

Update in progress – in relation to new WEEE categories

January 2015

Guidance for registration and annual reporting

DPA-System is short for Danish Producer Responsibility System. DPA-System is in charge of administrative tasks associated with the rules on producer responsibility under Danish environmental law regarding waste from electrical and electronic equipment, end-of-life batteries and accumulators, and end-of-life vehicles.

Producer responsibility for these waste types has authority in the Danish Environmental Protection Act. This Act translates into three Statutory Orders for the different waste types: the WEEE Order, the Battery Order, and the End-of-life Vehicles Order (the current statutory texts can be found on www.dpa-system.dk).

The Danish Statutory Orders take offset in three EU directives for the same waste types: the so-called WEEE Directive, the Batteries Directive, and the ELV Directive. Also, these directives with exact titles and dates can be found on www.dpa-system.dk.

Producer responsibility rests on the principle that each producer or importer assumes responsibility for collection and management of WEEE, waste batteries, and end-of-life vehicles to the effect that products becoming waste are managed in an environmentally correct manner, with the highest possible utilisation of resources contained in such products.

Producers and importers are in the following referred to as *producers* as the rules applying to both types are the same.

In general, the following abbreviations are used: WEEE for waste electrical and electronic equipment, BAT for batteries and accumulators, and ELV for end-of-life vehicles.

NOTE! Legislative amendments Please see outline of afmendments on www.dpa-system.dk

This document will be updated regularly.

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Note that this document has been updated further to the WEEE Directive recast and the entry into force of the Danish implementation. See an outline of the legislative amendments on the homepage of www.dpa-system.dk. This document will be updated regularly.

1 BACKGROUND

In pursuance of the rules on producer responsibility for electrical and electronic equipment (EEE), batteries/accumulators and vehicles this document describes how new producers or importers register in the producer register as well as which data to report annually to DPA-System in the reporting period from 1 January to 31 March.

Companies in the form of producers and importers placing as the first level of the distribution chain electrical and electronic equipment, batteries or vehicles on the market in Denmark are generally covered by the environmental legislation regarding producer responsibility.

The producer responsibility means that the company must register with DPA-System in order to legally place products on the market. This also applies to foreign companies established in another EU country that have registered for producer responsibility in Denmark through an authorised representative and to foreign non-EU companies.

In connection with the registration the producer must state the category to which the equipment belongs and, in the case of EEE, inform whether the equipment is used in private households or whether it is for professional use¹.

In connection with the annual statutory reporting to DPA-System in the period 1 January to 31 March the producer must report how many kilograms of electrical products/equipment or batteries have been placed on the Danish market in the previous year. Vehicles are reported in number of units.

1.1 STATUTORY REGISTER

The overall purpose of reporting to DPA-System's producer register is to enable the Danish Environmental Protection Agency to monitor whether the producer responsibility system works as intended and whether objectives in the legislation regarding collection and resource recovery are attained. All EU Member States have such national registers. The registers and the environmental authorities report the results annually to the EU Commission.

The purpose of reporting and payment of tax to SKAT for portable batteries is to have the producers pay their share of municipal costs for collection of batteries from residents.

 $^{^1}$ The ten categories and definition of equipment destined for end-users in households or businesses can be found on www.dpa-system.dk

2 USER GUIDE

This document describes data to be submitted in connection with the registration of a producer or an importer in the national producer register. In addition it describes data to be submitted to DPA-System annually after registration in the reporting period from **1 January to 31 March**.

Producers having placed <u>portable</u> batteries on the market must furthermore submit data on quantities of portable batteries placed on the market in the previous calendar year. This must be done to SKAT (The Danish Tax and Customs Administration) in the period from **1 January to 15 February.** SKAT transfers these data to DPA-System.

For producers registered under a collective scheme this scheme will normally assume registration and reporting to DPA-System on behalf of the producer. However, producers placing portable batteries on the market must report such quantities to SKAT themselves. Producers must also sign a confirmation of registration and submit it to DPA-System.

At any given time it is the responsibility of the producer to control whether master data are accurate and updated.

Producers from an EU country dealing in distance selling directly to end-users, for instance on the internet, must designate an authorised representative in Denmark to assume their producer responsibility.

