



The Hon Susan Close, MP
Deputy Premier
Minister for Climate, Environment and Water
GPO Box 2343
ADELAIDE SA 5001

Email: officeofthedeputypremier@sa.gov.au

CC: Dr Jon Gorvett, CEO SA EPA (Environmental Protection Agency)
Mr Josh Wheeler, A/CEO GISA (Green Industries SA)

31 May 2024

Dear Minister

**Re: Call for Urgent Action by SA in relation to
Risk of Fires to WARR Industry**

The Waste Management and Resource Recovery Association of Australia (WMRR) is the national peak body representing Australia's \$17 billion waste and resource recovery (WARR) industry. With more than 2,200 members from over 400 entities nationwide, we represent the breadth and depth of the sector, including representation from business organisations, the three (3) tiers of government, universities, and Non-Government Organisations (NGOs), including research bodies. WMRR is writing to you to request an urgent meeting with the SA Government to discuss the tangible actions we believe the government must take now to respond to the dramatic increase in fires we are seeing in both trucks and facilities of the WARR sector. We are aware that there was an industry meeting held on 12 December 2023 with SA EPA, however, there has been no follow up or action on this that we are aware of since early 2024.

As you may be aware, SA has already lost one (1) major recycling facility due to a fire resulting from batteries incorrectly placed in kerbside bins, in addition to the high number of fires in collection vehicles advised by all SA's kerbside collectors. Thankfully, to date these fires have not resulted in major injuries to WARR workers. The use of lithium-ion batteries is sharply increasing, and if left unaddressed the associated risk of battery fires in collection vehicles and WARR processing facilities will also increase sharply.

Industry is increasingly concerned that this emergency is not being given the commensurate level of attention necessary to protect both our workers and facilities, nor the viability of the sector given the cost of insurance. At present, WMRR estimates that there is at least one (1) fire a day nationally, due to batteries or products containing batteries being inappropriately disposed of through general waste and recycling bins. Federal Government figures estimate a staggering 90% of used handheld batteries are going to landfill or being disposed of incorrectly. This is highly problematic as it means they are being placed in our collection vehicles and moving through our facilities with a real chance of causing fires and creating risk to human health and environmental damage.

The message is very simple - do not put batteries in the bin, rather they must be delivered to a dedicated battery collection location, for example B-cycle.

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WMRR is acutely aware that the B-cycle scheme is not comprehensive and does not accept battery powered items or larger battery types such as those for electronic vehicles. To this end we are working with B-cycle and other states to either expand the scope of this scheme to include these items or clearly include them in the proposed federal e-waste recycling scheme (wired for change) as a matter of priority. However, we have been advised as of yesterday that the development of a national e-waste scheme has been deferred by Federal Government with packaging and solar panels being their current priorities.

Regardless, as a matter of priority we need the SA Government to commence educating households now and assisting with a national campaign promoting safe disposal of battery and battery powered items to ensure that we are not placing batteries in bins, and only returning them to dedicated locations.

Industry is very keen to work with SA Government on this and to this end we provided information to the SA EPA to assist with such an initiative in February 2024. This campaign should start immediately, whilst government also works with SA industry and local government to identify and fund alternative, accessible and suitable drop off locations for all battery types, including embedded battery products (including vapes) and larger battery items to keep them out of the established WARR stream given the hazard and risk they pose. The NSW Government is working towards this by proposing to make additional locations available through community recycling centres, while the elements of a national approach (led by Queensland) are being considered by the Environment Ministers.

Government and community need a safe pathway for managing battery and electronic items at end-of-life and the WARR industry needs to be able to provide a safe place for its employees to work. Urgent action is required by the SA Government to provide locations to dispose of these safely, particularly given we understand that there are current restrictions on accepting damaged batteries at the existing Hazardous Waste depots in SA at present, while the discussions on who is responsible to fund such schemes are worked through by governments and generators.

We also note a comprehensive extended producer responsibility scheme is required for batteries given the increasing incidence of fires at home and in the community, due to often poorly designed batteries. To this end WMRR has been advocating strongly with others that Australia needs to embrace a comprehensive framework such as the EU Waste Directives in managing these items (and others), we would appreciate your support on such an approach, which we are hopeful will be supported by the Environment Ministers in June. We have also taken the opportunity to attach a paper that we prepared with B-cycle summarising what we believe could be the solutions to what is increasingly becoming a national emergency.

Please contact Gayle Sloan, CEO, WMRR to arrange a meeting either at gayle@wmrr.asn.au or 0429 076 713. We look forward to discussing this matter with you further.

