



Wednesday 13 May 2009

Waste Policy Taskforce
Department of the Environment, Water, Heritage and the Arts
GPO Box 787
Canberra ACT 2601

By email: wastepolicy@environment.gov.au

Dear Waste Policy Taskforce,

Re: Submission to National Waste Policy

Thank you for the opportunity to provide input into the development of a National Waste Policy. This is an important initiative as the question of waste is not one primarily related to reducing the impacts of landfill, but rather one of promoting resource recovery. Australia needs to transform into a recycling society. Recovering resources will reduce pressure on virgin material use, in addition to reducing environmental impacts (for example, energy use and greenhouse gas emissions). The Australian Battery Recycling Initiative (ABRI) sees resource recovery as a component of effective stewardship.

ABRI is an industry based organisation that wants to make a positive difference to what happens to end-of-life batteries of any form sold into the Australian market, by being pro-active, professional and above all responsible in our approach and action.

ABRI's vision is the effective stewardship of all end-of-life batteries. To realise the vision, ABRI's mission is to:

- maximise resource recovery and establish the intrinsic value of recovered end-of-life batteries
- ensure the establishment of infrastructure capable of collection, processing and conversion of battery materials to beneficial use
- realise the good of no batteries to landfill
- create a synergy of actions contributing to a sustainable future.

ABRI would offer the following constructive observations for consideration by the Taskforce as it develops policy for consideration and approval by the Environment Protection and Heritage Council (EPHC):

1. Consistency Between Jurisdictions for Waste Strategy, Definitions and Regulations

Batteries have been identified as a priority waste in several Australian jurisdictions. A lack of battery recycling schemes and programs in Australia is largely the result of either inconsistent State and Federal regulation including waste definitions and priority for funding of recovery and recycling initiatives and end of life solutions. Also, like other e-waste, the costs of collection and recycling of many battery types may currently be greater than



the direct value extracted so without supplementary funding, they cannot be economically sustained. Voluntary schemes by individual businesses or organisations are often hindered for these reasons.

ABRI submits that avoidance must be the prime national policy directive in respect of wastes of all types (rather than diversion and management) and that once developed, legislated implementation of policy is undertaken consistently and not simply left as the responsibility of individual States and Territories with consequent variation in interpretation and definition of regulations.

An important point for policy recognition is that economic impacts from waste may be quite different from the environmental impacts from waste and if the latter is judged to be more important then Government regulations which afford a greater economic weight to wastes may be necessary, at least until community behaviours alter to reflect outcomes consistent with policy.

2. Effective Education Needed on Waste and Resource Recovery

ABRI believes that there is a strong community desire for battery recycling. Harm to environmental and human health can be caused by inappropriate disposal methods such as incineration and landfill dumping. Mercury, cadmium and lead are some of the dangerous materials that are used to produce batteries that may leach into ground and water sources at landfill sites, or release toxic fumes if incinerated.

Properly researched and resourced educational campaigns are needed to achieve desired community behaviour outcomes. This is largely the responsibility of Government in our view and will therefore become a funding requirement to be evaluated and secured by the Taskforce.

3. Resource Recovery Emphasis to Deliver Waste Minimisation

The concept of product stewardship encompasses minimising product waste and reducing toxicity threats to the environment and the community but it also includes improving resource recovery so as to maximise the good of reuse of materials (which are finite). To us it incorporates the notion of 'doing more with less', or eco-efficiency.

We believe that this model of stewardship is also applicable to waste and resource recovery issues that should be coordinated on a national basis. Battery recycling programs and resource recovery decisions will engage the entire battery value chain, from mining and processing companies, to recyclers, recoverers and reprocessors. All products would benefit from a shared product/shared brand platform for reverse logistics.

4. Waste Policy Should be Fact-Based

Like many other forms of community waste and recoverable resource, data surrounding battery waste and recycling in the Australian market is largely incomplete or unreliable. ABRI plans to undertake a detailed research project on the Australian battery market and stewardship options to begin to generate awareness of the importance of battery recycling. We wish to create momentum towards developing successful end of life schemes and initiatives. Battery recycling projects should demonstrate effective stewardship and facilitate commercial mechanisms to foster an efficient reverse logistics battery supply chain.

Each of us involved in the life cycle of battery products are facing increasing demands and expectations from the marketplace, regulators, stakeholders, communities and consumers to provide evidence and understanding of sustainable performance in the life cycle. Evidence of continuous improvement is the reasonable demand that we should be prepared to meet, not only in the area of "our immediate responsibility", but in all the other sectors



of the life cycle which are the areas of "our general concern". By working together, we believe we can meet (and possibly exceed) those demands and expectations and in particular we believe the requirement for consistent data and assessment methodologies re waste and resource recovery should be provided by a prevailing Government policy. Examples of Government mandated recovery rates and methodologies for review are now evident in resource constrained countries such as Japan and Europe.

As a not-for-profit industry association, ABRI sees its role and opportunity as creating an environment for all sectors of the battery value chain to communicate and coordinate resource recovery efforts. To this end we believe we can play a supporting role in developing and actioning Government's new national waste strategy.

However, we will rely on strong Government support as this is vital to initiate effective battery recycling initiatives. So too will ABRI's planned battery market study as it will support the development of accurate and reliable data from which progress can be gauged and emphasis can be targeted to achieve the desired waste strategy outcomes.

We look forward to the development of consistent State and Federal resource recovery legislation that will enable ABRI to better coordinate its Members efforts to recycle all forms of batteries in Australia.

ABRI welcomes the development of a National Waste Policy that will take proactive steps to increase the recovery of resources in general. ABRI believes battery and battery-containing products recycling regulation should be included under the National Waste Strategy. We would be happy to provide a presentation to you providing further information about ABRI, its vision, values and initiatives.

Regards,

Wayne Richardson
President