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## Mandatory Packaging Reporting Via Waste and Resource Management System By 31 March 2022

### Introduction

The planning, development and administration of Singapore's waste management system comes under the purview of the Singapore National Environment Agency ("NEA"). As part of Singapore's strategy to build a sustainable nation, focused on resource efficiency and climate resilience, the Resource Sustainability Act ("RSA") was enacted. This lends legal force to regulatory measures to reducing waste and targets three priority waste streams – e-waste, food waste, and packaging waste.

In this Update, we highlight the mandatory reporting requirements relating to packaging waste under the RSA. Affected companies are required to submit the first round of packaging data report and 3R (Reduce, Reuse, Recycle) plans for 2022 by **31 March 2022**, through the Waste and Resource Management System ("WRMS").

### Mandatory Packaging Reporting Framework

The RSA sets out a mandatory packaging reporting framework that obliges certain companies to undertake mandatory packaging reporting through the submission of packaging data and 3R plans. This framework is intended to, amongst other things, prompt companies to reduce the volume of packaging / packaging waste.

Companies required to comply with the requirements under the mandatory packaging reporting framework and submit packaging data and 3R plans are those that are:

- in the business of supplying regulated goods in Singapore;
- producers with an annual turnover of more than S\$10 million in 2020; and
- imports or uses specified packaging,

referred hereinafter as "**obligated companies**".

Obligated companies are required to: (i) submit reports on specified packaging that is imported or used in Singapore along with supporting documents on an annual basis, categorised by type of packaging material and packaging form, amongst others; (ii) submit 3R plans for reducing, reusing or recycling packaging on an annual basis, including details of key initiatives, key performance indicators and targets to do so; and (iii) maintain records related to these reports and plans for five years.

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The mandatory packaging reporting framework lays the groundwork for the implementation of an Extended Producer Responsibility framework for packaging waste management, which is intended to be implemented no later than 2025.

## **New Waste and Resources Management System (WRMS)**

Obligated companies are required to submit the first round of packaging data report for 2021 and 3R plans by **31 March 2022**.

The submission will be done via an online reporting portal – the WRMS, a system built to integrate all waste-related systems into an ecosystem, thereby promoting reduction of waste and resource sustainability. The module for submissions in relation to the mandatory packaging reporting framework is expected to be live on the WRMS by the end of 2021.

Obligated companies may access the portal [here](#).

## **3R Guidebook for Packaging**

To assist companies with preparing their 3R Report, the Singapore Manufacturing Federation and NEA co-developed a 3R Guidebook for Packaging. Obligated companies may find it helpful to refer to the Guidebook in developing and implementing 3R plans in their operations. The Guidebook may be accessed via the NEA website, [here](#).

## **Our Comments**

The reporting obligations apply depending on a series of considerations, including whether businesses supply regulated goods under the RSA, whether businesses use specified packaging, what falls under specified packaging and whether it is used in a prescribed way, whether businesses are producers and if they are a franchisor, and what the annual turnover is, amongst other things. Hence, even for businesses not currently subject to the reporting obligations, it is critical that they continuously monitor their operations against the RSA's criteria for any changes that may trigger an RSA obligation.

For businesses subject to the reporting obligations, the deadline for compliance is soon approaching. If not already done, we recommend that businesses immediately familiarise themselves with the requirements and NEA's guidance closely for the purpose of preparing the report. This is because the report will involve, amongst other things, collating and classifying the type and form of packaging used according to prescribed guidelines, which will not necessarily be a straightforward matter depending on the numbers and types of products in question.

# Client Update: Singapore

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If you have any queries on the above development, please feel free to contact our team members below who will be happy to assist.

### Further Information

- [Resource Sustainability Act 2019](#)
- NEA information on "[Mandatory Packaging Reporting](#)"
- [Online portal for Waste and Recycling Data Submissions Services](#)

## Contacts



**Kala Anandarajah**  
Partner  
Head, Competition & Antitrust  
and Trade  
T +65 6232 0111

[kala.anandarajah@rajahtann.com](mailto:kala.anandarajah@rajahtann.com)



**Lee Weilin**  
Partner  
Head, Sustainability  
T +65 6232 0707

[weilin.lee@rajahtann.com](mailto:weilin.lee@rajahtann.com)



**Tanya Tang**  
Partner (Chief Economic and  
Policy Advisor)  
Competition & Antitrust and  
Trade

T +65 6232 0298

[tanya.tang@rajahtann.com](mailto:tanya.tang@rajahtann.com)



**Alvin Tan**  
Partner  
Competition & Antitrust  
and Trade

D +65 6232 0904

[alvin.tan@rajahtann.com](mailto:alvin.tan@rajahtann.com)

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Please feel free to also contact Knowledge and Risk Management at [eOASIS@rajahtann.com](mailto:eOASIS@rajahtann.com)

## Our Regional Contacts

### RAJAH & TANN | *Singapore*

**Rajah & Tann Singapore LLP**  
T +65 6535 3600  
sg.rajahtannasia.com

### R&T SOK & HENG | *Cambodia*

**R&T Sok & Heng Law Office**  
T +855 23 963 112 / 113  
F +855 23 963 116  
kh.rajahtannasia.com

### RAJAH & TANN 立杰上海

SHANGHAI REPRESENTATIVE OFFICE | *China*

**Rajah & Tann Singapore LLP  
Shanghai Representative Office**  
T +86 21 6120 8818  
F +86 21 6120 8820  
cn.rajahtannasia.com

### ASSEGAF HAMZAH & PARTNERS | *Indonesia*

**Assegaf Hamzah & Partners**

#### Jakarta Office

T +62 21 2555 7800  
F +62 21 2555 7899

#### Surabaya Office

T +62 31 5116 4550  
F +62 31 5116 4560  
www.ahp.co.id

### RAJAH & TANN | *Lao PDR*

**Rajah & Tann (Laos) Co., Ltd.**  
T +856 21 454 239  
F +856 21 285 261  
la.rajahtannasia.com

### CHRISTOPHER & LEE ONG | *Malaysia*

**Christopher & Lee Ong**  
T +60 3 2273 1919  
F +60 3 2273 8310  
www.christopherleeong.com

### RAJAH & TANN | *Myanmar*

**Rajah & Tann Myanmar Company Limited**  
T +95 1 9345 343 / +95 1 9345 346  
F +95 1 9345 348  
mm.rajahtannasia.com

### GATMAYTAN YAP PATACSIL

GUTIERREZ & PROTACIO (C&G LAW) | *Philippines*

**Gatmaytan Yap Patacsil Gutierrez & Protacio (C&G Law)**  
T +632 8894 0377 to 79 / +632 8894 4931 to 32  
F +632 8552 1977 to 78  
www.cagatlaw.com

### RAJAH & TANN | *Thailand*

**R&T Asia (Thailand) Limited**

T +66 2 656 1991  
F +66 2 656 0833  
th.rajahtannasia.com

### RAJAH & TANN LCT LAWYERS | *Vietnam*

**Rajah & Tann LCT Lawyers**

#### Ho Chi Minh City Office

T +84 28 3821 2382 / +84 28 3821 2673  
F +84 28 3520 8206

#### Hanoi Office

T +84 24 3267 6127  
F +84 24 3267 6128  
www.rajahtannlct.com

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