

# NEW ACT SUBMITTED FOR CONSULTATION – EMBALLAGERETUR PROVIDES AN OVERVIEW



Webinar – October, 2024

[www.emballageretur.dk](http://www.emballageretur.dk)

# TODAY'S HOSTS FROM RETUR

**Morten Harboe-Jepsen**

CEO

Presentation

**Jesper Bøttcher**

Head of Sustainability

Questions and chat

# WELCOME!

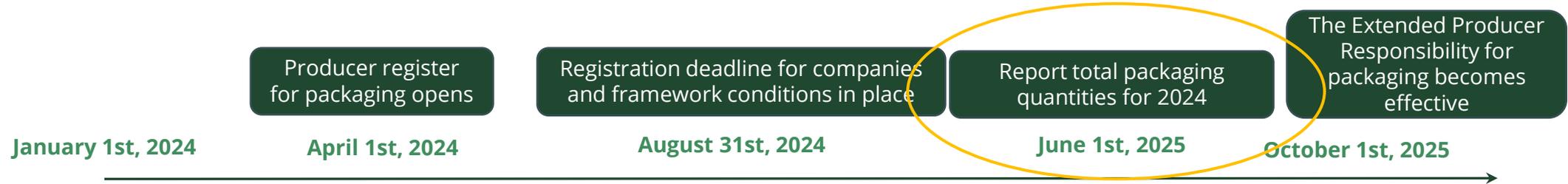
## AGENDA

- Overview – timeline towards October 1<sup>st</sup>, 2025
- Brief introduction to the (consultation draft) Act
- Presentation of the contents of the Act
- Input for Emballageretur's consultation response
- Questions from webinar participants (submit in the chat)
- Teaser: Election for Emballageretur's sections

# TIMELINE



# TIMELINE – IMPORTANT DATES



<p>Prepare and map expected packaging quantities placed on the market in 2024</p> <p>Obtain MitID-Erhverv</p>	<p>Register company and packaging quantities with Emballageretur.</p> <p>Confirm registered data with DPA</p>	<p>Map packaging data and prepare reporting 2025 data</p> <p><b>Last part of legal framework and final Acts are expected to pass</b></p>	<p>Continuous reporting to Emballageretur</p>
<p>Emballageretur membership</p> <p>Knowledge and guidance</p>	<p>Emballageretur membership</p> <p>Knowledge and guidance from Emballageretur</p>		<p>Emballageretur membership</p> <p>Emballageretur manages your Extended Producer Responsibility for packaging.</p>
<p>Free Emballageretur membership</p>	<p>Free Emballageretur membership</p> <p>Fee to Dansk Producentansvar: DKK 1,000/500 (new/existing member)</p>		<p>Emballageretur membership fee: DKK 1,500 and charge for packaging waste management, etc.</p>



# INTRODUCTION TO THE (CONSULTATION DRAFT) ACT

# THE CONSULTATION DRAFT

## Name

Act regarding certain packaging requirements, the Extended Producer Responsibility for Packaging and other waste collected with packaging waste.

In Danish: <https://hoeringsportalen.dk/Hearing/Details/69058>

Currently there is no English version.

## Consultation period

Deadline for submitting consultation responses is November 1st, 2024.

## Expected implementation

December 31st, 2024, and October 1st, 2025.

# THE CONSULTATION DRAFT

## Background

**The Act utilises the existing and expected legal basis of the Environmental Act to determine the regulations for the Extended Producer Responsibility for Packaging.** The Act thus utilises parts of the political agreement regarding the Extended Producer Responsibility for Packaging and Single-use Plastics adopted by a large majority of the parties in the Danish Parliament in August 2022.

**The Act repeals and replaces the current Act regarding certain packaging requirements** (no. 1271 of June 6th, 2021) and the current Act regarding packaging registration and reporting (no. 466 of May 16th, 2024).

**No changes will be made to the contents of the Act regarding certain packaging requirements** (Chapter 2-3 and appendix 1-4 of the Act), while there are certain amendments to the provisions regarding the registration and reporting of packaging.

