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## Fees to DPA-System (BAT)

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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 rules on producer responsibility for waste batteries this document describes fees to be paid by producers to DPA-System, including use of the fees.

## Fees to DPA-System

All registered producers and importers must pay a fee to DPA-System. Fees are a one-off registration fee, an annual quantity-based fee and an administration and case-handling fee for extraordinary services. Fee rates appear from the below table.

Fee rates 2015 for batteries	Amount excl. VAT per kilogram (DKK)	Per tonne (DKK)
One-off registration fee	1000 DKK	
Reduced registration fee if already registered for WEEE	500 DKK	
Annual quantity-based fee per kilogram	0,03143 DKK	31,43
Additional fee for portable batteries per kilogram	0,06144 DKK	
- Portable batteries total	= 0,09287 DKK	92,87
Minimum fee	250 DKK	
Hourly rate for extraordinary administration	711 DKK	

## One-off registration fee

Registration in the producer register triggers a one-off fee of DKK 1,000 excl. VAT – per registration.

DPA-System levies a registration fee per producer responsibility field (WEEE, BAT, and ELV) This means that a producer or an importer having registered for both electrical equipment and batteries will pay one registration fee per field. However, the registration fee is lowered to DKK 500 if a producer has already registered for a producer responsibility field and now registers for a new field. If the producer registers for WEEE and BAT categories when entering the producer register the registration is considered a first registration and is invoiced with DKK 1,000.

If a producer or an importer is deregistered, for instance due to non-performance of his duties under the registration DPA-System will levy a new registration fee at the next registration of the company.

### Annual quantity-based fee

All registered producers and importers must pay an annual quantity-based fee to DPA-System for amounts of batteries and accumulators put on the market – independent of type of battery. This fee is used to cover costs incurred by DPA-System in assuming their tasks under the Battery Order.

All registered producers and importers of *portable* batteries and accumulators must furthermore pay an annual quantity-based fee to DPA-System for amounts of portable batteries put on the market. This fee is to cover costs associated with DPA-System’s calculation and administration of the allocation scheme (producers’ collection of waste batteries at the municipal collection sites).

The annual fee rate is based on total quantities put on the market. Thus, the quantities reported by producers and importers (for portable batteries to SKAT as per 15 February and for industrial and automotive batteries to DPA-System as per 31 March) will form the basis for the annual fee calculation.

New producers and importers without realised quantities placed on the market and that have as a consequence only stated budget figures in connection with the registration will only pay a registration fee. Thereby, no quantity-based fees are invoiced based on expected quantities placed on the market. As from 2013 DPA-System had to change our calculation method in the determination of the annual fees. The fees are now stated per tonne and not as hitherto in kilograms. This change of method is due to the fact that the use of general rounding rules would mean that the fee would either be too high or too low when rounding the rate in cents and in kilograms.

#### Fee rate developments

Year	Type	DKK/kg
<b>2015</b>	General fee	0,03143
	Additional fee for portable batteries	0,06144
2014	General fee	0,02603
	Additional fee for portable batteries	0,04493
2013*)	General fee	0.01482
	Additional fee for portable batteries	0.02547
2012	General fee	0.02
	Additional fee for portable batteries	0.03
2011	General fee	0.03
	Additional fee for portable batteries	0.04
2010	General fee	0.05
	Additional fee for portable batteries	0.08
2009	General fee	0.08
	Additional fee for portable batteries	0.09

\* Calculation method has been changed. The fee is now calculated in tonnes instead of in kilograms.

## **Minimum fee**

If total quantities put on the market by a producer in a given year result in a fee of less than DKK 250 DPA-System will invoice a minimum fee of DKK 250. Thus, the minimum fee replaces annual quantity-based fee per kilo.

## **Administration and case-handling fee**

DPA-System levies a so-called administration and case-handling fee per hour spent for extraordinary service - including extraordinary treatment of cases on the allocation scheme, and in case of changes or additions to already reported data. This fee amounts to DKK 635 per hour spent (2013).

## **Levy of fee (invoicing)**

DPA-System normally invoices fees upon receipt of confirmation of registration in the register.

Invoicing of quantity-based fees to cover administrative tasks carried out by DPA-System is done on the basis of reports of annual quantities. Invoicing is done immediately after annual reporting to DPA-System by producers and importers of quantities marketed. Reporting must be done no later than 31 March every year. However, this is not the case for portable batteries that must be reported to SKAT no later than 15 February. After reporting, SKAT transfers reports to DPA-System after 15 March.

Read more about terms of fee payment and invoicing on [www.dpa-system.dk](http://www.dpa-system.dk).

## **Calculation and approval of fee rates**

The basis of fee rates appears from sections 44 and 45 of the Battery Order.

The fee rates for the DPA-System administrative tasks are fixed and approved by the board of directors of DPA-System every year.

## **Approach in case of incorrect registration**

If you find an incorrect registration or you wish to change already reported data changes in last years' data can, according to the Order, be made along with the next *annual reporting* taking place in the period from 1 January to 31 March. Subsequent changes in fees will also follow the annual invoicing in the current year.

If you wish to change already reported quantities, you should contact DPA-System in the next reporting period since the reporting system must be opened for corrections for each individual company.

### **Approach in case of cease of producer responsibility**

If a producer ceases putting products covered by producer responsibility on the market he must be deleted from the producer register and is no longer liable to pay fees.

The producer must inform DPA-System in writing when he is no longer subject to producer responsibility.

DPA-System, 2015

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