

## **B-cycle Collection** & Recycling Network Accreditation Protocols



Battery Stewardship Council



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### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



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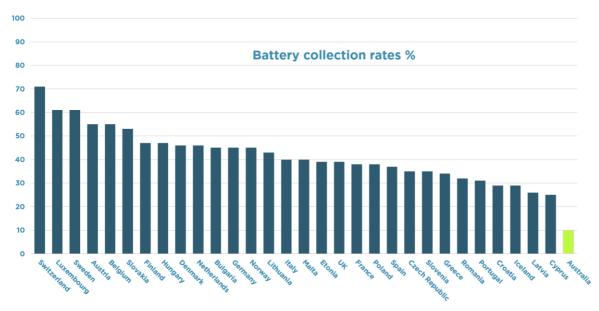


## **1** Purpose of this document

This document describes the requirements for becoming an accredited participant in the B-cycle collection and recycling network. It has been prepared to implement the requirements of the Battery Stewardship Scheme as authorised by the ACCC and ensure the Scheme operates in an effective, efficient, safe, and transparent manner.

## **2** Objective of the Scheme

Batteries have become an essential part of all our daily lives. In Australia, battery recycling rates are exceedingly low (other than used lead acid batteries). Only 10% of handheld batteries are recycled in Australia, well below best practice international recycling rates<sup>1</sup>.



### Figure 1. Figure 1: International Collection Rates

The primary reason for this poor outcome is that Australia's geographic spread and small population result in a high cost to collect batteries for recycling. This cost has not been built into the price of the product. To overcome this market failure, the BSC is establishing an accredited national collection and recycling network, to ensure batteries are responsibly collected and recycled.

<sup>&</sup>lt;sup>1</sup> Collection of Waste Portable Batteries in EU (2016) Perchards & SagisEPR, & Australian Battery Market Analysis (2020) Envisage Works on behalf of the BSC.





## **3** Scheme scope

The Scheme has been designed to address the battery waste problem, initially for handheld and rechargeable batteries. The figure below shows which batteries are out of scope.



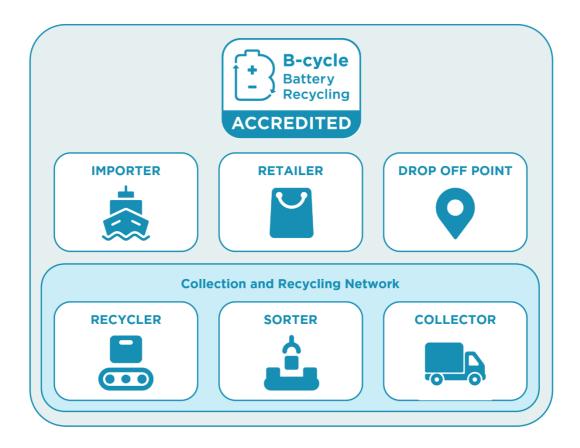






# 4 B-cycle Participant accreditation process

Accreditation provides the foundation of the B-cycle Scheme and includes both general commitments for all Participants and additional commitments specific to a Participant's role in the battery value chain. The focus of this document is on the B-cycle collection and recycling network.



### Figure 3. B-cycle accredited participants

## 4.1 Obligations

All Participants commit to general obligations and specific obligations depending on their role in the battery value chain. These commitments are documented in the B-cycle <u>Battery Steward</u> <u>Commitment</u>. Commitments for the B-cycle collection and recycling network are as shown in the table below.





### Figure 4. B-cycle Collection and Recycling network obligations.

B-cycle Drop off points	Collectors
Provide a safe Drop off point for batteries by consumers.	Provide collection services that conform to B-cycle approved standards for quality, environment health and safety, (e.g., packing, tracking, safety & quality assurance, including AS 5377, ISO 14001, and/or ISO 45001).
Conform to B-cycle Drop off point standards, including for the use of containers.	Guarantee that all used batteries received go to a B-cycle accredited Sorter and/or Recycler.
Acknowledge that legacy batteries from stockpiles are not eligible for the rebate without prior consent.	Accept collected batteries only from B-cycle accredited Drop off points.
Guarantee that all used batteries received go to B-cycle accredited Collectors, Sorters and Recyclers.	Acknowledge that legacy batteries from stockpiles are not eligible for the rebate without prior consent.
Use the B-cycle approved tracking system to ensure accurate tracking of batteries collected for recycling.	Maximise the use of domestic markets for battery sorting and recycling.
Report fire and other significant relevant incidents to the appropriate authorities and the BSC, to enable a better understanding of risks, and to improve collection	Use the B-cycle approved tracking system to ensure accurate tracking of batteries collected for recycling.
systems.	Report collection rates and costs to the BSC.
	Report fire, contamination, and other relevant significant incidents to the relevant authorities and the BSC, to enable a better understanding of risks, and to improve collection systems.
	Be a member of ABRI <sup>2</sup> .
Sorters	Recyclers
Sorters Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g, AS 5377, ISO 14001, and/or ISO 45001.	<b>Recyclers</b> Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO 45001 and relevant EPA licences.
Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g,	Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO
Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g, AS 5377, ISO 14001, and/or ISO 45001.	Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO 45001 and relevant EPA licences. Only accept batteries from B-cycle accredited Drop off
Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g, AS 5377, ISO 14001, and/or ISO 45001. Accept batteries from B-cycle accredited Collectors only. Guarantee that all used batteries received go to a B-cycle	<ul> <li>Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO 45001 and relevant EPA licences.</li> <li>Only accept batteries from B-cycle accredited Drop off points, Collectors and Sorters.</li> <li>Guarantee that all used batteries received are processed by a B-cycle accredited reprocessing facility for</li> </ul>
Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g, AS 5377, ISO 14001, and/or ISO 45001. Accept batteries from B-cycle accredited Collectors only. Guarantee that all used batteries received go to a B-cycle accredited Recycler for environmentally sound processing. Maximise the use of domestic markets for battery	<ul> <li>Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO 45001 and relevant EPA licences.</li> <li>Only accept batteries from B-cycle accredited Drop off points, Collectors and Sorters.</li> <li>Guarantee that all used batteries received are processed by a B-cycle accredited reprocessing facility for environmentally sound disposal.</li> <li>Ensure the environmentally sound use of commodities obtained from the recycling of batteries, and maximise</li> </ul>
Provide sorting services that conform to B-cycle approved quality, environment, health and safety laws standards e.g, AS 5377, ISO 14001, and/or ISO 45001. Accept batteries from B-cycle accredited Collectors only. Guarantee that all used batteries received go to a B-cycle accredited Recycler for environmentally sound processing. Maximise the use of domestic markets for battery recycling. Acknowledge that legacy batteries from stockpiles are not	<ul> <li>Provide processing services that conform to B-cycle approved quality, environment, health and safety standards and laws, e.g., AS 5377, ISO 14001, and/or ISO 45001 and relevant EPA licences.</li> <li>Only accept batteries from B-cycle accredited Drop off points, Collectors and Sorters.</li> <li>Guarantee that all used batteries received are processed by a B-cycle accredited reprocessing facility for environmentally sound disposal.</li> <li>Ensure the environmentally sound use of commodities obtained from the recycling of batteries, and maximise the use of domestic markets for process outputs.</li> <li>Acknowledge that legacy batteries from stockpiles are</li> </ul>
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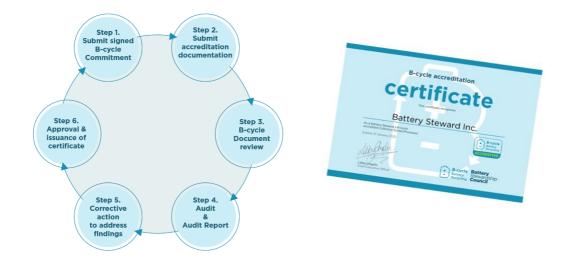
<sup>2</sup> Australian Battery Recycling Initiative





### 4.2 Verification process

Verification of these commitments will be conducted using a variety of methods appropriate to the Participant role, including audits and document reviews. This is intended to ensure a safe and transparent process for managing batteries, from the point of import through to closing the loop with recycling.



