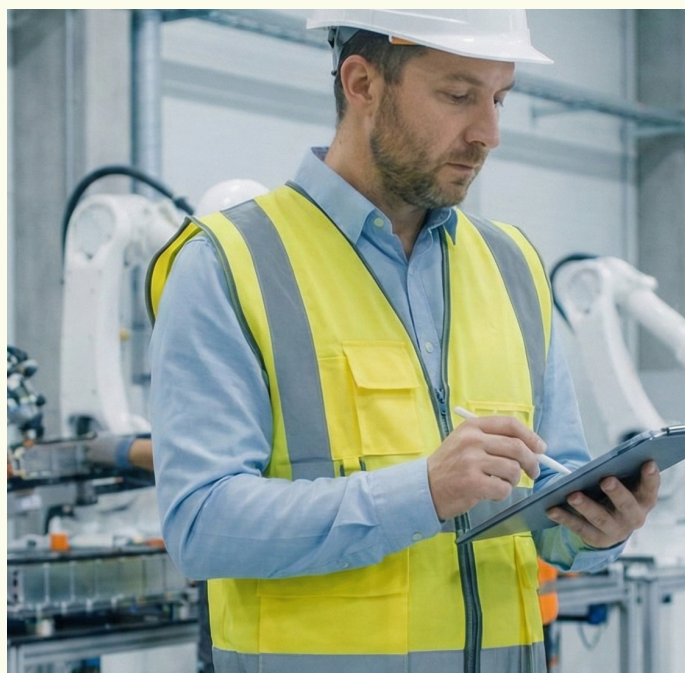


Bespoke technical and legal support

Recycler Mon Véhicule members benefit from a complete support :

- Compliance support to ensure they meet all legal requirements
- Monitoring of legislative developments
- Reporting and divulgation tools

Our goal is to turn your EPR obligations into a smooth, structured and useful process for your business.

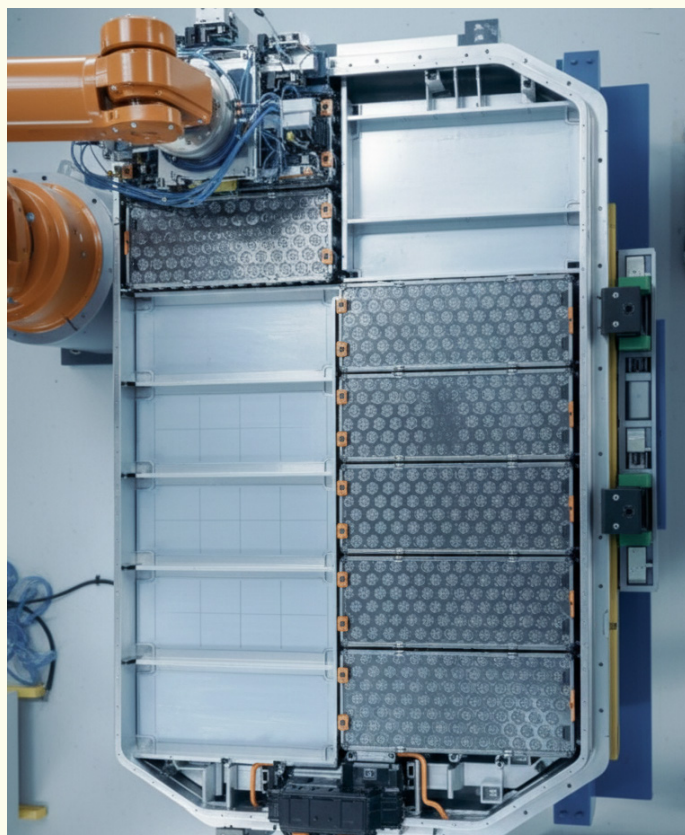


Contribute to research and innovation

As per the requirements of the French 27 March 2025 decree (article 2.4), **Recycler Mon Véhicule** funds and manages several R&D studies aiming to :

- enhance the collection, sorting and recycling process,
- promote traceability and battery safety,
- develop solutions to reuse the batteries,
- encourage sustainable design and circular strategies for key materials.

Subscribing to **Recycler Mon Véhicule** is a way to contribute to shaping the sustainable battery industry in France and in Europe.



➔ **In short**

Your needs

Simple and effective way to meet the legal requirements

Specialist partner in the automotive sector, with connexions to the ELV sector

Balanced governance

Partnerships focussed on the future

Our answer

Turnkey, approved solutions, efficient management of resources, optimised collections, processing and recycling, in order to reduce costs and maximise results.

The leading Producer Responsibility Organisation (PRO) in the automotive and motorcycle sector, made by and for producers and their partners and networks, and, more specifically, ELV centres as the main purchasers of EV batteries.

