Government of **Western Australia**
Department of **Water and Environmental Regulation**

Guidance

Container approval guidance – frequently asked questions for beverage suppliers

Western Australia’s container deposit scheme Containers for Change commenced on 1 October 2020.

From 1 July 2026, the container deposit scheme expanded to include almost all beverage containers between 150mL and 3L.

All eligible containers supplied into Western Australia must be approved and the first responsible suppliers will need to enter into a supply agreement with the scheme coordinator, WA Return Recycle Renew Limited (WARRRL).

What containers are now eligible?

After 1 July 2026, a range of beverages between 150ml – 3L were added to the scheme and now include:

- wine
- spirits
- beer and cider
- spirit-based mixed drinks
- cordial, fruit and vegetable juices and flavoured milk
- soft drinks, sports drinks and water

Plain milk containers, registered health tonics and food for special medical purposes remain excluded.

A more detailed list of eligible containers is available via this link.

Who needs a container approval?

First responsible suppliers must ensure their eligible beverage products have a valid container approval.

It is an offence to supply eligible beverage products without a supply agreement, barcode, refund mark and container approval under s.47E of the *Waste Avoidance and Resource Recovery Act 2007* (the Act).

The first responsible supplier is the person (or company) who first supplies the beverage product in the state. This is defined in s.47D (1) of the Act.

WARRRL has developed guidance on who is a first responsible supplier.

If a first responsible supplier checks the Containers for Change product registry and finds their product has already been approved, they will not need to apply for a new container approval.

The eligibility of containers can be checked via a search function on the Containers for Change website.

It is important to note, however, that all first responsible suppliers will need to enter into a supply agreement with WARRRL. Supply agreements are available on the WARRRL website.

What is a container approval?

A container approval is formal authorisation from the Department of Water and Environmental Regulation that an eligible container meets the requirements of the Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019.

Subject to meeting other requirements under the Regulations (the first responsible supplier entering into a supply agreement with WARRRL; the container having a barcode; and the container having the required refund mark); approved containers may be sold in Western Australia.

Is my container approval from other jurisdictions valid in WA?

No. A Western Australian approval is required to supply a container into Western Australia.

The summary of the approved products can be found on the Containers for Change website (in the ‘container eligibility’ search function).

How much does it cost for a container approval application?

There is no fee for a container approval application.

How long does a container approval last?

Most container approvals will have no expiry date, however, the Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations allow for a container approval to be granted for a limited term.

How do I apply for a container approval?

Applications are made through the WARRRL website. WARRRL will then manage the process of referring the application to the department for determination.

How are container approval applications assessed?

When an application is lodged, the scheme coordinator will review the application and provide advice to the CEO of the department. If the container is made wholly of glass or aluminum, then WARRRL will make the final determination on the application.

The main factor the department will consider is whether the container material is capable of being recycled or reused, in accordance with the requirements of r.3J, 3K and 3M of the [Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019].

A recyclable container isn't considered eligible unless there's actually a way for it to be recycled in practice:

- Can the container material be readily identified for sorting?
- If the container material (including the label and lid) cannot be identified and separated, will it contaminate the recycling stream?
- Is there a facility inside Australia or overseas (not covered by an export prohibition) that can crush/shred/separate or reprocess the container materials for recycling or reuse?

The CEO will consider WARRRL's advice and may seek further information from the applicant or any other person to inform the decision about whether to grant an approval for the container.

This may include information about the material's recyclability.

What is meant by materials that may contaminate the recycling stream?

Some materials (particularly some types of plastics) cannot be readily separated in current recycling processes and may significantly degrade the quality of existing recycling streams. The Regulations list prohibited materials that will not receive container approvals.

Any container, made wholly or partly (including labels, lids and collars), from these prohibited materials will be prohibited for supply into Western Australia:

- PVC
- PBS
- bioplastic like PLA
- biodegradable and degradable plastics
- ceramic

To expand, PVC is a contaminant in polyethylene terephthalate (PET) recycling processes and reduces the quality of PET. This is one of the reasons that the Australian Packaging Covenant identified PVC as a plastic packaging material to be phased out by 2025.