### Figure 5. Overview of the accreditation process for collection, sorting and recycling network

Verification activities vary depending on the Participant's role in the battery value chain. The time taken to navigate the accreditation varies, however the figure below provides indicative time frame.

Figure 6.

#### Verification timing





### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



Role	Obligation	Verification
All	<ul><li>Promote the Scheme.</li><li>Comply with legal requirements</li></ul>	<ul> <li>Document review and occasional health checks.</li> </ul>
Improper	• Disclose import data.	<ul> <li>Independent accounting firm data collection.</li> <li>Audit import data based on random selection.</li> </ul>
Retailer	<ul> <li>Pass on the levy.</li> <li>Preferred purchasing of accredited brands.</li> </ul>	<ul><li>Document review.</li><li>Interviews.</li></ul>
Drop off point	<ul><li>Code of Practice.</li><li>B-cycle training.</li></ul>	<ul> <li>Provision of signed Code to B-cycle App to BSC.</li> <li>Occasional site visits to conduct system health checks, verify implementation of the Code, and verify completion of safety training and the site's risk assessment and safety plan.</li> </ul>
Collectors	• B-cycle protocol conformity.	<ul> <li>Process described in this protocol.</li> </ul>
Sorters	B-cycle protocol conformity.	<ul> <li>Process described in this protocol.</li> </ul>
Processors	B-cycle protocol conformity.	• Process described in this protocol.



### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



Evidentiary requirements to be submitted to BSC are described in the table below.

Documentation & evidentiary verification	Responsibility (with BSC Oversight)	Drop off points	Collectors	Sorters	Recyclers	Downstream vendors & end processors
1. Commitment document	• Electronic submission to BSC	•	•	•	•	
2. Drop off point code of practice	• Electronic submission to BSC	•				
<b>3.</b> Drop off point health check (onsite)	Independent auditors or BSC	•				
4. Accreditation application & related documentation	<ul> <li>Electronic submission to BSC</li> <li>Used by independent auditors to plan onsite audit</li> </ul>		•	•	•	
5. Onsite audit	Independent auditors		•	•	•	
6. Chain of custody from receipt to transfer to next link in the chain	<ul> <li>B-cycle App</li> <li>Independent accounting firm (additional fee for service)</li> <li>BSC CFO</li> </ul>		•	•	•	
7. Sorting process and outcomes, meeting specifications processor	<ul><li>Independent auditors</li><li>BSC oversight if available</li><li>BSC CFO</li></ul>			•		
8. Recycling process	<ul><li>Independent auditors</li><li>BSC oversight if available</li><li>BSC CFO</li></ul>				•	
9. Recycling outcomes - mass balance	<ul><li>Independent auditors</li><li>Independent accounting firm</li></ul>				•	
10. Verification of environmentally sound management & fate	<ul><li>Independent auditors</li><li>Independent accounting firm</li></ul>				•	•
11. Export compliance (if involved in export)	<ul><li>Independent auditors</li><li>Independent accounting firm</li></ul>			•	•	•





### 4.3 Responsibilities when outsourcing activities

Participants seeking to access rebates are responsible for demonstrating how they have met Bcycle accreditation requirements. This applies whether the services are provided internally or outsourced. Participants seeking rebates are required to provide verifiable evidence that sub-contracted entities (e.g., drivers and couriers) comply with legal requirements, including the Australian Dangerous Goods Code.

### 4.4 Basis of the rebate

BSC uses an accreditation model to enable Participants to participate in the B-cycle system and claim rebates. This rebate system has been designed to address the market failure in the battery recycling industry.

Rebates are only available:

- + with evidence of chain of custody
- + from and to accredited parties
- + once for each unique battery
- upon validation that the batteries have been delivered to another accredited party, with the previous activity or chain of custody completed, or at the end of the recycling chain.





## 4.5 Chain of custody evidentiary requirements for Collector rebate claims

The table below summarises the evidence to be submitted with rebate claims on the B-cycle App, depending on the type of pick-up.

	Public pick-up	Private pick-ups	One-time annual private pick up < 15 kgs	Post-back service < 15 kgs per container	
Drop off point accreditation	Yes	Yes	NA	Yes	
Customer information	B-cycle system	B-cycle system or agreed alternate process	B-cycle system	B-cycle system	
Customer order # (outbound packaging)	NA	NA	NA	Yes	
Geo-located photo of battery receptacle & individual packages at pick-up location	Yes	Yes	Yes	No	
Signed consignment note or manifest (secondary evidence to strengthen claim verification)	Preferred	Preferred	Preferred	Preferred	
Consignment note or manifest	Yes	Yes	Yes	Yes	
Pick-up point contact details	Yes	Yes	Yes	Yes	
Estimated weight	Yes	Yes	Yes	Yes	
Battery type	Preferred	Preferred	Preferred	Preferred	
Chemistry	Preferred	Preferred	Preferred	Preferred	
Container type and size	Yes	Yes	Yes	Yes	
Number of containers	Yes	Yes	Yes	Yes	
Comments (non-conforming materials & incidents)	If applicable	If applicable	If applicable	If applicable	
Sorter verification (of receipt and verified weight of conforming and non- conforming materials)	Yes	Yes	Yes	Yes	

Figure 7. Collector Rebate claim evidentiary requirements





### 4.6 Alternative process

Participants seeking to submit alternative evidence to that described in the table above are required to submit a "B-cycle Alternative Evidence Proposal" form, available by contacting BSC. The proposal will be evaluated by the BSC Accreditation Committee. Subcommittee members include the BSC Chair, CEO, and CFO, plus the Director of Best Practice & Innovation as an Exofficio member.

Proposals for approval of alternative processes must include:

- + why the provision of required evidence is not possible
- + why special dispensation is warranted
- alternative evidence, explaining how it will be collected, managed, and submitted to the B-cycle App
- how the alternative evidence provides an equivalent level of assurance that chain of custody requirements have been met.

Acknowledge that the alternative process will be subject to robust verification from the source and additional more regular spot audits.





### 4.7 Sorter rebate claims

Verification Requirements	Evidence required	from sorter			
	Consignment note	from Collector matches S	Sorter receipt, includir	ng date received).	
Confirmation of Chain of Custody	Geo-tagged evidence of receipt (e.g., photo).				
	<ul> <li>Verify weight(s) of</li> </ul>	shipment received from	Collector.		
	Receipted shipmer	nts with verified weights a	and claim IDs assigned	to a sorting load.	
	Commencement d	ate of pre-sort.			
Characteristics of load	Verified total pre-s	ort weight (kg).			
	Verified total post-	-sort weight (kg).			
	• Verified total non-	conforming weights (kg)	by product type or ma	aterial of load.	
Collector claim(s) verified and closed	<ul> <li>Sorter verifies Coll payment).</li> </ul>	ector claim in B-cycle Ap	p (required for Collec	tor rebate	
	Sort load ID.				
	Commencement date of sort.				
	• Verified battery sort weights (kg) for each of the following:				
Data on sorted load	Alkaline	Lithium-ion	NiCd	Other	
battery chemistries	• NiMH	<ul> <li>Lithium primary</li> </ul>	Mercury	•	
	Information and weight (kg) of non-conforming material (if applicable).				
	Optional: product breakdown (by weight) of sort.				
	Completion date of sort.				
Continuing chain of	Date sorted mater	ial sent to Recycler facilit	у		
custody to Recycler	Nominated Recycle	er facility			
Sorter verification when exporting sorted batteries for offshore processing (these claims are not eligible for processing rebates, only Sorter rebates)	<ul> <li>If using an offshore Recycler, the Sorter must demonstrate: <ul> <li>Legal export and shipment (export permits, shipping records, invoices, etc.)</li> <li>Agreement that offshore receiving Recycler will accept materials</li> <li>Sorting specifications of offshore receiving Recycler</li> <li>Legal compliance of recycling facility</li> <li>Verification of environmentally sound recycling processes</li> <li>Landfill diversion rate and material recovery rates</li> </ul> </li> <li>Once verified, Sorters exporting sorted batteries for processing can close sorting claims for approval.</li> </ul>				



### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



Accreditation audit - required for all sorted batches	Batch	Batch	Batch	Batch	Batch	Batch	
Sample (all shipments or randomly chosen by verifier)	Claim 1	Claim 2	Claim 3	Claim 4	Claim 5	Claim 6	
1. Date							
2. ID from the B-cycle App							
3. Collector name							
4. Type(s)/chemistries of input batteries (if known)							
<ol> <li>Consignment note from Collector matches Sorter receipt, including date received (Y/N)</li> </ol>							
<ol> <li>Geo-tagged evidence of receipt (e.g., photo or approved (Y/N)</li> </ol>							
7. Verified weight(s) (kgs) of receipted shipment from Collector							
<ol> <li>Receipted shipments with verified weights and claim IDs assigned to a sorting load (Y/N)</li> </ol>							
9. Commencement date of pre-sort							
10. Verified total pre-sort weight (kg) of load							
11. Verified total post-pre-sort weight (kg) of load							
12. Verified total non-conforming weights (kg) by product type or material of load							
13. Sorter verifies Collector claim in B-cycle App (Y/N) (Ref)							
14. Sorter load ID							
15. Collector claim IDs included in record of sort load							
16. Include verification of legal transport							
17. Commencement date of sort							
18. Verified battery sort weights (kg):							
+ Alkaline weight							
+ Lithium-ion only weight							
+ NiMH weight							
+ Lithium primary weight							
+ NiCd weight							
+ Mercury weight							
+ Other							
19. Type and weight (kg) of non-conforming material (optional)							
20.Total weight (kg) of in scope batteries							
21. Product breakdown (by weight) of sort (if available)							
22. Completion date of sort							
23. Date sorted material sent to Recycler facility							
24. Date sorted material receipted by Recycler							
25. Nominated Recycler facility							
26. The Recycler's acknowledgement of receipt matches the information in the B-cycle App							
27. If using an offshore Recycler, also complete applicable part of processing template.							
28. Comments – notes to be used to prepare findings							
29. Finding / claim verified							





## 4.8 Recycler Rebate Claim

### 4.8.1 Chain of custody and load verification

VERIFICATION REQUIREMENTS	Evidence required from Recycler
	Consignment note from Sorter matches Recycler receipt (including date, weight and chemistry type).
Chain of custody verification	If Sorter claimant is different to Recycler, Recycler confirms Sorter's claim meets sorting specifications.
Sorter claim(s) verified and closed	Recycler verifies Sorter claim in the B-cycle App (required for Sorter rebate payment).
	Confirm Sorter load IDs and weights of Sorter claims in Recycler batch claim (actual claim IDs required)
Chave stavistics of average intraction	Confirm total weight of batch to be processed equals total weight of corresponding Sorter loads.
Characteristics of processing batch	Processing commencement and completion date
	Completion of Batch processing outputs verification table or equivalent (see below).

The following tool will be used to verify the above requirements for recycling processes and rebate claims.



### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



A	ccreditation audit: required for all chemistries.	Batch or shipment	Batch or shipment	Batch or shipment	Batch or shipment	Batch or shipment	Batch or shipment
Re	bate claims	Claim 1	Claim 2	Claim 3	Claim 4	Claim 5	Claim 6
1.	Date						
2.	ID from the B-cycle App (post accreditation)						
3.	ID from tracking system matches (Y/N) (Ref)						
4.	Value chain map is consistent with the requirements of the latest version of AS 5377						
5.	Customer name						
6.	Type(s) of material / batteries						
7.	Input Weight(s) (kg)						
8.	Weight by output materials (kg) (if available)						
9.	Outbound and inbound shipping (bills of lading/acknowledgement of receipt/invoices) records match weight and/or count (Y/N) (Ref)						
10.	Destination of material						
11.	Any exported deemed hazardous waste by AU or receiving countries, the required Hazardous Waste Permit is consistent with claim (legal import, transit, and export) (Y/N) (Ref)						
12.	Confirmation of legal shipment						
13.	Recycler provides Export Declaration Number (EDN) (Y/N) (Ref)						
14.	Recycler provides report from Integrated Cargo System (ICS) (Y/N) (Ref)						
15.	Info on value chain map matches invoices and shipments (business name, city, country) (Y/N) (Ref)						
16.	Claim can be tracked back accurately to mass balance and inventory management system (Y/N) (Ref)						
17.	Agreement or invoice shows business relationship (Y/N)						
18.	Weight by output materials (kg) (If available)						
19.	Certificate of destruction or recycling (with weight & date) by receiving downstream vendor (Y/N) (Ref)						
20	. Downstream vendor legal compliance (Y/N) (Ref)						
21.	Downstream vendor audit date (optional for now under AS 5377) (Y/N) (Ref)						
22.	Process is consistent with Basel Environmental Sound Management (Y/N) (Ref)						
23.	Evidence of independent verification of final processing outputs (accreditation) (Y/N) (Ref)						
24	. Downstream vendor process residuals documented (Y/N) (Ref)						
25.	Onshore landfill diversion rate verified3 (Y/N) (Ref)						
26	. Final recovery rate, downstream vendors included, using AS 5377 method or equivalent (Y/N) (Ref)						
27.	Comments – to be used to summarise observations and prepare findings						
	28. Finding / claim verified (Y/N)						

<sup>3</sup> Must be >90% onshore landfill diversion eligible for processing rebate payments. Processing outcomes to be >80% recovery rate (lower rates may be considered by BSC with approval of the Board if a pathway to 80% is clearly identified).



This Scheme is authorised by the Australian Competition & Consumer Commission (ACCC), accredited by the Australian Government, and has received financial support from the Australian Government and industry.



### 4.9 Rebate rates

Initial rebate rates have been set as shown in the table below. The determination of metro versus regional rebates is through postcodes aligned to the metro and inner transport zones, with the exception of all areas of Northern Territories, Tasmania, and Western Australia due to their geographical distance from battery processors at the time of launch of the Scheme.

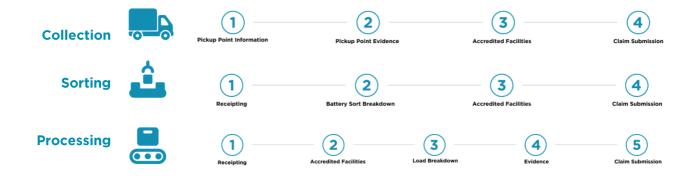
### Figure 8. Table 2: Initial rebate rate

Metro collection	\$2.50/kg	Sorting (to recyclers specifications)	\$1.00 /kg
Regional collection (+ all of Tas, WA NT)	\$3.50/kg	Processing	\$1.00 /kg

Rebate rates will be reviewed on a regular basis by the Board, in conjunction with cost information provided by Participants.

