

**Mary Creagh CBE MP**

Parliamentary Under-Secretary of State  
Department for Environment, Food and Rural Affairs  
Seacole Building  
2 Marsham Street  
London SW1P 4DF  
By email – **An open letter**

28<sup>th</sup> April 2025

Dear Minister

I write on behalf of members of the Environmental Services Association (ESA), and the organisations countersigned, to highlight a serious matter which threatens the safety of people working in waste management and the emergency services; damages the natural environment; and puts at risk the critical infrastructure we all rely on every day.

As you will no doubt be aware, carelessly discarded batteries and small electrical devices containing batteries are now responsible for the majority of serious fires in waste management buildings and vehicles in the United Kingdom. Concerningly, our industry has seen epidemic growth in the number of these battery-related fires over the past two years and this rising incident rate shows no signs of abating without significant and expedited regulatory intervention.

Data published by the National Fire Chiefs Council (NFCC) shows that the number of battery-related waste fires rose by 71% year-on-year to more than 1,200 between 2022/23, and our own research suggests that the total cost to the economy of these fires now exceeds £1bn a year.

According to Material Focus, every UK household on average incorrectly discards nearly 6kg of electrical items each year, and more than 3,000 batteries are thrown away every minute (or 1.6 billion in 2023/24). This presents a huge potential fire risk and this situation is unsustainable both in terms of circular economy outcomes and the rapidly rising societal and economic costs of waste fires.

Currently, only a quarter of local authorities voluntarily collect batteries and small waste electrical items at the kerbside, and there is no consistent collection methodology among those who participate. The ESA recently commissioned independent environmental consultancy, Eunomia, to research and appraise the costs and benefits of various options for universal kerbside battery and small waste electrical collection services in the context of fire-prevention. I append a full copy of their comprehensive report, due to be published this week, to this letter.

In its report, Eunomia recommends that the best way to address the epidemic of battery fires is to implement **universal kerbside collections for batteries and small waste electrical devices** as part of normal council kerbside recycling collections – making correct recycling more convenient for **all** householders, not just those living in councils where collections already happen.

The report suggests that the most advantageous cost/benefit ratio is achieved by retrofitting existing refuse collection vehicles (RCVs) with separate containers to safely store batteries and small waste electricals – collecting them on existing recycling rounds. This could, and should, be supported by both national and local communications campaigns, which would become more cost-effective and impactful by adopting a consistent approach across the country.

If such a scheme was implemented today, Eunomia estimates that the number of waste fires would drop correspondingly (with anticipated increased compliance levels) from over 700 a year to just over 100, and that the capital expenditure needed to implement the new service would equate to around just 70 pence per household. In return, this solution would deliver a total economic benefit of £6bn over the next decade.

In late 2023, Defra consulted on reform to the Waste Electrical and Electronic Equipment (WEEE) regulations and one of the headline proposals in this consultation was the introduction of a **producer-financed** household collection system for small and large items of waste electrical and electronic equipment (WEEE) – a proposal 64% of respondents agreed should be implemented, including signatories to this letter. A consultation over reform of the battery regulations, originally due to be published in 2022, has failed to materialise and deep flaws in the current regulations persist – contributing to the current situation.

We, the undersigned, therefore urge Government to press ahead with its proposal to introduce a producer-funded universal kerbside collection regime for waste electricals, as consulted on, without further delay and to replicate this approach for portable batteries. We also urge Defra to ensure that addressing these waste streams is a priority focus for the Circular Economy Task Force in 2025.

Our industry has invested hundreds of millions of pounds in advanced fire prevention and suppression measures in recent years, but this only serves to mitigate the symptom and not the cause of battery-related waste fires. All stakeholders in this issue must work together to make recycling batteries and electrical devices more convenient for households and stem the rising tide of improperly discarded batteries at the source.

Collectively, we would welcome the opportunity to discuss the report with you and your officials in more detail and the ESA is happy to play a convening role to achieve this.

Yours sincerely,



Michael Topham, Chair of the Environmental Services Association and Chief Executive Officer of Biffa PLC

**Countersigned by:**

- Jon Hastings, Chairman, for and on behalf of the National Association of Waste Disposal Officers (NAWDO)
- James Kelly, CEO, for and on behalf of the British Metals Recycling Association (BMRA)
- Councillor Richard Wilkins, Lead Member for Transport and Waste, on behalf of Somerset Council