

27 July 2020

Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601
Email: adjudication@accc.gov.au

Dear Sir/Madam

Comments on ACCC Authorisation AA1000476 – Battery Stewardship Council (BSC) - submission

The Consumer Electronics Suppliers Association (CESA) welcomes the opportunity to comment on the ACCC Draft Determination on the Authorisation of the proposed BSC Battery Recycling Scheme.

CESA does not have anything further to add to our earlier submission made on this subject on 29 April 2020. CESA Members support the concept of a battery recycling program that has measurable and demonstrated environmental benefits and circular economy principles. Members support the application by the BSC for ACCC Authorisation of the Scheme.

However, CESA Members do have reservations regarding the successful implementation of the BSC Scheme if battery suppliers do not commit to participation and funding. At this stage battery suppliers (members of CESA) have not agreed to sign up to the voluntary scheme.

Button Batteries

As the ACCC Draft Determination recognizes, the issue of inclusion of button batteries in the proposed scheme poses a number of questions. It has been a long standing CESA policy position that button batteries should not be included in the scope of the scheme. CESA is strongly of the view that storing spent button batteries in the home for recycling purposes poses an unacceptable health and life-threatening risk to young children.

Thresholds

CESA Members consider the scheme thresholds for products containing imbedded batteries should be set at over 1000 in order to alleviate the unnecessary administrative and compliance burden on retailers and suppliers. Small volumes (under 1000) of products such as toys, greeting cards and small household appliances should be exempt from the scheme to avoid the excessive costs of tracking and managing small volumes.

CESA looks forward to further consultation with ACCC officials on the further development of a voluntary product stewardship scheme for batteries and is happy to clarify any of the comments above.

Yours sincerely



Ian McAlister
Chief Executive Officer