### 4.10 Rebate claims process

Accreditation is a requirement for B-cycle rebate claims. Participants are required to participate in a closed-loop system in which the source, transfers, and recycling of collected batteries are traceable through a clear chain of custody. The figure below illustrates the rebate claim process on the B-cycle App.





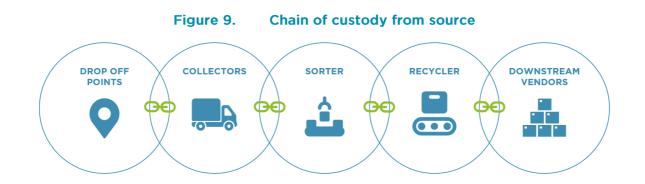


## 5 Use of the B-cycle App

The B-cycle App is the central administrative tool to enable traceability and process rebate payments. BSC has responded to industry's request for existing tracking systems to interface with the App to minimise duplication, particularly in the field. The system allows in-field use, and centralises information upload.

## 5.1 Transparency is critical to the success of the rebate model

The B-cycle Scheme is different to a typical commercial arrangement. It is funded by the consumer with the involvement of industry and the support of all Governments. This necessitates a higher level of accountability.



To access rebates, Participants must be accredited and meet <u>Battery Steward Commitments</u>, including traceability and transparency from source to final processing. BSC access to Participants' collection, transporting, sorting, processing, financial and relevant business data is of paramount importance to achieve the Scheme's objectives in a transparent manner.

### 5.1.1 Data security is essential to Scheme credibility

The ability of the BSC to protect sensitive data is central to the ongoing success of the Scheme and of our Participant relationships. The BSC needs to collect, track, and verify data to:

- + deliver on our strong commitments of safety and transparency
- + provide assurance that all collected batteries are in fact recycled
- + enable the BSC to process accountable and auditable rebate payments to B-cycle accredited Participants
- + prevent double counting and fraudulent rebate claims
- + track incidents and respond to consumer or Participant concerns.

BSC recognises that there may be privacy and security concerns regarding data requirements, therefore we have established robust processes to ensure data is protected.







### 5.1.2 Commitment to data protection

BSC is committed to protecting all personal and commercially sensitive data. We have conducted a risk analysis and instituted legal mechanisms, policies, and data management procedures to manage data security risks. Our data security program includes the following controls:

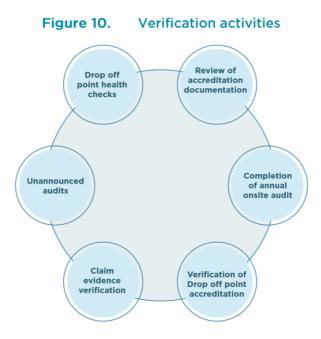
Mechanism	Approach
Employee data security controls	<ul> <li>Clear definition of data security responsibilities in employee contracts, the employee handbook and orientation training</li> <li>Make fraud and confidentiality issues a critical and regular agenda item at weekly management meetings</li> </ul>
Aggregated reporting	<ul> <li>BSC has processes in place to ensure that information and collection data is only made public through aggregated reports. This is reviewed to ensure that sensitive information is not released.</li> </ul>
Restricted access	<ul> <li>Sensitive information is partitioned from access to stakeholders including the BSC Board, with access limited to key BSC staff (CEO &amp; Director of Best Practice and Innovation).</li> </ul>
Outsourcing criteria	<ul> <li>All external BSC contractors are limited in their access to data held by BSC, and can only use data relevant to their task.</li> </ul>
Auditor verification	<ul> <li>From time to time, BSC will engage independent auditors to verify information. Auditors will be chosen on the basis demonstrated ability to independently audit and maintain data security.</li> </ul>
Non-disclosure	<ul> <li>BSC establishes non-disclosure agreements (NDAs) with participants who have concerns regarding the protection of commercial data.</li> </ul>
Administration	<ul> <li>BSC manages data entry of Participants and Drop off point information in-house.</li> <li>Rebate processing is administered by the BSC accounting firm.</li> </ul>
Developer controls	<ul> <li>The App developer is required by contract law to protect member data, including data on collection points.</li> <li>The developer must not have a conflict of interest or provide written confirmation of processes used to ensure conflict of interest is managed.</li> </ul>





## 6 Verification methodology for B-cycle Collectors, Sorter and Recyclers Verification activities

The BSC will conduct various verification activities to assure the integrity of the Scheme and that Participant obligations are met.



These verification processes enable the BSC to assure the B-cycle community (brands, retailers, consumers, Participants, partners, and government) of the following:

- + the legitimacy of the business and related interests to prevent exposure of BSC to potentially fraudulent activities
- + management systems support a safe and transparent B-cycle network
- + employee awareness is such that the obligations can be met
- + the use of the B-cycle brand is appropriate
- + Scheme participants (and thus the Scheme) operate in a safe and compliant manner
- + all batteries collected are in fact recycled, and rebate claims are substantiated.

### 6.1 Who will be audited?

The degree of verification will depend on the role in the supply chain. Except for unannounced audits, BSC will work with Participants to ensure obligations and processes are well communicated and understood, confirming that partners and customers are aware of upcoming audits. The following figure provides an overview of the key topics to be verified in audits.





## 7 Accreditation of Collectors, Sorters and Recyclers

Successful accreditation requires that BSC verify information and activities from Participants in the following categories:

	1.	Organisational & operational information	7.	Battery transport
<b>B-cycle</b>	2.	Management systems	8.	Battery sorting
Battery	3.	Regulatory compliance	9.	Battery processing
Recycling	4.	Container safety	10.	Chain of custody
	5.	Drop off point management	11.	Environmentally sound management
	6.	Battery storage	12.	Cost of service

### 7.1 Organisational and operational information

BSC requires Participants to disclose organisational and operational information in order to identify battery and related affiliations and site and vehicle ownership. The purpose is to avoid the potential for legacy and illegal stockpiles being submitted for rebate claims and to minimise the potential for batteries managed by a participant to be abandoned.

Requirement	Collectors	Sorters	Processors	Standard / documentation requirements
1. Provision of the ASIC listing for all parent and subsidiary companies.	•	•	•	ASIC listing.
2. Provision of the listing of Directors of all parent and subsidiary companies.	•	•	•	• List of parent and subsidiary companies.
3. Provision of the listing of all company sites, including aggregations sites, storage & processing facilities.	•	•	•	<ul> <li>List of current sites, including aggregations sites, storage &amp; processing facilities.</li> </ul>
<ol> <li>Evidence of site ownership and/ or ease arrangements of all listed sites.</li> </ol>	•	•	•	Copies of titles or lease agreements.
5. Company names and contacts of any subcontractors used.	•	•	•	List of contractors and subcontractors.
6. Please provide details of your fleet ownership/ leasing arrangements.	•	•	•	• List of fleet and statement of lease arrangements.
7. Membership of the ABRI to demonstrate your participation in the development of best practices.	•	•	•	• Current ABRI (Australian Battery Recycling Initiative) membership certificate.
8. Workers Compensation Insurance.	•	•	•	Current Workers Compensation Insurance Certificate.
9. Public and Products Liability Insurance.	•	•	•	Current Public and Products Liability Insurance Certificate.





### 7.2 Management systems

The *Battery Steward Commitment* includes a commitment to the collection and storage of batteries in accordance with management systems and processes. This ensures that risks associated with collecting and sorting used batteries are well understood by employees, minimal and mitigated appropriately.

