



## Principal Policy:

### Container caps

*Requirements for Refund Point Operators, Logistics Service Providers and Processing Services Providers*

WA Return Recycle Renew Ltd Limited  
("WARRRL") ACN 629 983 615

April 2025

|                       |  |                          |            |
|-----------------------|--|--------------------------|------------|
| <b>Written by:</b>    | Ben Raisbeck, Head of Network Delivery | <b>Date Authorised:</b>  | April 2025 |
| <b>Authorised by:</b> | Amy Lennox, Chief Operating Officer    | <b>Next Review Date:</b> | April 2026 |

| Version Control |                            |               |
|-----------------|----------------------------|---------------|
| Version         | Responsible                | Date          |
| 0.1             | Ben Raisbeck               | November 2024 |
| 0.2             | Reviewed by WHS Consultant | January 2025  |
| 1.00            |                            |               |
|                 |                            |               |

## Table of contents

|  |          |
|--|----------|
| <b>1. Overview and effective date</b>  | <b>3</b> |
| <b>2. Definitions</b>  | <b>3</b> |
| <b>PART A – Scheme requirements for container caps</b>                           | <b>4</b> |
| <b>3. Background</b>   | <b>4</b> |
| <b>PART B – Container cap requirements by Network participants</b>               | <b>4</b> |
| <b>4. Container caps handling requirements at Refund Points Operators sites</b>  | <b>4</b> |
| <b>5. Container caps handling requirements for Logistics Services Providers</b>  | <b>5</b> |
| <b>6. Container caps handling requirements for Processing Services Providers</b> | <b>5</b> |
| <b>7. WARRRL responsibilities</b>  | <b>5</b> |
| <b>8. Consultation, cooperation and coordination with other PCBU's</b>           | <b>6</b> |
| <b>9. Breaches of Principal Policy</b>   | <b>6</b> |

# 1. Overview and effective date

---

## 1.1 Purpose

This policy applies to all Network participants in particular, Refund Point Operators (RPOs), Logistics Services Providers, and Processing Services Providers of WA Return Recycle Renew (WARRRL) in the execution of operational services relevant to the Container Deposit Scheme.

The purpose of this policy is to:

- (i) outline WARRRL's policy and requirements with respect to the handling of container caps at Refund Point sites;
- (ii) outline WARRRL's policy and requirements with respect to collection standards for Logistics Service Providers
- (iii) outline WARRRL's policy and requirements with respect to processing standards for Processing Services Providers standards;
- (iv) outline the process to be undertaken by WARRRL to verify and check that the requirements of (a) to (c) are met.

The **effective date** of this policy will be the date this policy is formally notified to Network participants.

# 2. Definitions

---

2.1 General abbreviations used in this Policy have the following meanings set out below:

|                               |  |
|-------------------------------|--|
| <b>Board</b>                  | means the board of Directors of the Company.   |
| <b>Company</b>                | means WA Return Recycle Renew Ltd ACN 629 983 615.   |
| <b>Container cap</b>          | Any removable closure of a container accepted under the WA Container Deposit Scheme  |
| <b>Contaminated container</b> | <b><i>Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019:</i></b><br>Regulation 4C(1) - <b><i>contaminated container</i></b> means a container (including any labelling) presented to a refund point that is contaminated with any substance such that, in the reasonable opinion of the refund point operator of the refund point (taking into account any guidelines prepared under regulation 4D), the container<br>—<br>(a) is unsuitable for re-use or recycling; or<br>(b) poses a serious risk to health or safety or to the proper operation of the refund point. |
| <b>Director</b>               | means a director of the Company.   |
| <b>RPO</b>                    | Refund Point Operator  |
| <b>Network Participants</b>   | Any entity that is contracted to provide refund point, logistics or processing services to WARRRL  |
| <b>Operational Services</b>   | Services that are outlined in the refund point agreement, logistics agreement, processing agreement or related principal policies and guidelines which are in place between WARRRL and the network participant   |

|   |                         |
|---|-------------------------|
| Principal Policy: Container caps                | Version: 1.0 22/04/2025 |
| Contact: Ben Raisbeck, Head of Network Delivery | Page 3 of 6             |

## PART A – Scheme requirements for container caps

### 3. Background

---

- 3.1 The *Waste Avoidance and Resources Recovery Act 2007*; and the *Waste Avoidance and Resource Recovery (Container Deposit Scheme) Regulations 2019* (**The legislation**) supports a policy which facilitates the collection and processing of containers with caps
- 3.2 RPOs (and WARRRL) are required to accept containers (which includes the caps when attached to the container) when presented for collection.
- 3.3 RPOs currently have an obligation under their Refund Point Agreement (**RPA**) to remove caps from containers. This policy will remove the requirement for RPOs to remove caps from containers if they are presented with the cap attached.
- 3.4 WARRRL and others are prohibited under the legislation from disposing of, or allowing the disposal of, collected or returned containers in a Prohibited Manner.