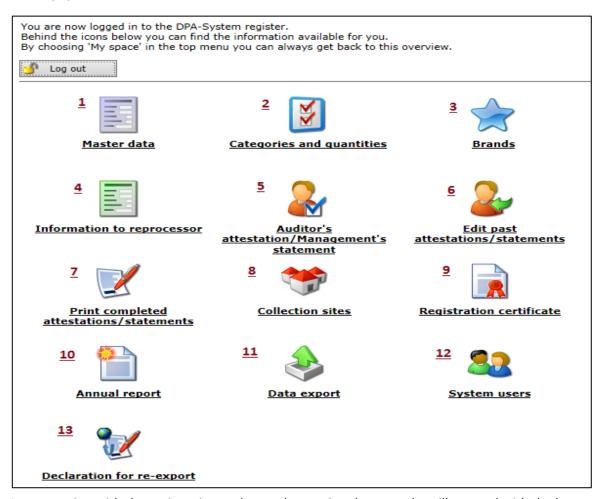
The registration of a new producer or importer and the annual reporting follow a specific procedure in the DPA-System producer register.

2.1 My space principle

The registration and reporting system is designed according to the principle of 'My space' in the producer register. 'My space' is a screen where the registered producer can log in through a login ID and a password. On the site the relevant icons appear, for instance for annual reporting and information/reports available to the producer. By clicking on 'My space' in the top menu the producer can at any time return to the overview page.

The icons appearing on my space are shown below and described further in this guidance.

2-1: My space



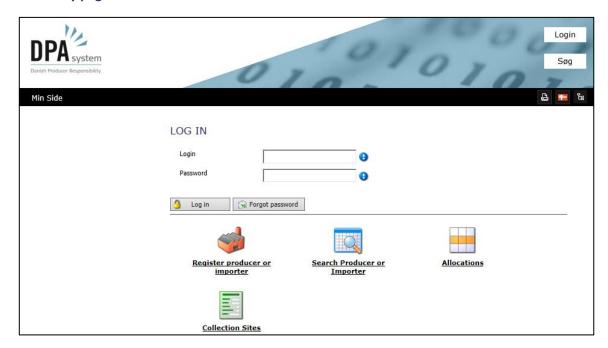
In connection with the registration and annual reporting the procedure illustrated with the below icons is followed. After entry of data it is possible to make a print or an extract of reported data.

Icons regarding <u>submission</u> of data:	Icons regarding <u>print</u> or <u>extract</u> of data:
1. Master data	7. Previous attestations/statements
2. Categories and quantities	9. Confirmation/Registration certificate
3. Brands	10. Annual report
4. Info for reprocessor	11. Extract of data
5. Auditor's attestation/management's	
statement	
6. Edit previous attestations/statements	
8. Reception sites for car batteries	
12. System users	
13. Declaration for re-export	

3 REGISTRATION OF NEW PRODUCER OR IMPORTER

New businesses must click LOGIN in the upper right-hand corner of www.dpa-system.dk and select "Create producer or importer" to make a registration.

3-1: Entry page

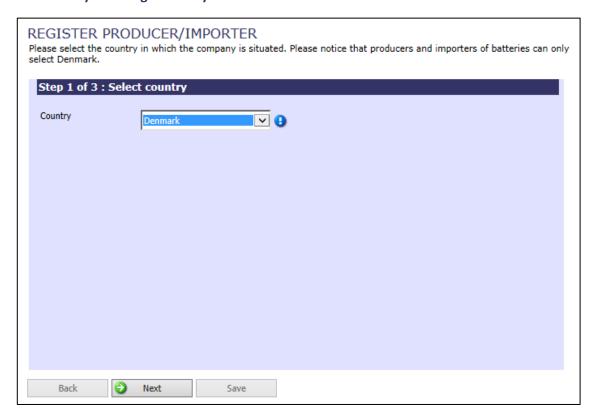


3-2: E-mail validation.



Enter e-mail and a link is sent to your mailbox that is used to start registration.

3-3: Start by selecting a country



Companies from other EU countries dealing in distance selling of electrical equipment to endusers in Denmark must register through an authorised representative (see explanation on www.dpa-system.dk), while companies from outside the EU must register directly.

Producers and importers of batteries must have a Danish CVR number before they can register.