# CONTENTS OF THE ACT

## Contents – relevant to the members of Emballageretur

1. Reporting of total packaging quantities
  2. Regulations for reporting and taking back reusable packaging
  3. The list of packaging categories covered by the producer responsibility is extended
  4. Mandatory membership of a Producer Responsibility Organisation (PRO)
  5. Determination of allocation periods
  6. Compensation for waste-producing companies
  7. Payment of fees to the authorities
  8. Environmentally graded contributions
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# CONTENTS OF THE ACT

## **Additional contents** (which will not be elaborated on this webinar)

1. Requirements for Producer Responsibility Organisations
2. Regulations regarding guarantees for Producer Responsibility Organisations
3. Regulations regarding packaging waste collected by the municipality
4. Regulations regarding packaging waste collected from companies
5. Waste management of packaging waste
6. Supervision, monitoring, and complaints
7. Penalty clauses
8. Etc.

# PRESENTATION OF THE CONTENTS OF THE ACT



# 1. REPORTING OF TOTAL PACKAGING QUANTITIES

**§ 27:** *No later than June 1st of each year, producers must report the amount of packaging they have placed on the market in the previous calendar year to Dansk Producentansvar (DPA).*

**NEW:** *This means that companies must also report the total packaging quantities placed on the market in 2024 before June 1st, 2025.*

*Previously, it was not a requirement for 2024 quantities to be reported.*



# 2. REUSABLE PACKAGING AND TAKE-BACK SCHEMES

**NEW:** Producers of reusable packaging are now obligated to register the company with the authorities as well as report data and establish their own take-back schemes.

## Reusable packaging

**§ 21, subsection 2:** *A producer placing reusable packaging on the market must be registered in the producer register, cf. § 20, no later than February 1st, 2025, and henceforth no later than 14 days prior to placing the reusable packaging on the market. A producer can also become registered through a representative, cf. § 9 y, subsection 1.*

**§ 27, subsection 2:** *No later than June 1st each year, producers of reusable packaging must report data about the amount of reusable packaging initially placed on the market by the producer in the previous year. Reusable packaging is packaging designed to last for several cycles by being refilled or reused for the same purpose for which it was designed.*

# 2. REUSABLE PACKAGING AND TAKE-BACK SCHEMES

**NEW:** Producers of reusable packaging are now obligated to register the company with the authorities as well as report data and establish their own take-back schemes.

## Take-back schemes

**§ 65.** *When reusable packaging can no longer be reused and becomes packaging waste, producers of the reusable packaging must organise a take-back of the packaging waste.*

**§ 29.** *Before June 1st each year, starting in 2026, producers must report the amount of packaging waste they have collected via their own take-back scheme to the DPA.*

# 3. LIST OF PACKAGING CATEGORIES IS EXPANDED

Porcelain, ceramics, textiles, and cork are added as new material categories, meaning producers with packaging within these material categories also have to register and report data to the DPA.

Initially, however, these material categories are not subject to payment obligations for waste management of packaging waste.

**The complete list of packaging categories can be seen in Appendix 6.**

## Appendix 6

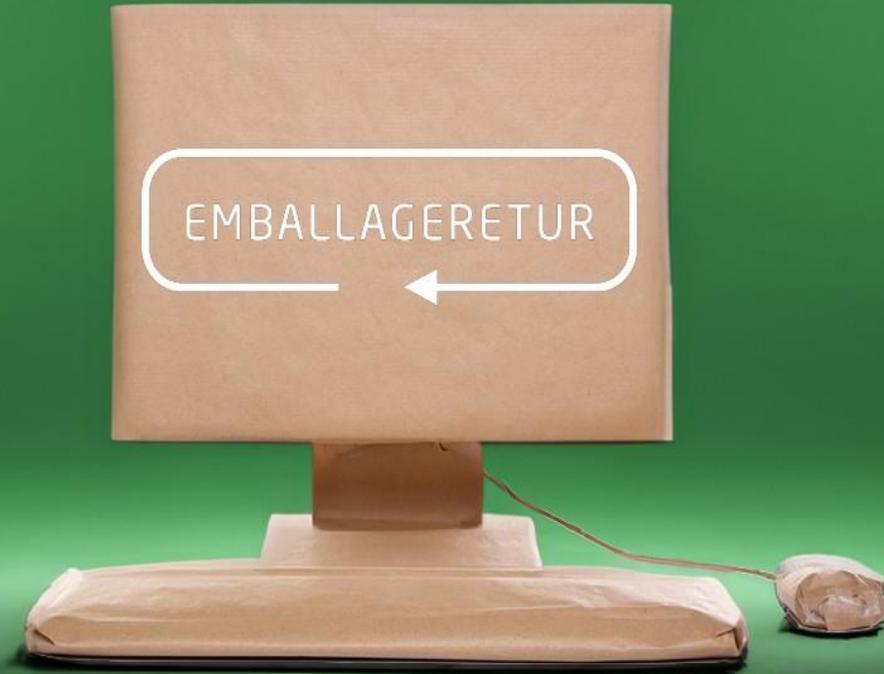
1. Cardboard
2. Paper
3. Ferrous metals
4. Aluminium.
5. Glass.
6. Plastics.
7. Food and beverage cartons.
8. Wood.
9. Textiles.
10. Porcelain.
11. Cork.
12. Ceramics.
13. Other.

