

**14 November 2025**

## **Submission on the Draft Product Lifecycle Responsibility Regulation**

The Australian Information Industry Association (AIIA) welcomes the opportunity to respond to the consultation on the draft Product Lifecycle Responsibility Regulation 2025 and accompanying Regulatory Impact Statement (RIS). The AIIA supports the NSW Government's objectives to improve the safety, recovery, and recycling of batteries, and to promote a nationally consistent circular economy framework.

### **About the AIIA**

The AIIA is the nation's peak body for those in the digital ecosystem, leading strategic policy and advocacy to shape a thriving digital sector. Through strong engagement with government, industry, and the broader community, the AIIA ensures the voice of its members informs decision-making on technology, innovation, and digital capability.

AIIA members include multinational information and communications technology (ICT) manufacturers with diverse product portfolios, who are actively participating and funding existing co-regulatory and government-accredited ICT product stewardship schemes in Australia.

### **Scope of Regulated Batteries**

The AIIA supports the exclusion of mobile phone, laptop and tablet computer batteries in Section 6(2)(b). We request that this exclusion include batteries from smart watches, mobile phone wearables and accessories, tracking tags and VR headsets, as these are captured as part of the MobileMuster program. Additionally, the exclusion should be extended to batteries from desktop computers and computer peripherals/accessories, as these are captured in the scope of the National Television and Computer Recycling Scheme (NCRS). Brand owners that are contributing to these existing accredited product stewardship schemes should not be subject to additional financial and administrative burdens for these products.

Under Section 6(1)(b) and 6(1)(c) of the draft Regulation, button and button cell batteries and removable rechargeable batteries weighing 5 kg or less as regulated batteries, while excluding laptop, tablet and mobile phone batteries. However, the Regulation remains unclear regarding the treatment of button cell batteries and similar components that are either embedded within products or supplied with products. Providing clearer distinctions in scope would better reflect the higher incidence of battery related fires associated with loose batteries and would align the Regulation with established approaches in other jurisdictions, including *California's AB-2440 Responsible Battery Recycling Act of 2022*.

The AIIA requests clarification on whether coin cell batteries (also known as button cell batteries) fall within the scope of the Regulation when they are:

- Embedded in electronic products, such as those installed on the motherboard of devices (e.g., for real-time clock or non-volatile memory functions); and
- Provided packaged with consumer electronic products, such as accessories.

In the first case, these batteries are typically not supplied independently to end users, and in the second, they are often included incidentally within product packaging. The current definition does not clearly address scenarios where products that are already compliant under another stewardship program are captured in-scope. Greater clarity is needed to understand how these overlapping scenarios will be managed to support businesses that are already meeting their product stewardship responsibilities and to avoid regulatory duplication.

To further support clarity and reduce administrative burden for brand owners, the AIIA recommends that Section 6 be amended to more precisely reflect the intended scope and to align with existing co-regulatory and voluntary product stewardship schemes such as MobileMuster and the NTCRS.

#### 6 Regulated batteries

(1) The following are **regulated batteries**—

(a) standard size **loose** batteries **that are** used to power household items **and are sold directly to end users separately from a product**, including batteries of the following sizes—

- AAA,
- AA,
- C,
- D,
- 9 volt,
- 6 volt lantern,

(b) button and button cell batteries **that are sold directly to end users separately from a product**,

(c) **removable** rechargeable batteries weighing 5kg or less **that are sold separately from a product and are designed to be easily removed from a product by the user of the product, with no more than common household tools**,

(d) rechargeable batteries used to power e-micromobility devices,

(e) portable power banks weighing 5kg or less, **excluding products covered by existing product stewardship schemes**.

(2) The following are not regulated batteries—

- lead acid batteries,
- mobile phone **(including accessories), smart watch, smart pen, tracking tag or VR headset** batteries,
- desktop**, laptop or tablet computer batteries, **including batteries in computer peripherals** and,
- back-up batteries incorporated in emergency lighting systems.

(3) To avoid doubt, batteries not listed in subsection (1) are not regulated batteries.

## **Conclusion**

The AIIA appreciates the opportunity to contribute to this consultation and recognises the significance of the proposed framework in shaping Australia's approach to battery stewardship. Clear and coordinated regulation will be essential to achieving meaningful environmental outcomes while maintaining a competitive, innovative technology sector.

Should you require further information, please contact Mr David Makaryan, Advisor, Policy and Media, at [david@aiaa.com.au](mailto:david@aiaa.com.au).

Thank you for considering our submission.

Yours sincerely

Elizabeth Whitelock  
**CEO, AIIA**