Requirement	Collectors	Sorters	Processors	Standard / documentation requirements
10. Management system (e.g., ISO 14001, ISO 45001, ISO 9001, or equivalent).	•	•		<ul> <li>Submission of certificates to BSC to demonstrate certified system or equivalent.</li> <li>Evidence of effective system implementation.</li> </ul>
11. E-waste certification (e.g. AS 5377, R2 or equivalent).		1	•	<ul> <li>Certified system or equivalent.</li> <li>Evidence of effective system implementation.</li> </ul>
12. Copies of recent certification audit & internal audit reports.	•	•	•	• Evidence of an effective system.
<ul> <li>13. Assessments and procedures, or similar, for example:</li> <li>+ Job Safety Analysis</li> <li>+ Safe Work Method Statements</li> <li>+ Risk Assessments.</li> </ul>	•	•	•	<ul> <li>Evidence of an effective risk and hazard analysis.</li> <li>Evidence of safety procedures for battery operations.</li> <li>Evidence of employee understanding of relevant risks, including battery safety, electrical safety and manual handling.</li> </ul>
14. Fire/ Emergency Plans and controls.	•	•	•	<ul> <li>Evidence of clear plan, understanding &amp; implementation of battery fire &amp; emergency response system(s).</li> </ul>
15. Pollution prevention and management plans.	•	•	•	• Evidence of effective stormwater and air quality management controls.
16. Manual handling procedures.	•	•	•	• Evidence of effective manual handling procedures including safe lifting procedures.
17. EHS Incident investigation and management procedures.	•	•	•	<ul> <li>Incident response management and continual improvement process.</li> </ul>
18. Employee training register	•	•	•	• Evidence that employees are aware of relevant responsibilities including battery safety, fire risk and fire management, and chain of custody.
19. PPE requirements	•	•	•	• Evidence that PPE requirements are suitable for battery operations and emergency response.





## 7.3 Regulatory compliance

The Battery Steward Commitment includes a commitment to national, state, and/or territory regulatory compliance for battery collection, transport, storage, handling, and processing. The following information is required by the BSC to verify your collection processes are compliant with existing regulations.

Requirement	Collectors	Sorters	Processors	Standard or documentation required
20.Compliance with jurisdictional requirements (including federal, state and local) for transporting batteries.	•	•	•	• Evidence of relevant transport permits and licences relating to fire and emergency services, transport/ADG Code, and environmental regulators.
				• Records of any current relevant legal notices, instructions, directives, or fines.
21. No history of wilful violations, and			•	• Records of any council warnings, infringements, notices, penalties, or fines.
evidence that regulatory infringements have been successfully resolved or there is a clear and agreed plan with regulators.				<ul> <li>Records of any of EPA clean-up Notices, Provisional Improvement Notices, or Pollution Abatement Notices</li> </ul>
Note: any decision to accredit or revoke accreditation based on infringements will be subject to confirmation by the	•			<ul> <li>Records of any Worksafe or WorkCover notices, site reports/ letters, penalties, infringement notices.</li> </ul>
BSC Board.				• Fire authority instructions or directives, site visit reports/ letters, revocation notices, penalties, or fines.
				<ul> <li>Transport / licensing infringement notices. Road authorities and/ or any transport authorities, including notice of vehicle accidents.</li> </ul>
22. Compliance with the Australian Heavy Vehicle National law.	•			• Evidence of vehicle and driver compliance with the Heavy Vehicle National law, for all vehicles with a combined vehicle and load weight of 4.5 tonnes
23. Compliance with State and Territory legal requirements for tracking, reporting, and recording transport of used batteries.	•	•	•	• Evidence of registration and compliance with required state/territory-based waste tracking systems (if applicable).
<ul> <li>24. No history of links to organisations or individuals with a history of illegal stockpiling.</li> <li>Note: any decision to accredit or revoke accreditation based on stockpiling history will be subject to confirmation by the BSC Board.</li> </ul>	•	•	•	<ul> <li>Organisations, previously linked organisations, or directors of an organisation with a track record of stockpiling or negligent behaviours, will not be eligible for accreditation.</li> </ul>
25. Prevention of stockpiled materials without prior arrangement with the BSC.	•	•	•	<ul> <li>A system of controls will be established to prevent acceptance of stockpiled materials.</li> <li>Note: any decision to accredit or revoke accreditation based on stockpiling will be subject to confirmation by the BSC Board.</li> </ul>





## 7.4 Container safety

The Battery Steward Commitment includes a commitment to national, state, and/or territory regulatory compliance for battery collection, transport, storage, handling, and processing. The following information is required by the BSC to verify your collection processes are compliant with existing regulations.

Requirement	Collectors	Sorters	Processors	Standard or documentation required
26. Drop off containers conform to the requirements in the B-cycle Container Protocols.	•			• Evidence that Drop off bins meet relevant regulatory requirements and standards.
27. A risk assessment has been conducted for chosen Drop off containers.	•			• Provision of risk assessment that identifies relevant risks associated with Drop off bins, their use, and location.
28. A risk assessment has been conducted for storage containers used for aggregation.	•	•	•	<ul> <li>Record of risk assessment that identifies relevant risks associated with storage containers, their use, and location.</li> </ul>
29. Drop off containers address identified risks, including risk of fire.	•			• Evidence that Drop off bins address identified risks.
<ul> <li>30.Drop off containers are regularly maintained to ensure that they:</li> <li>+ remain in good condition</li> <li>+ prevent harm to human health and the environment</li> <li>+ support B-cycle brand integrity</li> </ul>	•			• Evidence that Drop off containers are regularly maintained and serviced.
31. Battery storage and aggregation containers comply with regulatory requirements and standards.	•	•	•	• Evidence that battery storage containers meet relevant regulatory requirements and standards.
32. Battery storage and aggregation containers are designed to address identified risks including risk of fire.	•	•	•	• Evidence that battery storage containers address identified risks.
<b>33. Battery storage and aggregation</b> containers are properly labelled to indicate contents and comply with applicable legal requirements.	•	•	•	<ul> <li>Evidence that battery storage containers are properly labelled.</li> </ul>





## 7.5 Drop off point safety and transparency

Participants are required to demonstrate that Drop off points under their management are conducted in a safe and transparent manner. Accredited Collectors are required to verify Drop off point safety and transparency.

Requirement	Collectors	Sorters	Processors	Standard / documentation required
34. Ensure all Drop off points are accredited	•			<ul> <li>Signed Drop off point Code of Practice provided to BSC or BSC delegated agent.</li> <li>Upon request, provide evidence of completed Drop off point Safety training and Drop off point Risk Assessment and Safety Plan.</li> </ul>
35. A list of all public Drop off points/ Pick-up points for all sites a Participant collects from, with contact details.	•			<ul> <li>Identification of all sites a Participant collects from including contact details and address.</li> <li>Declaration of Public Drop off points uploaded to the B-cycle website for promotion.</li> </ul>
36. Provide a list of all private pick- ups (I.e. not open to the public).	•			<ul> <li>Declaration of all private Pick-up points.</li> <li>Note that private pick-ups are still required to meet all other accreditation requirements.</li> </ul>
37. Control of postal collection services.	•			<ul> <li>One-time postal collections do not require accreditation.</li> <li>For regular postal collections (&gt; 1 per year), ensure:</li> <li>Drop off point accreditation is completed.</li> <li>Box/ packaging has been specifically designed for safe transport of used batteries.</li> <li>Postal/ courier service satisfactorily meets the BSC traceability requirements.</li> <li>Chain of custody starts as the customer registers with the Collector and box is provided to them.</li> <li>Note: batteries posted in non-compliant boxes or packaging will not be eligible for a rebate.</li> </ul>
38. Control of one-off pick-ups (<1 per year).	•			<ul> <li>Establish and implement a system of controls to ensure one-off pick-ups are defined.</li> <li>New one-off private Pick-up points don't have to be accredited, but contact details are required.</li> </ul>
<b>39.</b> Process for ensuring all Drop off points / Pick-up points sign the Drop off point Code of Practice (this can be managed by B-cycle or by the Collector).	•			<ul> <li>Records of signed Code of Practice for all Drop off points/ Pick-up points prior to accreditation.</li> <li>Ensure records of signed Code are uploaded to the B-cycle App once in place.</li> </ul>
40.Processes for ensuring Drop off points and Pick-up points provide evidence that B-cycle safety training has been completed	•			<ul> <li>Training records for all Drop off points / Pick-up points are available in (in corporate training or B-cycle portal).</li> <li>Ensure records of signed Code are provided to B-cycle.</li> </ul>
41. Risk assessment and safety plans prepared for Drop off points	•			<ul> <li>Risk assessments will be provided if requested during a Drop point Health Check.</li> </ul>
42. Provision of containers that address identified risks, including risk of fire.	•			• Evidence that Drop off bins address identified risks.
43. Battery containers have appropriate B-cycle branding.	•			• Provide photographs of bins showing a B-cycle label affixed (or printed onto the bins) consistent with the B-cycle Style Guide.