**1 subscriber = 1 vote
+ strategic advice and balanced representation of all producers**

R&D and eco-design funding



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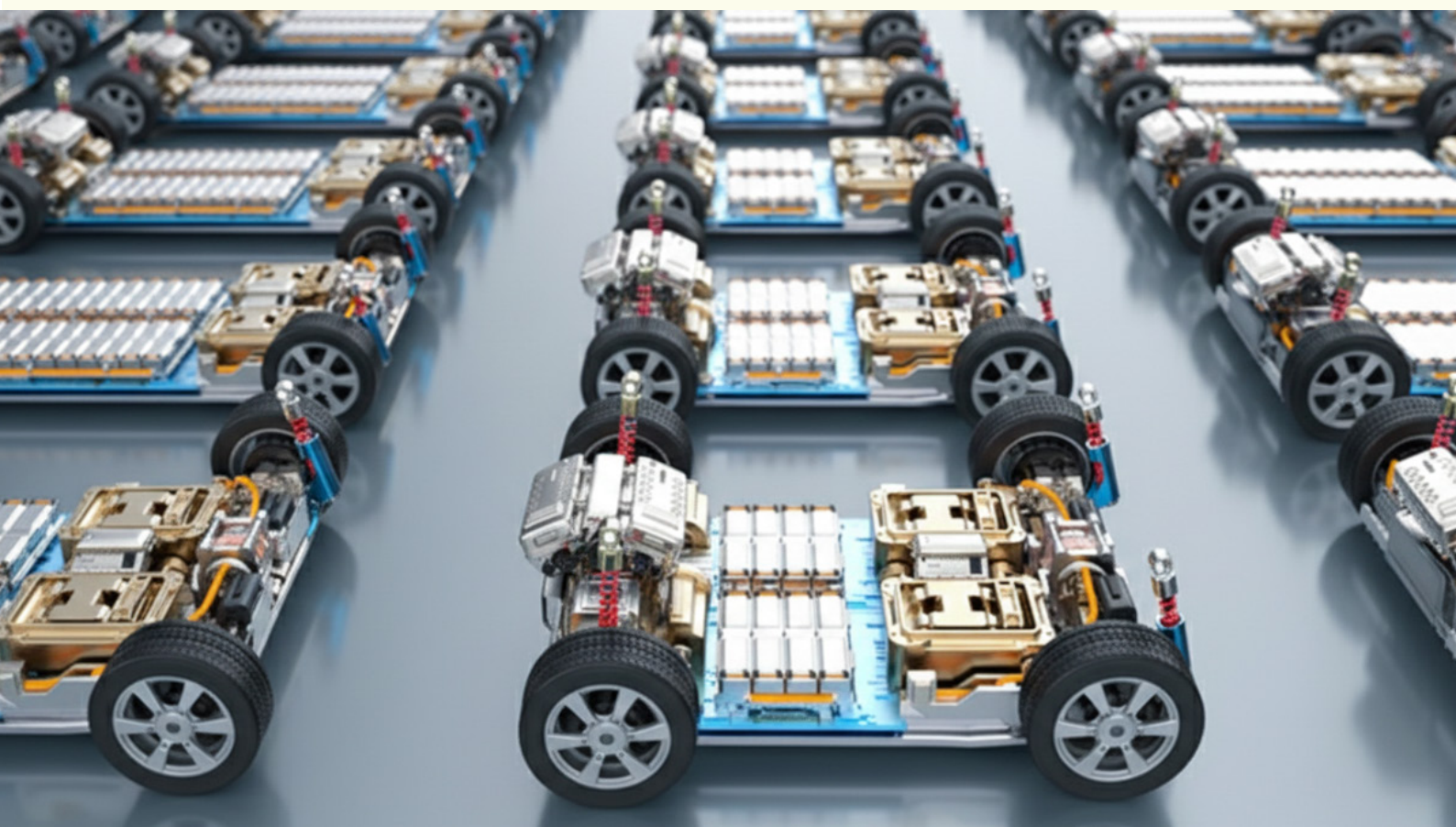
The eco-contribution explained

A compulsory contribution aimed at financing the industry

The term eco-contribution describes the key mechanism that allows you to entrust your Extended Producer Responsibility (EPR) to a Producer Responsibility Organisation (PRO). Each producer pays a contribution calculated on the basis of its sales and imports on a market. This is used to finance prevention measures and end-of-life management processes.

It is a legal requirement for all producers, whether they are producers, importers or distributors of new or remanufactured batteries.

In practice, your legal requirements are safely handled, and you contribute to a better collective performance for your entire industry.



Fair and balanced subscription fees

The amount of your eco-contribution reflects the real costs of collecting, recycling, reusing or reconditioning your products, as well as the communication, studies and R&D costs. It is calculated according to the battery types, chemical types and weight of the products you bring to market. To ensure it remains balanced, it is prorated depending on the number of batteries sold by each producer. This means your contribution remains fair and proportional to everyone's business.

The calculations are made according to the brief published by the authorities. It is not a service fee. It reflects the real costs involved in managing the sector, has been evaluated in collaboration with the subscribers and is based on an estimate of the product sales/imports, taking into account the return rate and the solutions collectively adopted to ensure the legal targets are met.

The calculation relies on three key principles :



Equity :

Each producer's contribution is calculated on the basis of their actual impact (weight, volumes, battery type)



Transparence :

The contribution amounts are clearly defined and adjusted, under the scrutiny of the public authorities



Ecomodulation:

The contribution amount may be increased or reduced depending on the environmental characteristics of the batteries, such as :

- the integration of recycled materials,
- the durability or reparability of the design,
- the ability to easily dismantle and/or recycle them
- the efforts to minimise the use of dangerous components.
- Penalties can also be applied to increase the contribution for particularly complex processes.