3-4: Master data

REGISTER PRODUCER/IMPORTER Here you register CVR (Central Business Register number) of the legally responsible company which is first level of distribution chain in Denmark. Then other master data are filled in automatically with the information registered with the Danish Commerce and Companies Agency in the national Central Business Register. If the register is out of operation you will have to					
try again later. Only companies dealing in distance sale (Internet sale) of electrical equipment from abroad into Denmark to private households can register with a foreign VAT number and country code. It is not possible for foreign companies to collect data automatically from the Central Business Register.					
Step 2 of 3 : Producer					
VAT-no.	Get data				
Company name					
Address					
Zip code / City					
Webaddress					
Protected against Advertising (Check = Yes)					
Alternative billing, Country	Denmark				
Alternative billing, Address		0			
Alternative billing, Zip code / City					
Electronic invoice, Email					
Reference on invoice					
Alternative billing, Attention					
	ave				

The system collects information on name and address from the Central Business Register (CVR) when the CVR number is entered. For foreign non-EU companies the VAT number is entered.

Producers wishing that invoicing is done through another division or similar can enter alternative contact information than what is retrieved from CVR.

Contact person and e-mail address should refer to a personal contact in the company. Click approve and master data have been created. The system now takes you directly to Categories and quantities.

Note that all contact from DPA-System takes place through the e-mail address entered here. The producer is fully responsible for ensuring that information from DPA-System reaches the relevant persons in the company. It is also the responsibility of the producer to state, if relevant, debtor code or reference to be used in the invoice.

3-5: Categories and budgeted quantities

tep 1 of 2 : Categories			
VEEE (kg)		Household	Business
. Large household appliances			
. Small household appliances			
. IT and telecommunications equipment			
a. Consumer equipment			
b. Photovoltaic panels		✓	
a. Luminaries			
ib. Light sources			
6. Electrical and electronic tools			
. Toys, leisure and sports equipment			
B. Medical devices			
. Monitoring and control instruments			
O. Automatic dispensers			✓
ELV (items)			
rivate vehicles			
ight goods vehicles	П		

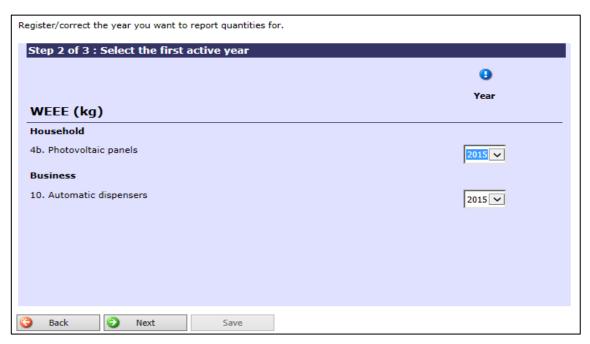
NOTE! Batteries (portable, industrial, or automotive batteries) are not shown on this picture (as a test example we use a foreign company).

Under the icon 'Categories and quantities' you mark the categories of electrical equipment (WEEE) and/or batteries (BAT) and/or ELV for which your company has producer responsibility. Read more about categories on www.dpa-system.dk.

As from 2014 photovoltaic panels have a special category 4b: Photovoltaic panels; Category 10, automatic dispensers, now also covers equipment for use in households.

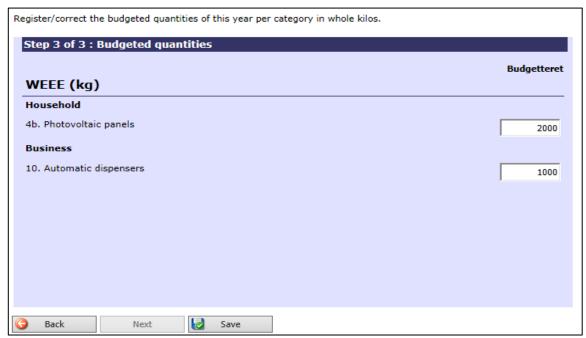
For electrical equipment, the categories are registered under end-user 'Households' or 'Businesses' – depending on whether equipment is manufactured for use in private households or for professional use. It is possible to mark both types of end-user under each relevant category.

3-6: Select year



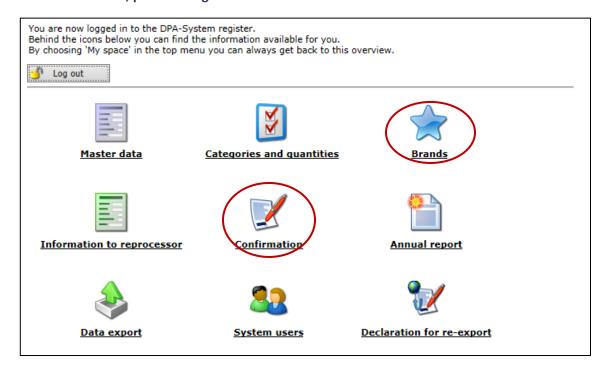
Companies just entering the market select this year while companies that have not registered in time may select previous years (actual quantities).

