



Results of „ProBaMet“

Partnership for Responsible
Battery and Metal Recycling

**The Plattform Blei
bundles, initiates
and communicates
information,
background knowledge
and concrete projects
for the material lead.**

Members:





The Material Lead

is one of the most strictly regulated substances in the world. And rightly so, because it is irreplaceable today and will remain that way in the future.

**German Initiative
of the non-ferrous
metals industry**

The German Lead-industry

IN 2023

412.000

TONS OF LEAD
PROCESSED

OVER

3.500

EMPLOYEES
IN GERMANY

MORE THAN

5.800

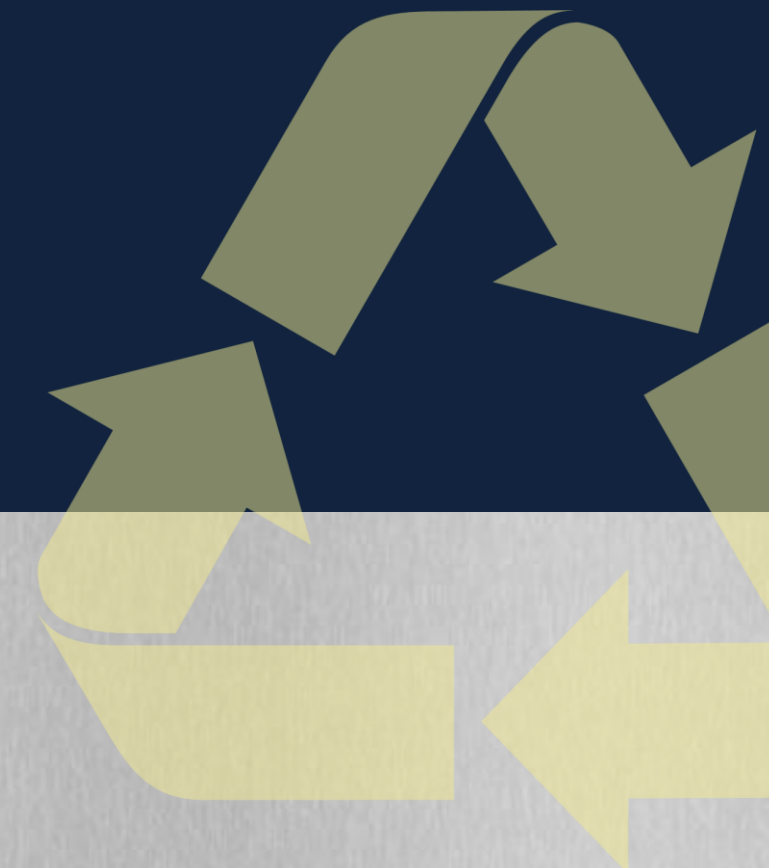
GERMAN
SUPPLIERS



Recycled Lead and its importance for Europe.

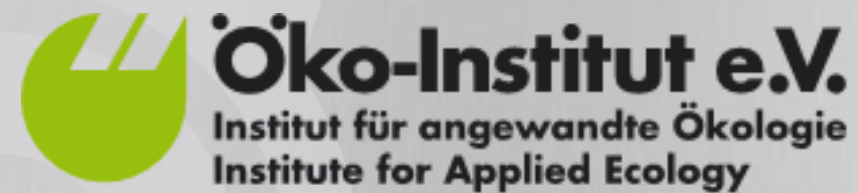
With **technically advanced processes**,
the lead industry makes it possible:

- The **carbon footprint** of recycling lead is approximately 50% of that needed to extract primary lead from ore
- **In the EU**, domestic production of refined lead meets **>90% of demand** with **87% from recycled products**
- Increasingly demanding **sustainability laws and regulations** can be met.



**Lead is sourced globally.
Why engagement for improvement matters.**





EUROBAT



Financed by:



