manolie update document <3

What is our Income model?

INCOME MODEL OVERVIEW

Here’s a clean and concise table summarizing the **SaaS income models**:

| **Model** | **Description** | **Pros** | **Cons** |
| --- | --- | --- | --- |
| **Subscription-Based** | Recurring monthly or annual fee for access | Predictable revenue, simple model | May limit flexibility for low-usage customers |
| **Freemium** | Free basic plan, charge for premium features | Easy user acquisition, low entry barrier | Low conversion, potential high support costs |
| **Usage-Based (Pay-as-you-go)** | Charges based on actual usage (e.g., API calls, storage) | Scales with usage, fair to users | Harder to predict revenue, billing surprises |
| **Per-User / Per-Seat** | Charge based on number of users or seats | Simple to scale with team size, easy upsell | Can restrict growth if users share accounts |
| **Tiered Pricing** | Multiple plans with different features/limits | Appeals to different segments, encourages upgrades | Needs clear differentiation between tiers |
| **Enterprise Licensing** | Custom contracts for large clients | High revenue per client | Long sales cycles, requires sales team |
| **Transaction Fees** | Take a percentage of transactions processed | Revenue aligns with client success | Revenue can be volatile or seasonal |
| **Affiliate/Partner Revenue** | Earn from recommending or bundling other services | Extra income stream | Requires trusted partnerships, not core revenue |
| **Ad-Supported** | Free access funded by advertisements | No cost for users | Less common in SaaS, can hurt UX |

suitable for us:

→ ad, subscription-based OR

→ ad, freemium OR

→ ad, Tiered Pricing

What is our concrete service?

What is our concrete product?

What are the current Regulations for Battery Recyclers in the EU and Netherlands?

| **Obligation** | **Frequency** | **Applies From** |
| --- | --- | --- |
| Registration with authorities/PROs | Annual | Ongoing |
| Reporting to authorities | Annual | Ongoing |
| Financing take-back/recycling | Annual | Ongoing |
| Product labeling/marking | Ongoing | 2025 (QR codes) |
| Carbon footprint disclosure | Annual | 2025 |
| Due diligence reporting/audit | Annual | 2025 |
| Recycled content documentation | Annual | 2028 |
| Recycling efficiency verification | Annual | 2025 |
| Digital battery passport (data prep) | Ongoing | 2027 |

**→** 8–10 core annual regulatory requirements

→ requirements are expected to increase as new elements of the EU Battery Regulation are phased in through 2030.

1. <https://environment.ec.europa.eu/topics/waste-and-recycling/batteries_en>
2. <https://www.circularise.com/blogs/eu-battery-passport-regulation-requirements>
3. <https://www.linkedin.com/pulse/you-ready-eus-new-battery-labeling-recycling-regulations-molly-li-wggjc>
4. <https://www.compliancegate.com/battery-producer-responsibility-european-union/>
5. <https://deutsche-recycling.com/blog/battery-regulation/>
6. <https://minefieldnavigator.com/knowledge-base/battery-directive-compliance>
7. <https://www.acquiscompliance.com/blog/eu-battery-regulation-update/>
8. <https://getenviropass.com/battery-compliance/>

## 

## What are the practical steps companies take to ensure compliance with EU battery rules?

| **Step** | **Description** |
| --- | --- |
| 1. Understand requirements | Identify applicable rules and obligations |
| 2. Register with authorities/PROs | Register and update details annually |
| 3. Internal assessment/gap analysis | Audit processes and supply chain for compliance gaps |
| 4. Upgrade data/reporting systems | Track and record all required compliance data |
| 5. Product labeling/QR codes | Ensure batteries are correctly labeled and traceable |
| 6. Meet collection/recycling targets | Operate take-back schemes and achieve recycling rates |
| 7. Prepare and submit reports | Compile and file annual compliance reports |
| 8. Collaborate with suppliers | Ensure data and compliance throughout the supply chain |
| 9. Monitor updates/train staff | Stay current with regulation changes and educate team |

→ ongoing process that involves registration, data management, collaboration, and regular reporting

→ supported by internal audits and staff training to ensure that SME lithium-ion battery recyclers meet evolving regulatory requirements.[2](https://glassdome.com/5-steps-to-prepare-for-eu-battery-regulation/)[3](https://www.optelgroup.com/app/uploads/2024/03/ebook_a-practical-guide-to-complying-with-the-eus-battery-regulation_en_mkt_10227-1.pdf)[4](https://www.flashbattery.tech/en/blog/eu-battery-regulation-obligations-updates/)

who in a battery recycling sme is doing the job of ensuring compliance?