# 4. MANDATORY MEMBERSHIP OF A PRO

With the Act, an obligation is placed on producers of single-use packaging to join a Producer Responsibility Organisation (PRO).

If you have already registered as a producer in the producer register, you must also become a member of a PRO no later than January 14th, 2025.

For producers of reusable packaging, signing up with a PRO.



# 4. MANDATORY MEMBERSHIP OF A PRO

## Signing up with a PRO

**§ 77, subsection 2.:** *A producer placing single-use packaging on the market, who have already been registered in the producer register, cf. § 21, must also join a PRO no later than January 14th, 2025.*

Emballageretur finds the requirement to join a PRO crucial as it will help minimise the free-rider problem by making the vast majority of companies covered by the producer responsibility contribute to fulfilling the financial obligations that follow.

Throughout the negotiation process with the authorities, Emballageretur has focused, particularly on this point.

It is currently estimated that approximately 40% of the expected companies have registered under the Extended Producer Responsibility.

# 5. DETERMINATION OF ALLOCATION PERIODS

According to the consultation draft, the first allocation period will run from October 1st, 2025, to December 31st, 2026.

After that, the allocation periods will stretch across a two-year period from January 1st.

The allocation will be based on the reported packaging quantities placed on the market and waste amounts.

The DPA will allocate the organisational responsibility (for transport and treatment of the waste) and payment obligations in accordance with the guidelines detailed in Appendix 9.



# 5. DETERMINATION OF ALLOCATION PERIODS

*§ 36. Based on the reported quantities, the DPA will make decisions on the allocation of the producers' payment obligations for the municipal council's collection, transport and treatment of packaging waste. This will take place for the first time on April 1st, 2025, and then on October 1st every second year. The DPA calculates the allocations according to the guidelines described in Appendix 9.*

*§ 38. The first allocation period is from October 1st, 2025, to December 31st, 2026. Subsequent allocation periods will henceforth be a two-year period from January 1st to December 31st in the following calendar year.*

Emballageretur has argued in favour of aligning the rules across various producer responsibilities as much as possible.

This is one of many examples of how the regulations for the individual producer responsibilities can differ greatly and must be administered according to individual deadlines and methods.

# 6. COMPENSATION FOR WASTE-PRODUCING COMPANIES

The Extended Producer Responsibility for Packaging must cover the costs of waste-producing companies for collection, transport and treatment of their packaging waste. Therefore, regulations are added to the Act detailing how waste-producing companies can be compensated for their costs related to this - § 61.

According to the Act, waste-producing companies themselves can request compensation. Requests should be made to the producer or its PRO assigned with the payment obligation for commercial packaging waste of the relevant material category, in the municipality where the waste-producing company is physically located according to the company's P-number.

# 7. PAYMENT OF FEES TO THE AUTHORITIES

## Fees to the DPA

**§ 89:** *For registration in the producer register, each producer pays a one-time fee of DKK 1,000/500.*

**§ 90:** *For administration of allocation schemes for commercial packaging and domestic packaging, producers pay an annual fee to the DPA. The fee is calculated in relation to the amount of packaging placed on the market in the previous calendar year.*

**§ 90, subsection. 2.:** *For additional administrative tasks carried out by the DPA in accordance with this Act, all producers pay an annual fee. The fee is calculated in relation to the amount of packaging placed on the market in the previous calendar year.*

**DPA** | DANSK  
PRODUCENT  
ANSVAR

# 7. PAYMENT OF FEES TO THE AUTHORITIES

## Fees to the Environmental Protection Agency

**§ 92, 93 and 94:** Producers of domestic packaging, commercial packaging, and reusable packaging must pay an annual fee to the Environmental Protection Agency's administration. The fee is calculated in relation to the amount of domestic packaging placed on the market in the previous calendar year.

