BatteryStewardshipCouncil CONSULTATION PAPER











Purpose

BSC has drafted this Consultation Paper to gather input from current and prospective B-cycle Participants, particularly collectors and transporters of used batteries, regarding the existing B-cycle Container Protocols.



This Paper outlines the context, challenges and key questions for consideration as we undertake a review the B-cycle Container Protocols to ensure they align with regulatory standards, represent best practice and fit-for-purpose.

The purpose of the Protocols.

The Protocols establish minimum requirements and best practices for the design and selection of containers for collection and storage of used batteries by B-cycle accredited Participants.

The Protocols are made up of general requirements designed to ensure that all containers meet legal compliance and best practice standards necessary to achieve BSC's commitment to safety.

Not a one size fits all approach

The Protocols need to be functional and applicable to various container types, catering to the different business models of participants, the types of batteries being collected, the specifications of Drop off points, and the diverse storage, aggregation, and transport activities they entail. BSC seeks your input on refining the requirements to ensure compliance and safety for various battery types and their respective uses, for example:

- + mixed loose batteries
- consumer batteries including vapes and or small electrical and electronic products
- power tool batteries
- e-bike and e-battery products only
- + schools and educational settings with small children.

Background

The BSC released its current Container Protocols in mid 2022, post the launch of B-cycle in Jan 2022.

While every endeavour was taken to ensure the Container Protocols were considered leading best practice globally for transport of used batteries, the BSC acknowledges that since then both practices and technologies have changed, and it is therefore timely to review the protocols to see if changes are required.

BSC also acknowledges that as these Container Protocols were published post B-cycle launch, some of the containers in the Drop off point network may not have met these Protocols initially. Therefore, a transitionary arrangement was in place with impacted Collectors and Recyclers to ensure timely conformance with Protocols. This transitionary time has now passed and it is the ongoing expectation that all B-cycle accredited Drop off points' containers meet existing and in future, B-cycle Container Protocols.

This consultation paper is focused on addressing current gaps in the Container Protocols and seeks

Issues with current Protocols

Through the implementation of the existing Container Protocols, BSC has identified the following challenges:

- Collectors had purchased containers prior to implementation of Protocols.
 - This has meant that there are currently containers in the B-cycle network that may not conform to Container Protocols.
 - Acknowledging the financial commitment required for implementing battery collection container infrastructure, BSC has supported a transitionary timeframe for Collectors to meet the Protocols.
 - However, BSC has an obligation to ensure that all containers within the network are meeting B-cycle Container Protocols.
 - + The timeframe for meeting Container Protocols has proved challenging for some Participants.



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- Current Protocols do not adequately address the broader range of storage requirements that is the reality of B-cycle collection network implementation, including considerations:
 - + for larger battery products
 - higher energy density, such as e-mobility and ebike battery products
 - appropriate containers for storage at aggregation sites.

Your input is essential

BSC is requesting your input into the existing Container Protocols and asks that you consider the following questions.

We wish to understand the operational impact of the Protocols and how we update them to ensure the network is safe and efficient.

Consultation questions

BSC is seeking feedback on the following questions:

General Questions

- + Do you think the current Protocols are fit-forpurpose?
- + What do you think is lacking from the existing Protocols?
- + Are there any issues in the General or Specific requirements that are missing from the current Protocols?
- + Other issues and concerns you may have with the current or future Protocols?
- + In what ways can the BSC support increased uptake of best practice containers?

Container categories

- + How should the Protocols be changed to recognise the different operational realities to allow for:
 - Participant type (e.g. Drop off point type -School)
 - + Volume thresholds
 - Stage in the process e.g. Drop off point vs aggregation
 - + Battery product type (embedded, li-ion only, etc)?

Operational issues

- Should considerations such as sourcing issues (e.g. supply chain challenges) or costs be considered?
- + Is a transition period needed for Participants to meet Protocols?
 - + If yes, what transition period is appropriate for Participants to meet any changes to the Container Protocols?

B-cycle branding

- + What proportion of your network currently features Bcycle branding, including the B-cycle accredited logo?
- + What proportion of your network currently has the required B-cycle safety labels?

Best practice

 Do you know of external or international best practice container protocols and standards BSC may consider implementing?

Next steps

BSC will hosts 2 (two) webinars explaining the Consultation Process to be held on:

- + 11 April 2024; 12.00pm 1pm
- + 18 April 2024; 12.00pm 1pm
- + BSC welcomes requests from organisations to schedule individual meetings as required. Please email contact@bsc.org.au to organise.
- + Once consultation has been prepared by your organisation, please submit it in writing to BSC.

Feedback due by

Please provide feedback to the BSC on the questions raised on Page 2 by **5pm Friday 30 April 2024**.

- + It is requested that feedback be submitted in writing to contact@bsc.org.au.
- + Once feedback has been received and reviewed, BSC will issue a draft updated Container Protocols for final industry feedback.
- + Following further review, BSC will issue the updated B-cycle Container Protocols to replace the existing Protocols documents.

REF: BSC Consultation Container Protocols 20240318