### 7.6 Receiving and storing batteries

To achieve accreditation, Participants must demonstrate safe storage of batteries during operations and transit. The following information is required by BSC to verify battery storage is safe and compliant.

Requirement	Collectors	Sorters	Processors	Standard required
44.Evidence that you receive batteries from accredited Collectors and provided them to accredited recyclers only.		•		<ul> <li>Agreements to sort batteries from accredited collectors.</li> <li>Agreements for sorted batteries to be processed by accredited recyclers.</li> <li>Tracking system confirms batteries have only been received from accredited collectors and sorters.</li> </ul>
45. Battery chemistries collected are consistent with the BSC Scheme cope.	•			<ul><li>Declaration of batteries chemistries collected.</li><li>Declaration of battery types collected.</li></ul>
46.Regular reporting of battery collections. Please note that this report can be generated through the B-cycle App.	•			<ul> <li>Monthly and annual reports of battery collected including volumes (kg) by:</li> <li>month</li> <li>state or territory</li> <li>chemistry and type</li> <li>non-conforming loads</li> <li>incidents.</li> </ul>
<ul> <li>47. Limit customer battery Drop offs:</li> <li>Retail Drop off point or similar: 1 kg</li> <li>Transfer stations or similar: 10 kg</li> <li>Alternative with BSC written agreement.</li> </ul>	•			<ul> <li>Records of communication with Drop off/ Pick-up points.</li> </ul>
48. Process for ensuring that non- conforming loads are not submitted for rebate.	•			Procedure for managing non-conforming loads.
49. Process for verifying that your Drop off points do not stockpile used batteries (>1,000 kg).	•			<ul> <li>Process for ensuring you reject loads from unaccredited entities attempting to dispose of stockpiles, including notifying the BSC.</li> </ul>
50.Declare any sites where you aggregate used batteries >1,000 kg at any one time, including those with aggregated volumes.	•	•	•	<ul> <li>Declaration of sites where batteries may be aggregated, including where batteries are stored in excess of 1000 kgs at any one time.</li> <li>Evidence that legal storage time limits are met.</li> </ul>
51. Declare stockpiles, i.e., aggregated volumes >1,000 kg.	•	•	•	<ul> <li>Declaration of stockpiles, and provision of a management action plan approved by relevant regulators, including:         <ul> <li>source, history, extent, &amp; nature stockpiles</li> <li>stockpile management practices</li> <li>timeline for treatment and processing.</li> </ul> </li> </ul>
52. Process that ensures that all used collected batteries are not stored beyond legal time limits.	•	•	•	<ul> <li>Declaration of all sites where you aggregate used batteries for transportation purposes and associated legal storage limits.</li> </ul>
53. Forklift safety (in general and to prevent damage of batteries).	•	•	•	• Forklift safety procedures and maintenance programs are implemented.





### 7.7 Battery transport

To achieve accreditation, participants are required to demonstrate safe and compliant transport of used batteries. The following information is required by BSC to verify transport activities.

Requirement	Collector	Sorters	Processor	Standard required
54. Number and type of vehicles you manage.	•			<ul> <li>Submission of documents to BSC for document review.</li> <li>Include vehicles that your subcontractors may use.</li> </ul>
55. Use suitably qualified drivers.	•			• Evidence of process to ensure driver qualifications and that drivers have a safe driver record.
56. Vehicle accident response procedures.	•			<ul> <li>Evidence of effective vehicle accident preparedness and response process.</li> </ul>
57. Documented procedures for Safe Battery Transport.	•			<ul> <li>Submission of documents to BSC for document review.</li> <li>Effective procedures for safe battery transport.</li> </ul>
58. Documented procedures, including controls, for loading and unloading of batteries to Sorters or Recyclers.	•			<ul> <li>Submission of documents to BSC for review.</li> <li>Safe loading and unloading practices.</li> </ul>
59. Documented procedures for battery/ container spills (during transport).	•			<ul> <li>Submission of documents to BSC for review.</li> <li>Effective spill management system.</li> </ul>





### 7.8 Battery sorting

If you are seeking B-cycle Sorter accreditation, your sorting processes must meet the specifications of your receiving B-cycle accredited recycler. This includes confirming what battery chemistries you sort, and how you comply with sorting specifications established by the BSC. The following information is required by BSC to verify sorting activities.

Requirement	Collectors	Sorters	Processors	Standard required
60.Business arrangement with Recycler, including sorting specifications and process for managing non-conforming materials including out-of-scope batteries.		•		<ul> <li>Current contract or agreement with recycler including sorting specifications and processes for managing non-conforming materials including out-of-scope batteries.</li> </ul>
61. Total monthly and annual volumes sorted, in accordance with specifications set by the receiving B-cycle battery recycler. Note that this report can be generated through the B-cycle App.		•		<ul> <li>Monthly and annual reports of battery collected including volumes (kg) by:</li> <li>month</li> <li>state or territory</li> <li>chemistry</li> <li>non-conforming loads</li> <li>incidents.</li> </ul>
62. Identification of B-cycle battery chemistries sorted e.g.: + mixed batteries + alkaline only + Li-ion only + Li primary + NiMH + NiCd + Mercury + other		•		• Declaration of all battery chemistries sorted.
63. Sorters that are exporting batteries will do so in conformance with the below section on battery processing.		•		<ul> <li>System of controls for managing offshore downstream vendors.</li> </ul>





### 7.9 Battery recyclers

If you are seeking B-cycle Sorter accreditation, your sorting processes must meet the specifications of your receiving B-cycle accredited recycler. This includes confirming what battery chemistries you sort, and how you comply with sorting specifications established by the BSC. The following information is required by BSC to verify sorting activities.