→ designated compliance manager or regulatory affairs manager, if the company has one[2](https://tozero.jobs.personio.com/job/2030815?language=en)[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager)[8](https://landbell-group.com/job/environmental-compliance-manager-m-f-d/).

→ in smaller organizations, a senior manager, the operations manager, or even the business owner, depending on company size and resources[7](https://www.gme-recycling.com/navigating-battery-recycling-regulations-and-compliance/).

**Key responsibilities of this person include:**

* Monitoring and interpreting relevant laws and regulations[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager)[2](https://tozero.jobs.personio.com/job/2030815?language=en).
* Developing and updating internal compliance policies and procedures[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager).
* Registering the company with national authorities and producer responsibility organizations[1](https://europa.eu/youreurope/business/product-requirements/recycling-waste-management/weee-responsibilities/index_en.htm).
* Ensuring timely and accurate reporting to authorities (e.g., quantities of batteries recycled, compliance with recycling targets)[1](https://europa.eu/youreurope/business/product-requirements/recycling-waste-management/weee-responsibilities/index_en.htm)[8](https://landbell-group.com/job/environmental-compliance-manager-m-f-d/).
* Overseeing product labeling, documentation, and traceability[4](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32023R1542).
* Training staff on compliance requirements and best practices[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager).
* Liaising with external stakeholders such as regulators, compliance schemes, and supply chain partners[2](https://tozero.jobs.personio.com/job/2030815?language=en)[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager).
* Conducting internal audits to identify and address compliance gaps[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager).

In summary, while larger companies may have a dedicated compliance department, in SMEs the compliance function is often managed by a single individual or a small team, who must stay up-to-date with regulatory changes and ensure all obligations are met to avoid legal and financial risks[2](https://tozero.jobs.personio.com/job/2030815?language=en)[5](https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager)[7](https://www.gme-recycling.com/navigating-battery-recycling-regulations-and-compliance/).

1. <https://europa.eu/youreurope/business/product-requirements/recycling-waste-management/weee-responsibilities/index_en.htm>
2. <https://tozero.jobs.personio.com/job/2030815?language=en>
3. <https://www.sciencedirect.com/science/article/pii/S2949750725000112>
4. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32023R1542>
5. <https://business.linkedin.com/en-in/talent-solutions/resources/talent-acquisition/job-descriptions/compliance-manager>
6. <https://clarity.eco/knowledge/extended-producer-responsibility-the-complete-guide/>
7. <https://www.gme-recycling.com/navigating-battery-recycling-regulations-and-compliance/>
8. <https://landbell-group.com/job/environmental-compliance-manager-m-f-d/>

## What costs are involved in SME compliance?

| **Cost Element** | **Typical Annual Range (SME)** |
| --- | --- |
| Registration/PRO fees | €1,000 – €5,000 |
| Reporting/documentation | €2,000 – €10,000+ (labor/admin) |
| Labeling/traceability | €1,000 – €5,000 |
| Audits/internal controls | €1,000 – €5,000 |
| Staff training/system upgrades | €1,000 – €5,000 |

Total estimated annual compliance cost:  
€5,000 – €30,000+ per year for a typical SME battery recycler, depending on complexity and national specifics.

→ €5,000 - €30,000 annually to fulfill compliance paperwork and related obligations, costs driven by registration, reporting, labeling, and ongoing administrative requirements[1](https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELLAR%3A2c74690f-9aa0-11e6-9bca-01aa75ed71a1).

<https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELLAR%3A2c74690f-9aa0-11e6-9bca-01aa75ed71a1>

are there tools to support sme s in complying to eu battery regulations?

Yes, there are several digital tools and platforms available to help SMEs comply with EU battery regulations. These solutions are designed to simplify, automate, and centralize the complex compliance tasks required under the new EU Battery Regulation, making it easier for smaller companies to meet their obligations without excessive administrative burden.

## Examples of Compliance Support Tools for SMEs

**1. Centralized Compliance Management Platforms**

* Platforms like Daato offer centralized systems to manage all compliance data, automate reporting, facilitate traceability, and simplify communication along the supply chain. They help SMEs collect the necessary data internally and from suppliers, automate reminders, and generate required documentation for authorities[3](https://www.daato.net/articles/eu-battery-regulation).

