



606 High Street
Kew VIC 3101

27 January 2022

Mr Lee Miezis
Chief Executive Officer
EPA Victoria
Email: OCEO@epa.vic.gov.au

Dear Mr Miezis

I am writing to encourage you to continue to prioritise work on preventing fires from lithium-ion batteries and to thank your Strategy and Operations Divisions for the constructive and collaborative way they have worked with the Australian Battery Recycling Initiative (ABRI).

Preventing fires from lithium-ion batteries is important as this battery chemistry becomes the dominant battery in the market. ABRI is contributing to work with Fire and Rescue NSW to test fire properties and responses of small, handheld mixed battery collections with as much as 85% lithium batteries in the mix. This figure is based on data showing these batteries already make up this proportion of battery stocks. This work will become public and I understand that it will be shared through the AFAC, the Australian and New Zealand National Council for fire and emergency service, of which Victoria is a member.

ABRI and its members also engaged with EPA Victoria during 2021 on your fire prevention work program to understand industry's perspectives on:

- the main barriers/challenges to compliance in relation to fire prevention in the waste and recycling sector; and
- Possible solutions to minimising risk of fires in the waste and recycling sector.

My understanding was this work was contributing to the development of a strategy to minimise lithium ion battery fire risks. It would be great if you could provide an update on the status of this work. ABRI would like to continue to support you and contribute to this initiative.

Some of the priorities for ABRI in reducing fire risks from lithium ion batteries are

- Sharing information about fires, causes and lessons learned;
- Collaboration across government on lithium ion issues to establish best practice. We recognise this is happening informally but wonder if a more formal approach together with industry might be beneficial;
- Increasing skills and capability for fire risk assessment and specialist advice to minimise risks;



- Funding to support the development and implementation of fire risk management best practices for the transport and storage of lithium-ion batteries. Rapidly growing stocks of lithium-ion batteries present growing challenges and costs for recyclers and logistics companies to implement initiatives to minimise fire risks. This is curtailing industry growth at a time when battery recycling activities should be increased; and
- Demonstrating Victorian leadership in collaborating with AFAC to support research and understanding of best practice safe and sustainable management of end-of-life batteries from drop-off points through to the recycler.

Finally, I would like to thank your Strategy and Operations Divisions for the collaborative and constructive way they have engaged with ABRI and its members on the development of the fire risk prevention program and responding to the challenges faced by the used lead acid battery industry with the commencement of the new environmental regulatory framework on 1 July 2021. In what's been a challenging year, your staff have demonstrated the values of excellence, partnership and accountability set out in the EPA's Organisational Strategy.

By way of background, the Australian Battery Recycling Initiatives (ABRI) is an industry association for all battery types with a focus on:

- Continuous improvement in safety, environment and circular economy outcomes
- Industry best practice through collaboration, guidance and training

ABRI's current priorities are supporting establishment of B-cycle (Australia's battery stewardship scheme), safety and streamlining regulatory requirements across jurisdictions. ABRI is seeking pragmatic regulatory approaches to achieving best practice safety and environment outcomes that are fit for purpose for each element of the recycling chain.

If you require further information, please call me on 0488 216 750 or email secretariat@batteryrecycling.org.au.

Yours sincerely,

BY EMAIL

Katharine Hole
Chief Executive Officer