All fees are published on the websites of the DPA's and The Environmental Protection Agency.



**Miljøministeriet**  
Miljøstyrelsen

# 8. ENVIRONMENTALLY GRADED CONTRIBUTIONS

Environmentally graded contributions, which are harmonised within the EU, are introduced:

- Payment to the producer responsibility is based on the company's packaging consumption. This should give the company a strong incentive to **reduce its packaging quantities**.
- To ensure that more packaging is **designed to be reused or recycled**, the individual company's payment to its PRO must be environmentally graded in accordance with the environmental impact of the various packaging materials.
- This gives the companies a real and significant financial incentive to design **environmentally friendly packaging** that promotes reused and efficient recycling.

# 8. ENVIRONMENTALLY GRADED CONTRIBUTIONS

§ 83: PROs must grade the producer's financial contribution to covering operational costs relating to managing packaging waste in the PRO in accordance with Appendix 14, cf. subsection 2 and 3.

*However, this does not apply to producers placing less than 8 tons of packaging on the market in a calendar year (although individual producers can request for the producer's financial contribution to be graded). Only very few types of packaging are exempt from the rules.*

*New guidelines from the Environmental Protection Agency on environmentally graded contributions can be found [here](#) (in Danish - there are currently no English versions).*

*New guidelines from the Environmental Protection Agency on the producer definition and the register order of October 11<sup>th</sup>, 2024, can be found [here](#) (in Danish - there are currently no English versions).*

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Overview of material subcategories:

Packaging must be divided into material subcategories that indicate which materials are subject to grading. The material subcategories are defined by the type of material and the recycling flow in which the packaging is recycled.

1. Flexible plastics
2. Hard plastics
3. Hard PET
4. Foam plastics
5. Glass
6. Cardboard
7. Paper
8. Food and beverage cartons
9. Ferrous metals
10. Aluminium

The categorisation of the packaging into various material subcategories indicates the design requirements after which the packaging is assessed.

You can find an in-depth explanation of which type of packaging each material subcategory covers in the MST guide on pages 10-11.

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Method for categorisation of material subcategories

Packaging consists of a main component and, in some cases, separate components. The main component and separate components can have integrated components:

**Main component:** A component that weighs the most in cases where several components are glued, welded or fastened together.