**2. Automated Compliance and Audit Solutions**

* Tools such as ComplyNexus automate up to 85% of EU Battery Regulation compliance tasks. They provide features like:  
  + Real-time compliance monitoring
  + Audit-ready documentation and reporting
  + Automated supply chain risk assessments and traceability mapping
  + Digital battery passport creation and management
  + Automated reporting for recycled content and carbon footprint tracking
  + Cross-border regulatory alignment and discrepancy alerts[6](https://complynexus.com/eu-battery-regulation/)

**3. Data Analytics and ESG Platforms**

* Some platforms integrate with existing business systems (ERP, HRM, EMS) to pull and analyze data for compliance, sustainability, and supply chain due diligence. They also provide dashboards and analytics to track progress and identify gaps[3](https://www.daato.net/articles/eu-battery-regulation)[6](https://complynexus.com/eu-battery-regulation/).

**4. Guidance and Knowledge Hubs**

* Several providers offer knowledge bases, guides, and expert support to help SMEs understand regulatory requirements, prepare for audits, and implement best practices[3](https://www.daato.net/articles/eu-battery-regulation).

## **Key Benefits for SMEs**

* **Reduced Administrative Burden:** Automation and centralized management save time and lower the risk of errors.
* **Improved Traceability:** Digital tools ensure supply chain data is accurate and accessible for reporting and audits.
* **Audit Readiness:** Platforms generate audit-ready reports and maintain document trails aligned with EU requirements[6](https://complynexus.com/eu-battery-regulation/).
* **Scalability:** Solutions are designed to grow with the business, supporting future regulatory changes.

## **Cost Considerations**

* Many platforms offer tiered pricing suitable for SMEs, with entry-level packages focused on essential compliance needs[6](https://complynexus.com/eu-battery-regulation/).
* Free trials and onboarding support are often available to help SMEs evaluate and implement the right solution.

**In summary:** There are robust digital tools and platforms specifically designed to support SMEs in complying with EU battery regulations, making compliance more manageable, efficient, and less resource-intensive[3](https://www.daato.net/articles/eu-battery-regulation)[6](https://complynexus.com/eu-battery-regulation/).

1. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32023R1542>
2. <https://www.epbaeurope.net/policy/eu-directive/eu-batteries-regulation>
3. <https://www.daato.net/articles/eu-battery-regulation>
4. <https://environment.ec.europa.eu/topics/waste-and-recycling/batteries_en>
5. <https://www.intertek.com/blog/2025/05-22-eu-battery-regulation/>
6. <https://complynexus.com/eu-battery-regulation/>
7. <https://te-cdn.ams3.cdn.digitaloceanspaces.com/files/Due-diligence-guidance-for-the-Battery-Reg-1.pdf>
8. <https://www.tdi-sustainability.com/changes-to-the-eu-batteries-regulation-why-effective-due-diligence-strategies-cant-wait/>

can you think of something the tools are lacking to support the smes?

**While digital compliance tools help SMEs with EU battery regulation, they still have important gaps:**

* They struggle with deep supply chain traceability and supplier data collection.
* Integration with existing business systems is often incomplete.
* Practical, SME-specific guidance and customization are limited.
* Some tools are too expensive or complex for small businesses.
* Not all tools provide real-time updates on evolving regulations.
* Broader risk management (like cybersecurity and safety) is often missing.

**In short:** Current tools ease compliance but don’t fully address SMEs’ needs for supply chain transparency, integration, tailored support, affordability, timely updates, and comprehensive risk management.

1. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32023R1542>
2. <https://www.daato.net/articles/eu-battery-regulation>
3. <https://www.sciencedirect.com/science/article/pii/S092134492400346X>
4. <https://www.jomec.nl/post/everything-you-need-to-know-about-eu-battery-regulation>
5. <https://www.linkedin.com/pulse/fact-sheet-proposed-regulation-support-smes-smcs-hilal-y%C4%B1ld%C4%B1r%C4%B1m-zowfc>
6. <https://te-cdn.ams3.cdn.digitaloceanspaces.com/files/Due-diligence-guidance-for-the-Battery-Reg-1.pdf>
7. <https://www.whitecase.com/insight-alert/new-eu-batteries-regulation-introducing-enhanced-sustainability-recycling-and-safety>
8. <https://www.flashbattery.tech/en/blog/eu-battery-regulation-obligations-updates/>

How much do Consultants Charge for Battery Complience tasks?

