

DPA-SYSTEM INFORMS

December 2018

NOTE!

**ANNUAL REPORTING
2019**

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INFORMATION](#)

LAST PHASE OF IMPLEMENTATION OF WEEE2

NEW PRODUCT CATEGORIES

See the presentation of the new categories and timeline for conversion in the producer responsibility register.

REFUND FOR RE-EXPORT

DPA-System explains the contents of the provision

To producers and importers registered for producer responsibility for electrical and electronic equipment, batteries and vehicles.

The last part of the recast WEEE Directive (WEEE2) has now taken effect in Denmark.

In this newsletter DPA-System describes the timeline for producers' and importers' annual reporting and transfer to the new product categories, as well as the possibility of having a refund for re-export.

In an earlier newsletter we have informed that one of the major changes further to the WEEE2 directive is a reclassification of the categories under which producers and importers are to register and report their electrical and electronic equipment in the national registers in the EU. In the months/weeks to come DPA-System will put focus on the new categorisation, measurement method, and the IT registration system.

REPORTING 2019 IN OLD CATEGORIES

The next statutory quantity reporting is in the period 1 January - 31 March 2019; this is the last time that reporting will be done according to the existing ten product categories. The transfer to the new categories, according to the Danish Environmental Protection Agency, must be fully effectuated before 2020, when the first reporting - for the calendar year 2019 - will be made in the new categories.

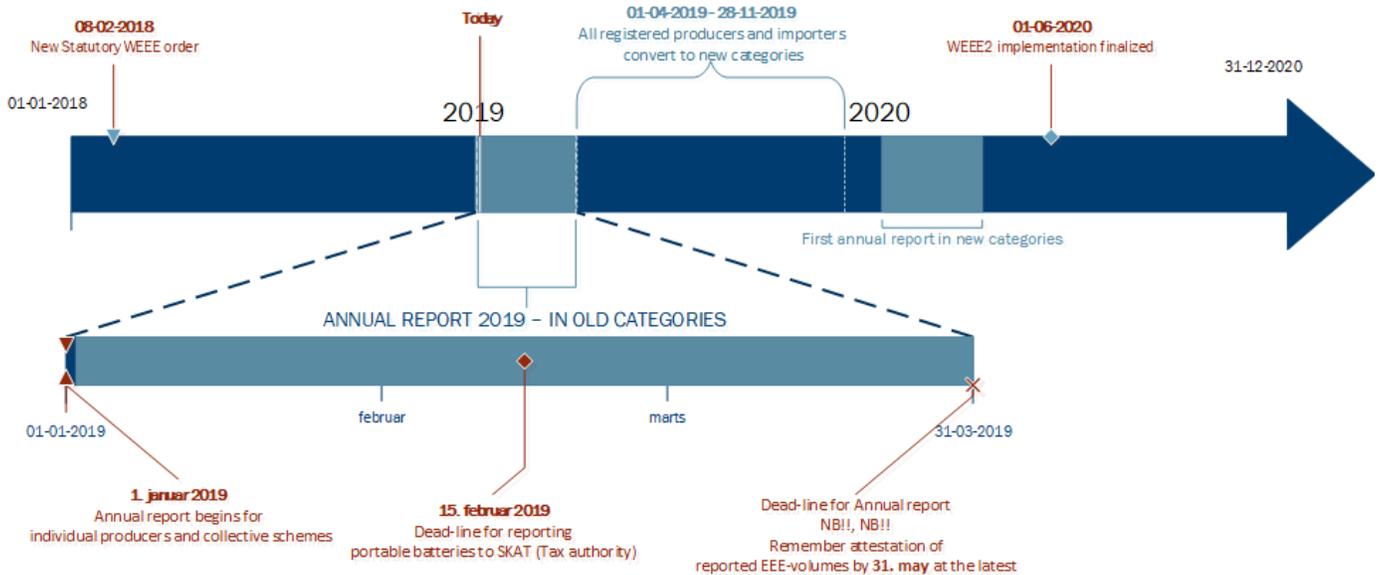
The annual reporting to the national producer responsibility register with DPA-System of quantities placed on the market, collected, and environmentally treated must cover one calendar year. It will therefore be necessary for most registered producers and importers to extract quantities (kilograms) in the new categories already from January 2019, in order to be able to report for this calendar year in 2020.

The new six categories are based on logistics associated with the environmental treatment and resource recovery- from end-of-life electronics to new raw materials.



After the end of the reporting period on 31 March 2019 the new IT-system opens so that both producers, importers, collective schemes, and authorised representatives can convert their product categories before the 2020 reporting.