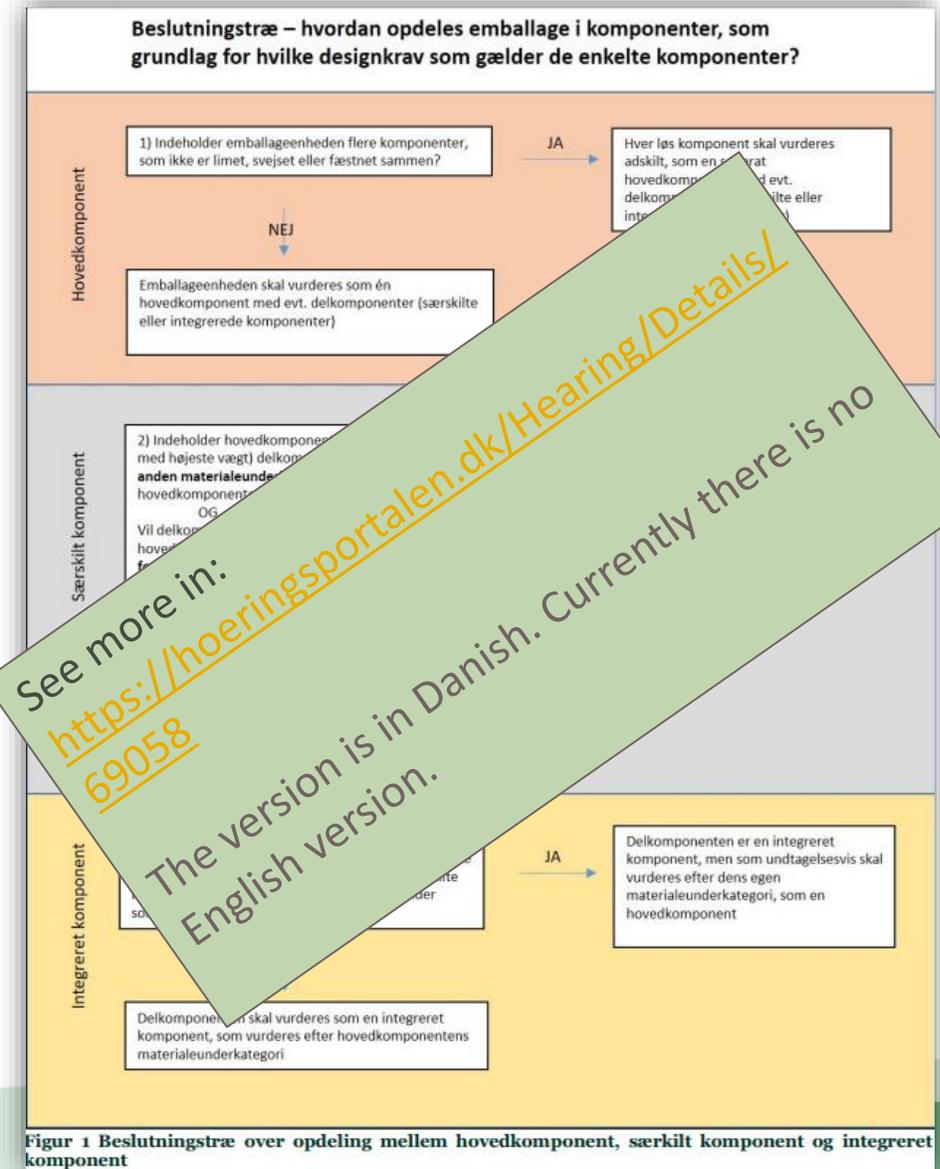
**Separate component:** A component that differs from the main component, is made of a different material, and must be completely and permanently separated from the main component. The separate component must typically be disposed of before and together with the packaging unit and it includes packaging components that can be separated from each other by a simple mechanical impact during transport and sorting.

**Integrated components:** A component that may differ from the packaging unit's main component and can be made of a different material but is integrated in the packaging unit and its function. It is not necessarily separated from the packaging unit's main component to ensure its functionality, and it is typically disposed of together with the packaging unit, however not necessarily in the same disposal process.

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Method for categorisation of material subcategories

- The main component, documented separate components, and integrated components that are documented to be separable from the component on which it is integrated, are categorised independently of each other and by the component's predominant material based on weight.
- If a separate component is documented, it is categorised in the same material subcategory as the main component and is included in the main component's weight.
- If it is not documented as integrated components and is separated from the main component [by simple mechanical impact], it is categorised in the same material subcategory as the main component and is included in the main component's weight.
- If there is no predominant material, the packaging is categorised by the material requiring the highest contribution in the Producer Responsibility Organisation.



# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Examples of using the decision tree

Konkrete eksempler på anvendelse af beslutnings

Figur 3.



See more in:  
<https://hoeringsportalen.dk/Hearing/Details/69058>

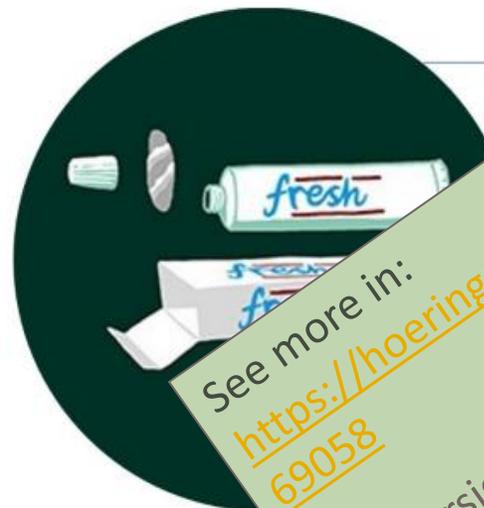
The version is in Danish. Currently there is no English version.

