

Ms Jacqueleine Moore  
Acting Chief Executive Officer  
NSW Environment Protection Authority  
[info@epa.nsw.gov.au](mailto:info@epa.nsw.gov.au)

Dear Ms Moore

I am writing to request a meeting with the NSW EPA to discuss a number of matters to support safe and circular economy solutions for battery recycling including through the new B-cycle (battery stewardship) scheme to reduce the 90% of mixed batteries currently going to landfill.

The Australian Battery Recycling Initiative (ABRI) is the peak body representing members across the battery value chain focusing on stewardship, recycling and safety. The move to a circular economy means that ABRI is interested in issues across the battery life cycle. This is consistent with our membership which represents the supply chain including importers, distributors, retail, OEMs, used battery collectors and recyclers.

ABRI works collaboratively with the Battery Stewardship Council, who operates, the new B-cycle scheme which commenced 1 January 2022.

Firstly, the battery recycling industry would like to understand what your approach will be to applying the EPA Regulatory Policy to B-cycle participants as scheme operations ramp up and consumer understanding of how to safely dispose of batteries grows from a low base. ABRI would like to work closely with the NSW EPA to ensure that lessons learnt overseas can be applied to deliver safe outcomes and diversion of batteries from the waste stream.

Two immediate issues that ABRI would like to work with you on to develop solutions are: the use by the public of plastic bags to dispose of waste batteries and how this can be managed in a safe way; and the size of collection containers.

B-cycle advice does not promote plastic bags, although consumers use these, making the options of managing once in container bins very challenging. A balance needs to be achieved in minimising fire risks, safe handling and delivering environmental outcomes by removing used batteries from garbage trucks and waste facilities.

On container size, overseas experience suggests batteries can be transported safely using large containers. European battery stewardship schemes have been operating with transporting large container sizes for many years. Container size is an important consideration in the costs for consumers of the scheme.

B-cycle has a range of materials to support safe disposal of batteries through consumer education. B-cycle is also working with its members and a range of other industry organisations in the waste sector to broadly distribute key messages. ABRI, together with B-cycle, is also working with Fire & Rescue NSW to build understanding of battery fires and contribute to the communication of messages via the Fire and Rescue NSW website.



ABRI would like to understand what role NSW EPA could play in reaching out to consumers and whether a more coordinated government strategy could complement initiatives by industry to improve battery safety across both new and used batteries.

Secondly, ABRI would like to give you an overview of a range of projects we have underway to build understanding of safety across different battery chemistries and best practice industry regulatory compliance. A presentation from NSW EPA staff would greatly help industry understand how you are approaching compliance and also your priorities. NSW EPA staff would also be welcome to participate or be observers on ABRI working groups to learn more about the industry.

Thirdly, ABRI is contributing to Future Batteries Industry CRC discussions around research priorities for developing a lithium battery industry in Australia. Whilst the priority areas are still evolving, these could include: battery standards; battery energy storage system fire testing; and assisting to remove policy barriers to develop a circular economy. I would be interested to know what NSW EPA's priorities are for managing waste lithium batteries and if there are opportunities for us to work collaboratively together to deliver safe, circular economy outcomes.

Finally, I would like to reiterate ABRI's support for your organisation in leading action 5.10 of the National Waste Policy Action Plan (Develop a nationally consistent tracking and data system for the movement and stockpiling of hazardous and controlled wastes). My thanks to NSW EPA staff from the Regulatory Policy, Initiatives and Advice Division who have actively keeping ABRI informed of progress on this project.

ABRI is keen to be part of working groups to further develop and prioritise delivery of this project. Lead acid battery recyclers, with a recycling rate of 96%, have extensive expertise in coordinating collection and recycling of lead acid batteries across Australia and dealing with multiple reporting systems. ABRI members could bring valuable insights to the development of a national waste tracking and data system.

Please reach out to let me know the next steps from here. I can be contacted by phone 0488-216 750 or email [secretariat@batteryrecycling.org.au](mailto:secretariat@batteryrecycling.org.au).

Yours sincerely,

Submitted via email

Katharine Hole  
CEO, Australian Battery Recycling Initiative