



Friday 31 July 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: Comment on the Draft National Waste Policy Framework

Thank you for the opportunity to provide comment on the draft National Waste Policy Framework. These comments follow on from our previous submission (dated 13 May 2009) where we highlighted the need for:

- consistency between jurisdictions for waste strategy, definitions and regulations
- effective education on waste and resource recovery
- resource recovery emphasis to deliver waste minimisation
- fact-based waste policy.

We note that many of these issues have been incorporated into the draft framework, and we are supportive of the general direction of the framework. In particular we welcome the inclusion of batteries in the discussion around product stewardship. After all, the vision of ABRI is for 'the effective stewardship of all end-of-life batteries'.

In addition to our previous submission, ABRI would like to raise the following issues with regard to the draft framework:

- aims of the policy: with regard to batteries, resource recovery is the most desirable end-of-life option. Resource recovery delivers a 'waste disposal' service as a by-product to its intrinsic value adding nature. The current aim of the draft framework should recognise this dual benefit
- vision and targets: the target adopted by the National Waste Policy will be a key factor in assessing the vision for resource recovery in Australia. Most of the materials in batteries are capable of closed loop recycling. We support a policy position that creates the conditions to realise this outcome in a commercially viable manner
- themes and directions: an important component underpinning resource recovery of batteries is collection and aggregation (reverse logistics) capacity to aggregate sufficient quantity and quality of recovered resource for reprocessing. This capacity should be made explicit as a theme within the draft framework in order to highlight the importance of reverse logistics



- themes and directions: another important component in the resource recovery of batteries is effective education. Once systems of collection are in place there is a need to translate community desire for recycling into effective outcomes. We recommend that education (including promotion and marketing) should be included as a key theme of the framework
- reporting on performance: ABRI is very supportive of 'fact based' decision making. This requires a level of data collection and analysis that is not available in the market for batteries. We recommend establishing partnership roles whereby government could work with industry groups like ABRI to undertake the necessary research and assessment of market data required to support fact based policy making.

ABRI welcomes the development of a National Waste Policy that will take proactive steps to increase the recovery of resources in Australia. ABRI believes that action to improve the stewardship of battery and battery-containing products should be an outcome of a successful National Waste Policy. We look forward to providing further information to the Department to help this become a reality.

Best Regards,

Wayne Richardson
President