Figur 2

Eksempel på hovedkomponent og integrerede komponenter



Etiket  
Integreret komponent, da det ikke dokumenteret fjernes fra hovedkomponenten under transport eller sortering, og vurderes derfor efter hovedkomponentens materialeunderkategori



See more in:  
<https://hoeringsportalen.dk/Hearing/Details/69058>

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Figur 3 Eksempel på hovedkomponent, særskilte og integrerede komponenter

Eksempel på hovedkomponent, særskilte og integrerede komponenter

Integreret komponent, da det ikke dokumenteret fjernes fra hovedkomponenten under transport eller sortering, og vurderes derfor efter hovedkomponentens materialeunderkategori

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Levels of environmental grading



Figure 4 Levels of environmental grading

The packaging is divided into a number of levels according to the environmental impact of the packaging waste for each material subcategory. The levels are green, yellow, and red.

If a design requirement cannot be documented, the packaging is placed at the red level.

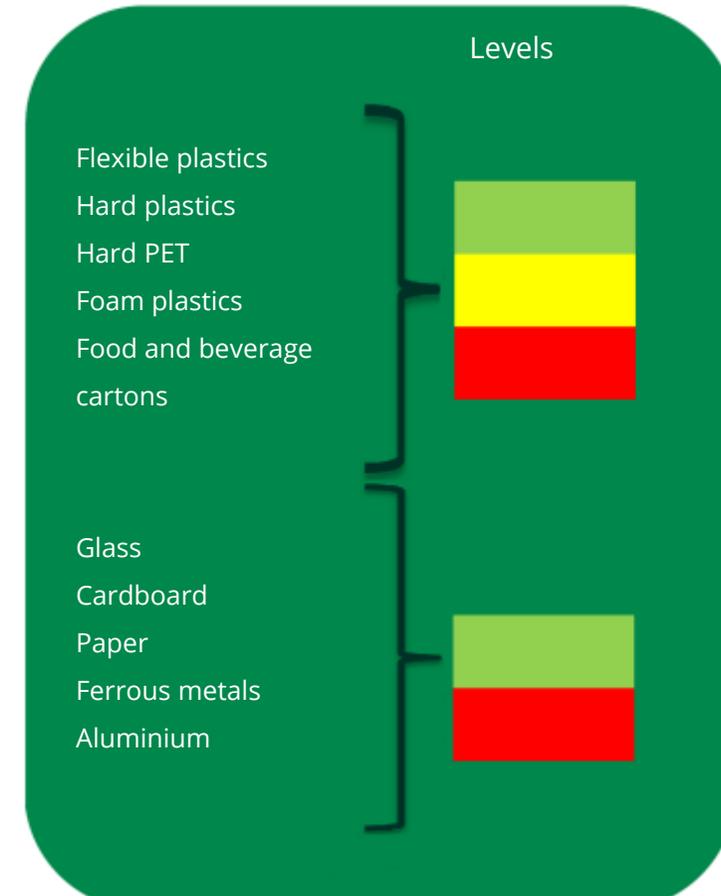


Figure 5 Levels of the 10 material subcategories

The packaging is divided into various levels depending on the material subcategory.

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Design requirements – Cardboard – example with 2 levels

### Hovedkomponent og integreret komponent

	Grønt niveau	Rødt niveau
Materiale	Består af mere end eller lig med vægtprocent fibremateriale + vægt. Hovedkomponent + komponent, hvor + og	af den + ent +
Overfladebehandling	behandlet med voks eller	eller - Tilsat tilsætningsstoffer der gør pappet svær opløselig jf. ISO standarden 5263 - Overfladebehandlet med voks eller paraffin

See more in:

<https://hoeringsportalen.dk/Hearing/Details/69058>

The version is in Danish. Currently there is no English version.