## PART B – Container cap requirements by Network participants

### 4. Container caps handling requirements at Refund Points Operators sites

---

- 4.1 RPOs must accept all container caps that have been presented to the RPO from a customer. Caps can be presented in two ways:
  - (i) separated from beverage containers; and
  - (ii) still attached to beverage containers.
- 4.2 When container caps are presented by the customer at the RPO site separated from the container, the RPO is required to:
  - (i) ensure that caps are placed in designated caps collection infrastructure that has been provided by WARRRL ready for collection by Logistics Services Providers,
  - (ii) provide clear signage and/or collection process preventing customers from placing non-accepted container caps into the cap collection infrastructure,
  - (iii) ensure that caps are placed as individual caps in collection bins and not contained in bags or containers, and
  - (iv) ensure that caps are not contaminated with glass, dirt or organics including from cleaning of sorting tables. RPOs may refuse to accept container caps that are contaminated.
- 4.3 When container caps are presented by the customer at the RPO attached to the containers,
  - (i) The RPO is not required to remove the cap from the containers. The containers with caps attached can be counted and placed into collection infrastructure or compactors for collection by Logistics Services Providers unless the container is contaminated.

|   |                         |
|---|-------------------------|
| Principal Policy: Container caps                | Version: 1.0 22/04/2025 |
| Contact: Ben Raisbeck, Head of Network Delivery | Page 4 of 6             |

- (ii) If the container is contaminated, the RPO is required, if safe to do so, to remove the cap and dispose of the contaminant. If not safe to do so, the container must be disposed of safely and appropriately, and these containers should not be counted or accepted.

#### 4.4 In regard to the caps collection infrastructure provided by WARRRL:

- (i) The operator must not:
  - modify the Collection Infrastructure
  - move the Collection Infrastructure from the location to which it was delivered or installed;
  - transfer possession or control of the Collection Infrastructure to any other person
- (ii) The Operator must take reasonable care to prevent loss of, or damage to, the Collection Infrastructure. The Operator is liable for any loss of or damage to the Collection Infrastructure in its possession unless it is fair wear and tear.

## 5. Container caps handling requirements for Logistics Services Providers

---

### 5.1 Containers with caps will be presented for collection in collection infrastructure

- (i) The Logistics Service Providers will be required to transport the containers with caps attached. This may present some reduction in collection efficiencies due to a reduction in compaction rates.

### 5.2 Cap logistics collection service. Logistics Service Providers are required to

- (i) Work with Refund Points Operators and WARRRL logistics to collect caps collection infrastructure in a safe and efficient manner
- (ii) Report any contamination issues to WARRRL and the refund point operator as soon as possible. The Logistics Services Providers may choose not to collect material if contamination is present.

## 6. Container caps handling requirements for Processing Services Providers

---

### 6.1 Containers with caps will be presented in collection infrastructure for processing

- (i) The Processing Services Providers will be required to process the containers with caps attached. This may present some reduction on compaction outcomes due to a reduction in baling compaction rates and performance.
- (ii) Processing Services Providers will be required to monitor levels of containers with caps and compaction performance for safety and compaction rates. When baling performance gets to a level of reduced compaction that starts to significantly impact costs and increases baling safety risks, perforators will need to be considered.
- (iii) WARRRL and Processing Services Providers will discuss the costs of the implementation of perforators at that time.
- (iv) The Processing Services Providers will be required to review safe work procedures to ensure that increased volume of containers with caps present has been assessed and any risks addressed

## 7. WARRRL responsibilities

|   |                         |
|---|-------------------------|
| Principal Policy: Container caps                | Version: 1.0 22/04/2025 |
| Contact: Ben Raisbeck, Head of Network Delivery | Page 5 of 6             |

---

### 7.1 Duties of WARRRL are to

- (i) Provide sufficient collection infrastructure for caps at no cost to the operator.
- (ii) Provide clear guidelines for the implementation of this policy
- (iii) Organise a safe and efficient collection service for cap collection infrastructure
- (iv) Work with network participants on processes for cap collection and provide communication to the network participants of the processes.
- (v) If there are means for the containers caps to be recycled, WARRRL should consider how this should be facilitated with Recyclers.

## 8. Consultation, cooperation and coordination with other PCBUs

---

8.1 Network participants must be consulted as far as reasonably practicable on any matter which may affect health and safety requirements. Consultation requires that:

- (i) relevant work health and safety information and/or changes are shared with Network participants;
- (ii) Network participants are given a reasonable opportunity to express their views and to raise work health and safety issues;
- (iii) Network participants are given a reasonable opportunity to contribute to the decision-making process relating to a work health and safety matter and their views are considered; and
- (iv) Network participants are advised of the outcome of any consultation in a timely manner.
- (v) Consultation has taken place with network participants as part of the development of this policy. If any significant amendments are made in future to this policy further consultation will take place.

## 9. Breaches of Principal Policy

---

9.1 Non-compliance with this Principal Policy will be viewed as a serious matter and treated in accordance with WARRRL's rights and obligations under the Waste Avoidance and Resource Recovery Act and associated Regulations, the WHS Act and contractual requirements.

Any breach of this policy will be referred to the WARRRL Assurance and Integrity team for assessment and further actions as appropriate.