



Australian Competition & Consumer Commission  
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August 6th, 2020

### **Response to the Australian Toy Association submission**

To whom it may concern,

The Australian Battery Recycling Initiative (ABRI) is the peak body representing the battery industry in Australia. It is a not-for-profit association established in 2008 to promote responsible environmental management of batteries at end of life. Our members represent the entire supply chain including battery import, distribution, retail, used battery collection and recycling.

#### **ABRI considers stewardship essential for improving community safety and increasing recycling**

ABRI strongly supports ACCC authorisation of the proposed battery stewardship scheme and considers the Scheme to be an essential enterprise to overcome the current market failure which:

- does not cover the cost of end of life management
- results in exceptionally low collection and recycling rates compared with other OECD countries
- fails to address the need for safe collection, recycling, and resource recovery
- is preventing industry development and innovation necessary to improve safety of batteries at end-of-life and to increase collection points throughout the country.

ABRI acknowledges that the ATA strongly supports a circular economy and diversion of battery from landfill however ABRI members respectfully do not agree with the conclusions of the ATA in their submission. We offer the following observations to clarify the issues raised.

#### **Industry readiness and capacity**

It is the view of our members that the battery recycling sector in Australia is ready and eager to respond to the anticipated expansion that will be created by the proposed Scheme. The battery recycling industry in Australia:

- already has a strong collection, disassembly, sorting, recovery, and treatment service
- has extensive experience in providing safe solutions for both toxic and non-toxic batteries
- is at the forefront of battery recycling technology internationally and engages globally in emerging technologies
- is investing significantly in new collection networks and processing facilities

#### **Safety of battery collections**

ATA questions the safety of battery collections but does not recognise that the failure of industry to manage batteries at the end-of-life is in itself resulting in a significant negative impact on consumer safety and on the safety of local governments and the general waste management industry. For example, under the current state of play we are seeing an increasing rate of incidents in the broader recycling sector because of inappropriate disposal of batteries in existing recycling and rubbish collections.

**Australian safety standards rising to the occasion**

AS 5377 is an Australian standard that addresses safe handling, collection and disposal of electronic waste including batteries and ABRI has been an active participant in the current review of this standard to better address battery safety. ABRI considers that the introduction of a stewardship scheme will provide a fertile environment in which our understanding of safety risks and controls can result in a reduction of incidents and to innovation in safety measures for consumers and for industry.

**Curbside collection of batteries is not a viable or safe option**

The concept of curbside collection of e-waste presents very real safety issues. Curbside collection of e-waste results in damage and degradation of the value of the equipment being collected. More importantly the potential for a battery to be damaged or to short circuit is high. Either outcome is a known cause for the battery, its receptacle, or the collection truck to catch fire. Further, a national curbside program would be difficult to achieve due to the number of jurisdictions involved (537 local councils), each of which has its own choice regarding how to implement curbside programs.

**The cost of stewardship in Europe is not comparable with the Australian situation**

ATA states that cost differential is AU\$1.67/kg compared with EU\$50 (AU\$0.82). This comparison is not helpful as Australia is more sparsely populated and has a much larger geographical footprint which adds a significant transport cost. In addition, European schemes have been operating for nearly 30 years and have achieved economies of scale necessary to bring the cost down. It is anticipated that this will also occur in Australia and the BSC has proposed an annual review to put downward pressure on the cost.

Yours faithfully,



Ben Pritchard  
President, Australian Battery Recycling Initiative