3-7: State expected quantities placed on the market



Electrical equipment and batteries are stated in kilograms while vehicles are stated in number of units. (See more details in next section on annual reporting). Budgeted quantities are not used for any calculations. Click Save.

3-8: State brands, print and sign confirmation



At the homepage, the new producer's "My space" will look like this. It will be expanded with more icons along with the reporting of realised quantities, including the icons with auditor's attestation and management's statement that are used to authenticate quantities placed on the market.

Proceed as follows to finalise the registration:

- Under the icon 'Brands' the brands (trademarks) that the producer places on the market in Denmark are listed at category level. Click Save.
- Under the icon 'Confirmation' a print-friendly version of master data is shown. Please
 print, sign and submit be ordinary mail or email to DPA-System in order to have your
 registration approved.

See more on registration and annual reporting in the following sections.

3.1 OTHER REGISTRATION STEPS

Info for reprocessor



Under the icon 'Info for reprocessor' information is stated to allow reprocessors to contact producers or importers. This may be an e-mail address, website, telephone number etc.

It must be possible for reprocessors to contact the producer/importer if they have questions in connection with waste management of electrical equipment or waste batteries from the producer.

Reception sites for automotive batteries



Businesses under the category of automotive batteries must create/select reception sites established for reception of waste automotive batteries.

Select among already created reception sites and/or create a new reception site by entering name and address of the site.

System users



Under the icon 'System users' the producer can create further users of the system. New users have the same rights as the system user that creates them. It is also possible to see the company's users of the system, delete users, and change passwords. If a staff member stops working in the company the user must immediately be deleted as a system user.

Confirmation or Registration certificate







After the first registration the icon 'Confirmation' is shown on 'My space'. Click the icon to get a print-friendly version of master data entered in the DPA-System producer register.

It is a statutory obligation to have a registration in the DPA-System producer register approved by the responsible management of the company. Therefore, upon registration, the responsible manager of the company must sign this form and submit it by mail or in scanned form in an email to DPA-System.

The registration must be complete – i.e. stating categories, quantities and brands – before the company's registration is finalised. In addition, the responsible manager must submit the signed confirmation to DPA-System. Completed registration AND submission of signed confirmation is a precondition for legal sale of products on the Danish market.

Lack of submission of signed confirmation and incomplete registration or reporting will cause cancellation of the company in the producer register.

When the registration is complete and a signed confirmation has been received, DPA-System will approve the registration electronically in the register. The business will now appear in searches on the DPA-System website. The icon 'Confirmation' will disappear from 'My space' and will be replaced by the icon 'Registration certificate'.

The registration certificate can be printed and used as a proof of statutory registration towards clients and/or trade partners.

Annual report



Under the icon 'Annual report' you can see previously registered quantities for a given year. Enter the year in question and click Show.

Export of data



Under the icon 'Export of data' it is possible to export previously entered information to Excel. Select the year/-s in question and mark which information to export to Excel for further processing in your company.

4 ANNUAL REPORTING



In the period 1 January to 31 March the system is open for entry of those data that are the basis for the entire producer responsibility legislation. In this period all producers and importers or their collective schemes must report quantities of electrical equipment, batteries or vehicles that have been placed on the market, as well as any quantities collected and sent for environmental treatment in the previous calendar year.

- ✓ The collective schemes report to the producer register on behalf of the producers that are members in the scheme.
- ✓ SKAT (The Danish Tax and Customs Administration) transfers data to the producer register on behalf of producers and importers of portable batteries and vehicles.

4.1 How to compute and report quantities

Electrical equipment in kilograms

The weight is stated in entire kilograms, as the weight of the entire product (finished article) in the form it is sold to the purchaser, including electronic accessories but excluding batteries and accumulators, packaging, instructions and manuals. The weight is stated as the exact weight in entire kilograms of products put on the market per category and per end-user.

Batteries in kilograms

The weight is always stated in entire kilograms, as the weight of the entire product (finished article) in the form it is sold to the purchaser, but excluding the weight of transport packaging, instructions and manuals.

