

## Changes/additions to reported data (WEEE)

DPA-System (former WEEE-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 in the future also end-of-life vehicles.

In pursuance of rules on producer responsibility for waste electrical and electronic equipment (EEE) this document describes procedures for how to make changes and additions to data that do not necessarily concern the current reporting period.

Producer responsibility has authority in the Statutory Order on placing on the market of electrical and electronic equipment and management of waste electrical and electronic equipment (The WEEE Order), no. 362 of 6 April 2010.

The Order is based on Directive 2002/96/EC of the European Parliament and of the Council of 27 January 2003 on waste electrical and electronic equipment (WEEE Directive).

All statutory and other documents mentioned below can be found on [www.dpa-system.dk](http://www.dpa-system.dk) under the item *Legislation and Guidelines*.

Producer responsibility rests on the principle that each producer or importer assumes responsibility for collection and management of WEEE to the effect that EEE becoming waste is managed in an environmentally correct manner.

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

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## **Introduction**

When a producer is to maintain data, report annually or correct incorrect registration, different procedures apply. Information about ordinary registration of a new producer and annual reporting is available on the DPA-System website.

Following types of changes may occur:

- Change of master data and contact information
- Change of CVR number (Central Business Register number) of producer
- Change of previously reported quantitative data
- Additions to quantitative data for previous reporting periods

If a company changes its affiliation from one collective scheme to another or wishes to become an individual complier, DPA-System will have to be involved. You can read about cease, changes and mergers on the DPA-System website.

## **Change of master data**

Master data and contact information regarding a producer may be changed at any time. To change master data and contact information you must log in with user name and password. Some master data must be updated in the Central Business Register, and thus they can only be changed through the Danish Commerce and Companies Agency.

## **Change of CVR number**

Special rules apply to changes in a company's CVR number (Central Business Register number). The CVR number is a unique registration of a company. If an incorrect CVR number has been registered in the reporting system, the registration is invalid and a new registration must be made. The same rule applies to foreign companies using instead of a CVR number a unique number consisting of a two-digit country code and the VAT number of the company. If this registration is incorrect a new registration must be made.

## **Change of previously reported quantities**

If a producer has reported incorrectly in a previous reporting period these errors must be corrected during the next reporting period. In this case the producer must contact DPA-System to request opening of the registration system in view of changing existing reports. If changes concern quantities from 'private end-user' DPA-System must have an auditor's attestation in connection with the request. DPA-System will give the producer a

system status ("Temporarily open for corrections"), after which the system will be open for corrections or additions in an agreed, limited period. Changes must be attested by the auditor.

Generally, it is not possible to change data reported for a period before the year preceding the year subject to reporting.

Certain data cannot be changed subsequently. This applies to budgeted quantities put on the market. Once these data have been reported and saved in the reporting system they cannot be changed at a later stage.

## **Addition of data for present and previous reporting periods**

If a registered producer starts activities within new product categories or end-users (private households and/or professional users) he must register for these new activities no later than two weeks before he starts dealing in this new equipment. The producer must log in on the DPA-System website and register new product categories and/or end-users with associated quantitative data.

If an already registered producer has reported incompletely during a previous reporting period the producer must immediately report lacking data. Reporting of lacking data is done through a log in on the DPA-System website.

Producers registering for the first time but who should have done so previously must report data for previous periods in connection with registration. Reporting of lacking data is done in practice by selecting the category and year of sale and thereby the start of producer responsibility (2006 at the earliest). Then directions are followed and requested information filled in.

## **Implications of corrections**

In cases where corrections and additions have an impact on calculation of quantity-based fees, allocation of WEEE and provision of financial security, DPA-System will make a calculation and adjustment. This means that fees will be calculated for previous reporting periods and allocations of WEEE for previous periods will be added to the next allocation. Furthermore, the financial security will be corrected for the changed allocation. Note that in cases where the end-user is changed from "private" to "professional" no adjustment is made in previous allocation periods.

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

Cases where corrections and additions are made in data for previous reporting periods need special attention from DPA-System. Therefore, an administration and case-handling fee of DKK 750/hour is levied.

You can read more about fees on the DPA-System website.

Below is an outline of types of changes and most significant implications.

## Outline of types of changes and additions

<b>Type of change or addition</b>	<b>When to correct or add data in registration system</b>	<b>When registration has implications for allocation, financial security and fee</b>	<b>Remarks</b>
<b>Changes of master data and contact information</b>	Immediately. May need intervention from Central Business Register	-	May be done without DPA-System intervention
<b>Changes of CVR number or VAT number</b>	Cannot be changed. New registration needed	Allocation and financial security: next allocation period.  Fee: Fee levied for new registration	-
<b>Change of previously reported data</b>  <b>Transfer of quantities between product categories and/or end-users without change of quantitative data</b>	Immediately. Only in period 1/1 -31/3	Allocation and financial security: next allocation period after change has been subject to readjustment.	DPA-System intervention needed.  If end-user is changed from "private" to "professional" or if change is from one product category to another, no adjustment in previous allocation periods is made.  Note that it is not possible to change data before the year preceding the year subject to reporting.

<b>Type of change or addition</b>	<b>When to correct or add data in registration system</b>	<b>When registration has implications for allocation, financial security and fee</b>	<b>Remarks</b>
<b>Change of previously reported data</b>  <b>Changes of quantities without change of product category /end-user</b>	Immediately. Only in period 1/1 -31/3	Allocation and financial security: next allocation period after change has been subject to readjustment.	DPA-System intervention needed.
<b>Additions to quantitative data</b>  <b>Quantities put on the market, taken back and treated for already registered product categories/end-users</b>	Immediately	Allocation and financial security: next allocation period after change has been subject to readjustment.  Fees: as soon as possible.	May be done without DPA-System intervention
<b>Additions to quantitative data</b>		Allocation and financial security: next allocation period after change has been subject to readjustment.  Fees: as soon as possible.	DPA-System intervention needed.

Note that complaints about guidelines issued by DPA-System can be brought before the Danish Environmental Protection Agency at any time.

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