* **General Energy/Environmental Consultant Salaries:** In Germany, for example, energy consultants earn an average of €50,000–€54,000 per year as employees[2](https://www.glassdoor.com/Salaries/berlin-germany-energy-consultant-salary-SRCH_IL.0,14_IM1020_KO15,32.htm). Independent consultants or consulting firms, however, often charge by the project or day rather than as salaried staff.
* **Typical Consulting Fees:** For specialized compliance projects, consultants commonly charge between €500 and €1,500 per day, depending on expertise, project scope, and country.
* **Project-Based Fees:** For a full compliance review, gap analysis, and setup of reporting/documentation systems for a battery recycling SME, total project costs can range from €10,000 to €50,000 or more, depending on company size, the complexity of operations, and the number of regulatory requirements to address.
* **Ongoing Support:** Annual retainer fees for ongoing compliance monitoring, updates, and reporting assistance might range from €5,000 to €20,000 per year.

**Key Cost Drivers:**

* The complexity of EU and national regulations for battery recycling.
* The need for tailored compliance systems, data collection, and reporting.
* The evolving nature of battery regulations, which requires regular updates and audits.

**In summary:** Consultants helping battery recycling companies ensure compliance with EU regulations typically earn between €10,000 and €50,000 per project, or €500–€1,500 per day, with ongoing annual support often in the €5,000–€20,000 range, depending on the scope and complexity of the compliance work[2](https://www.glassdoor.com/Salaries/berlin-germany-energy-consultant-salary-SRCH_IL.0,14_IM1020_KO15,32.htm)[4](https://uk.indeed.com/m/jobs?q=Recycling+Consultant).

1. <https://uk.indeed.com/q-battery-recycling-engineer-jobs.html>
2. <https://www.glassdoor.com/Salaries/berlin-germany-energy-consultant-salary-SRCH_IL.0,14_IM1020_KO15,32.htm>
3. <https://jobs.undp.org/cj_view_job.cfm?cur_lang=en&cur_job_id=104696>
4. <https://uk.indeed.com/m/jobs?q=Recycling+Consultant>
5. <https://www.argusmedia.com/es/news/2341485-battery-recycling-profitable-in-europe-by-2025-nomura>
6. <https://www.leadventgrp.com/events/2nd-annual-electric-vehicle-battery-and-recycling-forum/details>
7. <https://www.mckinsey.com/industries/automotive-and-assembly/our-insights/battery-recycling-takes-the-drivers-seat>
8. [https://www.evbattery-recycling-europe.com](https://www.evbattery-recycling-europe.com/)
9. <https://fullycharged.show/blog/battery-recycling-to-become-big-business/>

What is the main Goal of the CRM Act?

→ ensure a secure, resilient, and sustainable supply of critical raw materials that are essential for Europe’s industry, the green and digital transitions, and strategic sectors like defense and aerospace

→ strengthen the entire raw materials value chain within the EU—covering extraction, processing, and recycling—while reducing dependency on imports from single countries and increasing preparedness for supply disruptions[1](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en)[2](https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/critical-raw-materials-act_en)[6](https://www.consilium.europa.eu/en/infographics/critical-raw-materials/).

Key objectives include:

* Setting benchmarks for 2030: at least 10% of the EU’s annual needs from domestic extraction, 40% from domestic processing, and 25% from recycling, with no more than 65% of any material coming from a single third country[1](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en)[2](https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/critical-raw-materials-act_en)[5](https://unece.org/media/news/391440)[6](https://www.consilium.europa.eu/en/infographics/critical-raw-materials/).
* Diversifying supply sources and streamlining permitting for strategic projects[2](https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/critical-raw-materials-act_en)[6](https://www.consilium.europa.eu/en/infographics/critical-raw-materials/).
* Promoting circularity and sustainability by boosting recycling and secondary markets[1](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en)[6](https://www.consilium.europa.eu/en/infographics/critical-raw-materials/).
* Supporting research, innovation, and workforce skills to strengthen the EU’s raw materials sector[1](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en).

In summary, the Act is a cornerstone policy to reduce supply risks, support Europe’s climate and digital goals, and enhance the EU’s strategic autonomy in critical raw materials[1](https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en)[2](https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/critical-raw-materials-act_en)[6](https://www.consilium.europa.eu/en/infographics/critical-raw-materials/).

1. <https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/green-deal-industrial-plan/european-critical-raw-materials-act_en>
2. <https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials/critical-raw-materials-act_en>
3. <https://single-market-economy.ec.europa.eu/sectors/raw-materials/areas-specific-interest/critical-raw-materials_en>
4. <https://publyon.com/critical-raw-materials-act-boosting-the-twin-green-and-digital-transition/>
5. <https://unece.org/media/news/391440>
6. <https://www.consilium.europa.eu/en/infographics/critical-raw-materials/>
7. <https://www.unpri.org/eu-policy/policy-briefing-eu-critical-raw-materials-act/12910.article>
8. <https://en.wikipedia.org/wiki/Critical_Raw_Materials_Act>

USP: Why are we better than what is already on the market?

