



Child Accident Prevention Foundation of Australia  
Kidsafe Australia

**Kidsafe Australia response to the Draft Determination  
Application for authorization AA1000476 lodged by Battery Stewardship Council  
in respect of the Battery Stewardship Scheme authorization number AA1000476.**

**To:** Australian Competition and Consumer Commission  
**From:** Susan Teerds CEO Kidsafe Qld Inc on behalf of Kidsafe Australia  
**Required:** 31 July 2020

Kidsafe Australia has been involved in raising awareness of the dangers of button batteries including the sale, storage and disposal of these batteries for more than 10 years. Button batteries are everywhere and in almost everything. They seem innocuous; you can hold them in your hand but when swallowed they trigger a caustic injury that causes irreversible tissue damage with catastrophic effect. There are currently no safe storage, disposal or transportation methods available.

Kidsafe acknowledges the ongoing work of Standards Committee AS5347 Button Batteries and CS118 Button Battery Scoping Workshop.

We acknowledge the Draft Determination paper to be very thorough - particularly in relation to the safety and dangers of button batteries.

We considered whether button battery safety ought to be addressed **before** the ACCC makes a final decision on authorisation or whether it would be appropriate to proceed with authorisation contingent upon urgently addressing safe button battery recycling.

**Kidsafe Australia strongly supports:**

- Granting authorisation to enable the Battery Stewardship Council (BSC) to establish and operate a national stewardship scheme for managing all types of end of life batteries except for automotive lead-acid batteries and batteries that are currently included in a stewardship or recycling scheme.
- Granting authorisation for five years.

**Kidsafe Australia strongly recommends:**

Imposing a condition of authorisation requiring BSC to develop a Button Battery Safety Strategy as a priority at the beginning of the authorisation period. This Strategy should, in line with the ACCC Consultation Paper on improving button battery safety, ensure that communities, including Indigenous and CALD communities, are educated about the profoundly serious risks to children of ingesting button batteries. This Strategy should also include, *as a minimum*, the safe storage, disposal and transport of button batteries as well as promoting awareness of these dangers and the dangers of button batteries, the potential consequences and mitigation measures across the lifespan and product-related journey of the battery.

A Kidsafe representative would be available to assist with development/ implementation of the Button Battery Safety Strategy.



Susan Teerds  
CEO  
Kidsafe Queensland Inc  
28 July 2020