If the battery is incorporated into an appliance only the weight of the battery is stated. For batteries containing liquids (electrolyte) the weight is stated including liquid and gel.

Vehicles in number of units

For ELV, the total number of imported and sold passenger cars and light trucks is reported.

4.2 How to START

Under the icon 'Categories and quantities' you will find an overview of the categories under which the company is registered. You may add new categories of electrical equipment (WEEE) and/or batteries (BAT) and/or ELV for which your company has got producer responsibility during the year. If you no longer sell products in previously selected categories, you send an email to info@dpa-system.dk asking to have inactive categories removed.

After this, the reporting year is shown. If there are corrections for previous years, please contact DPA-System to have the system opened temporarily.

4.3 QUANTITIES PLACED ON THE MARKET

gister/correct marketed quantities for the selected year per o ms for ELV.	ategory in whole kilos for WEEE an	d BAT, and in number
ease note that the field 'Marketed quantity' is obligatory.		
antities for vehicles (ELV) are registred by SKAT (The Danish	Tax Authority), and consequently	you must enter a 0.
Step 4 of 7 : Marketed quantities		
	•	•
	Marketed	Responsibility
WEEE (kg)	quantity	assigned
201/	4	
Household		
1. Large household appliances	34	
2. Small household appliances	2000	
3. IT and telecommunications equipment	3000	
4a. Consumer equipment	0	
6. Electrical and electronic tools	0	
9. Monitoring and control instruments	0	
Business		
3. IT and telecommunications equipment	234	200
5b. Light sources	234	0
10. Automatic dispensers	543	
BAT (kg)		

For those categories and end-users that a producer has registered previously he must report how many kilograms he has actually placed on the market in the previous calendar year.

Placing on the market means the first time a product is made available on the Danish market. 'Made available' means any delivery of a product for distribution, consumption or use in Denmark against payment or free of charge.

Electrical equipment

Quantities of electrical equipment placed on the market must be broken down on categories and end-users – i.e. within each category how many kilograms have been used in households and quantities of equipment manufactured exclusively for professional use. For a more detailed definition of the user categories of Households and Professionals see www.dpa-system.dk.

If the company is no longer active within a given category, it must be deleted. This is done by sending an email to info@dpa-system.dk asking DPA-System to delete the category in question.

Industrial and automotive batteries

The producer must report quantities of batteries placed on the market distributed on chemical substance groups, i.e. how many kilograms the producer has placed on the market/expects to place on the market - distributed on lead-acid, nickel-cadmium, mercury, and other.

Portable batteries are reported to SKAT

Quantities of portable batteries placed on the market must be reported to SKAT who transfers data to DPA-System. Reporting to SKAT must be done no later than 15 February. More details on reporting to SKAT can be found on www.dpa-system.dk.

Vehicles

Imported and sold new or second-hand vehicles are reported in numbers sold distributed on passenger cars and light trucks.

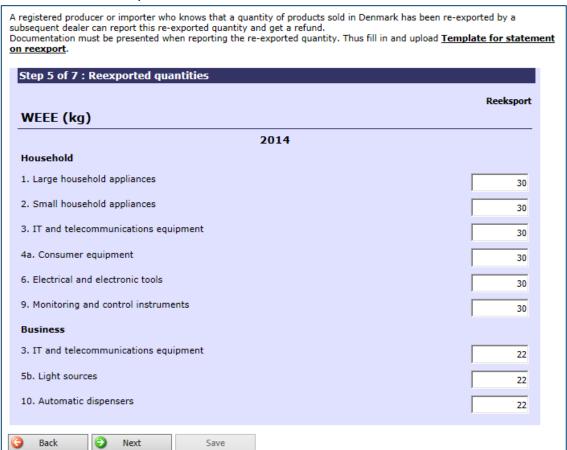
Quantities subject to transfer of responsibility

Producers and importers placing electrical business equipment or automotive or industrial batteries on the market may enter agreements with a subsequent level in the distribution chain about transfer of the take-back duty under the producer responsibility scheme. This is known as 'quantities subject to transfer of responsibility'.

Quantities subject to transfer of responsibility make up a fraction of the quantities placed on the market, so the quantity will always be lower than or equal to quantities placed on the market in the calendar year in question. If no quantities have been subject to transfer of responsibility, click Next.

Please note that as from the reporting period 2015 ALL electrical equipment placed on the market must be authenticated by the management or an auditor.