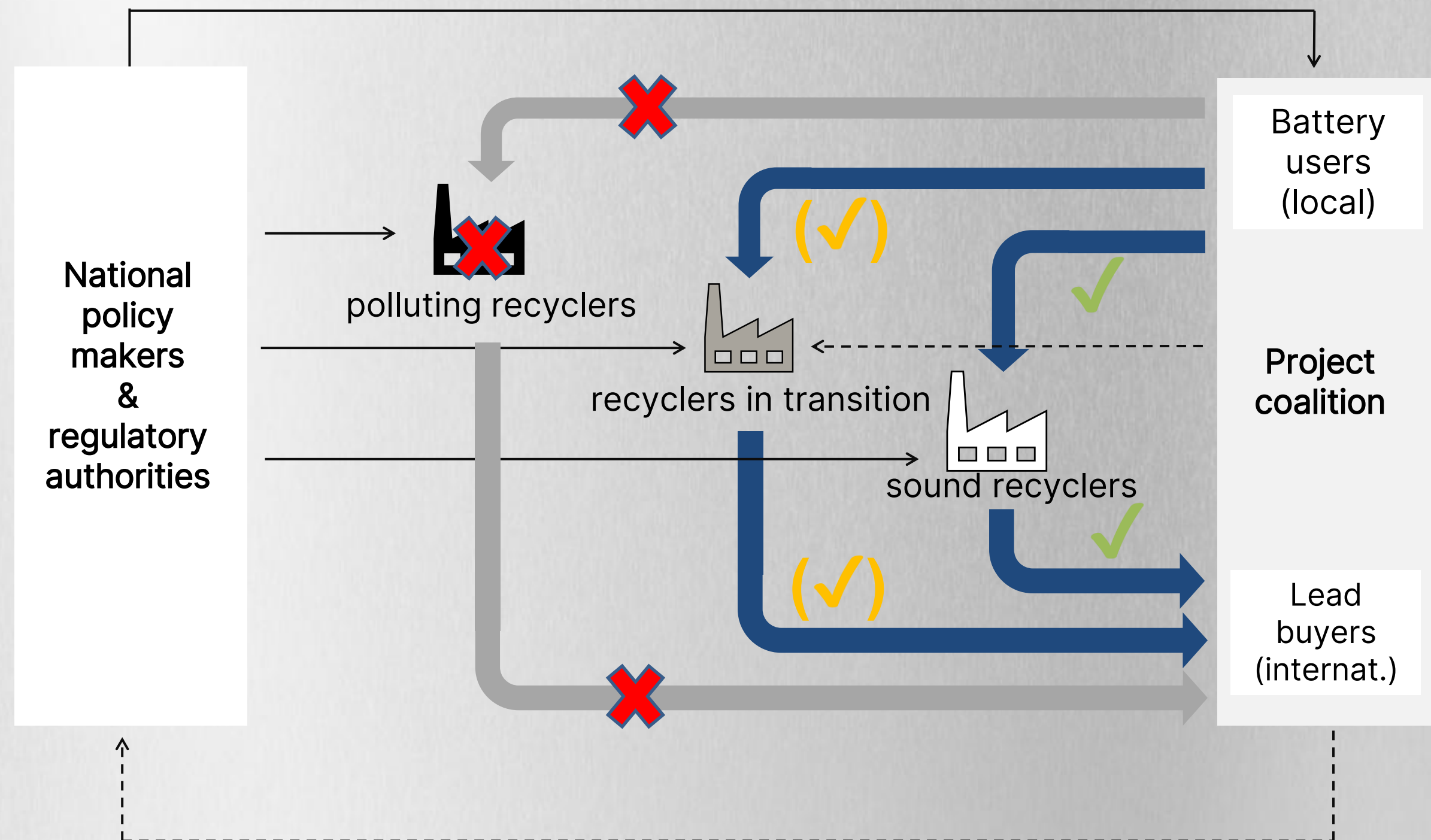
IGS INITIATIVE
GLOBALE SOLIDARITÄT

Stakeholders: Together for one aim.

PROJECT MEMBERS:

- **Öko-Institut** (German NGO)
- **Plattform Blei** (Platform Lead, Initiative of German Non-Ferrous Metals Industry)
- **SRADev Nigeria** (Nigerian NGO)
- **Alliance for Rural Electrification - Solar industry**
- **Nigerian Ministry of Environment**
- **NESREA** (National Environmental Standards and Regulations Enforcement Agency)
- **OGEPA** (Nigeria, Ogun State EPA)
- **LASEPA** (Nigeria, Lagos State EPA)
- **Nigerian Civil Society incl. regional leaders**
- Supported by: **ILA, EUROBAT, BCI**
- Financed by: **German Ministry of Cooperation and Development**

The idea behind the project and its theoretical approach.



Practical Implementation:

1. SOPs for a basic audit in LMICs



Standard Operating Procedures for Environmentally Sound Management of Used Lead-acid Batteries

December 2021

SOP Assessment Form

Section	Requirement	Assessment	
A.1.1	Location of the recycling plant		
Requirement: A U LAR recycling plant must be located at a site that minimises the risk of population food exposure and/or environmental contamination.			
Observations	Assessment		
Is the plant located on geologically stable ground (no underground mines or municipal waste dumps, no risk of seismic activities, landslides, volcanic eruptions) and outside flood-prone areas?	YES / NO		
Is the plant located on an isolated area with a protected border that prohibits the presence of residential dwellings and hospitals? If not, is it effectively assured that there are (and will be) no residential, educational and health-related functions within a diameter of at least one kilometre from the plant?	YES / NO		
Does the site avoid ecologically sensitive areas that should not be disturbed (e.g. nesting sites of animals and bird migrating routes)?	YES / NO		
Does the plant's location ensure that potential emissions and leachates do not contaminate groundwater sources and aquifers used to supply drinking water?	YES / NO		
Does the site avoid valley situations, where fugitive air emissions might be trapped under certain unfavourable weather conditions?	YES / NO		
Type of corrective actions recommended (may be filled after assessment is concluded)			
Fundamental actions	Major actions	Minor actions	Timeline/Date
A.1.2 Licences & permits			
Requirement: U LAR recycling plants should only operate with valid business, environmental, health & safety licenses / permits in accordance with regulations and local laws.			
Observations	Assessment		
Does the recycling plant have the legally required licenses and permits for business, the environment, (pplg) and safety and handling hazardous waste?	YES / NO		
Does the recycling plant have the legally required insurance policies for third party liability?	YES / NO		
Type of corrective actions recommended (may be filled after assessment is concluded)			