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Design requirements – Flexible plastics – example with 3 levels

Hovedkomponent:

	Grønt niveau	Gult niveau	Rødt niveau
Materiale	- Mere end eller lig med 90 vægtprocent PP enkel eller flerlagsmateriale  eller  - Mere end eller lig med 95 vægtprocent PE enkel eller flerlagsmateriale	- Blanding af PE og PP mere end eller lig med 90 vægtprocent PE eller PP	- Bionedbrydelig plast  eller  - Andre materialer fx flerlagsfolier med barrierematerialer fx PET, PEAD, PA, PA6, PA66, PA11, PA12, PA12/11, PA12/6F, PA12/6T, PA12/6I, PA12/6D, PA12/6A, PA12/6G, PA12/6H, PA12/6K, PA12/6L, PA12/6M, PA12/6N, PA12/6O, PA12/6P, PA12/6Q, PA12/6R, PA12/6S, PA12/6T, PA12/6U, PA12/6V, PA12/6W, PA12/6X, PA12/6Y, PA12/6Z, PA12/6AA, PA12/6AB, PA12/6AC, PA12/6AD, PA12/6AE, PA12/6AF, PA12/6AG, PA12/6AH, PA12/6AI, PA12/6AJ, PA12/6AK, PA12/6AL, PA12/6AM, PA12/6AN, PA12/6AO, PA12/6AP, PA12/6AQ, PA12/6AR, PA12/6AS, PA12/6AT, PA12/6AU, PA12/6AV, PA12/6AW, PA12/6AX, PA12/6AY, PA12/6AZ, PA12/6BA, PA12/6BB, PA12/6BC, PA12/6BD, PA12/6BE, PA12/6BF, PA12/6BG, PA12/6BH, PA12/6BI, PA12/6BJ, PA12/6BK, PA12/6BL, PA12/6BM, PA12/6BN, PA12/6BO, 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PA12/6YR, PA12/6YS, PA12/6YT, PA12/6YU, PA12/6YV, PA12/6YW, PA12/6YX, PA12/6YY, PA12/6YZ, PA12/6ZA, PA12/6ZB, PA12/6ZC, PA12/6ZD, PA12/6ZE, PA12/6ZF, PA12/6ZG, PA12/6ZH, PA12/6ZI, PA12/6ZJ, PA12/6ZK, PA12/6ZL, PA12/6ZM, PA12/6ZN, PA12/6ZO, PA12/6ZP, PA12/6ZQ, PA12/6ZR, PA12/6ZS, PA12/6ZT, PA12/6ZU, PA12/6ZV, PA12/6ZW, PA12/6ZX, PA12/6ZY, PA12/6ZZ
Densitet	- Densitet af PE mindre end eller lig med 0,91 g/cm <sup>3</sup>	- Densitet af PE eller PP mindre end eller lig med 0,92 g/cm <sup>3</sup>	- Densitet af PE eller PP mere end eller lig med 0,93 g/cm <sup>3</sup>
Farve	- Ingen tryk og/eller trykoverholdelse	- Trykoverholdelse	- Trykoverholdelse og/eller tryk
Barriere	- Materiale med PVC eller PVdC	- Materiale med PVC eller PVdC	- Materiale med PVC eller PVdC
Klæbemidler for flerlagsmateriale	- Mindre end eller lig med 5 vægtprocent af samlet vægt af hovedkomponent	- Mindre end eller lig med 7 vægtprocent af samlet vægt af hovedkomponent	- Mere end 7 vægtprocent af samlet vægt af hovedkomponent

Hovedkomponent og integreret komponent

	Grønt niveau	Gult niveau	Rødt niveau
Trykfarve til label og dekoration af folie	- Ingen tryk og/eller trykoverholdelse  - Trykoverholdelse og/eller tryk	- Trykoverholdelse	- Trykoverholdelse og/eller tryk
Genanvendt indhold af PCR plast	- Mindre end eller lig med 5 vægtprocent af samlet vægt af hovedkomponent	- Mindre end eller lig med 7 vægtprocent af samlet vægt af hovedkomponent	- Mere end 7 vægtprocent af samlet vægt af hovedkomponent

See more in:  
<https://hoeringsportalen.dk/Hearing/Details/69058>

The version is in Danish. Currently there is no English version.

See more in:  
<https://hoeringsportalen.dk/Hearing/Details/69058>

The version is in Danish. Currently there is no English version.

