

Preliminary ABRI observations on streamlining reporting through Victorian Waste Tracker

Working Draft – 30 August 2020

ABRI has spent the past 12 months working collaboratively with the Victorian Environment Protection Authority on used lead acid battery (ULAB) reporting for waste tracker. The lessons learnt should be used to inform the development of the national harmonised waste tracking system.

The key learnings:

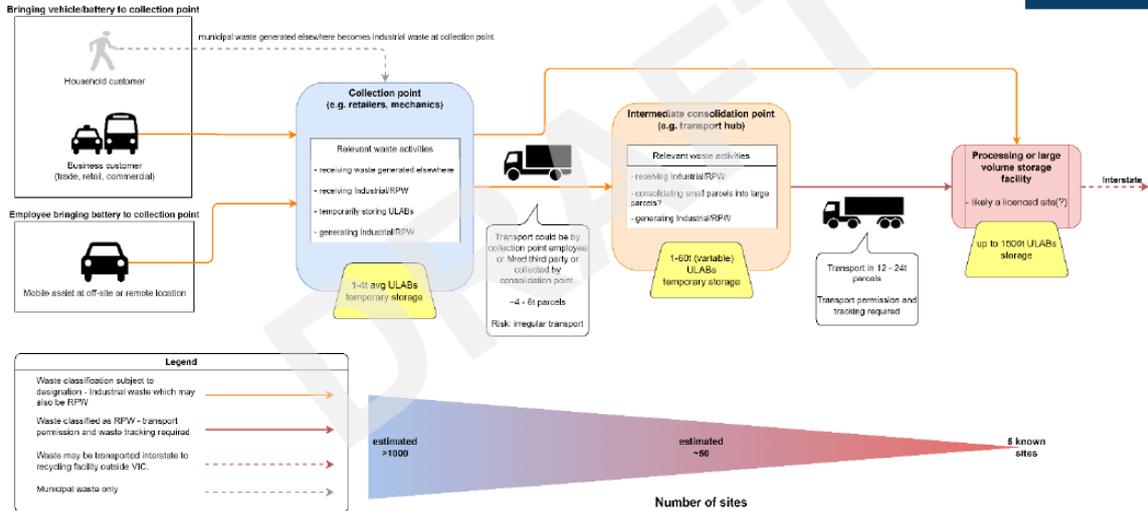
- Thresholds are needed for real time reporting to balance administrative burdens with information needs on waste tracking. The ULAB collection network starts with many thousands of collection points (e.g. roadside assist vehicles, mechanics) before consolidation with a handful of recyclers. Whilst Vic arrangements are still to be finalised, it is understood that the reporting requirement for ULAB will now not commence until transport of 4t (1,000L acid net volume). (See Attachment 1 for pictures of ULAB stakeholders and volumes). The threshold for reporting is still low when considering that ULAB collection each year amounts to around 150,000 tonnes per year but provides a practical outcome. ABRI understands the Vic EPA is also considering setting reporting thresholds for clinical waste due to the same issues of many thousands of collection sites.
- Consistency is required with the Australian Dangerous Goods Code as the core framework governing transport of dangerous goods and already providing high levels of guidance on packaging and other transportation requirements.
- Taking into account operating practices, including truck sizes, and variabilities in collection and logistics timing is important for considering reporting requirements and thresholds. ULAB collection is variable for a range of factors:
 - seasonality
 - impacts of by one-offs (such as COVID lockdowns causing a spike in flat batteries) and
 - for customers at the end of a collection route, there may not be enough space left on a truck to collect the batteries so they will be collected at the next available opportunity.

ABRI appreciates that both Victoria and Queensland have adjusted storage thresholds for ULAB collection to provide for practical solutions to the need to consolidate smaller amounts of batteries before collation into larger units for delivery to recyclers. Understanding consolidation levels and transport movements/volumes, is also critical to support streamlined reporting and balance red tape with the need for information.

ATTACHMENT 1 – ULAB COLLECTION PROCESS INCLUDING VOLUMES & STAKEHOLDERS INVOLVED

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What we heard – ULABs collection, consolidation & transport



Draft position in context