Bioplastics such as PLA, compostable plastics, biodegradable plastic such as Polyethylene terephthalate glycol (PETG) and other types of degradable plastic are all potential contaminants in PET recycling.

To manage the risk of contaminating the significant amount of PET currently recycled, beverage containers incorporating potentially contaminating materials, such as those outlined above, are not likely to be approved without advice from the scheme coordinator that arrangements can be established to identify, separate and recycle that material.

Labels are considered as part of the beverage container and contaminating label materials, such as those described above, are not likely to result in a container approval.

Lids are also considered as part of the beverage container and can be returned to refund point operators for recycling.

WARRRL arranged for plastic lids to be processed for recycling into a material that can be used by Australian manufacturers in October 2023, and this arrangement is currently in place.

Containers made of mixed plastic and aluminium are also likely to not receive a container approval. More information on PETCANS is available.

How long will it take to receive a container approval?

The Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019 set out maximum time frames for making a decision about a container approval (r.3I, 3J, and 3M).

The scheme coordinator will review the application and provide advice to the CEO of the department within 10 business days.

The CEO may seek additional information on the recyclability of the container.

The CEO must make a determination within 20 business days after all requests for information have been complied with.

If the container is approved, the scheme coordinator must publish the details of the container approval on the product register within five business days.

If the container is refused, the CEO must notify the applicant within 10 working days and provide the grounds on which the approval was refused.

How will I know if my container approval application has been successful?

The container approval commences once WARRRL has entered the details of the container approval in the register of container approvals.

Container approvals will be publicly available in the Containers for Change product registry.

The CEO of the department will notify the applicant directly if an application has been rejected.

Do I need a container approval for every new product I produce?

Yes, a product is the combination of the beverage and the container and any change to either component requires a new container approval.

The assessment of wine and spirituous liquor products varies slightly, as these products are assessed by beverage class:

Wine

All types, varieties and vintages of wine are the same 'beverage class' (wine).

Suppliers only need a new approval when the container material or volume changes, not for different types, varieties or vintages. For example, if a winery produces multiple varieties like shiraz, merlot and chardonnay that are all bottled in 750 ml glass bottles, they will only require one (x1) container approval for all , however, if that winery also produces a 375 ml glass bottle of shiraz, this will require a separate container approval as the container volume has changed.

In this way, the 'beverage class is comprised of material type (glass), container size (750 ml) and product (any wine).

Spiritous liquor

All spirit types, styles and flavours are the same 'beverage class(spirit).

If a distillery produces multiple gins (flavoured and unflavoured), as well as vodka and whisky that are all bottled in standard 700 ml glass bottles, they will only require one (x1) container approval, however, if the distillery also produces a 200 ml glass bottle of gin, this will require a separate container approval, as the container volume has changed.

If the volume or material type of the container changes, a supplier will require an additional container approval.

How do I notify the scheme coordinator of a new barcode on my product?

Container approval holders must notify the scheme coordinator of a new barcode on their product by completing the standard approved form in the scheme coordinator's portal.

During the transition period, containers may be approved without a barcode.

Before the transition period ends, container approval holders must notify the scheme coordinator of their new barcodes by completing the standard approved form.

Container barcodes must be unique to their beverage product class.

Can I appeal if my container approval application is rejected?

Yes. Section 47H of the *Waste Avoidance and Resource Recovery Act 2007* allows for a first responsible supplier to apply to the State Administrative Tribunal for a review of a decision by the CEO in relation to the rejection of a container approval.

Does my container need a refund mark?

Yes (for new transitioned containers - see more in ‘labelling requirements’ below). All states and territories with container deposit schemes use the same refund mark.

A first responsible supplier commits an offence when the beverage product is first supplied in the state unless the container used for the beverage product displays a refund mark that complies with the requirements prescribed by the regulations (s.47E(2)(c) of the *Waste Avoidance and Resource Recovery Act 2007).*

The refund mark must be displayed in a colour and size that ensures it is clear and legible.

It is recommended that the numeral ‘10’ be a minimum of 3 mm in height with a minimum 3 mm ‘free space’ boundary around the refund mark.

