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Guidelines on assessment of producer responsibility for cables and wires

Danish Producer Responsibility, December 2023

DPA is short for Danish Producer Responsibility. DPA is in charge of administrative tasks associated with the rules on producer responsibility under Danish environmental law regarding electrical and electronic equipment, batteries and accumulators, and vehicles, as well as payment of scrapping premium for vehicles.

The producer responsibility has authority in the Danish Environmental Protection Act. This Act translates into three Statutory Orders for the different product types: the WEEE Order, the Battery Order, and the End-of-life Vehicles Order. The current statutory texts can be found on producentansvar.dk.

The Danish Statutory Orders take offset in three EU directives for the same product areas: the so-called WEEE Directive, the Batteries Directive, and the ELV Directive. Also these directives can be found on producentansvar.dk.

Producer responsibility rests on the principle that each producer or importer assumes a life-cycle based responsibility for their products - from design until the products have reached their end of life and must be managed in an environmentally correct manner. The purpose is to promote a circular economy where production and environmental treatment must take place with the highest possible consideration and recovery of hazardous, but also valuable resources contained in this type of 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, ELV for end-of-life vehicles and FTT for filters for tobacco products.

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Producer responsibility for cables and wires

These guidelines describe the criteria for an assessment whether and to which extent cables and wires are covered by producer responsibility for electrical and electronic equipment. The purpose is to enable companies to make their own assessment using examples. In case of doubt and on request DPA can make a concrete decision whether a product or a product group is covered by the rules in the WEEE Order, including to which category they belong and whether they are equipment for use in households or equipment for professional use.

Are cables and wires electrical equipment?

Equipment destined for the transmission of electric currents is electrical and electronic equipment as defined in the WEEE Order. Generally, cables and wires are thus covered by producer responsibility for electronics because they are used for the transmission of electric currents. However, it is a precondition that the cables and wires constitute a useable and directly functional product and are not merely a piece of copper thread.

How to make the assessment

In the assessment, the decisive, practical element is whether a cable or a wire is fitted with a plug. Such cables and wires are called 'manufactured'. Manufactured cables and wires are generally considered as finished equipment. By contrast, cables and wires without a plug, including cables and wires "in reels", for instance for use in electrical installations, are not covered by producer responsibility. So in practice, cables or wires must be directly useable for their purpose without any further installation or processing for them to be subject to producer responsibility.

When assessing to which category of electronics a cable or a wire belongs, you must look at the way in which the product is marketed and used. Cables and wires that are part of another main product such as IT equipment, lamps and fixture or other electrical equipment and that are sold in the same package as that main product, are categorised in the same category as the main product. Cables and wires without a specific connection to a product or an application (such as an ordinary extension cord) or other cables with a specific application but that are sold as a stand-alone product, are registered in category 5 (small equipment) or category 4 (large equipment), if the outer dimensions of the equipment are more than 50 cm when reeled (e.g. a cable reel).

The assessment whether the equipment is for professional use or for use in households does not depend on the buyer of the equipment but on whether the equipment can only be used by professionals or whether it is of a kind that may also be used in households. For cables and wires, it may, for instance, be the size of the cable or the type of plug that decides whether the cable is exclusively for professional use.

What is the implication?

Cables and wires that are covered by producer responsibility must be reported in the producer register by the first company that puts them on the market in Denmark. This means that the cables are included in the total quantity of electrical and electronic equipment put on the market in Denmark. After this, the producer is subject to the requirements for collection, take-back, and separate management of cables and wires at their end of life. For cables and wires for use in households it means that the equipment is included in the allocation scheme for the relevant electronics fraction and is collected in the municipal collection schemes.

Examples of different types of cables and wires

Manufactured

Cables and wires with plugs or other connectors are called manufactured and are considered as finished electrical and electronic equipment. This means that the cable or the wire is covered by producer responsibility. Manufactured cables and wires come in many different forms and sizes. It is therefore necessary to carry out the above assessment in order to decide to which category and end-user the equipment belongs. Most manufactured cables and wires, however, will belong to the category of small equipment and be destined for use in households. An ordinary extension cord or a socket will typically be small equipment for households, but they may also be large equipment depending on their dimensions. Some cables and wires are of a nature that they will probably not be used by private households; for example, feeders for construction site power may in specific cases be equipment for professional use. However, it is important to note that the criterion does not state that the equipment is normally sold for professional use, but that the equipment *may* be used in households.

Non-Manufactured

Simple cables and wires that are not assembled with plugs or other connectors are considered as components in line with other components that are parts of finished equipment. This means that cables and wires with loose ends (also called "in reels") are not by themselves electrical and electronic equipment, as they need further processing or installation into other equipment before serving their purpose. As a consequence, it is not necessary to register putting on the market of non-manufactured cables and wires. The non-manufactured cables and wires are not covered by producer responsibility until they are installed into other equipment, after which they will be covered by the categorisation and end-user of that equipment.

Fitted on electrical and electronic equipment

Cables and wires fitted on other electrical and electronic equipment are considered as part of that equipment. This means that cables and wires that are, for instance, fitted on the back side of a washing machine or a refrigerator are covered by the producer responsibility for that equipment. The cable or the wire is a component of the finished equipment and contributes to ensuring its correct functioning. It also means that the weight of the cable or the wire must be reported as part of the total weight of the equipment when reporting quantities put on the market and collected. It is therefore important that the cables and wires are collected together with the equipment since otherwise there will be a difference between equipment put on the market and collected.

Loose cables sold together with electrical and electronic equipment

Cables and wires sold together with other electrical and electronic equipment and that are meant to be used together with this equipment for it to function correctly are considered as part of that equipment. This means that the power supply that may, for instance, follow a computer or a TV set is covered by the producer responsibility for that equipment. The power supply in this connection is considered as a component of the main equipment, and it must be reported as part of the total weight of the equipment when reporting quantities put on the market and collected in the category to which the main equipment belongs. It is therefore important that the cables and wires are collected together with the equipment since otherwise there will be a difference between equipment put on the market and collected.

A power supply that is sold separately as a spare part, by contrast, is stand-alone equipment that must be reported in the relevant category. In practice, however, it may be difficult to distinguish between a power supply being stand-alone equipment or being part of large or small equipment when collected. It should therefore be expected that cables and wires sold together with large equipment often will end up in the fraction of small equipment in the collection stage.

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