4.4 Re-exported quantities



Electrical equipment

In connection with the revised WEEE Order in 2014 it has become possible to report re-exported quantities in connection with the annual reporting.

A registered producer or importer who knows that a quantity of products sold in Denmark has been re-exported by a subsequent dealer can report this re-exported quantity and get a refund.

Note! Documentation must be presented when reporting the re-exported quantity. The documentation is a re-export form that is uploaded on the producer's registration in connection with the annual reporting period from 1 January to 31 March. Use the icon 'Declaration for re-export' to upload the form. See the section 2.1 'My space'.

Portable batteries

Portable batteries transformed into industrial batteries (in battery packs used exclusively for industrial purposes) or exported by the purchaser (subsequent level) can be deducted from the quantity of portable batteries placed on the market, provided that documentation is available. This documentation must be presented to SKAT. If an adjustment is made SKAT will transfer the adjusted data to DPA-System.

4.5 QUANTITIES TAKEN BACK

	B	•	A
	•	Collected	•
	Collected by	by collective	Collected by
MEEE (I)	producer	scheme	municipality
WEEE (kg)	2014		
Household	2014		
Large household appliances			
2. Small household appliances			
3. IT and telecommunications equipment			
4a. Consumer equipment			
6. Electrical and electronic tools			
9. Monitoring and control instruments			
Business	,		,
3. IT and telecommunications equipment			
5b. Light sources			
10. Automatic dispensers			

For household products and portable batteries the producer or the collective scheme must register the share of WEEE/waste batteries that the producer has collected from the municipal collection sites. This quantity is stated as collection from 'Municipal collection sites'.

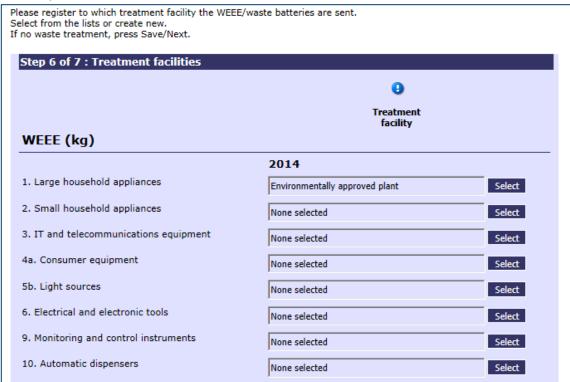
Correspondingly, the producer under a collective scheme has a share in WEEE from households and waste portable batteries collected at the collection sites of the collective scheme. This quantity is registered under 'Collective collection'.

In addition, the producer may have initiated his own collection of WEEE/waste batteries. This quantity must be registered under 'Producer's own collection'. The sum of these three figures per category represents total quantity per category taken back by the producer.

Collection and environmental treatment of vehicles is not reported to DPA-System.

If you have not collected any WEEE or waste batteries, click Next.

4.6 QUANTITIES TREATED - TREATMENT FACILITY



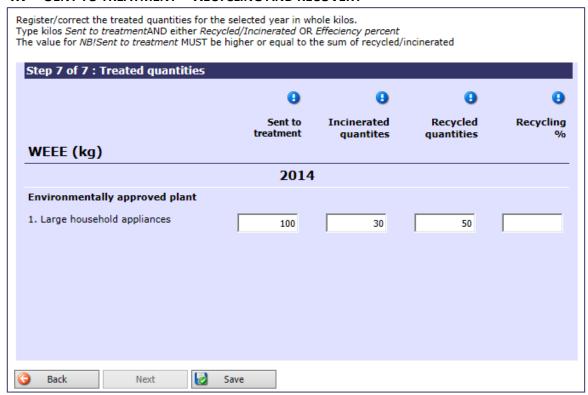
The quantities that have been collected must be sent to environmentally approved treatment facilities in view of recycling and recovery of the resources contained in the electrical equipment and the batteries - this is also called waste treatment (see definitions in Appendix 2 to this document).

For the categories registered previously the producer must report to which recycling facility/-ies waste products have been sent for environmental treatment.

It is possible to select between already registered recycling facilities or to add a new one with country code, CVR number, name and address.



4.7 SENT TO TREATMENT - RECYCLING AND RECOVERY



After selection of recycling facility state per category for electrical equipment and at substance level for batteries how large quantities of WEEE/waste batteries have been 'Sent for treatment'.

