



/Senior Associate
Direct line
Email
Our ref
Your ref

Emily Shoemark
[REDACTED]
[REDACTED]
20102 ESH

Monday, 22 June 2020

Mr Robert Janisson
Australian Competition & Consumer Commission
23 Marcus Clarke Street
CANBERRA ACT 2601
adjudication@acc.gov.au

Dear Mr Janisson

BSC RESPONSE TO BUTTON CELL BATTERY QUESTIONS

I refer to your email of 17 June 2020 seeking a public submission to clarify the proposed treatment of Button Cell Batteries within the BSC Battery Stewardship Scheme design.

BSC acknowledges the concerns raised by ACCC that:

- (a) if the Scheme involves at-home storage of button batteries, this has the potential of posing a safety hazard until the batteries are disposed of are disposed of;
- (b) button batteries pose a serious safety risk and would be concerned by any proposed conduct that might increase the risk of ingestion by young children in the home.

The ACCC has requested BSC provide a submission addressing these concerns for publication on the public register, and in particular explaining:

- i) how consumers will be asked to dispose of button batteries, including whether the advice will be for immediate disposal, or retention in the home for subsequent disposal at a battery collection point, and
- ii) if BSC's recommendation will not be for immediate disposal of button batteries, how BSC's proposed process will address the heightened safety risk posed by the retention of these batteries.

Please find below the BSC's submission.

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1. The primary intent of the proposed Battery Stewardship Scheme is to ensure safe management and recovery of all battery types including button cell batteries. This broad scope has been agreed by all governments in Australia. The BSC has proposed a flexible approach for the implementation of the stewardship scheme to take account of the state of the domestic battery recycling industry; the limited impact of existing schemes for handheld batteries and issues that are subject to other regulatory processes such as with button cell batteries.
2. The proposed BSC scheme will involve a staged implementation in recognition that it will take some time to achieve its objective of ensuring all batteries are recycled rather than go to landfill disposal where there are health, fire and environmental risks.
3. In the case of button cell batteries, BSC will not be proposing or endorsing any significant at-home storage of batteries but rather a preference for immediate disposal through collection for recycling.
4. As stated in the submission to the ACCC dated 11 May 2020, the BSC intends to further address button battery safety as a priority in our operational design phase. While the Scheme's objectives appear to necessitate the retention of batteries for later recycling, in the case of button batteries BSC would seek to take a risk-based approach.
5. The operational design phase would include evaluation of risks, recovery options and educational strategies recognising that button batteries:
 - (a) present profoundly serious risks for children (highest priority);
 - (b) present risks to households as they can ignite if short circuiting occurs (e.g. through damage or contact with other batteries or metal objects);
 - (c) are still sometimes inappropriately stored in the home as consumers hoard batteries due to a lack of responsible recycling options and an aversion to wasting resources;
 - (d) are sometimes disposed of by consumers in rubbish bins and recycling receptacles both of which may be accessible to children;
 - (e) are currently collected for recycling at a rate of 6% of annual sales;
 - (f) are recycled by consumers in limited amounts as evidenced by anecdotal information from recyclers who see that button batteries comprise approximately 2% of handheld batteries received.
6. The BSC intends that the Scheme will:
 - (a) build on the existing work by industry and regulators to prepare a button battery stewardship strategy to identify safe recovery procedures and create educational material to increase awareness of button battery hazards and mitigation measures.

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- (b) allocate revenue from the proposed stewardship levy to, inter alia, community and school education on battery safety and correct disposal of end-of-life button batteries for recycling.
 - (c) conduct additional research and/or development of child resistant packaging for use in the home.
7. BSC CEO Libby Chaplin has been involved in the issue of button cell safety over the past four years. This involvement has included:
- (a) Provision of project management support to the Institute of Sustainable Futures research project “Exploring new business models for battery recycling”, which involved research and testing of three prototypes for button battery containers as well as focus groups to evaluate container designs and understand consumer preferences regarding containers and associated messaging.
 - (b) Development of the ABRI¹ button cell batteries guidelines for safe & responsible use & disposal, which involved consultation with ACCC to ensure safety concerns were adequately addressed (**attached**).
 - (c) Participation in the Button Battery Safety Working Group which developed the draft Australian supplier guidelines for consumer goods that use button batteries & replacement batteries.
 - (d) Membership of the AS 5347 Project Scoping team established to conduct a needs analysis for development of an Australian standard for suppliers Button batteries and Consumer goods that use button batteries.
8. As a result of Ms Chaplin’s experience, the Scheme design has, and will continue to have, a focus of ensuring child safety, and in particular in relation to button batteries.
9. The BSC supports the need for improved packaging and availability of information on button battery disposal and is ready to work with the ACCC on the most effective approach to reduce human health risks.

Sincerely

EMILY SHOEMARK

¹ Australian Battery Recycling Initiative

BUTTON CELL BATTERIES

Guidelines for Safe & Responsible Use & Disposal



RECYCLING BATTERIES

can recover up to 90%
of the materials used
to manufacture them



MORE INFORMATION
www.batteryrecycling.org.au

Poisons Hotline 13 11 26
Emergency 000

WHAT ARE BUTTON BATTERIES?



Button, disc and coin batteries are widely used in electronic devices such as hearing aids, thermometers, greeting cards, calculators, remote controls, children's toys, kitchen scales, watches, tea-light candles, and flashing jewellery.

Button batteries contain valuable natural resources that can be recycled into new products, reducing the need for mining raw materials from the natural environment.



