

Questions & Answers - BCRS Producer Briefing on 19 and 26 Feb 2025

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1. Coverage

S/N	Question	Response
1.1	Can beverages without deposit mark still be sold in Singapore?	After 1 July 2026, all regulated beverage containers must be labelled with the deposit mark and carry a \$0.10 deposit in order to be sold in Singapore.
1.2	Is powder drink in sachet included in this scheme? Are powdered beverages in metal tins (e.g., drink powder containers) included in the scheme?	No, the scheme only covers pre-packaged liquid beverages in plastic and metal containers with volumes between 150 millilitres to 3 litres that are supplied in Singapore. Powdered drinks in sachets or metal tins are not included.
1.3	Are companies that sell beverages only in glass bottles required to join the scheme? Are glass bottles with metal caps included in the scheme?	No. If your company sells beverages only in glass bottles , you are not required to join the scheme. Companies may declare this by writing to NEA or complete the FormSG . However, if your company supplies beverages in both glass bottles and regulated containers (i.e., in plastic or metal containers), you must participate in the Scheme and register as members with the scheme operator. No. Glass bottles with metal caps are not included in the scheme.
1.4	Is bulk water for office usage included?	The scheme covers plastic and metal beverage containers from 150 millilitres to 3 litres that are supplied in Singapore. If the bulk water containers fall within this volume range and are made of plastic or metal, they are included.

S/N	Question	Response
1.5	Is there a minimum quantity requirement to participate in the Scheme?	No. There is no minimum quantity requirement. All companies supplying regulated beverages to the Singapore market must register and participate in the Scheme.
1.6	Are beverages that are not sold but used for sponsorship/marketing included in the scheme? Do they need the deposit mark? The producer will not be able to collect back the \$0.10 on this. For example, such as a running event where consumers receive free drinks, how does this apply?	Yes, regulated beverages used for sponsorship or marketing will need to have the deposit mark. The \$0.10 deposit is payable to the scheme operator, regardless of whether the regulated beverage is sold or given away. Companies can write to NEA for further clarifications on how to obtain the deposit refund, depending on the specific circumstances.
1.7	My company supplies our own-branded beverages to Singapore and manufactures beverages for Company B under their brand name. If we are already registered with the scheme operator for our own beverages, does Company B need to register separately?	As the first supplier and contract manufacturer of the regulated beverages into the Singapore market, only your company needs to register with the scheme operator. This applies to both the beverages you supply under your own brand and the beverages you manufacture for Company B under their brand. Downstream parties (including the brand owner, distributors, and retailers) do not need to register with the scheme operator, but they must still comply with requirements under the scheme including deposit payment and charging. Companies can write to NEA for clarification if they are unsure about how the scheme applies to their specific supply chain.
1.8	Do I need to register for my company if I am importing from a registered overseas facility?	Yes. Every Singapore-registered company that imports or manufactures regulated beverages for supply in Singapore must register independently with the scheme operator, regardless of whether they are importing from overseas facilities or are part of a

S/N	Question	Response
		larger corporate group. Companies can write to NEA for clarification if they are unsure.

2. Scheme Mechanism

S/N	Question	Response
2.1	How was the \$0.10 deposit amount determined?	The \$0.10 deposit amount was determined through public consultations and behavioural studies conducted in 2022 and 2023.
2.2	When are importers required to pay the deposit to the scheme operator – at the point of import or when selling to distributors? Is the deposit payment based on when containers are labelled with the deposit mark?	The deposit is to be paid after the regulated beverages are supplied to another party. In other overseas jurisdictions that have implemented similar schemes, members first supply their beverages to the market, then report these supplied volumes to the scheme operator on a regular schedule (e.g., monthly). The deposits and producer fees are typically paid retrospectively based on these reported volumes. The specific payment guidelines (e.g., payment frequency) will be provided by BCRS Ltd. subsequently in the agreement with the producers. The agreement will be issued to the producers when they register as members with the scheme operator.
2.3	Can you explain the Producer Fee? If this is based on put-to-market volume, then this would be a regular fee expense that we will incur? What is the purpose of this Producer Fee?	Producers will pay producer fees, based on per container placed on the Singapore market, to the scheme operator to collect and recycle beverage containers on their behalf. The fees will be determined by the scheme operator and are proportional to the number of regulated drinks put on the market. Producer fees ensure that producers take responsibility for the collection and recycling of their products. This is aligned to the Extended Producer Responsibility (EPR) approach where producers are made responsible for the end-of-life management

