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**Sendt:** 31. oktober 2014 14:21  
**Til:** info@dpa-system.dk  
**Emne:** Important communication from DPA-System



## Important communication from DPA-System:

To all businesses registered for producer responsibility for electrical and electronic equipment in Denmark

Danish Producer Responsibility-System (DPA-System) is an organization established under the Danish Environmental Protection Act with the purpose to administer the rules on producer responsibility in Denmark. We now inform all registered businesses that the WEEE legislation has been revised and that the amendments adopted at EU level now enter into force in Denmark.

The amendments have implications for producers and importers, as well as for other players in the sector, be it collective schemes, local authorities and recycling facilities.

During 2014 DPA-System has worked to clarify how the practical implementation will take place, including clarification of date of entry into force of the different items. This work is ongoing and takes place in collaboration with the Danish Environmental Protection Agency, industrial organisations, collective schemes, recycling businesses, and local authorities.

DPA-System will inform you about the results of this collaboration regularly.

Below you can see whether the amendments have implications for your business.



Of importance in particular to businesses producing or importing, and selling:



### Luminaires

The exemption for luminaires for use in households has been repealed with the revised WEEE directive. Note that luminaires are no longer exempt from the regulation.

*Further information: [DPA-System's memo on lighting equipment](#)*

### Photovoltaic panels

Solar photovoltaic panels are now subject to producer responsibility whether they are used in businesses or in private households. When a producer or an importer places such equipment

on the Danish market he must ensure that there is a take-back and recycling system for the panels in order that they are recycled instead of becoming waste. He must also register in the producer responsibility register and report once a year how many kilograms were sold the previous year. Solar photovoltaic panels must in the future be reported separately in a new Category 4b: Photovoltaic panels. At the end of the useful life of the panels they must be collected separately from other electrical equipment.

*Further information: [DPA-System article on photovoltaic panels](#)*

## Printer cartridges

The exemption for printer cartridges has been repealed with the revised WEEE directive. Printer cartridges dependent on electric currents are now subject to producer responsibility. In connection with the registration printer cartridges must be registered as Category 3: IT and telecommunications equipment.

*Further information: [DPA-System's memo on printer cartridges](#)*

## Smoke detectors

Smoke detectors with radioactive sources used to be exempt from producer responsibility in Denmark. This exemption has been repealed and any sale of such products must now be reported and handled by the players of the producer responsibility system. Sale of smoke detectors with radioactive substances must be registered as Category 9: Monitoring and control instruments. All affected parties in industry and in the municipalities are presently discussing the management of end-of-life detectors.

## Vending machines and automatic dispensers

Category 10: Automatic dispensers used to be called salgsautomater (vending machines) in The Danish Statutory Order, this incorrect translation has been corrected. As from January 2015 the term "automatiske dispensere" will be used. In the future also equipment used in private households can be registered as Category 10-equipment. This means, among other things, that businesses selling soap dispensers dependent on electric currents in the future must register this type of product in Category 10 for households if the products are aimed at this customer segment.

*Further information: [DPA-System's memo on automatic dispensers](#)*

## Equipment for use in businesses

Businesses selling equipment exclusively for use in businesses (B2B) will in the future be subject to a requirement for attestation of quantities reported annually as being sold on the Danish market. This means that under certain conditions the management or an external auditor must certify the correctness of the quantities reported to the producer register. The requirement for attestation of reported data covers now BOTH equipment with end-users in households and equipment for professional use.

## Re-exported equipment - refund provision

If a quantity of products sold on the Danish market by a business subject to producer responsibility is subsequently exported out of Denmark by another business it will be possible in the future for the producer who originally registered the quantity in question in the producer responsibility to register the re-exported quantity. DPA-System will take this quantity into account, i.e. give a refund for the re-exported quantity in our calculation of allocation, financial guarantee, and fees to DPA-System.

## From abroad to the Danish market (Authorised Representative)

The purpose of the amendment regarding an authorised representative (AR) is to make it easier for businesses to assume their producer responsibility in the countries to which they

export; the authorised representative can take over the duties of the producer/importer locally in respect of registration and reporting in the different countries.

Businesses based in the EU and dealing in distance sale to Denmark must in the future designate an authorised representative in Denmark to assume their producer responsibility in Denmark. Under certain conditions the authorised representative is an alternative to a company's own registration in the register since the authorised representative takes over reporting duties etc. from the foreign producer.

Danish businesses exporting directly to an end-user in another EU Member State, for instance through internet sale, will be subject to similar rules in the countries to which they export.

Businesses domiciled outside the EU cannot use the authorised representative option. These businesses must register directly with DPA-System in order to assume their producer responsibility in Denmark. In this way it is ensured that businesses from outside the EU do not appear as free riders under the producer responsibility system in the EU.

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