

# Proposed New Participant Category B-cycle accredited Aggregator

## Purpose

In response to feedback from participants, BSC has prepared this Consultation Paper to seek input from existing and potential B-cycle Participants on a proposed new Participant category, B-cycle accredited **Aggregator**.

This Paper explains the rationale for the new proposed Participant category and provides the proposed implementation process and timelines for comment.

## Background

Existing Drop off point accreditation requirements are explained in the [Accreditation Protocols](#) and the [Drop off point Code of Practice](#). This consultation paper is focused on a subset of issues relating to the eligibility to become a Drop off point.

As the Scheme has evolved, it has become evident that a number of entity types have signed up as 'Drop off points' that are not consistent with the Scheme design, for example landfills, MRFs (Materials Recovery Facility), e-waste & scrap metal collectors who are engaged in recovering waste batteries. This has presented both an opportunity and a challenge.

BSC would like to include these batteries in the Scheme, but is currently prevented from doing so due to non-conformity with the Accreditation Protocols, as they:

- + exceed the volume threshold of 15 kg per annum
- + are unable to demonstrate chain of custody requirements established to prevent fraud
- + include significant volume of batteries from a

## The proposed solution

BSC proposes to establish a new B-cycle Aggregator Category. While the long-term intention is for these batteries to be redirected into the B-cycle network for safety and chain of custody reasons, BSC recognises that this may take significant time and a transitional arrangement is needed.

This paper describes how this process might work and poses several questions for network participants.

## Proposed new definition of a B-cycle Aggregator

An entity that collects or aggregates batteries in an incidental manner as part of other waste or material collection services for which it is difficult to verify the original source of batteries.

## Eligibility requirements

<b>Collection arrangements</b>	<ul style="list-style-type: none"> <li>+ May collect waste materials from sites</li> <li>+ Customers may drop off waste materials direct to their site.</li> <li>+ Guarantee that all in scope used batteries received go an accredited Collector, Sorter, or Recycler</li> </ul>
<b>Eligible volumes</b>	<ul style="list-style-type: none"> <li>+ Aggregators may claim up to a maximum volume of battery collections per annum at a reduced rebate.</li> <li>+ The maximum volume an Aggregator can claim will decrease annually to line with the preferences for batteries to be sourced from only verifiable and accredited Drop off points e.g., to discourage batteries being disposed of via kerbside waste and recycling and to go to a specific Drop-off point.</li> </ul>
<b>Transitional time frame / thresholds</b>	<ul style="list-style-type: none"> <li>+ Eligible volumes will reduce:                             <ul style="list-style-type: none"> <li>+ 2023: 3 tonnes / annum</li> <li>+ 2024: max 2 tonnes / annum</li> <li>+ Post 2024: 1 tonne / annum ongoing</li> </ul> </li> </ul>
<b>Rebate availability</b>	<ul style="list-style-type: none"> <li>+ Aggregators will be eligible for an Aggregator rebate of \$0.50 / kg.</li> <li>+ Batteries collected from verified sources (accredited Drop off points) with all required evidence are eligible for the collector rebates of \$2.50 or \$3.50 / kg</li> <li>+ Aggregated or collected batteries can access only one of the Aggregator or Collector rebates, not both.</li> </ul>
<b>Other arrangements</b>	<ul style="list-style-type: none"> <li>+ The Aggregator will be considered a (private) Drop off point.</li> <li>+ The Aggregator must meet the Aggregator Code of Practice (TBC) to ensure safe and transparent battery collection.</li> <li>+ If an Aggregator has or gains Collector accreditation and can provide evidentiary requirements for Collector rebate then those volumes can be claimed for Collection rebates above the max threshold.</li> </ul>
<b>Associated rebates</b>	<ul style="list-style-type: none"> <li>+ Batteries collected via Aggregators up to maximum annual threshold volume will be eligible for the full Sorting and Processing rebate at \$1 /kg respectively.</li> </ul>

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## Preference for Aggregators to become Accredited Collectors

If an Aggregator is able to meet all chain of custody evidentiary requirements and have their Drop-off points accredited, they are encouraged to complete the B-cycle Collector accreditation application process, as they will then be eligible for the higher Collection rebates of \$2.50 or \$3.50 / kg.

## Supporting the transition

B-cycle will support the transition by implementing focused communications campaigns to:

- + improve community awareness of the safety issues and the importance of never disposing of batteries in general waste or recycling facilities
- + encourage consumers to appropriately dispose of batteries for recycling at their nearest B-cycle Drop off point.

The intent is to ensure that decreasing volumes are not being disposed of inappropriately via kerbside waste and recycling bins and at scrap metal yards.

## Benefits of decreasing battery collections from unverified sources

Reducing battery collections from diffuse and unverified sources and instead having them disposed of via the appropriate B-cycle accredited Drop off points will reduce the risks of incidents such as fires. Supporting dedicated B-cycle Drop off points will reduce fire incidents and reduce costs to industry and society. Ultimately this means further financial benefit and incentive for batteries not to be generated from these sources.

## Consultation questions

BSC would very much appreciate your feedback on the following questions:

- + Will this proposed change be of benefit to industry and support the objectives of B-cycle?
- + Can this Aggregator participant category be easily implemented?
- + Is it fit-for-purpose?
- + What are the challenges of this approach?
- + Might there be unintended impacts from this new proposal that could undermine the integrity of the Scheme – if so, what could they be?
- + Is it fair?
- + Is the transitional approach workable?
- + Are you supportive of this initiative?

If this category proceeds, please let us know if you like to contribute to the development of the Aggregator Code of Practice. Your engagement is invaluable to us.

## The future

If adopted, this policy will be reviewed by the BSC as needed and in response to industry feedback. The BSC Board may modify the Scheme, including the Aggregator Participant category, in consultation with industry to ensure its implementation is fit-for-purpose and aligns to the objectives of the Scheme.

Future adjustments may consider issues such as:

- + volume of unverified batteries collected at Aggregator sites
- + number of Aggregators
- + cost of Aggregator rebate and long-term financial sustainability of Scheme
- + chain of custody, transparency and evidentiary requirements being met
- + safety issues and risks
- + effectiveness of communications campaigns.

## Feedback

Please provide feedback to the BSC on the questions raised on Page 2 by **5pm Friday 10 February**. Feedback may be submitted in writing to the BSC to [contact@bsc.org.au](mailto:contact@bsc.org.au). BSC will receive feedback and prepare the final protocol to be used by participants.