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For each public consultation document, general feedback is sought on whether it:

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- reflects contemporary understanding and practices on the given subject or issue
- has an appropriate level of information (e.g. technical content is appropriate for the given purpose)
- requires additional examples or case studies to provide clarification or remove ambiguity.

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Whole submission

Contact details (i.e. anonymous)

Part of submission (please specify below)

If applicable specify any parts of your submission provided in confidence

Name:	Katharine Hole
Organisation:	Australian Battery Recycling Initiative
Title of document:	D22/107002 Large-scale external lithium-ion battery energy storage systems – Fire safety study considerations

Section no. / page no.	Section title or subject	Specific comment or suggestion
Enter text	Enter text	Enter text
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General comment or suggestions

This document focuses on an individual site. However, in implementing these fire safety studies consideration should also be given to the management and handling of damaged lithium-ion batteries as they move from site to recycling or waste disposal, if beyond recycling:

- The discussion of the thermal runaway at 5.8.1 should not be limited to combustion events for any BESS on a renewable energy site alone. Safe handling and management of the physical movement of a damaged battery from site to a new location, and then the subsequent recycling of that damaged unit will be important for minimising fire risks. Thermal runaway events are not limited to at site combustion only – and lithium-ion cells are now well documented to pose ongoing risks of combustion for extended periods of time (often weeks). To this end many of the well-founded risk discussion points for first responders highlighted in the technical information sheet also apply to personnel that will then be required to either move or recycle the damaged unit, and the community at large.
- At 5.9.1 the responsibility for handling and removal of any damaged BESS cells is discussed but the cost implications of handling, transporting and recycling are not. Specialist equipment and expert personnel will be required to handle such fragile & hazardous units. Dealing with damaged lithium ion battery cells is not straightforward and it is not clear that renewable developers will adequately consider the cost implications of dealing with such damaged units. This includes, for example, where insurance coverage for the handling and recycling of damaged units commences or finishes. There are also potentially a number of stakeholders involved, recyclers are often the last step in the process with specialist removal, transport and other companies, such as the OEM, involved in removing the damaged battery and arranging delivery to a recycler.

Note: To add rows, either click the Plus symbol when cursor is placed at the beginning of a row, or insert your cursor after the last table cell and hit 'Tab' on your keyboard.