Electrical equipment

For WEEE you must state per category how large quantities (in kilograms) have been sent for treatment and how large a share has been incinerated (in kilograms). In addition, state EITHER quantities recycled (in kilograms) OR recycling rate/efficiency rate of the facility (as a percentage).

Subsequently the system calculates the remaining field, i.e. either quantities recycled or efficiency rate. It is not possible to enter both quantities recycled and efficiency rate. Energy recovery and recycling sum up to recovery. Any remaining quantity is computed automatically in the system. This will appear from the producer's annual statement.

Batteries

For waste batteries you must state at substance level how large quantities have been sent for treatment, including how large a share has been treated in view of recycling.

Note! Incineration is not a permitted treatment option for batteries.

The reporting procedure is now completed - click Save.

Appendix 1: DPA-System use of reports

The overall purpose of reporting to DPA-System is to enable the Danish Environmental Protection Agency to control whether the producer responsibility system works as intended and whether the statutory objectives are attained, including whether the EU targets for recovery of waste batteries and recovery and recycling of WEEE are met in the Member States.

The purpose of reporting and payment of tax to SKAT for portable batteries is to have the producers pay their share of municipal costs for collection of batteries from residents.

Electrical equipment: Quantities placed on the market, households:

For household products, DPA-System uses quantities placed on the market to calculate how large a share of WEEE collected in municipalities each producer (or his collective scheme) should take back and treat. Correspondingly, DPA-System uses this figure to calculate how large a financial guarantee each producer (or his collective scheme) must provide to DPA-System.

Electrical equipment: Quantities placed on the market, households and professional users:

For both household and business equipment DPA-System uses quantities placed on the market to calculate fees to be paid to the operation of DPA-System. The fee rate is based on total quantities placed on the market.

Vehicles: Number of units placed on the market, Passenger cars and light trucks:

As above, only the number of imported and sold passenger cars and light trucks

Batteries: Quantities placed on the market:

Reported quantities of portable batteries placed on the market are used in DPA-System to calculate how large a share of waste portable batteries collected in the municipalities should be taken back and treated by each producer. This is called the allocation scheme.

Reported total quantities placed on the market for all battery categories are used to calculate fees to be paid to DPA-System. Quantities placed on the market in conjunction with collected quantities are used to give an overview of the efficiency of collection in Denmark.

Electrical equipment and batteries: Quantities taken back:

Quantities taken back are used in DPA-System to adjust the allocation scheme in relation to WEEE from households and portable batteries. For WEEE from professional sources and industrial and automotive batteries quantities taken back are used to calculate how large a share of WEEE and waste batteries is taken back compared with quantities put on the market.

Electrical equipment and batteries: Treated quantities:

Quantities of WEEE treated are used to control whether the producer has recovered and recycled a sufficiently large share of WEEE taken back compared with statutory rates in the WEEE Order (sections 36-37).

Quantities of waste batteries treated are used to control whether the producer has recycled a sufficiently large share of waste batteries taken back compared with statutory rates in the Battery Order (section 41).

Appendix 2: Definitions

The following definitions appear from Statutory Order on Waste no. 1309 of 18 December 2012:

Collection:

Gathering of waste, including the preliminary sorting and preliminary storage of waste for the purposes of transport to a waste treatment facility.

Disposal:

Any operation which is not recovery even where the operation has as a secondary consequence the reclamation of substances or energy.

Management:

Collection and transport, as well as recovery and disposal of waste including supervision and aftercare of landfills as well as activities of dealers and brokers.

Recovery:

Any operation the principal result of which is waste serving a useful purpose by replacing other materials which would otherwise have been used to fulfil a particular function, or waste being prepared to fulfil that function, in the plant or in the wider economy.

Recycling:

Any recovery operation by which waste materials are reprocessed into products, materials or substances whether for the original or other purposes. It includes the reprocessing of organic material but does not include energy recovery and the reprocessing into materials that are to be used as fuels or for backfilling operations.

Treatment:

Recovery or disposal operations, including preparation prior to recovery or disposal. Way in which waste is managed.

Waste suitable for incineration:

Waste which is not suitable for material recovery and which can be destroyed by incineration without causing unacceptable emission of pollutants. Waste suitable for incineration does not comprise:

- a) waste which is prohibited from incineration by legislation,
- b) waste which is subject to legislation or regulations passed by a local council shall be collected or assigned to material recovery or other treatment, including disposal, or which is concretely assigned to material recovery or other treatment, including disposal

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