Requirement	Collectors	Sorters	Processors	Standard required
64. Evidence that you receive batteries from accredited Collectors or Sorters.			•	<ul> <li>Agreements to process batteries from accredited collectors and sorters.</li> <li>Your tracking system confirms that you have received batteries from accredited Collectors and Sorters only.</li> </ul>
65. Declaration of battery chemistries processed: + Mixed batteries + Alkaline only + Li-ion only + Li primary + NiMH + NiCd + Mercury + Other			•	• Record of all battery chemistries processed.
66. Provision of monthly and annual processing capacity by site, weight and chemistry type.			•	<ul> <li>Record of monthly and annual processing capacity by site, weight and chemistry type.</li> </ul>
67. Site operations have the capacity to process all batteries received in a 12-month period.			•	• Evidence confirming that your site(s)' operations have the capacity to process all batteries received in a 12-month period.
68. Recovery rates and end of life markets consistent with BSC Scheme design and protocols.			•	<ul> <li>Declaration of current recovery rate.</li> <li>Records from downstream vendors conforming receipt and recovery rates achieved.</li> </ul>
69. Evidence of appropriate disposal or recovery of all battery materials in accordance with environmentally sound management (including processing for landfill where appropriate).			•	<ul> <li>Processing is conducted according to environmentally sound management (see definitions section).</li> <li>Rebate claims must demonstrate recovery rates greater than 90% unless approved by the BSC (e.g., in the case of problematic chemistries) and demonstrated recycling efficiency.</li> <li>Demonstrate and continuously improve the environmental benefit and value of the recovered materials.</li> </ul>
70. Provide verification from downstream vendors that all materials are reprocessed/ recycled legally, according to local and international environmental regulations.			•	<ul><li>Certificates of recycling.</li><li>Certifications and accreditations of DSV.</li></ul>





## 7.10Chain of custody

If you are seeking B-cycle accreditation, traceability is a core commitment. This includes maintaining the chain of custody from receiving batteries to final processing, whether onshore or offshore. The following information is required by BSC to verify the chain of custody.

Requirement	Collectors	Sorters	Processors	Standard required
71. B-cycle accredited Participants agree to receive and/ or transfer batteries from/ to other accredited Participants only.	•	•	•	• Current contract or similar with accredited Participants.
72. Verify that collected batteries are only transferred from/ to other B- cycle accredited Participants.	•	•	•	<ul> <li>Evidence that batteries are only received or transferred from/ to accredited Participants.</li> <li>Evidence required in the evidentiary requirements in Section 5.3 - 5.5.</li> </ul>
73. In the case of one-off post-back services of <10kg, accreditation is not required. However, a chain of custody is still required.	•			• Evidence of consignment/ tracking number verifying pick-up and drop-off to the accredited Sorter or Recycler.
74. Reporting to BSC consistent with AS 5377 (2022) including value chain mapping of collected batteries including all downstream vendors.		•	•	<ul> <li>For Recyclers (and Sorters that export) provide flow chart or table documenting the flow of batteries consistent with the value chain mapping required in AS 5377, including:</li> <li>Battery chemistries within the scope of B-cycle</li> <li>Contact details, activity undertaken, and outputs</li> <li>Batteries and materials that are out-of-scope of B-cycle, or covered by other schemes, including small sealed lead acid batteries, batteries covered by the NTCRS, Mobile Muster or ExitCycle, waste materials including sand and vermiculate, and hazardous waste e.g. water.</li> </ul>
75. Ensure chain of custody for all batteries received and processed.	•	•	•	<ul> <li>Chain of custody can be demonstrated for all batteries collected, sorted, and processed by implementing internal tracking processes, including:</li> <li>Internal inventory and tracking system</li> <li>Fate map &amp; mass balance (sorters and recyclers only)</li> <li>Invoicing systems</li> <li>Shipment records such as bills of lading, acknowledgements of receipt and invoicing</li> </ul>





### 7.11 Environmentally sound management

Environmentally sound management is a core commitment of B-cycle accreditation. This includes ensuring that all batteries collected are ultimately processed, whether onshore or offshore, in an environmentally sound manner and in accordance with BSC recovery rate criteria. The following verification activities will be conducted:

Requirement	Collectors	Sorters	Processors	Standard required
76. Confirmed business relationships with downstream vendors that receive and process batteries, to ensure that battery materials are destined for environmentally sound end markets.		•	•	<ul> <li>Current contract or similar with downstream vendors to receive and process batteries</li> <li>Traceability and transparency of downstream processing</li> </ul>
77. Battery materials exported legally.		•	•	<ul> <li>If exporting batteries, export licences for all chemistry types.</li> <li>Final processing complies with all legal requirements for export, transit and import.</li> <li>Export licences provided.</li> </ul>
78. For each exporting shipment, there are records that demonstrate that all shipping/ transit requirements have been met.		•	•	<ul> <li>Records include bills of lading, acknowledgements of receipt, and shipping numbers.</li> <li>Evidence of exported used batteries, shipping and consignment documents, including Export Declaration Number (EDN) for each shipment and reports from Integrated Cargo System (ICS).</li> </ul>
79. Confirmed destination and processing outcomes.		•	•	<ul> <li>Confirmed recipient and processing of used batteries by nominated OS processors including received consignments, purchase orders/ receipts and Certificates of Recycling.</li> </ul>
80. Verification that downstream vendor is appropriately processing used batteries to a high environmental standard and value.		•	•	<ul> <li>Photos of site (to confirm site exists)</li> <li>Evidence that the downstream vendor: <ul> <li>complies with international legal requirements</li> <li>has operational permits</li> <li>is environmentally healthy and safe.</li> <li>operates in a responsible manner</li> <li>has corporate systems</li> <li>has international environmental accreditations</li> </ul> </li> </ul>





## 7.12 Cost reporting

Your Battery Steward Commitment includes a commitment to disclose the costs of service. Information on both your service fees and costs are important to ensure rebate payments contribute to the ongoing financial viability of the Scheme. The BSC uses aggregated data to analyse the costs of the Scheme and will not publish company-specific or market-sensitive financial information.

The following information is required:

Requirement	Collectors	Sorters	Processors	Standard required
81. Disclosure of service fees.	•	•	•	<ul> <li>Service fee information to be made available to Independent accounting firm or other BSC delegates.</li> <li>Independent accounting firm to meet with participants to assist with establishing standard reporting frameworks for reporting the cost of the Scheme.</li> <li>Independent accounting firm to provide BSC with aggregated high-level financial data.</li> </ul>
82. Disclosure of cost information to enable the BSC to evaluate adequacy of rebate rates.	•	•	•	<ul> <li>A report on the cost of your Participation in the Scheme (as applicable) will be provided by Independent accounting firm, including direct and indirect costs such as:</li> <li>containers</li> <li>collection (transport) and sorting</li> <li>processing of used batteries by:</li> <li>chemistry (per kg)</li> <li>location (metro vs regional)</li> <li>battery type</li> <li>employment</li> <li>indirect costs</li> <li>capital costs</li> <li>administrative costs</li> <li>other related costs or income</li> </ul>
83. Provide corroborating information to support the cost of service.	•			<ul> <li>Contracts, agreements, or service relationships with other accredited Participants and downstream vendors (if used) to be provided to Independent accounting firm initially and when they change.</li> </ul>





## 8 Addendum Fee for service firewall

An additional firewall process is available to respect some Participant concerns for providing an additional layer of data separation. This process does not replace the B-cycle accreditation process, but rather is offered as an addendum to the broader accreditation requirements. It will operate on a fee-for-service basis to Participants who are looking for a higher level of assurance. The cost of this service will be monitored and charged on a monthly basis.

The table below provides an overview which data will be eligible for inclusion in the firewall trial.

