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Submission to the NSW EPA Issues Paper: Resource Recovery Framework

ABRI has three priorities (see details in attached) to facilitate better battery circular economy outcomes (question 3) and structure the framework to deal with new and emerging battery waste streams (question 2):

1. Increased coordination across agencies, particularly environment, emergency management, transport and planning to accelerate improvements in battery recycling safety and growth of the NSW battery recycling industry;
2. Recognising the step change underway in a rapidly growing and involving industry and regulatory arena, ABRI encourages the EPA to apply the listen, enable, education and act tools within the Regulatory Policy framework to address emerging issues; and
3. ABRI supports the development of a framework to support safe and sustainable lithium-ion battery reuse and repurposing.

By way of background, ABRI, is the battery recycling industry association providing a voice for a broad range of members including: battery recyclers, manufacturers, importers and distributors; OEMs; waste industry companies; research institutions; governments; advisors on sustainability solutions; and environmental groups.

ABRI supports all types of battery recycling and reuse through:

- continuous improvement in safety, environment and circular economy outcomes
- industry best practice through collaboration, guidance and training.

ABRI collaborates closely with the Battery Stewardship Council (BSC) and the Australian Battery Industry Association (ABIA).

Please contact Katharine Hole, Chief Executive Officer, Australian Battery Recycling Initiative via email secretariat@batteryrecycling.org.au if you have further queries.

Yours sincerely,

BY EMAIL

Katharine Hole



Attachment - Submission – Issues Paper: NSW Resource Recovery Framework

The Australian Battery Recycling Initiative (ABRI) has three priorities to facilitate better battery circular economy outcomes (question 3) and structure the framework to deal with new and emerging battery waste streams (question 2):

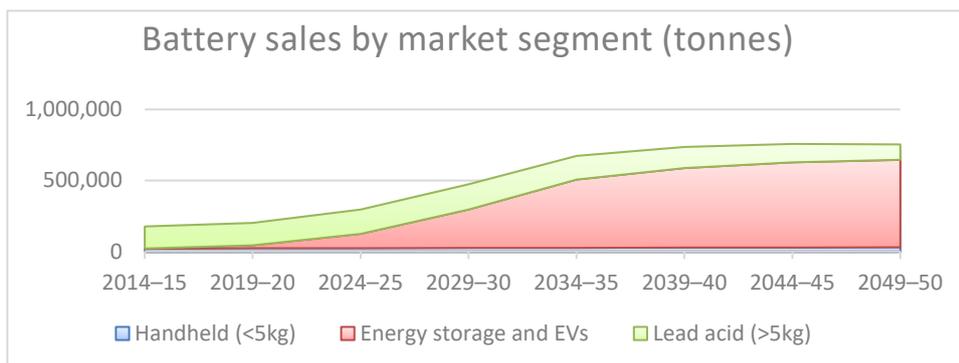
1. Increased coordination across agencies, particularly environment, emergency management, transport and planning to accelerate improvements in battery recycling safety and growth of the NSW battery recycling industry;
2. Recognising the step change underway in a rapidly growing and involving industry and regulatory arena, ABRI encourages the EPA to prioritise the development of a national hazardous waste tracking system and to apply the listen, enable, education and act tools within the Regulatory Policy framework to address emerging issues; and
3. ABRI supports the development of a framework to support safe and sustainable lithium-ion battery reuse and repurposing.

Delivering these priorities will improve safety outcomes and support industry development by rapidly addressing issues as the battery circular economy industry goes through a step change.

2022 marks a milestone for battery recycling and reuse in Australia:

- B-cycle the national battery stewardship scheme has commenced operations. It has over 2,300, and increasing, drop off points across Australia for the recycling of used consumer batteries. It is designed to reduce the 90% of mixed, consumer batteries going to landfill and supporting increased funding in industry development; and
- There is increasing investment in electric vehicle and battery energy storage system reuse. A recent example of this was the awarding of a grant by Sustainability Victoria to an ABRI member for a sustainable business model for retired electric vehicles. ABRI has met with Transport for NSW to discuss battery recycling and reuse considerations to support implementation of the NSW Government's Zero Emissions Bus Strategy. The Strategy looks at the challenge of transitioning the 8,000+ NSW bus fleet to zero emissions by 2030 and developing a pathway to achieve this. California's Lithium-ion Car Battery Recycling Advisory Group March report on EV end of life battery management highlighted measures to improve information, support industry development, and deliver safe and efficient reverse logistics.

Battery recycling volumes and industry capacity will be accelerated by structural changes underway in the battery market. Battery Stewardship Council analysis shows that batteries in circulation will grow several hundred percent over this decade and lithium-ion batteries will dominate the Australian market by 2029/30 (see chart).





Responding to this structural change in battery use, the NSW Resource Recovery Framework is one tool to a battery circular economy requires. Priorities under the Framework should seek to accelerate development of the Australian battery recycling and reuse industry and support emerging challenges presented by the fire risks of lithium-ion batteries. B-cycle, Australia's battery stewardship scheme is an important component as it provides a network for dropping off used batteries and financial support for recyclers. However, this should be complemented with other regulatory tools and coordination across government.

Firstly, ABRI considers the NSW Resource Recovery Framework would support battery circular economy outcomes by setting out how the Framework supports collaboration across government agencies and with industry. This should include considering:

- Prevention strategies for fires from waste lithium-ion batteries, where compliance is only one of a number of tools;
- Focus on building skills capabilities for fire risk assessments and management tools;
- Understanding how regulatory actions have consequences for business operations and industry capability and capacity; and
- Supporting safe and sustainable battery reuse and repurposing.

Regulation could then be developed on an evidenced based approach and seek to deliver safety and circular economy outcomes.

Secondly, the Resource Recovery Framework should seek improvements to administrative arrangements. As previously raised with the NSW EPA, ABRI considers that implementation of the national hazardous waste tracking system would support delivery of circular economy and safety goals by:

- Improving practices in waste management and resource recovery with improved transparency and reduced administrative inefficiencies due to multiple reporting frameworks;
- Identifying emerging issues for potential collaboration; and
- Delivering a trusted source of data to inform future policy work This project should draw on the experience of recycling industries and on the existing jurisdictional reporting systems. 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.

Within the administrative framework, the other area ABRI suggests NSW EPA prioritise to address emerging challenges to balance safety, resource recovery and costs to industry is the implementation of your Regulatory Policy¹ framework around listening, enabling, educating and acting. Flexibility and a coordinate cross agency and industry response to emerging issues in a rapidly evolving environment is critical. The battery and battery recycling industry are undergoing a structural change, ABRI would like to work collaboratively with NSW EPA to resolve issues and improve community outcomes to support safety and resource recovery.

¹ See diagram p.21 <https://www.epa.nsw.gov.au/-/media/epa/corporate-site/resources/about/2021p3444-regulatory-policy.pdf>



Finally, the move to reuse batteries and battery cells from EVs is gathering momentum. The need for a framework to support a safe and sustainable industry is critical to support growing EV and battery energy storage use. This issue is being examined by a number of jurisdictions and ABRI would encourage NSW EPA to be a leader in this space.