This flexible model encourages producers to design eco-friendly batteries and rewards eco-design approaches whilst empowering all retailers. This way, the best battery designs - in terms of durability, reparability or recyclability - are the ones that cost the least.

Equally, your contributions are optimised if your products are more durable, repairable or recyclable.

Useful and concrete contribution

The contributions are directly used to :

- Manage the collection and processing of used batteries across the region,
- Safely transport and process them,
- Remanufacture and reuse them if possible,
- Recycle strategic materials (lithium, cobalt, nickel, copper),
- Shape and control the sector,

- Communicate and raise awareness,
- Finance research and development initiative,
- and promote a sustainable and circular battery sector.

Every euro is used to structure an efficient, secure and future-proof industry.



Transparency and information

The regulations specify that the eco-contribution must appear on all points of sale and business documentation (invoices, quotes, websites, etc.) without showing the ecomodulation that may have been applied based on eco-design criteria.

Thanks to this level of transparency, your clients know that you contribute to financing the sustainable end-of-life management of the products they buy from you.



Reduced contribution: the real benefit of getting involved

If you take care of collecting and/or processing some of your batteries, you may benefit from a reduced eco-contribution.

This financial rebate reflects your effort to support the sector: your Producer Responsibility Organisation (PRO) has smaller volumes to manage, which in turn reduces the collective costs. So it's only fair that your contribution be adjusted accordingly. In other words, the more you are actively involved in your batteries' end-of-life management, the more your contribution is reduced. The amount and conditions of the rebate are defined in the government approved calculations and shared yearly with all subscribers.



Financial contribution scale

(€/kg brought to market)

	2025	2026
Li-NMC	€ 0.012	€ 0.043
LFP	€ 0.022	€ 0.067
NCA	€ 0.012	€ 0.043
NCMA	€ 0.012	€ 0.043
NiMH	€ 0.005	€ 0.017



Rebate scale

(€/kg collected and processed)

	2025	2026
Li-NMC	€ 2.32	€ 2.32
LFP	€ 4.37	€ 4.37
NCA	€ 2.32	€ 2.32
NCMA	€ 2.32	€ 2.32
NiMH	€ 0.95	€ 0.95

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How to sign up to Recycler Mon Véhicule ?

The EPR took effect in August 2025. You may transfer your obligations to us as soon as you subscribe to ensure you safely and quickly meet your compliance requirements.

To become a member, get in touch with us via email to secretariat@recyclermonvehicule.fr.

We will send you a subscription agreement along with the instructions to join. You will need to share your basic business detail and an estimate of your yearly electrified vehicle battery sales and import volumes.

After signing the agreement, you will become a full member of **Recycler Mon Véhicule** and we will send you your unique identification number (UID). You will have access to our support service during your first steps and you will enjoy all the benefits that come with your subscription.

About your UID

Your unique identification number (UID) is provided by the ADEME (the French ecological transition agency) to all producers subject to the Extended Producer Responsibility (EPR). It is a way to show that your business is meeting their legal obligations and that it is listed in the national battery producers register. It officially identifies your business as a battery producer complying with the regulation. It must appear on your invoices, quotes, terms and conditions, and website. It also allows the authorities to check that stakeholders subject to EPR comply with the transparency and traceability requirements.



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What next?

Your yearly obligations and how we can support you.

Once your subscription is complete, we become your partner for the management and documenting of all your EPR obligations. Our role is to make your job simpler, to ensure compliance, and to help you capitalise on your commitment.

Your yearly obligations

Yearly declaration

Every year, you must declare the sales/import volumes categorised by battery and chemical type, as well as the collected volumes complying with the rebate criteria.

This is done via a secured online platform designed to keep the input and validation process easy.

Payments and deadlines

After receiving your declaration, we calculate your yearly eco-contribution according to the current calculation guidelines, taking into account any discount. You then receive a clear summary and an easy-to-manage payment calendar.



We centralise your obligations, we support you in all the steps and we notify you of all essential deadlines.



Yearly support

We support you way beyond data collection :

- **Technical and regulatory advice:** our bespoke support team helps you with your declaration and with understanding any legal documents or regulation updates.
- **Communication and visibility:** we help you make the most of your subscription and highlight your actions in support of a circular economy.
- **Influence and transparency:** we combine your data, look after all compulsory reporting for the ADEME, and guarantee your business's individual compliance as well as the sector's collective conformity.

Develop synergies within the sector

Recycler Mon Véhicule is a unifying mechanism. We promote active collaboration between all stakeholders in our sector. We bridge the gap between your business and the vehicle repair providers, the ELV centres or the battery processing operators.

Through regular contacts, we support sharing of experiences and lessons learnt, economies of scale and collective knowledge development.

Becoming a member of **Recycler Mon Véhicule** is not just a way to meet legal requirements ; it's an active contribution to improve the battery industry through sustainable practices and innovation.



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