S/N	Question	Response
		of the products that they put on the market, and has been applied in many overseas jurisdictions as well as for regulated electrical and electronic goods in Singapore under the e-waste EPR.
2.4	Since BCRS is not for profit, what about the unclaimed amounts when consumers do not return the empty cans? Do producers get refunded? If unclaimed deposits are used for covering operating costs, then why do producers need to pay producer fee?	Unclaimed deposits are not refunded to the producers. Producers will get back the deposits that they paid to the scheme operator, when they sell the regulated beverage to the next party along the supply chain, e.g., retailer. Unclaimed deposits and producer fees are both used to finance the scheme operations, which include the cost of collecting, sorting and recycling the beverage containers.
2.5	What about produced unsold goods that have expired or have defects? How do producers/importers dispose of them and claim back the fee? How do we process and/or claim back expired products with the mark? What's the procedure if a warehouse needs to dispose of expired goods in batch and how to collect back deposit? I am an importer. For expired beverages returned by retailers (e.g., supermarkets) to importers, who would refund the deposit to us?	Beverage products that have been manufactured or imported but have not been supplied in Singapore, e.g., expired products that are still in the producers' warehouse, are not included in the scheme. The deposit and producer fee only apply after the product has been supplied in Singapore. Producers (e.g., importers, manufacturers) will get back the deposits that they paid to the scheme operator, when they sell the regulated beverage to the next party along the supply chain, e.g., retailer. Once supplied, producers cannot reclaim the deposit from the scheme operator, even if the product later expires before reaching the end consumer, as producers would have already collected the deposit from the next party in the supply chain.

S/N	Question	Response
		Guidelines will be issued by BCRS Ltd. subsequently to address the treatment of deposits in such scenarios, e.g., return or exchange of expired goods that have already been supplied in Singapore, and disposal of expired goods.
2.6	In a scenario where the stock expired in retailers' hands, do they have to arrange to empty every can/bottle before deposit at the return point? Or will there be a return point where they can return in bulk quantities (could be in pallets) for these stocks in non-sellable condition?	In general, the containers must be empty before they are returned at designated return points, such as reverse vending machines, to avoid spillage. BCRS Ltd. will provide more information about bulk return possibilities subsequently.
2.7	We are giving free bottled drinking water to our customers in our retail store and for donations. How can we expect or ask customers to return the bottle back to us? They may even carry the water bottle for later usage.	Even if the regulated beverage is provided for free, the deposit still applies. The party that gives the free beverage will be required to pay the deposit to BCRS Ltd. or its supplier, as the case may be, and is deemed to have absorbed the deposit amount when they give the beverage to the customer for free. The customer is deemed to have paid the deposit and can return the container to any designated return point for a refund.
2.8	How are "retailers" defined? If we sell to cafes, restaurants, hotels etc., does the financial flow "1b" apply? i.e. "retailers" pay producers the beverage price + deposit	Yes, "retailers" are broadly defined to include sales to cafes, restaurants and hotels. They will need to pay producers the beverage price + deposit when purchasing regulated beverages.
2.9	If I sell my product to other countries via Singapore (i.e. Manufacturer -> Distributor -> Wholesaler Exporter -> Overseas Country), do I still need to pay the \$0.10	Pre-packaged beverages that are intended to be consumed overseas, including those supplied to outbound travel channels like maritime and aviation vessels, can be excluded from the

S/N	Question	Response
	deposit? Can I use a sticker to cover up the \$0.10 barcode for export sales?	scheme provided they do not have a deposit mark. BCRS Ltd. will provide guidelines on the use of stickers subsequently. Producers will need to keep and maintain documentary proof to show that the beverage has been exported out of Singapore. Companies can write to NEA for clarification if they are unsure about how the scheme applies to their specific supply chain.

