



Woolworths Group Limited (Woolworths) submission on the Battery Stewardship Council's application for authorisation AA1000476

24 April 2020

Woolworths are grateful to be consulted as an interested party concerning the Battery Stewardship Council's application for ACCC authorisation (the **Application**) of the Battery Stewardship Scheme (the **Proposed Scheme**).

Further to Woolworths' letter to the Battery Stewardship Council dated 20 February 2020 (our **Letter**) supporting the Proposed Scheme, Woolworths continues to support the Proposed Scheme and agrees with the analysis at Sections 10 - 11 of the Application in respect of the likely public benefits and possible detriments. In particular, we agree that the considerable public benefits of the Proposed Scheme will outweigh the detriments (including with respect to competition). We consider that participation of major industry participants will be important to the Proposed Scheme's success.

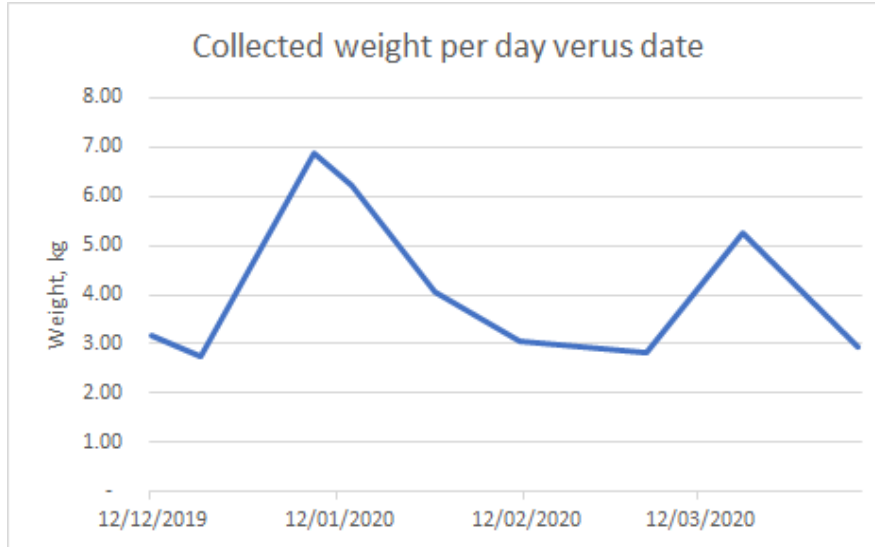
As set out in our Letter (at page 143 of the [Application](#)), Woolworths considers that the following are key aspects of the Proposed Scheme:

- enterprise-to-enterprise arrangements, which we consider will adequately address the free rider issue. Should such a mechanism not ultimately be included in the Proposed Scheme, then a suitable alternative solution would need to be developed in order for Woolworths to continue to support the Proposed Scheme.
- the exclusion of embedded batteries such as those found in toys, gift cards and other small electronic devices. Should this exclusion not ultimately be included in the Proposed Scheme, then Woolworths would not continue to support it.

By way of update to the information provided in our Letter, Woolworths has recently trialled a battery collection and recycling initiative at our store in Burwood, Victoria, in conjunction with Ecocycle. The trial has demonstrated that there is public support for such initiatives. Since 1 December 2019, more than 524kg of batteries have been collected at this store and sent for recycling. This represents approximately 25,600 batteries.



The weight of batteries collected per day at Woolworths' Burwood store has been:



This averages 4.13kg of batteries each day, which indicates a high level of community engagement and has been achieved with minimal advertising of the availability of the service.

While the trial of the battery collection and recycling service has been successful, its future expansion is predicated on the establishment of the Proposed Scheme. Rebates provided under the Proposed Scheme will support Woolworths to expand our collection and recycling service in future (on a not for profit basis).

A breakdown of the more than 524kg of batteries collected at Woolworths' Burwood store is:

Collection date	Net Weight	kg collected per day	Alkaline, kg	Lead Acid, kg	NiCad, kg	NiMh, kg	Lithium, kg	Button Cell, kg	Residual waste, kg
12/12/2019	35	3.18	23	0	4	3	4	0.5	0.5
20/12/2019	22.1	2.76	19.2	0	1.3	1.3	1.2	0.4	0.2
08/01/2020	130.4	6.86	91.2	0	11.7	7.4	10.8	3.1	0.9
14/01/2020	37.4	6.23	26.4	1.3	3.1	1.6	4.6	0.2	0.6
28/01/2020	57	4.07	36.6	0	6.4	4.3	7.6	1.9	0.7
11/02/2020	42.8	3.06	30.3	0	2.4	2.9	5.1	1.6	0.5
03/03/2020	59.6	2.84	38.5	0	5.8	4.7	9.1	0.9	0.6
19/03/2020	84.1	5.26	53.8	0	8.7	9.1	11.1	0.7	0.7
07/04/2020	55.9	2.94	39.2	0	5.7	3.2	6.1	1.3	0.4
Total	524.3		358.2	1.3	49.1	37.5	59.6	10.6	5.1