SAFETY WARNING

Button batteries are extremely hazardous to children & vulnerable people

Examples of vulnerable people include older people and people who have special needs or visual impairment.

BE AWARE OF THE HAZARDS

If swallowed or inserted into the body, button batteries can lodge in the oesophagus, ears or noses resulting in internal burns

The electric current in button batteries (not leaking battery acid) turns saliva into a caustic solution that can burn in as little as two hours. In Australia two children have died from button battery injuries.

Delayed symptoms

Button batteries can be swallowed without choking or coughing. Children and vulnerable people may not be able to communicate about their experience. Unless someone sees them swallow a battery, parents or carers may be none the wiser.

Button batteries may be mistaken for pills

Hearing aid users or those with poor eyesight may accidentally swallow button batteries.

Even low voltage can be dangerous





Lithium batteries are dangerous even when they stop working as they still retain some voltage.

Risk of fire

Some batteries present a low but real risk of catching fire if they are damaged or if their terminals short-circuit (see next page for details).






IMPORTANT SAFETY INFORMATION

If you suspect a child or adult has swallowed or otherwise ingested a button battery:





-  don't wait for symptoms to develop - immediately call the Poisons Information Centre: 13 11 26
-  go straight to the hospital, not to a doctor
-  prevent victims who may have swallowed a button battery eating or drinking. Do not induce vomiting
-  if possible, take the device and the battery packaging to help you identify the battery type

BUTTON BATTERY SAFETY TIPS



When buying new batteries or equipment

-  Choose products with a sealed battery compartment.
-  Choose products that prevent easy access to battery compartments.
-  Only buy button batteries in childproof packaging.
-  Give priority to products using rechargeable button batteries and those made with recycled content.
-  Always read the directions before use.

Keep button battery products away from children or vulnerable people

-  Ensure open packs of batteries are kept out of reach of children.
-  Store batteries in a container that requires use of a tool, key or two or more independent AND simultaneous actions to open.
-  Regularly check devices using button batteries to make sure battery compartments are secure.
-  Duct tape over button battery compartments in devices. Batteries may come out if the product is dropped and the compartment breaks open.

Avoid mistaking button batteries for medicine

-  Always look at medicine you intend to swallow.
-  Turn on the lights, put on your glasses, read the label and look at the medicine itself.

Ensure used batteries are safely managed

**SEE NEXT PAGE FOR INFORMATION
ON HOW TO SAFELY MANAGE USED
BUTTON BATTERIES**

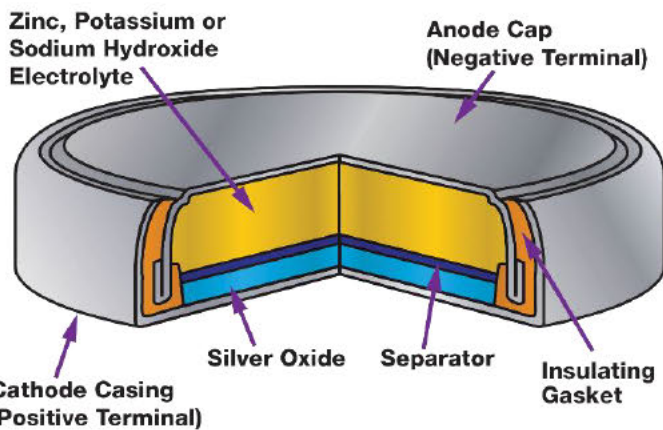


FIRE SAFETY WARNING

Button batteries have a low but real risk of igniting if they are damaged, not fully discharged, or if they short-circuit

Batteries can cause fires in rubbish bins, in recycling and waste collection trucks, and in landfills.

Short-circuiting may occur if terminals touch other terminals or if they touch metal objects such as keys. Terminals are on the top and bottom of the battery.



TIPS FOR SAFE DISPOSAL OF BUTTON BATTERIES AT THE END OF THEIR LIFE

- As soon as you have finished using a button battery put sticky tape around them to:
 - make them less attractive to children
 - prevent short-circuiting and avoid the low risk of having them catch fire.
- Once taped, store batteries in a child-proof container.
- Take batteries to a designated battery recycling drop-off location.

WHAT TO AVOID

- Always keep used button batteries out of reach of children i.e. not in unsecure bins or draws.
- Avoid storing button batteries for long periods of time or near running water or in damp cupboards.
- Avoid disposing of button batteries in kerbside bins to prevent fires in collection trucks and landfills.

HOW TO PROTECT BUTTON BATTERY TERMINALS

The best way to avoid a fire is to protect the terminals by preventing contact with other batteries or metal objects. This can be done by covering both sides of the battery with sticky tape as shown below.



This can be done for one or more batteries.

WHY RECYCLE?

By delivering taped used button batteries to designated battery recycling drop-off centre you can:

- help to ensure toxic or valuable metals such as lithium, mercury, cobalt, or lithium are recovered
- prevent toxins from contaminating landfills
- reduce the risk of landfill fires. Such fires release toxic gas that can cause long-term health problems
- prevent fires from occurring in general rubbish and recycling collection trucks

FIND A BATTERY RECYCLING DROP-OFF POINT NEAR YOU BY VISITING THE ABRI WEBSITE

www.batteryrecycling.org.au

or go to

www.recyclingnearyou.com.au

FOR MORE INFORMATION

Visit the ABRI website for more information about batteries, battery hazards, or industry best practice.

DID YOU FIND THIS GUIDANCE USEFUL?

If so, please consider joining ABRI to support the work we do to improve battery stewardship and recycling in Australia and internationally.