

## Individual compliers' collection of WEEE

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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](http://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](http://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.

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In pursuance of the rules on producer responsibility for WEEE this document describes how producers that are not affiliated to a collective producer scheme can assume take-back and treatment of WEEE.

## **Individual compliers**

When a producer or an importer (in the following referred to as 'producer') of electrical and electronic equipment chooses to be an individual complier, he himself must establish systems for take-back of WEEE. If a producer is established through an authorised representative, this representative must establish systems for take-back of WEEE similar to a producer, since the rules for the two types of player are similar in this respect.

Systems for take-back of WEEE from private households and from businesses differ significantly.

## **Take-back of WEEE from private households**

When a producer places equipment for use in private households on the market and he is not affiliated to a collective scheme, he is covered by the so-called allocation scheme. Under the allocation scheme DPA-System allocates to each producer specific geographic collection areas with a number of municipal collection points. The producer is under the obligation to collect WEEE from these collection points. The producer must collect and organize treatment of WEEE delivered by private households to the allocated collection points. Also, the producer must make collection equipment available to the municipal collection points to the extent requested by the local councils. Treatment of WEEE must be made by an environmentally approved recycling company.

Collection districts are allocated to producers in relation to their market shares for product categories put on the market. Some producers may have such a small market share that they cannot be obliged to collect WEEE from the local authorities.

The producer is obliged to comply with the guidelines for collection from the municipal collection points which appear from Appendix 7 to the WEEE Order.

In addition to collecting and treating WEEE from the municipal collection points the producer must be able to assign regional collection points where dealers, distributors, and other businesses can deliver WEEE similar to household WEEE that cannot be managed by the municipality because of its type and quantity.

Producers placing equipment for private use on the market may acquire these logistic services from collective schemes. Collective schemes assume against payment, among others, take-back from municipal collection sites, and they have established regional collection points where dealers and others can deliver WEEE received in connection with sale of new equipment. Also,

collective schemes have entered agreements with environmentally approved recycling companies treating collected WEEE.

## **Provision of financial guarantees**

When a producer or an importer places equipment on the market for private end-users the producer responsibility entails a requirement for provision of an annual financial guarantee for the costs for collection and reprocessing of WEEE.

The financial guarantee is used in situations where a producer or an importer ceases to exist or does not assume responsibility for management of the allocated quantities of WEEE

The guarantee is provided by the producer or his collective scheme in a so-called guarantee on demand or in connection with the DPA-System invoicing in case of individual compliers.

## **Take-back for individual compliers with small quantities of household equipment**

The duty placed on producers to take back waste from electrical and electronic equipment appears from the WEEE Order.

In practice, this means that DPA-System informs the producer every year how large quantities of WEEE he must take back.

The quantity to be collected will be based on total quantities placed on the market in the previous year as reported by the producer, multiplied by a so-called take-back factor calculated per category. The take-back factor is calculated by DPA-System every year, based on total quantities of equipment placed on the market in relation to total quantity of collected equipment per category.

### **Example:**

An individual complier has put 100 kg of equipment on the market under the category 'small household appliances' for use in private households.

The take-back factor has been calculated at 0.60 for the category "Small household appliances". DPA-System may subsequently inform the producer that in the relevant allocation period he must collect 60 kg of WEE in this fraction or the fraction to which the category belongs. The quantity is found as follows:  $100 \times 0.60 = 60$  kg. This is also the quantity for which the producer must provide financial security.

Due to the small quantity in this example it is not possible for the producer to collect WEEE from the municipal collection schemes. If the producer does not wish to affiliate to a collective scheme assuming, among others, collection of WEEE for the producer, this producer must provide a financial guarantee for costs of collection in the current year. Under certain conditions DPA-System may release the financial guarantee to the de collective schemes having collected surplus WEEE of the same category as the producer.

You may read more about financial guarantees on [www.dpa-system.dk](http://www.dpa-system.dk).

Under the law producers can establish their own collection schemes. When a producer has collected WEEE he must comply with the rules stated in the WEEE Order on separate management and recycling requirements.

## **Take-back of WEEE from professional users**

The majority of producers placing business equipment on the market choose to assume producer responsibility individually. When a producer chooses to become an individual complier for business equipment he himself must establish a take-back and treatment system for equipment put on the market.

A seller of business EEE may agree with the buyer that the latter takes over the treatment duties and the value of the EEE once it becomes waste. It will then be the responsibility of the buyer that the waste is delivered to an environmentally approved reprocessor.

The producer of business EEE not establishing his own take-back systems must in connection with the annual reporting inform of the quantities subject to transfer of responsibility.

In the following some of the most important elements of a take-back and treatment system are discussed.

## **Information for trading partners**

As the first element of a system for take-back of WEEE from professional users the producer must supply information for trading partners and end-users about how to return WEEE in practice to the producer. Therefore, the producer must make efforts to ensure that trading partners in connection with sale of equipment give information to end-users about the duty to take back equipment at the end of its useful life.

Producers must also make sure that procedures are established for how trading partners must approach the practical take-back. This may be through the use of special contact persons, e-mail

addresses, websites for registration of quantities taken back and special transporters and addresses for take-back.

## **Agreements with environmentally approved reprocessing companies**

The producer must ensure that WEEE taken back from professional users is treated in environmentally approved facilities if the end-user takes back the WEEE to the producer.

It is important that treatment forms used ensure that the producer complies with the requirements for recovery and recycling stated in the WEEE Order.

Links to environmentally approved reprocessing companies are available on the DPA-System website [www.dpa-system.dk](http://www.dpa-system.dk).

As a significant part of the contract with the environmentally approved recycling facility the producer must make sure that the reprocessing company registers quantities received and treated as well as the treatment option chosen for the WEEE. Registration of quantities must be made in a form that the producer can subsequently use the information in his annual reporting to DPA-System.

## **Registration and reporting to DPA-System**

When a producer has chosen to be an individual complier he must register and report annually in the producer register. The producer is also responsible for updating of master data.

Once a year the producer must report various statutory information to the DPA-System producer register. This information comprises quantities in kilograms placed on the market, taken back and treated. Therefore, the producer must make sure to have the necessary information registered in internal administrative systems ready for reporting to DPA-System between 1 January and 31 March every year.

## **Costs for take-back and treatment systems**

The individual complier must bear all costs for establishment and maintenance of his take-back and treatment system. Further information can be found on [www.dpa-system.dk](http://www.dpa-system.dk).

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