Revision of SRI Standard Operating Procedures for Low- and Middle-Income Countries:

- Including learning from former audits
- More focussed on realistic situation on the ground
- Easy to use – no need to be a specialist
- Including pictures with examples: unacceptable / in transition / standard
- Recommendation for improvement plan included

(Updated SOPs available upon request)

Practical implementation:

2. Assessment Training – Theory

Classroom Training covering:

- General technical background of ULAB recycling
- Use of SOPs
- Methods of plant assessment
- Documentation of results

Participants:

- Regulators
- ULAB recycling industry
- Local Associations



Practical implementation: 2. Assessment Training – Hands on

Assessment Results:

9 ULAB recycling facilities visited:

7 facilities = substandard

1 facility = in transition

1 facility = high standard, but closing,
due to no access to ULABs

Preparation and detailed report including
recommendations prepared together with stakeholders
and handed over to the authorities.

Positive Listing:

Start of a list for LMIC recycling facilities in transition
incl. minimum standard which is needed to be listed.

https://www.oeko.de/fileadmin/oekodoc/Resp_ULAB-recyclers_Nigeria.pdf



Where is the ULAB recycling sector in Nigeria standing now?



High awareness from stakeholders,
incl. civil society

Compliance monitoring
& corrective action plans

Alliance for Responsible Battery
Recycling - ARBR

National Environmental
(Battery Control) Regulations

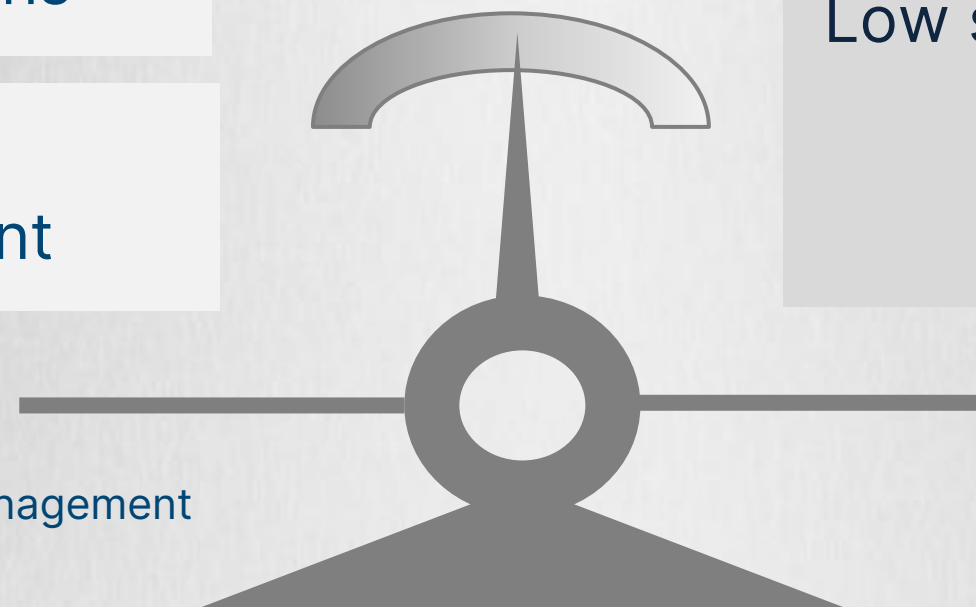
National Policy on
Waste Battery Management

No court case against polluters so far

Low standard operations can sell
their outputs to the (world) market
without barriers

Low standard recyclers get
enough battery volumes

Low standard recycling still possible
without risking business
threatening sanctions



Recommendations to the stakeholders.

RECYCLING INDUSTRY:

- **Take environment, health and safety seriously:** Civil society and regulators will continuously focus on the topic of unsound lead recycling.
- **Cooperate with stakeholders:** Transparency helps.

BUYING AND TRADING INDUSTRY:

- **Conduct environmental, health & safety risk assessments:** when sourcing from low- and middle-income countries.
- **Actively engage:** with lead supplying industries from low- and middle-income countries.

LARGE USERS of BATTERIES:

- **Acknowledge the responsibility for sound end-of-life management:**
Partner with best-in-class recyclers.

Recommendations to the stakeholders.

POLICY MAKERS:

- **Prioritization of the ULAB recycling sector:** Enforcement is key.
- **Establish a nationwide radar for ULAB companies:** Know the market.
- **Strategic focus:** Limited number of high-quality / high-standard recycling plants.
- **Repeat:** Regular plant assessments and plans for ambitious and continuous improvements.
- **Systematic blood lead monitoring:** Global level playing field.
- **Promotion of best recyclers:** No tolerance policy for polluting recyclers.

<https://www.giz.de/en/downloads/giz2025-en-ProBaMet.pdf>

The industry and its changes due to continuous improvement and enforcement of regulation.



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Keep going - The Pan-African approach: Ghana, Tanzania, Kenya, Cameroon, Nigeria