Yours sincerely

Tiana Nairn
SA Branch President

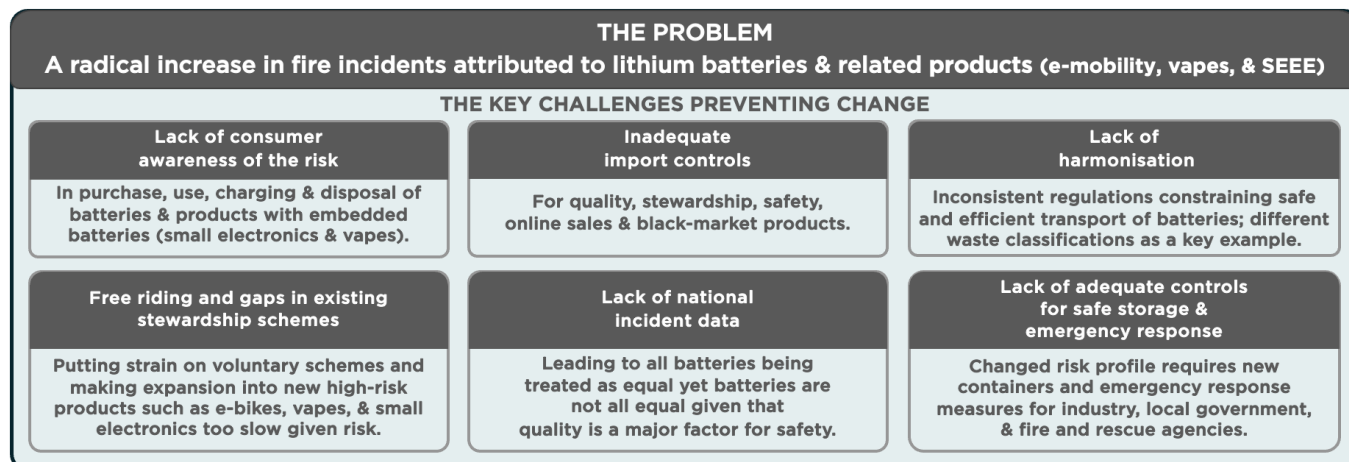
Geof Webster
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PURPOSE OF THIS PAPER

This paper advocates for urgent regulatory reform to support the industry led battery stewardship scheme to increase its scope to include vapes and small electrical and electronic products that have an embedded battery (SEEE), to mitigate their health and safety risks they pose.



URGENCY: THE HIGH COST OF BATTERY FIRES

Batteries are dangerous goods presenting significant fire risk; Societies' increased use of these and the inclusion in many products that cannot be removed has led to disposal confusion and increased risk as there is no clear and safe pathway for embedded battery products in Australia The NSW Government reported a [20% increase in lithium battery fires this year](#) and ultimately the Community is bearing the cost. These costs are high (both in cost and time disruption) and present a serious threat to the viability of the waste and resource recovery (WARR) sector and its' workers.

| | |
|---|------------------------------|
| ▪ Collection truck replacement | ▪ \$250 - \$500,000 |
| ▪ Materials recycling facility replacement | ▪ \$50-75 million |
| ▪ Processing material while waiting to build new facility | ▪ \$260/tonne (\$8m/ annum). |

THE OPPORTUNITIES FOR PREVENTING FUTURE INCIDENTS

Urgent action is required to address the increased risk and prevalence of fire that focuses action on each of the six (6) identified priorities. Industry is seeking Government support for the following actions. Detailed plans and costings for each of the short-term activities have been created and are ready for deployment.

| Short term | Medium term | Long term |
|--|---|---|
| <p>A. A National campaign to change community behaviour to never put batteries or products with embedded battery in kerbside bins and only dispose of them at dedicated Battery drop of points.</p> | <p>▪ Government procurement, permitting to specify participation in battery stewardship.</p> | <p>▪ Import law reform to address quality & safety, particularly online sales.</p> |
| <p>B. Expand B-cycle scope to include vapes, e-mobility, & SEEE (interim solution pending national scheme) and fund the increase in collection points.</p> | <p>▪ Establish national reporting process for battery incidents to establish risk profiles of different battery products.</p> | <p>▪ Amend Recycling & Waste Reduction Act to establish a Battery Rule to support strong industry led stewardship</p> |
| <p>C. Commit to regulatory reform to address free riders including options analysis and development of draft language for battery free rider regulation.</p> | <p>▪ Encourage harmonized waste classifications, tracking and licensing of relevant facilities to ensure batteries are not disposed of to landfill.</p> | |
| <p>D. Support industry and local government to improve safety and emergency response measures.</p> | | |
| <p>E. Conduct a Scheme Review to ensure long term economic stability particularly for emerging products.</p> | | |
| <p>F. Develop an incentive program for consumers to participate in B-cycle.</p> | | |