

## Changes/additions to reported data (WEEE, 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.

The producer responsibility for these waste types has authority in the Danish Environmental Protection Act and 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 electrical and electronic equipment (EEE equipment), batteries/accumulators, and end-of-life vehicles this document describes the procedure to be followed in case of changes or additions to data that are not necessarily related to the present reporting period.

## **Introduction**

Information about ordinary registration of a new producer and annual reporting is available on the DPA-System website. Concerning changes and additions the procedures differ when it comes to data, lacking reporting, and incorrect registration.

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 (correction of errors in the report)
- Addition of quantitative data for present and previous reporting periods

In general, the producer register is open for additions of data in the form of selection of new categories or registration of new fields of producer responsibility. Changes of previously reported data, with the exception of master data, request DPA-System intervention and documentation of changes and information as to who caused the changes.

Changes of the affiliation of the producer from one collective scheme to another or to becoming an individual complier can be made in the register by the producer and/or the collective scheme. The same applies to changes to the affiliation of foreign producers to an authorised representative. You can also read about cease, changes and mergers on the DPA-System website.

## **Change of master data**

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 (CVR) , and thus they can only be changed through the the Danish Business Authority. DPA-System regularly collects master data from CVR.

## **Change of CVR number**

The CVR number is a unique registration of a company. If a company changes its CVR number this is done with the Danish Business Authority, after which DPA-System must be contacted. DPA-System will then assist in updating the CVR number in the producer register.

If you need to change a non-Danish VAT number (only possible for foreign non-EU companies registered for distance sale of electrical equipment directly to private households or companies) you must contact DPA-System.

## **Change of previously reported data to producer register**

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. The request for opening of the registration system must contain documentation for the correction and information whether the change is caused by the producer, the collective scheme, or the auditor. The request may be submitted by e-mail. Then DPA-System will open the system for an agreed, limited period.

If the change is made by a party other than the producer, this other party must document that the producer agrees to this change. This will be done, for instance, by submitting an e-mail showing that the producer agrees that a figure is changed from one value to another value.

Note that changes concerning quantities of electrical equipment placed on the market must be controlled in connection with the preparation of the next auditor's attestation.

In general, it is not possible to change data older than two calendar years back, i.e. the year immediately preceding the present reporting year. By contrast, you may add new categories and quantities for previous years in connection with free-riders' obligations to report retrospectively.

In connection with supervision by the authorities the supervisory authority can decide that changes must be made in pursuance of the authority's directions.

## **Addition of data to DPA-System for present and previous reporting periods**

### **Further categories/end-users:**

If a registered producer starts activities within new product categories (and/or for WEEE also new end-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 with associated quantitative data. This registration can be made outside the reporting period.

### **"Free-rider-reporting":**

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 for the actual start of activity. Then the reporting directions are followed and the requested information filled in.

## **Refund for reported quantities re-exported at a later stage**

It is possible to obtain a refund for reported quantities if it is substantiated that a subsequent level in the chain has re-exported a certain quantity out of Denmark.

A refund for re-export means that a given quantity of electrical equipment sold by a producer on the Danish market and reported to the producer register in Denmark is subsequently in the same year sold for export by a subsequent level in the supply chain. Re-export can as a maximum be reported two years back, i.e. for the current reporting year or as a change to last year's reporting. The quantity exported is always stated for the same year as the sale of the corresponding quantity. Thus, the re-exported quantity can as a maximum be equal to the same quantity that has been placed on the market in the reporting year in question. See also the section on change of previously reported data to the producer register.

The re-exported quantities must be documented with a specific declaration from the company having re-exported the equipment.

This declaration form for the data report year and the previous year are available through the reporting system and through the search function on [www.dpa-system.dk](http://www.dpa-system.dk). The registered producer must provide the necessary documentation and upload the declaration to DPA-System. The documentation must reach DPA-System before the end of the reporting period.

## **Changes and addition of data to SKAT for portable batteries**

Quantities of portable batteries placed on the market must be reported every year to SKAT in connection with the duty of payment (tax) to SKAT. Changes/additions can be made through SKAT in pursuance of SKAT's directions. However, all changes/additions that DPA-System needs concerning last year's reporting must be reported to SKAT no later than 15 February after which SKAT transfers data to DPA-System. Data are only transferred once a year.

## **Implications of corrections**

In cases where corrections and additions have an impact on calculation of quantity-based fees, allocation of portable batteries and allocation of WEEE and provision of financial guarantee for collection of WEEE from end-users in households, DPA-System will make a calculation and an adjustment. This means that fees will be calculated for previous reporting periods and allocations of WEEE from households and portable batteries for previous periods will be added to the next allocation.

Financial guarantees for collection of WEEE from private end-users will be corrected for the amended 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 is normally levied for the specific service.

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