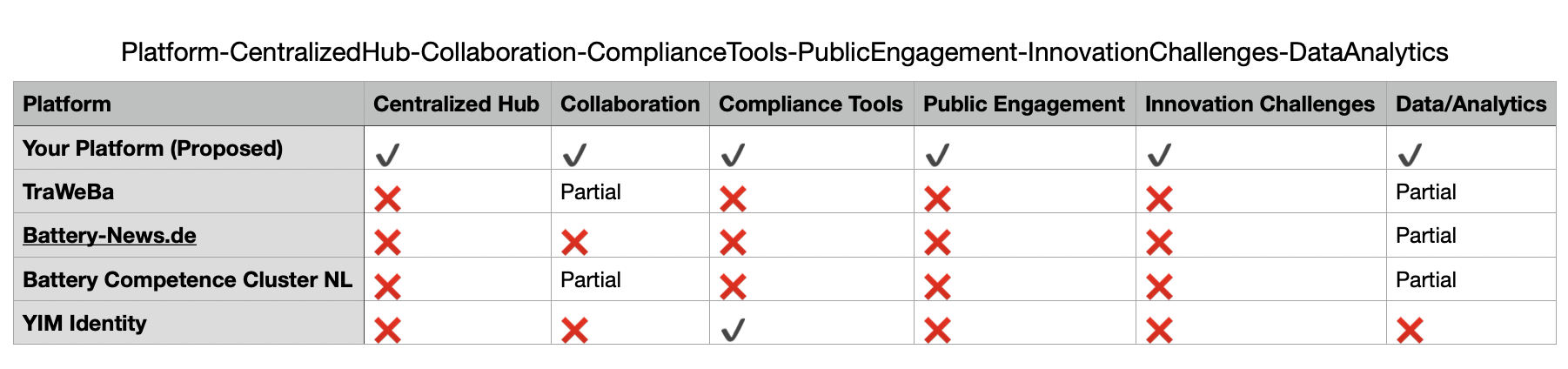
Strong Websites:

<https://traweba.de/transformationsnetzwerke/>

<https://battery-news.de/en/2025/03/28/battery-recycling-in-europe-as-of-march-2025/>

<https://batterycompetencecluster.nl/en/projects>

<https://yimidentity.com/nl/oplossingen/compliance-management/?gad_source=1&gad_campaignid=22126122187&gbraid=0AAAAAChN0IdRErV0gOsEWOtxFR-OSaMcF&gclid=CjwKCAjwr5_CBhBlEiwAzfwYuP0Lct1c41W0KVchtXwpzNikKKZSYOxVMgnK2UZvv1AKc4qrbsQgahoCttIQAvD_BwE>



CHIS EMAIL

Well done, #1 of the teams

Lets stay ahead of the curve and see what we have to do next.

Can you try to build me a user-flow of how it could look, make it cartoon like, use the a.i tools to help your thinking.

[https://duckduckgo.com/?q=storyboard+app+funny&t=brave&ia=images&iax=images&iai=https%3A%2F%2Fsbt.blob.core.windows.net%2Fstoryboards%2F5e3dbf33%2Fapp-leamos-storyboard.png](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fduckduckgo.com%2F%3Fq%3Dstoryboard%2Bapp%2Bfunny%26t%3Dbrave%26ia%3Dimages%26iax%3Dimages%26iai%3Dhttps%253A%252F%252Fsbt.blob.core.windows.net%252Fstoryboards%252F5e3dbf33%252Fapp-leamos-storyboard.png&data=05%7C02%7Cleoni.hartung%40windesheim.nl%7C9eac52d27d80428191f008dd7a784fd6%7Ce36377b770c44493a338095918d327e9%7C0%7C0%7C638801379335245654%7CUnknown%7CTWFpbGZsb3d8eyJFbXB0eU1hcGkiOnRydWUsIlYiOiIwLjAuMDAwMCIsIlAiOiJXaW4zMiIsIkFOIjoiTWFpbCIsIldUIjoyfQ%3D%3D%7C0%7C%7C%7C&sdata=34A69JrMCJ3L5f9EfTCfEtIG1BdPg4wD45HLzsrBRiU%3D&reserved=0)

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