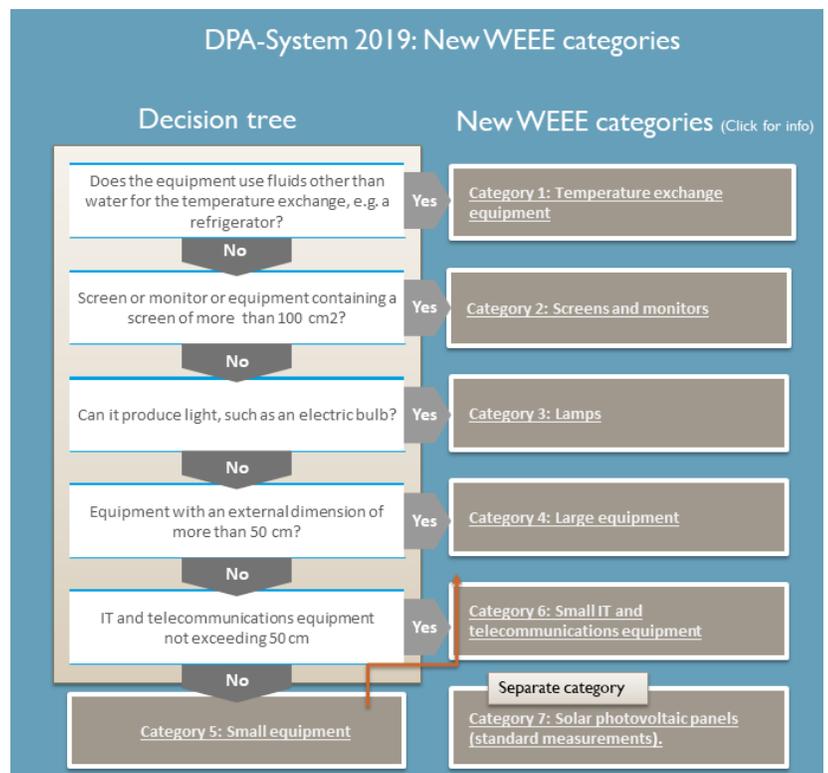
[Click for further information about annual reporting and conversion to new categories](#)



UNDERSTANDING THE WEEE CATEGORIES - FROM END-OF-LIFE ELECTRONICS TO NEW RAW MATERIALS

Hitherto, electrical and electronic equipment (EEE) has been classified and reported in ten sector-directed categories. In the future, products and equipment dependent on electric currents will be classified according to their substance and material properties as well as their dimensions. In Denmark all EEE must be classified in one of the six categories stipulated in the WEEE Directive or as photovoltaic panels that have been established as an extra category 7. It appears from the decision tree that it is necessary to know the external dimension of the equipment (and delimit the product group of small IT and telecommunications equipment).

DPA-System will regularly make information and guidance available in this process.



[CLICK HERE TO ACTIVATE DECISION TREE ON www.dpa-system.dk](http://www.dpa-system.dk)

CASE 1: REPORTING CURRENT YEAR

In 2018 a registered producer/importer sells a total of 10,000 kg of electrical and electronic tools on the Danish market. In connection with an order for 500 kg to a Danish customer, this latter informs that the goods have been resold to a customer abroad in that same year. In the reporting period 2019 the Danish producer/importer therefore reports in cat. 6) Electrical and electronic tools: Total 10,000 kg placed on the market, of which 500 kg re-/exported. In connection with the reporting the producer submits "Statement on re-export 2018" to his customer who confirms the export in kilograms by his signature. The declaration is uploaded by the producer before the expiry of the reporting period on 31 March 2019.

CASE 2: CHANGE TO PREVIOUS YEAR'S REPORTING

In 2017 a registered producer/importer sells a total of 20,000 kg of electrical and electronic tools and he reports this to DPA-System in the reporting period 2018. In connection with the revision of the reporting the auditor points out after the expiry of the reporting period that 1,000 kg of this equipment has been exported by a Danish customer.

In the reporting period 2019 the Danish producer/importer asks DPA-System in writing to open up for the reporting in 2017, so that he can deduct 1,000 kg from his reporting of 20,000 kg. In connection with the change he encloses the "Statement on re-export 2017" duly filled in by the exporter.

REFUND FOR RE-EXPORT - WHAT AND HOW?

Companies subject to producer responsibility can obtain a refund for own reported quantities that a subsequent level of the distribution chain has exported out of the country.

DPA-System explains in the following the contents of the provision and how reporting is done in practice in connection with the annual reporting.

Purpose of the refund

The main purpose of the producer responsibility legislation is to monitor the material and substance flows associated with the so-called prioritised waste streams¹, one of which is electrical and electronic equipment. It is therefore essential that quantities that must be reported pursuant to the law to the national producer registers are as true and fair as possible.

This means, among others, that double reporting of products should be avoided. The option of using the above-mentioned refund procedures has thus been established to avoid such double registrations. It is also ensured that producers and importers are compensated for any resource value of the quantity of equipment placed on the market in case this equipment has been subsequently re-exported.

Reporting in practice

In practice this means that a producer/importer in the reporting period can report that a subset of (never exceeding) the total sale in the reporting year has been re-exported out of the country by a subsequent level in the supply chain in that same year. The reporting is only valid together with documentation from the exporting Danish customer (see Case 1).

The producer/importer may also report an exported quantity as a correction to the previous year's reporting in case that this producer only knows of this export activity after the end of the annual reporting period. The exported quantity is therefore reported as a correction to last year's reporting of the corresponding quantities sold per category (see Case 2).

Don't forget the documentation

In this way a refund can be obtained for the current reporting year and as a correction to the previous year's reporting. In both cases documentation in the form of a "Statement on re-export" must be submitted; this statement can be found on the DPA-System website as a preprinted form with statement of the current or the previous reporting year. It can also be retrieved through a link in the reporting process.

Timely and correct documentation is a prerequisite for obtaining a refund. The reporting period starts on 2 January 2019 and ends on 31 March 2019.

¹ Already back in 1996 WEEE, BAT, ELV, and packaging were designated as prioritised waste streams due to their volume, environmental pressure, and valuable contents.

**NOTE! The annual
reporting can be made from
Wednesday 2 January 2019**

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