3. Artwork and Labelling Guidelines

S/N	Question	Response
3.1	Can deposit mark be printed on all products (imported both into Singapore and other SEA countries)? Is GS1 considered local barcode? What defines a Singapore barcode or international barcode?	Singapore-specific or local barcode means that the product barcode is only available in the Singapore market. Local barcodes are strongly encouraged, as they reduce the risk of cross-border fraud. The barcode needs to be of GS1 standard, and more information is available on GS1's website.
3.2	Are vertical barcodes compulsory? What about imported beverages that have a horizontal barcode? They will not change their design for Singapore market.	Vertical barcodes are strongly recommended, as it facilitates the reading of the barcode by the reverse vending machines (RVM). If there is a need for horizontal barcode placement, producers may submit their artwork to BCRS Ltd. for case-by-case review.
3.3	Is it mandatory to place the deposit mark within 10mm of the barcode? Given the limited space on containers, what flexibility is available for its placement?	Yes. This allows reverse vending machines to capture both elements in a single image when empty containers are deposited, which is important for fraud prevention and investigation purposes. If there are space constraints, producers may submit their artwork to BCRS Ltd. for case-by-case review.
3.4	For bottled waters often selling in a carton (example: 12x500ml), with a shrink wrap from imported country, how to place the deposit mark and barcode? Opening up the shrink wrap and re-sealing it will cause second time exposure to high heat for shrink wrap packaging, and increased cost. If imported products are shrink-wrapped/pack in multipack to be sold as such, do we have to open the	All beverage containers supplied in Singapore must have the deposit mark and barcode, regardless of how they are packaged. Importers should work with overseas suppliers to ensure individual containers are pre-labelled or use stickers if necessary.

S/N	Question	Response
	pack and label every single container with the deposit logo and seal it back for sale?	
3.5	Can I clarify that the deposit mark is only required on the individual bottle/can drink? For outer carton wraps, is the deposit mark required? If the product is sold in a cluster (e.g. 6 cans in a cluster) would the deposit mark be on the cluster label? Are there any requirements to label multipacks? Must the deposit mark be visible from the outer packaging of the multipack?	The deposit mark is required on each individual container, regardless of how it is packaged. The outer packaging of a multipack does not need to be labelled with a deposit mark.
3.6	Can importer arrange to put the deposit mark when the stock arrives at the premises and before it is sold for local consumption? Or is it compulsory to have the deposit mark before it is imported to Singapore for local consumption? For import products, stickering is required before we supply to the market. At point of cargo clearance, is any additional declaration required as the products enter Singapore port without the deposit mark?	Yes, importers can import beverages without the deposit mark. They must ensure that the beverage container has a deposit mark when it is supplied in Singapore, e.g., by affixing a deposit mark sticker on the container. No additional declarations will be required during cargo clearance.
3.7	Can we just use EAN-8 for BCRS? Understand my sales barcode for retailer may require EAN-13. Any difference between selecting EAN-13 and EAN 8 from BCRS perspective?	There is no difference between EAN-13 and EAN-8 barcode from BCRS's perspective. However, retailers in Singapore generally use EAN-13 barcodes at the point-of-sale machines. Producers are encouraged to check with their retailers if they have any barcode requirements.

S/N	Question	Response
3.8	Can I check if the minimum barcode size is pre or post shrinkage? This is for PET bottles, where packaging will be shrunk after production.	The minimum barcode size is post shrinkage.
3.9	Can producers start using the mark before the April 2026 start date? There are multiple regulatory changes happening within few months (Food Regulations Amendment to come into enforcement on 30 Jan 2026), we want to apply necessary changes to the artwork at one time, is it acceptable to launch the product with deposit mark before 1 April 2026?	No. Producers are strongly encouraged to work with their retailers to ensure that containers with the deposit mark are only found on the shelves from 1 April 2026, to avoid confusion among consumers.
3.10	For the artwork approval to BCRS, do you need the physical mock up or just a digital copy of the label?	BCRS Ltd. will need the digital copy, to be uploaded upon product registration. Physical mock-ups may be requested for testing purposes, especially for any odd-shaped containers.
3.11	A 3-month lead time to have all the BCRS logos up in trade is very tight. Also heard earlier that we are not advised to have the logos up earlier than April 2026. Previously when we had to implement the Nutri grade logos on our packaging, we were given 1 year lead time.	The deposit mark and artwork design guidelines are available on BCRS Ltd.'s website, and producers can start to revise their artwork already. The 3-month transition period between 1 April 2026 and 30 June 2026 is for the industry to clear the unlabelled stocks which are ineligible for refunds.
3.12	Do we need to inform gs.1.org.sg about anything in particular when creating the BCRS barcodes? It is my company's first time having to apply and use this service as usually our overseas factory manages the barcodes.	Producers do not need to inform GS1, but should ensure that the barcodes they use are GS1-compliant.

