



MTAA SUBMISSION

# **Heads of EPAs Australia and New Zealand**

## Draft National Guideline for the Safe Management of End-of-Life Lithium-ion Batteries

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The Motor Trades Association of Australia (MTAA) welcomes the opportunity to publicly engage with EPA Victoria on the *Draft National Guideline for the Safe Management of End-of-Life Lithium-ion Batteries* it has developed on behalf of the Heads of EPAs Australia and New Zealand (HEPA).

The intended audience for this guideline is the waste and recycling industries, local governments in Australia and New Zealand, and informative for bodies such as Safety and Environmental Regulators and fire services. However, end-of-life lithium-ion batteries are also an emerging issue for the automotive industry. With the significant upward trajectory of electric vehicles sales and the ongoing global fuel and energy challenges, this issue is likely to become increasingly prominent.

MTAA is the leading advocate for the automotive retail sector, representing a broad range of automotive businesses across Australia. This includes mechanical workshops, body repairers, towing and recovery operators, dismantlers, and recyclers. Many of these businesses directly interact with and handle damaged, compromised, or end-of-life lithium-ion batteries.

Overall, MTAA considers the draft guideline to be a useful compilation of the current state-of-knowledge in the management of end-of-life lithium-ion batteries. It provides a strong foundation for improving safety and environmental outcomes across the waste and resource recovery sector.

From an automotive industry perspective, the draft guideline should include a dedicated section that covers the high-risk operational phases that occur prior to formal waste classification, particularly:

- > towing and recovery
- > transport of damaged or fire-affected electric vehicles (EV)
- > temporary storage at workshops and tow depots
- > interface points between emergency response, automotive operators, and waste facilities.

These operational phases present some of the highest practical safety risks, including thermal runaway, delayed battery re-ignition, toxic gas release, and fires during transport or temporary storage. These risks are well documented through incident examples and post-incident investigations involving EV towing, transport, and storage. They are borne by automotive businesses, rather than waste operators alone.

MTAA's member associations' the Victorian and Tasmanian Automotive Chamber of Commerce have developed the following industry-specific guidance for our Victorian and Tasmanian members. This guidance may assist EPA Victoria in refining the draft guideline to better account for significant risks that arise prior to waste classification:

## **1. Automotive Guide for Electric Vehicles – Guide 1**

- Provides foundational safety principles and risk awareness for working with EVs.
- Establishes baseline requirements relating to hazard identification, safe work practices, and emergency preparedness across automotive operations.

## **2. Automotive Guide for Electric Vehicles – Guide 2**

- Covers EV servicing, repair, towing, storage, dismantling, recycling, and end-of-life vehicle handling.
- Provides basic awareness of the risks of thermal runaway, delayed ignition, and toxic gas release.
- Aligns with AS 5732:2022 (*Electric vehicle operations – Maintenance and repair*).

(Both guides are available upon request)

The guidance reinforces prevention-focused and early detection fire management principles. It emphasises evacuation-first responses, highlights the limitations and unintended consequences of suppressing lithium-ion batteries that are in thermal runaway. It also underscores the importance of safe practices and segregation, monitoring, and authorised competence when interacting or handling damaged or compromised batteries. Recognition of these operational controls may further support alignment between environmental protection objectives and day-to-day safety practices across the automotive supply chain.

Finally, while training requirements are outside the regulatory scope of the draft guideline, it is important to recognise competence as a critical risk control, especially when handling damaged or compromised batteries. The guidance identifies specific nationally accredited competency pathways for automotive and towing personnel and clearly differentiates awareness-level and high-voltage-authorised roles.

MTAA commends EPA Victoria and HEPA for progressing this important national work. We believe this initiative will help establish the foundations for broader education and awareness across industries beyond the waste and recycling sectors. MTAA would welcome greater engagement between regulators, emergency services and industry, along with the future development of industry-specific guidance materials.

We trust our observations are constructive in ensuring the draft guideline is both practically implementable and nationally effective. Please feel free to contact us should you have any queries or require clarification in relation to our submission. Please also contact us, should you require either of our automotive guides for electric vehicles. We would welcome the opportunity for further engagement on this important and emerging issue.

## Contact

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