



AUSTRALIAN BATTERY RECYCLING INITIATIVE

# NSW DRAFT CIRCULAR ECONOMY POLICY

SUBMISSION TO  
THE NSW EPA

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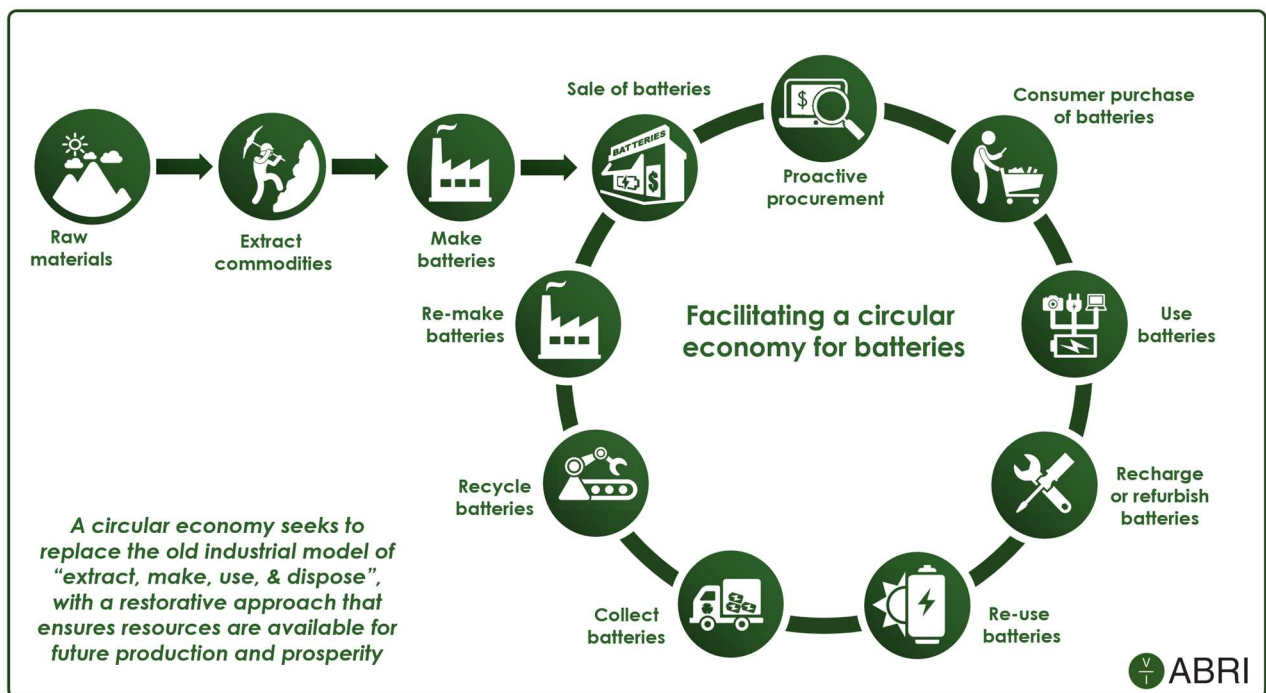
To whom it may concern,

## NSW DRAFT CIRCULAR ECONOMY POLICY

### The solution is in your hands

The Australian Battery Recycling Initiative is writing in strong support of the NSW Draft Circular Economy Policy. This is a critical policy for securing a strong and viable recycling sector into the future and addressing risks to industry arising from the China Sword policy.

The Australian Battery Recycling Initiative has recently refined its mission to 'facilitate a circular economy for batteries in Australia' and believe this to be an important pursuit given the hazardous nature of this product range, the valuable resources they contain, and the need to create a self-sustaining and secure recycling sector over time.



ABRI believes the general approach outlined in the “NSW Circular Economy Policy Statement – Too Good to Waste” to be well thought out and clearly communicated.

We do however believe the following additions to be essential if the policy is to realise its full potential.

The Australian Battery Recycling Initiative recommends:

1. The inclusion of batteries (handheld and energy storage) as a priority focus area (page 2 of the policy document) and as a:
  - In recognition of the projected exponential increase in this waste stream,
  - In the knowledge that 99% of materials in batteries are recyclable,
  - Key commodities contained in batteries such as cobalt are currently derived from supply chains that are unethical (It has been estimated that 400,000 children are caught within the cobalt mining supply chain),
  - To send a signal to the national scheme that the current 3% collection rate is unacceptable to the NSW Government,
  - The potential for attracting battery manufacturing technology to NSW, for example with companies such developing battery or cathode manufacturing and recycling capability in Australia, for example Lithium Australia and Envirostream, and initiatives such as the UNSW Microrecycling of battery and consumer waste for their transformation into value added materials,

2. The inclusion of an additional key principle (page 5 of the policy document)

Principle	Description
<b>Drive demand for recycled products</b>	<ul style="list-style-type: none"> <li>▪ Maximising the purchase of products containing recycled content to create sustainable supply chains</li> <li>▪ Demonstrating the value and quality of recycled products</li> </ul>

3. Expansion of Pro-active procurement section (page 26 of the "Too Good to Waste" document) to include recycled content purchasing targets in each government agency / department to drive demand for recycled products.

Please do not hesitate to contact us if you have questions about our suggestions or if we can support the adoption of this policy in the future.

Best regards,

Libby Chaplin  
 CEO, AUSTRALIAN BATTERY RECYCLING INITIATIVE  
 cc ABRI Executive Committee Members  
 Andrew Mackenzie, EnviroStream, ABRI President,  
 Peter Tamblyn, VP, Close the Loop  
 Warren Overton, ANZRP, ABRI Treasurer  
 Will LeMessurier, MRI, ABRI Executive Committee Member  
 Andy Jackson, Lex EnviroServices, ABRI Executive Committee Member  
 Adrian Griffin, Lithium Australia, ABRI Executive Committee Member  
 Kylie Hughes, DEHP, ABRI Executive Committee Member  
 Janet Leslie, Canon Australia Pty Ltd, ABRI Executive Committee Member

## ABRI Members

- AGL New Energy
- Australia Post
- Australian & New Zealand Recycling Platform
- Australian Mobile Telecommunications Association
- Canon Australia Pty Ltd
- Century Yuasa Batteries Pty Ltd
- Close the Loop Ltd
- Club Assist Pty Ltd
- CMA Ecocycle Pty Ltd
- CSIRO
- Dept. Environment & Heritage Protection
- Department of the Environment and Energy
- DG Air Freight Pty Ltd
- Dodd & Dodd
- EnviroStream
- Enirgi
- GNB Industrial Power (Network Power Australasia)
- Lex Enviro Services
- Infoactiv Australia
- Institute for Sustainable Futures, ISF
- Lithium Australia NL
- Macintype Design Pty Ltd
- Marshall Power Australia Pty Ltd
- MRI (Aust) Pty Ltd
- NSW Environment Protection Authority
- Ocean Batteries Pty Ltd Trading as Seil Recycling
- Planet Ark Environmental Foundation
- Powercell
- R&J Batteries
- Samsung
- Sims E-Recycling Pty Ltd T/A Sims Recycling Solutions
- Solax Power Australia
- Supercharge Batteries
- Sustainability Victoria
- TES-AMM Australia Pty Ltd
- Watts Batteries
- Western Australia Local Government Association
- Zero Waste SA
- Gold Coast Resource Recovery
- Smart Energy Council