It must state:

> ‘10c refund at collection depots/points in participating state/territory of purchase’

in clear and legible characters.

Does my container need a barcode?

Yes (for new transitioned containers - see more in labelling requirements below).

A first responsible supplier commits an offence when the beverage product is first supplied to the state unless the container used for the beverage product displays a barcode that complies with the requirements prescribed by the regulations (s.47E(2)(c) of the *Waste Avoidance and Resource Recovery Act 2007*).

Beverage containers without a valid barcode will not receive a container approval.

The requirements for a barcode on every container are set out in r.3H of the Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019.

Beverage products sold only in multipacks and not intended for individual sale must still display a barcode on each individual product as detailed in r.3H(4) and 3H(5).

Labelling requirements and transition period for new containers

It is an offence under the *Waste Avoidance and Resource Recovery Act 2007* to supply a beverage in an eligible container in Western Australia unless the first responsible supplier has a supply agreement with the scheme coordinator; the container has been approved; and it bears the refund mark and a product barcode.

A transition period has been introduced for all new eligible containers, which allows suppliers to use existing stock with a long shelf life, and container labels they have already printed.

The transition period will last 36 months and will end on 30 June 2029.

After this date, all eligible containers must display the refund mark and barcode, unless they are eligible for the second transition period outlined below.

Second transition period for legacy and cellared wine and spirits

Wine and spirits are an aged product, and some products may be bottled, labelled and stored for many years before being brought out and sold at the cellar door, direct to customers online or sent to retailers.

In the regulations, a cellared beverage transitioned container is defined as a container that is a bottle made wholly or partly of glass; contains only spiritous liquor or wine; and was stored before 1 July 2029 for the purpose of aging the spiritous liquor or wine before it is supplied.

In this instance, a 10-year exemption is in place for cellared beverage transitioned containers that:

- were bottled, labelled and stored prior to 1 July 2026, then brought out to be sold (supplied) after 1 July 2026; or
- were bottled, labelled and stored during the transition period while exempt from the labelling requirements, then supplied after 30 June 2029.

Container approval streamlining for glass and aluminium

To streamline and reduce the approval process timeframe, container approvals for containers made wholly of aluminium or glass will be approved on registration with the scheme coordinator.

Approximately 70% of annual beverage sales are aluminium and glass containers, which are easily identifiable through both manual and automated sorting processes.

As these container types have consistently met container approval requirements, a streamlined approval pathway was introduced to reduce approval timeframes for suppliers.

Approval for aluminium only or glass only containers is taken to be granted without further assessment by the Department where:

- the container is made solely of aluminium or glass;
- the required information is provided; and
- the scheme coordinator is satisfied that the information was complete and that the label and barcode meet integrity requirements of the scheme.

How to distinguish between cordial and syrups

As syrups are not included in the scheme, but cordial is.

The following definition is provided to distinguish between these two products:

- A syrup can be defined as a highly-concentrated, viscous liquid, consisting predominantly of sugar or sugar derivative, intended for use as an ingredient, topping or sweetening agent to enhance other beverages such as coffee or tea, or foods such as desserts, whether or not it is also capable of being diluted.
- For syrups, sugar is the primary bulk component, and it generally has non-fruit flavouring and is used more as an additive to another food or drink.
- Cordials are predominantly derived from actual fruit juices, fruit concentrates, botanical extracts, flavourings or a combination of these, consists predominantly of water and sold as a product to prepare a drink. As an example, Sodastream flavouring is considered a cordial, while Bickford's French vanilla coffee syrup is a syrup.

Exemptions for refillable containers

Under the regulations, a refillable container (also referred to as a *growler*) is not eligible for participation in the scheme. A refillable container is defined as a vessel that is designed to:

(a) be filled with a beverage and sealed; and
(b) after the beverage has been consumed, be returned to the supplier from whom it was purchased for re-filling and re-sealing.

The Department must be satisfied that genuine refill and reuse initiatives are in place and that suppliers are making reasonable efforts to ensure containers are reused in practice.

Additional guidance is available.

Is my WA container approval valid in other jurisdictions?

No. You must check with other Australian jurisdictions regarding their specific requirements for a container approval or registration.