S/N	Question	Response
3.13	Is there a deadline on when stickering is disallowed?	From 1 April 2026, regulated beverages sold in Singapore should start to be affixed with a deposit mark. These beverages will carry a \$0.10 deposit. The beverage and retail industry will be given a 3-month transition period from 1 April 2026 to 30 June 2026 to clear old stocks which are not labelled with the scheme's deposit mark, not carry a \$0.10 deposit and therefore ineligible for refunds. By 1 July 2026, all regulated beverages must be labelled with the deposit mark and carry a \$0.10 deposit. Companies may use stickers to meet the labelling requirements, especially if they cannot meet minimum order quantities for direct printing. BCRS Ltd. will provide guidelines on the use of stickers subsequently.
3.14	Can we have more details on stickering guidelines - can it be done overseas i.e., in Malaysia or does it have to be done locally?	Companies can apply these stickers either locally or overseas. However, the stickers must be purchased from approved suppliers by BCRS Ltd. BCRS Ltd. will subsequently provide guidelines on the use of stickers, which will include the list of approved sticker suppliers.
3.15	If we have inventory of old SKUs after 30 June, can we put the deposit mark sticker onto the cans / bottles and sell them after 30 June to avoid scrapping?	By 1 July 2026, all regulated beverages must be labelled with the deposit mark and carry a \$0.10 deposit. To meet this deadline, companies can apply stickers to beverages that have not yet been

S/N	Question	Response
		supplied to the Singapore market (e.g., stocks in warehouse) by 30 June 2026, before selling them. The beverage container details, including the barcode, must also be registered with the scheme operator to ensure the return points can recognise and accept them during return.
3.16	Any concern if imported products already have deposit mark logo which is applicable only for deposit refund schemes in other countries (e.g. from UK, AUS)?	No concern as many beverage containers currently found in the Singapore's market already display deposit labels from other countries. If the beverage product with the same barcode is sold in other countries (i.e., the beverage product uses an international barcode), higher producer fees will apply. Refer to BCRS Ltd.'s Artwork Design Guidelines for details.
3.17	There are some preliminary exemption criteria to use local barcode, one of it is to base on annual sales volume in neighbouring countries, is Hong Kong considered as neighbouring country?	The preliminary exemption criteria in the guidelines apply to all artwork, including those shared between Singapore and other markets such as Hong Kong. The use of Singapore-specific barcode is encouraged to prevent parallel imports from being accepted at return points without the deposit being paid upfront to the scheme operator.
3.18	Is it mandatory for producers to register new barcodes for all products covered under the scheme, or is there flexibility to continue using existing barcodes?	Producers have the flexibility to use new or existing barcodes on their regulated beverages. However, all barcodes (existing or new) must be registered with the scheme operator to ensure containers can be recognised by return points. The new artwork must also include the deposit mark according to the published guidelines by BCRS Ltd.

S/N	Question	Response
	If new barcodes are required, will NEA consider requiring retailers to waive listing fees, given the significant cost implications for producers?	Beyond producers, retailers also have obligations under the scheme - NEA has mandated larger supermarkets to set up return points to collect empty beverage containers. The listing fees are commercial arrangements between producers and retailers that are not regulated under the scheme.
3.19	For beverages with separate labels, can the deposit mark and barcode be printed on the label, or must they be printed directly on the bottle? 	If your existing barcode is already printed on the separate label, you may print the deposit mark on the same label. However, consumers must return containers with the label intact so that return points can read the barcode and accept the containers accordingly.

4. Registration Process

S/N	Question	Response
4.1	How long does it take for the artwork approval from BCRS? We will need approval before commercial production. The timeline is quite tight if registration starts Q3. How do we expedite approval? The FAQ mentions it takes 12 weeks and we also need to submit empty container. Is empty container a must if the design is approved online already? For product registration of 16 weeks (4 months), starting from Q3 July, it is very tight for producers to push for the product to be live in April 2026. Is there a possibility to start earlier? According to the Artwork design guidelines, the procedure to register a new product would be required to start several weeks (approx. 12 weeks in the guidelines) before the planned introduction of the Singapore market. Why does the registration process take so long? I assume the process is automated. This discourages products that go from idea to production within a short turnaround time. Can you comment on this? For every new product that we want to launch post-April 2026, do we have to register it 3 months in advance?	Producer registration will be fast. BCRS Ltd. will share more information when the producers' registration portal is opened. Product registration will take approximately 12 weeks. More time may be required at the beginning of registration (e.g., up to 16 weeks), where many producers will be registering their products at the same time. BCRS Ltd. is working with the IT supplier to allow bulk upload of product Stock Keeping Units (SKUs) during the registration. More details will be shared by BCRS Ltd. in Q2 2025. The deposit mark is already available on BCRS Ltd.'s website, and producers can start to incorporate the deposit mark in their artwork design. As long as producers adhere to BCRS Ltd.'s artwork design guideline, BCRS Ltd. will generally approve the artwork design.