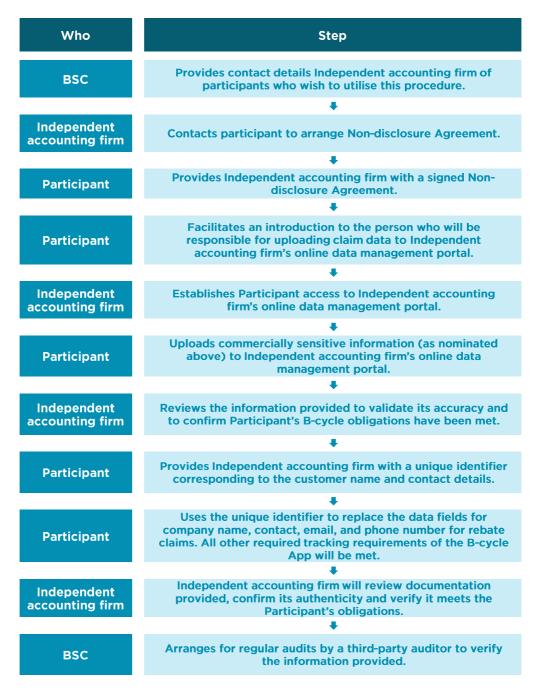
Туре	Examples	Methods		
Private pick-up points	Confirmation of business arrangements, customer name and contact, address, geo- located photograph, and independent evidence of transfer etc.	<ul> <li>Participant will upload requested documentation for Independent accounting firm to review.</li> <li>Independent accounting firm to verify collection contracts on an initial basis and annually or when they change.</li> <li>The Participant will assign private customers with unique identifiers and upload the list to the Independent accounting firm portal on an ongoing basis.</li> <li>The unique identifier will be used by the Participant to submit data for rebate claims based on the collections associated with the specific unique identifier and including all other required tracking information.</li> <li>All other data required in the B-cycle App will be provided as usual, with the only exception being that the identifier will be used in place of the following data in the B-cycle App</li> <li>Entity name &amp; contact person</li> <li>Email &amp; phone.</li> <li>Independent accounting firm, with oversight by the BSC, will conduct a monthly or quarterly verification to confirm the unique identifier corresponds with rebate claims.</li> </ul>		
End markets	This includes records required to show legal export and final disposition. Contracts, export permits, prior informed consent, etc.	<ul> <li>Independent accounting firm will conduct a quarterly review of contracts, confirmation of business relationships and verification that end markets associated with the processing rebate make sense.</li> <li>The BSC's independent auditor, currently Equilibrium, will confirm traceability using onsite verification of mass balance and tracking system, including: <ul> <li>random selection of transactions from B-cycle App</li> <li>verification of bills of lading, acknowledgements of receipt / invoices</li> <li>verification of the final disposed of the batteries</li> <li>legal export</li> <li>export permits, prior informed consent, etc.</li> <li>final disposition – evidence that the recycling has occurred – invoicing, certificate of destruction, certificate of recycling</li> </ul> </li> <li>Independent accounting firm will provide BSC with aggregated highlevel reporting <ul> <li>quarterly verification of transactions with downstream vendors Li primary</li> </ul> </li> <li>Outcomes used to calculate processing rebate Li primary</li> <li>BSC's independent auditor to confirm traceability using onsite verification of the Participant's mass balance and tracking system.</li> </ul>		





## 8.1 Firewall process

This process is the same as that used by B-cycle accredited importers. Information is outsourced to Independent accounting firm, so that market sensitive information is not submitted to the B-cycle App or the B-cycle web portal. Information submitted to Independent accounting firm will remain accessible to the BSC CEO and the Director of Best Practice and Innovation, and independent auditors for validation purposes. The process will be trialed as follows:



## 8.2 Implications of the firewall process

The B-cycle accreditation procedures will still apply, as will oversight by the BSC CEO and the BSC Director of Best Practice and Innovation. Audits will continue to be conducted by independent auditors engaged by the BSC with a subset of documents being verified and analysed by Independent accounting firm as above, on a fee-for-service basis.





# 9 Addendum: Definitions and acronyms

For the purposes of this document, the following terms, definitions, and acronyms apply.

#### Figure 11. Table of terms and definitions

Term	Definition
Accreditation	Recognition by the Battery Stewardship Australia (BSC) that a business or organisation has made a commitment to, and meets the requirements of the B-cycle Scheme.
Battery	A container or cell which primarily consists of casing, cathode, anode, electrolyte, and terminals that together act as a source of energy.
Battery importers	Businesses or organisations that are engaged in importing or manufacturing batteries or other products that include batteries to the domestic Australian market.
Battery Stewardship Scheme	B-cycle, an arrangement between parties in the battery value chain to share responsibility for the long-term management of end-of-life batteries in Australia, as set out in this document.
Pick-up point (Public Drop off point)	A site that allows members of the general public to drop batteries off for recycling. For example, a supermarket that has a dedicated Drop off point.
Pick-up Point (Private Drop off point)	A site that provides a Drop off point for a target group which is not made available to the general public. For example, a facilities company that changes batteries in smoke alarms, mail-back programs and pick-ups from residents and businesses.
Battery Collector	An individual, business or organisation that arranges collection bins, pick-up and transport of used batteries in any part of Australia for the purposes of recycling, reuse or disposal. For the purposes of the Scheme, a transporter is a collector. A Battery collector is not a Drop off point or a courier.
Sorter	A participant who receives batteries, and sorts them to BSC and recycler specifications.
Recycler	Any business or organisation that recovers metals, metallic compounds (including those of Lithium, Cobalt, Nickel, Cadmium, Potassium, steel, Copper, etc.), graphite, plastic and other component materials and processes them into a form whereby they can be used as intermediate products in the manufacture of derived products.
Used battery	A battery that is deemed no longer capable of performing the function for which it was originally made, including both single-use and rechargeable battery types.
Environmentally sound management	All practical steps are taken to ensure that used batteries are processed in a manner which will protect human health and the environment against potential adverse effects.
Pick-up - Postal	Applies to postal services provided by a Collector, in which case the rebate claim starts when the box is posted/ provided to the customer.
Pick-up – One-off	A once-only pick-up for a container with< 10 kgs of used batteries for recycling, once per year. Public Drop off points are ineligible. The first time a new private pick-up point is used, they don't have to be approved, but they do have to provide contact name and contact details to enable BSC to verify the transaction.
Drop off public event	A one-off public Drop off event supported by an accredited Collector.



### COLLECTION AND RECYCLING NETWORK ACCREDITATION PROTOCOLS



Term	Definition
Environmentally sound use	The use of whole, part or recovered components of used batteries for applications that minimise or prevent harm to the environment or health. Processing outcomes work to provide high value material outcomes and onshore processing.
Equivalent Battery Unit (EBU)	A unit of weight which enables batteries of different sizes to be compared. For the purposes of this Scheme, the assumed weight of one new EBU is taken to be 24g which is approximately one AA Lithium rechargeable battery.
Fleet operator	An entity that owns or operates a fleet of vehicles, including private and government fleet operators.
Landfill	Waste disposal sites used for the authorised deposit of solid waste onto or into land.
Participant	A business or organisation that has received accreditation from the Battery Stewardship Council and made a commitment to meet the requirements of the B- cycle Scheme.
Non-conforming materials	Batteries covered by other schemes, materials that are not batteries, and waste materials.
Recycling	A process to recover constituent materials from end-of-life batteries and use those materials to produce new products.
Resource recovery	The process of extracting materials or energy from a waste stream through reuse, recycling or recovering energy from waste.
Retailer	A business or organisation that offers products for sale at retail through any means, including sales outlets, catalogues, or the Internet.

### Figure 12. Table of acronyms

Acronym	Terminology	
ABRI	Australian Battery Recycling Initiative	
ACN	Australian Company Number	
BSC	Battery Stewardship Council	
EBU	Equivalent Battery Unit	
E2E	Enterprise-to-enterprise	
NTCRS	National Television and Computer Recycling Scheme	
PSO	Product Stewardship Organisation	
ULAB	Used lead acid batteries (automotive)	