# 8. CRITERIA AND METHOD FOR GRADING CONTRIBUTIONS

## Financial model

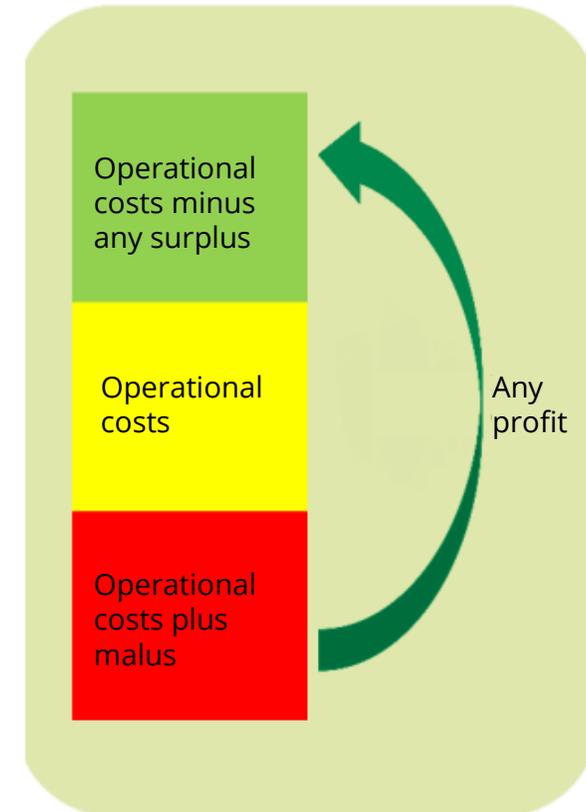
Producer Responsibility Organisations are responsible for categorising packaging placed on the market into the material subcategories and into the grading levels (Green, Yellow, Red).

Each producer placing red-level packaging on the market is given additional costs of 35% of the individual producer's calculated operational costs for managing the waste of its red-level packaging.

The Producer Responsibility Organisations use the extra income from the additional charge in a material subcategory to cover up to 80% of the operational costs in the green level.

The producer's payment to the Producer Responsibility Organisation will reflect the amount of packaging placed on the market within a given material subcategory, and the packaging is placed at Green, Yellow, or Red level.

## Financial model



# INPUT FOR EMBALLAGERETUR'S CONSULTATION RESPONSE



# EMBALLAGERETUR'S CONSULTATION RESPONSE

Emballageretur is currently preparing our consultation response to the Ministry, and we would like to open a dialogue with you – our members – about the future framework conditions.

If you have any comments on the consultation draft for a new Act, we would like to hear from you.

Contact us with your feedback no later than October 25th, 2024.

Write to us: [info@emballageretur.dk](mailto:info@emballageretur.dk)

Call us: +45 3336 9198



**QUESTIONS**



# ELECTION FOR EMBALLAGERETUR'S SECTIONS



# SECTIONS: EMBALLAGERETUR'S MEMBER DEMOCRACY

The purpose of the sections is:

- To determine and decide on the environmentally graded contributions
- To manage the individual section's budget and accounting
- To ensure our members' influence on how Emballageretur works
- To request working groups and knowledge to support our members' work with packaging

We will soon be opening for the opportunity to sign up for the sections and to run for section leadership election.

The 8 sections:

Agro and fishing

Manufacturing (non-food)

Foodstuffs

Office and service

Transport and logistics

Medical

Trade (retail)

Wholesale and distance selling

# WORK IN THE SECTIONS

## At start-up in 2024

Mid-November: Information meeting about sections

End of November: Deadline to register your candidacy

Early December: Section leadership election

December 10th, 2024: Executive committee meeting with approval of sections and participation of section leaders

## Annually from 2025

Spring: Section meeting about last year's accounts

Autumn: Section meeting about future contributions

Moreover: Working groups, study tours, presentations, and knowledge-sharing based on the need in the individual sections.



# EXAMPLES OF WORKING GROUPS

- How to convert your glass packaging from the "red category" to the "green category"
- How to set requirements for packaging suppliers
- How to work with more direct recycling of transport packaging
- How to obtain a lower carbon footprint for plastic packaging
- How to help the circular economy on its way by creating demand for recycled materials

Working groups must solve a need among the members and can contribute to ESG reporting, internal CO2 targets, or improving the category for environmentally graded contributions.



EMBALLAGERETUR



# WANT TO KNOW MORE?

Write to us: [info@emballageretur.dk](mailto:info@emballageretur.dk)

Call us: +45 3336 9198

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Visit us: [www.emballageretur.dk](http://www.emballageretur.dk)

