



Director
Lithium-ion Batteries Project
Consumer Product Safety Division
Australian Competition & Consumer Commission
GPO Box 3131
Canberra ACT 2601Name

Email: lithiumbatteries@acc.gov.au

3 February 2023

Dear Ms Warre

Re: Lithium-ion Batteries – Issues Paper

Thank you for the opportunity to provide feedback on the Lithium-ion Batteries – Issues Paper. WMRR is the national peak body for all stakeholders in the essential waste and resource recovery (WARR) industry. We have more than 2,000 members across the nation, representing the breadth and depth of the sector within business organisations, the three (3) tiers of government, universities, and NGOs. Our members are involved in a range of important waste management and resource recovery activities within the Australian economy, including community engagement and education, infrastructure investment and operations, collection, manufacturing of valuable products from resource recovered materials, energy recovery, and responsible management of residual waste.

WMRR's members are also involved in various e-waste and product stewardship schemes nationally. In this capacity industry performs multiple roles including network operators, collection points, operating depots and operating remanufacturing facilities.

WMRR would like to take this opportunity to contribute to this discussion, albeit our major concern may appear to be outside the initial scope of this consultation. In particular WMRR has serious concerns about battery end of life management in Australia, given the ongoing incidence of fires at both facilities and in transit to facilities, due to batteries being incorrectly disposed of.

Whilst WMRR Appreciates that the national battery recycling scheme commenced in early 2022, to date it has had little to no effect on the incidence of these fires possibly due to limited publicity and a lack of accessibility and consumer knowledge. The cost and impact on both the facilities impacted, as well as the broader industry through for example insurance premiums are matters of grave concern for industry.

Industry and the community require a properly funded, accessible end of life scheme that has clear pathways for all batteries in Australia, the costs of which must be met by those that



generate these batteries, backed up by a clear education campaign that makes it clear that no batteries go in traditional bins. Having a properly funded national scheme that yields a clean separated stream of batteries also then provides an opportunity for a consistent input stream to harvest the valuable materials that are contained within these items, enabling investment in on shore recycling and recovery in Australia.

Please do not hesitate to contact the undersigned if you would like to discuss WMRR's feedback further.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Gayle Sloan'.

Gayle Sloan

Chief Executive Officer

Waste Management and Resource Recovery Association of Australia

Submission

<p>Types of Li-ion batteries in consumer products</p> <p>1. Do you consider certain types of Li-ion batteries (see Table 1.1) are more hazardous than others? For example, are certain types of Li-ion batteries more hazardous because of the chemistry make up and/or other factors that impact the hazard (see Table 1.2 for reference)? Please provide an explanation and/or evidence to support your response.</p>	<p>WMRR cannot verify if one type of Li-ion battery is more hazardous than another, they all have huge environmental impacts and potential fire and explosion risks when disposed of incorrectly.</p>
<p>Hazards and risks associated with Li-ion batteries</p> <p>2. Do you consider the characterisation of the hazards of Li-ion batteries in Table 1.3 accurate and why? Are there other hazards? 3. Is there a stage at which Li-ion batteries are most dangerous? For example, when being manufactured, transported, stored, used/misused, charged or disposed of. Please provide an explanation and/or evidence to support your response.</p>	<p>The WARR sector's focus is on the disposal and recovery stages of a battery's life. Batteries represent a significant fire risk hazard when transported whether discarded correctly or incorrectly, and as such must be both correctly disposed and transported to mitigate this risk.</p> <p>The magnitude of fires started from Li-ion batteries due to incorrect disposal are often exacerbated due to their mixing with other flammable materials (plastics and paper) in disposal trucks and at waste and resource recovery sites. Not only do these fires risk lives and damage property, they have a significant commercial impact given the known incidences of fire on insurance premiums across industry.</p> <p>Please note that it is industry's understanding that even if a battery is failed or expired that it still presents a risk of fire. Coordinated and in - depth consumer education on battery disposal is urgently needed in Australia. Batteries whether failed or operating, must be disposed of via specific waste collections and under no circumstances placed in general waste streams and clearly articulating where they can be deposited safely.</p>
<p>Li-ion battery incident data</p> <p>4. Can you provide any information or data (not already provided) on injuries,</p>	<p>WMRR does not hold data on incidents however industry is aware that there have been a number of discussions with respective Fire and Rescue services across the states that may have access</p>

<p>incidents, fatalities or near-misses involving a Li-ion battery?</p>	<p>to this information, as well as a number of insurers.</p>
<p>Consumer awareness and behaviour</p> <p>5. Do you consider that consumers are sufficiently educated on Li-ion battery safety hazards? If so, what are the key sources of information for consumers? Do you consider that further consumer education is required, what should the message be and in what form?</p> <p>6. What actions can consumers take to mitigate the risks presented by Li-ion batteries?</p> <p>9. What other actions can supply chain participants take to mitigate the risks presented by Li-ion batteries?</p> <p>10. If you are a manufacturer or seller/distributor of Li-ion batteries, what education or information, if any, do you provide to your supply chain participants, staff and/or consumers about Li-ion battery hazards and risks?</p>	<p>A coordinated education campaign on the current battery stewardship scheme as well as only disposing of batteries through this scheme or hazardous clean ups, is urgently needed to mitigate this risk, as well as raise the profile of batteries as a valuable recyclable resource. Manufacturers need to advertise recycling and disposal advice on packaging and at point of consumption.</p> <p>As this scheme and other e-stewardship schemes continue to expand additional campaigns will be required to distinguish between batteries and battery powered devices- both of which need clear and accessible points of disposal. These campaigns must cover safe disposal of recyclable and waste batteries and promote drop off locations.</p> <p>Along with current battery stewardship scheme publicization there needs to be awareness raised on how to safely dispose of damaged or possibly damaged batteries and the locations and process to do this needs to become more accessible.</p>
<p>Regulatory landscape</p> <p>14. Do you consider government intervention is required to manage Li-ion battery safety risks? If yes, what form of intervention do you recommend? Please explain your response.</p>	<p>Yes, a national end of life mandatory product stewardship scheme for all batteries must be developed, implemented and funded. Product stewardship schemes that are nationally consistent and involve the designers and manufacturers of products to ensure that end of life considerations are included in product development, as well as ideally recycled content recovered from this process included in the design and development of what is placed on market. Such a scheme must also be supported by an increase in consumer education campaigns on safe recycling and disposal.</p>