



MANAGEMENT OF EXISTING BATTERY STOCKPILES

BACKGROUND

During consultation with industry and the Commonwealth Government, BSC was advised of significant legacy stockpiles of batteries owned by operators who may attempt to claim rebates under the Scheme even though recycling costs have, in most cases, already been received. Claims for such “windfall” rebate payments would be fraudulent and adversely impact on the Scheme

BSC understands that most stockpiles of batteries are likely to be in the order of a few tonnes at each of numerous scrapyards and resource recovery centres. These small stockpiles may be classed by regulators as legal stockpiles, although storage limits vary by state.

Legacy stockpiles increase the risk of either storage battery fires with consequential environmental and health impacts, or fraudulent claims for rebates, either of which has potential to expose the Stewardship Scheme to reputational risk and/or public criticism.

**What is a stockpile?**

A legacy stockpile refers to quantities of batteries greater than 1000kgs collected prior to the launch of the Scheme in January 2022.

Why this is an issue for the BSC

The BSC Scheme is not designed or funded to accept the years of legacy batteries that have been accumulated and for which recycling costs have already been paid.

Despite the potential financial imposition, the BSC prefers that legacy stockpiles are collected and processed as to avoid incidents such as fires that represent a significant risk to the community and the environment.

BSC has been clear in our discussion with industry and Governments during the Design Phase that the Scheme is not designed to receive legacy stockpiles.

BSC is working with State and Territory Governments to identify, monitor and restrict stockpiles, and to develop a shared response to the management of this important issue.

BSC Policy

The BSC strategic position is based on the following:

- stockpiled materials are not eligible for rebates without prior consent
- rebate payments are restricted to only BSC accredited participants
- participants in the Scheme are required to make a commitment that they will not claim stockpiled material for rebates unless agreed by BSC
- participants who breach this commitment may lose accreditation and future access to rebates.

Additional actions

The BSC Stockpile Strategy includes the following actions:

- continuing to develop a shared understanding of the issue with State and Territory governments by:
 - identifying stockpiles
 - ensuring existing illegal stockpiles are monitored and responsibly and transparently managed.
- continuing our dialogue with the recycling industry through ABRI to ascertain the extent of stockpiling and development of management options
- requiring a pre-accreditation audit of applicants for BSC accreditation from battery recyclers during 2021 to:
 - identify existing collection points, logistic providers and the source, extent, and nature of any potential stockpiles
 - create a baseline picture for each accredited collector/ recycler against which future volumes can be monitored to ascertain source of batteries coming into the Scheme.
- working with each accredited recycling member and regulators to develop an action plan that might include:
 - payment of partial processing rebate; and
 - a schedule for transfer of stockpiled material.

ACTIONS FOR YOU

If you are thinking of participating in the Scheme, you can become a Battery Steward by:

- **Joining the BSC (<https://bsc.org.au/document-types/bsc-forms/>) and submit your signed Battery Steward Commitment**
- **register your interest in becoming a collection, sorting or recycling partner**
- **Declare any stockpiled material to the BSC**

Still have questions or need assistance?

If you still have questions or would like further information, related documents can be downloaded from the BSC Website 'Resources' menu. Or email us at: contact@bsc.org.au