



Australasia's Leading Mercury Recycler

Site Offices in NSW, QLD, SA, TAS, WA & VIC
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29 July, 2020

Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Email: adjudication@accc.gov.au

Dear Commissioners

RE: Comments on ACCC Authorisation AA1000476 – Battery Stewardship Council (BSC) – Button Cells

My name is Doug Rowe from EcoBatt with Sister companies Ecocycle, Eco E Waste, Recycal, ACL Metal Powders and Castings Tasmania all part of our group. We are a small family business with a strong commitment to recycling in Australia. We have offices and factories in every State of Australia. There are not many battery recycling plants in the world that I have not visited, and for the past many years have been going to the Battery Conferences overseas awaiting the time, recycling of batteries would be supported and promoted here in Australia.

We have installed a very automated battery sorting plant with AI for placing the batteries, of varying chemistries in their individual categories. This plant can process mixed batteries while also separating the button cell batteries into their Lithium and Silver Mercury classes. It's a State-of-the-Art patented plant designed and built here in Australia, from ideas gleaned from all around the world.

Thank you for your efforts and we commend you on the published Draft Determination. A well written and thought out paper. I hope we can provide some suggestions or answers to the concerns raised in your Draft Determination re the recycling of Button Cell Batteries.

We understand there will be around 4,000 Battery collection cabinets and around 4,000 battery tubes and buckets out there around Australia which will give the general public many options to drop all batteries, ready for recycling, off in the most convenient and frequently visited places that families and households visit each and every week. Traditionally we have seen overseas, places like Super Markets, Hardware Stores, Battery retail stores, Telephone Stores, Council Recycling Centres etc etc which are mostly accessible 7 days a week and up to 10 hours a day, so plenty of opportunities. Options they have never had or seen before. We don't see the scheme encouraging consumers to hold onto batteries, rather with the right promotion, and the vast network of recycling options open to them, we see them recycling these used batteries on a weekly basis. Something we see all around the world in countries that have these Battery Stewardship Schemes.

We appreciate there have been some concerns, and issues around the world with children and button cell batteries. Many cases are from children biting, tearing or playing with a toy that has an embedded



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battery. It seems rare that any issues have arisen from the storage of them around the house, we are sure many just find their way into the household rubbish bin.

We are hoping that with industry providing so many options for the recycling of all batteries, including button cells, to every household, that from around July the 1st 2021 families will avail themselves of the facilities that will be in front of them, on their day to day movements. So, we think it will be easy for the members of the public to just pop 3-4 batteries in their pocket and drop them in the recycling bins made available to them, when calling past these collection/drop off points.

These small button cell batteries we have been recycling for many years and have collection tins at all Mister Minute type stores around Australia and New Zealand. We have developed a process to treat hundreds of kilos at a time of these difficult button cell batteries, recovering the Mercury, and recycling the other elements. People will also be able to drop their button cell batteries to any of these Mister Minter type networks for recycling.

From around April next year we will have these drop off points highlighted on our website so it will be easy for the public to find a drop off/collection point close to them.

So, we think from July the 1st 2021 and in some cases before, the general public will have many choices close to them and their everyday travels to pop the full range of batteries at these various collection/drop off locations around Australia.

Yours sincerely

Douglas Rowe
Director