S/N	Question	Response
	Can you share about the SKU registration process? My business is built on seasonal drinks, with 100+ new SKUs every shipment. How efficient are you making the process to support the success of our businesses? What is the lead time for: 1) Producer registration 2) Product registration as we will need to factor this into our timelines? What will need to be submitted at each stage (e.g. any docs/sample containers, etc)?	
4.2	Will there be a contract between BCRS and importer/producer?	Yes, more information will be shared by BCRS Ltd. in Q2 2025.
4.3	Who will receive NEA's notification to register as a member in Q2 2025? What are the consequences of not registering as a member by the deadline?	Importer/manufacture of beverages in Singapore are licensed with the Singapore Food Agency (SFA). NEA will send notifications to the SFA-registered licence holder of these companies. Companies may write to NEA with the updated contact details if you wish to designate a different point of contact. While there are no legal consequences for not registering by Q2 2025, companies must be registered members of the scheme before supplying regulated beverages in Singapore from 1 April 2026. After this date, companies are not allowed to supply regulated beverages without being registered as a member and having the deposit mark and barcode on their products. To ensure compliance, all producers are encouraged to register with the scheme operator early.

S/N	Question	Response
4.4	When would we expect the product registration to happen. If in the event is only in Dec 2025, and the lead time is 16 weeks, how to ensure we are in time for 1st April 2026.	Product registration is expected to begin in Q3 2025, with an estimated maximum processing time of 16 weeks. It will be processed more quickly if all required information has been clearly provided to BCRS Ltd..

5. Others

S/N	Question	Response
5.1	If the packaging is compacted or out of shape, will the RVMs still be able to read the barcodes?	If the barcodes are defaced or damaged, the reverse vending machines (RVMs) may not be able to read the barcodes. NEA and BCRS Ltd. will carry out public education to educate the public about the proper return of the containers.
5.2	To apply this scheme in a dormitory, will this be guided to the workers by MOM?	The scheme applies to all plastic and metal beverage containers from 150 millilitres to 3 litres that are supplied in Singapore, including those consumed in dormitories. NEA and BCRS Ltd. will carry out public education to educate the public about the proper return of the containers.
5.3	Are there any measures to ensure that the beverage recycle vending machine remains available at all times for consumers to return their used packaging?	The scheme operator will be responsible for ensuring the availability and maintenance of return points, including reverse vending machines (RVMs).
5.4	What will happen to those bottles collected at return points? Will they still be clean and reused for beverages?	The collected containers will be recycled. The scheme operator will engage licensed recyclers to process the empty beverage containers collected under the scheme, as required by law.
5.5	Would there be any support given to manufacturers and retailers during the early stages of implementation? Particularly with the redesign of labels, reprint of labels, and cover incurred costs for labels that aren't able to be cleared by the 3-month transition period?	Producers should plan the inventory drawdown early to minimise wastage due to labels that cannot be cleared by 1 July 2026.

S/N	Question	Response
5.6	If the product is sold in March, forecast to be cleared by July, however due to slow sales/retailer didn't put it on-shelf on time, and the product is still on-shelf in August, who will be responsible? Manufacturer or retailer?	By 1 July 2026, all regulated beverage containers must be labelled with the deposit mark and carry a \$0.10 deposit. Retailers are responsible for ensuring that all regulated beverages sold in their stores are compliant with the scheme.
5.7	What is the dimension and power output of the reverse vending machine?	Different machine sizes and power requirements will be available to accommodate varying return volumes. BCRS Ltd. will provide more information on this subsequently.
5.8	Is the reverse vending machine free?	More information will be provided subsequently when BCRS Ltd. engages retailers to discuss their obligations, such as setting up return points and related arrangements.
5.9	Who will own the reverse vending machines if there are two supermarkets within proximity?	
5.10	Can the reverse vending machine be placed outside of the store?	
5.11	Who bears the repair cost of the reverse vending machines?	
5.12	When we return water bottle without cap, is it entitled to refund?	Empty containers can be returned without caps and still receive a refund. However, containers must have intact, readable barcodes to receive refunds. NEA and BCRS Ltd. will carry out public education to educate the public about the proper return of the containers.
5.13	Is there anything stopping consumers to peel the plastic (with barcode) off the PET bottle and shove it in the machine to get the refund? Is the machine smart enough to detect it?	The reverse vending machines use multiple verification methods including barcode scanning, infrared sensors, cameras, and weight detection systems to ensure returned containers match their registered details in BCRS Ltd.'s database. Hence, all

S/N	Question	Response
		beverage containers must be pre-registered with BCRS Ltd. to enable accurate verification and deposit refund.