

EMBALLAGERETUR



INTRODUCTION TO ECO-MODULATED FEES

07-05-2025

www.emballageretur.dk/en/



WELCOME

- 1 Introduction to the eco-modulated fees
- 2 Material categories, levels & design requirements
- 3 The economic model
- 4 Your task

HVAD TALER VI OM I DAG?

2024

REPORTING OF **EXPECTED**
QUANTITIES IN 2024



2024

REPORTING OF **ACTUAL**
QUANTITIES IN 2024



2025

By October the 1st 2025:
**EPR ENTERS INTO
FORCE**



QUESTIONS?

Questions are more than welcome!

Write your question in the chat:

We will collect and answer questions at the end of the webinar. Any questions we may not get to, you are more than welcome to ask our member service afterwards.

CONTACT US

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INTRODUCTION TO ECO-MODULATED FEES

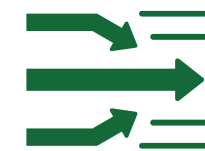
WHAT ARE ECO-MODULATED FEES

- Economic incentive structure incorporated into producer responsibility for packaging.
- Packaging designed for reuse and recycling will receive an economic benefit compared to packaging that is non-recyclable or of low-quality recyclability.





THE PURPOSE ECO-MODULATED FEES



Ensure that producers take full responsibility for designing their packaging in accordance with environmental considerations.



Strengthen the quality of recycling by ensuring that the packaging placed on the market can be kept in a circular flow, with minimal need for new virgin resources.



Create an economic foundation and market for recycled materials.



The design requirements are inextricably linked to the data that you will need to gather on your packaging!

THE DANISH MODEL FOR MODULATING

Consists of two main parts:

- 1** An overview of **material subcategories, modulating levels, and design requirements** that determine which level your packaging falls into.
- 2** An **economic model** that specifies how much you, as a producer, need to pay according to the categorization of your marketed quantities.

A brown cardboard box is centered against a solid green background. The box has a large, three-dimensional recycling symbol cutout in the center of its front face. The symbol is made of the same cardboard material as the box, with visible flaps and a 3D effect. The text '1) MATERIAL CATEGORIES, LEVELS & DESIGN REQUIREMENTS' is overlaid in white, bold, sans-serif font across the middle of the box.

1) MATERIAL CATEGORIES, LEVELS & DESIGN REQUIREMENTS

MATERIAL CATEGORIES

Overview of material subcategories covered by eco-modulating:

The material subcategories are defined based on the material type and the recycling stream in which the packaging is recycled.

- ✓ Flexible plastic
- ✓ Hard plastic
- ✓ Hard PET
- ✓ Foam plastic
- ✓ Glass
- ✓ Cardboard
- ✓ Paper
- ✓ Food and beverage cartons
- ✓ Ferrous metals
- ✓ Aluminium

The categorization of the packaging into different material subcategories indicates the design requirements by which the packaging should be assessed.

LEVELS FOR MODULATING



Figure 4. Levels for environmental graduation

- The packaging is divided into several levels based on the environmental impact of the packaging waste under each material subcategory. The levels are **green, yellow, and red.**
- If a design requirement cannot be documented, the packaging is placed in the red level.

Note: Other categories that need to be reported on are not eco-modulated!

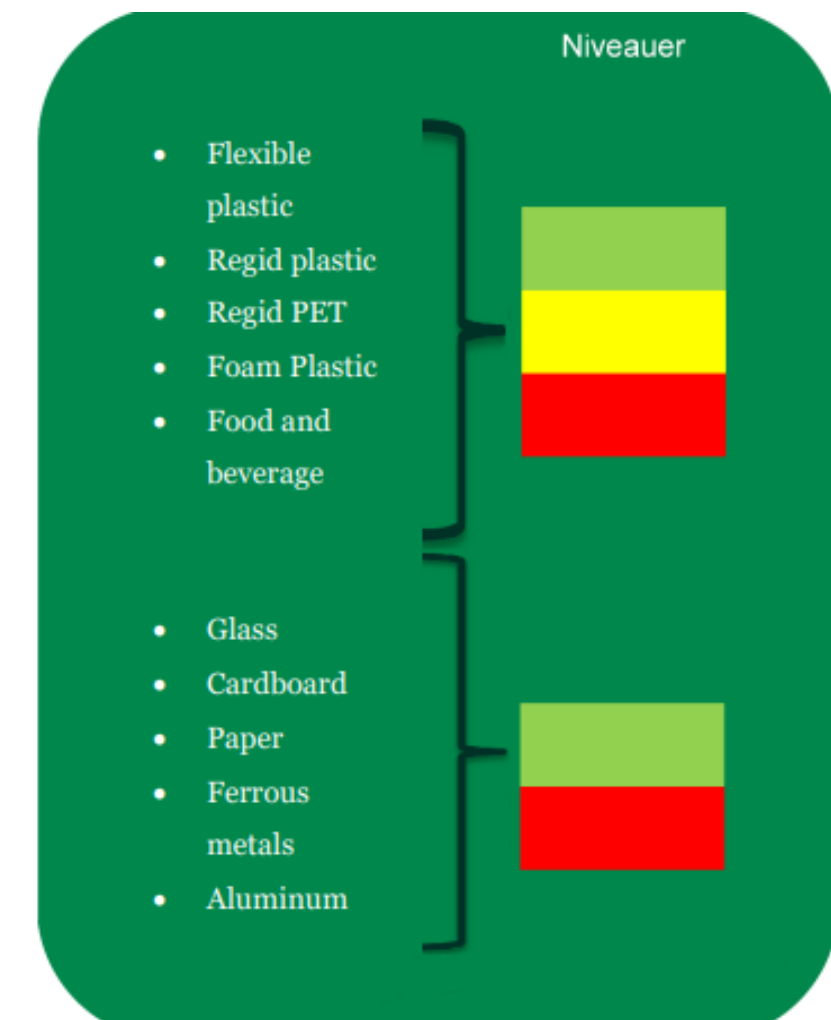


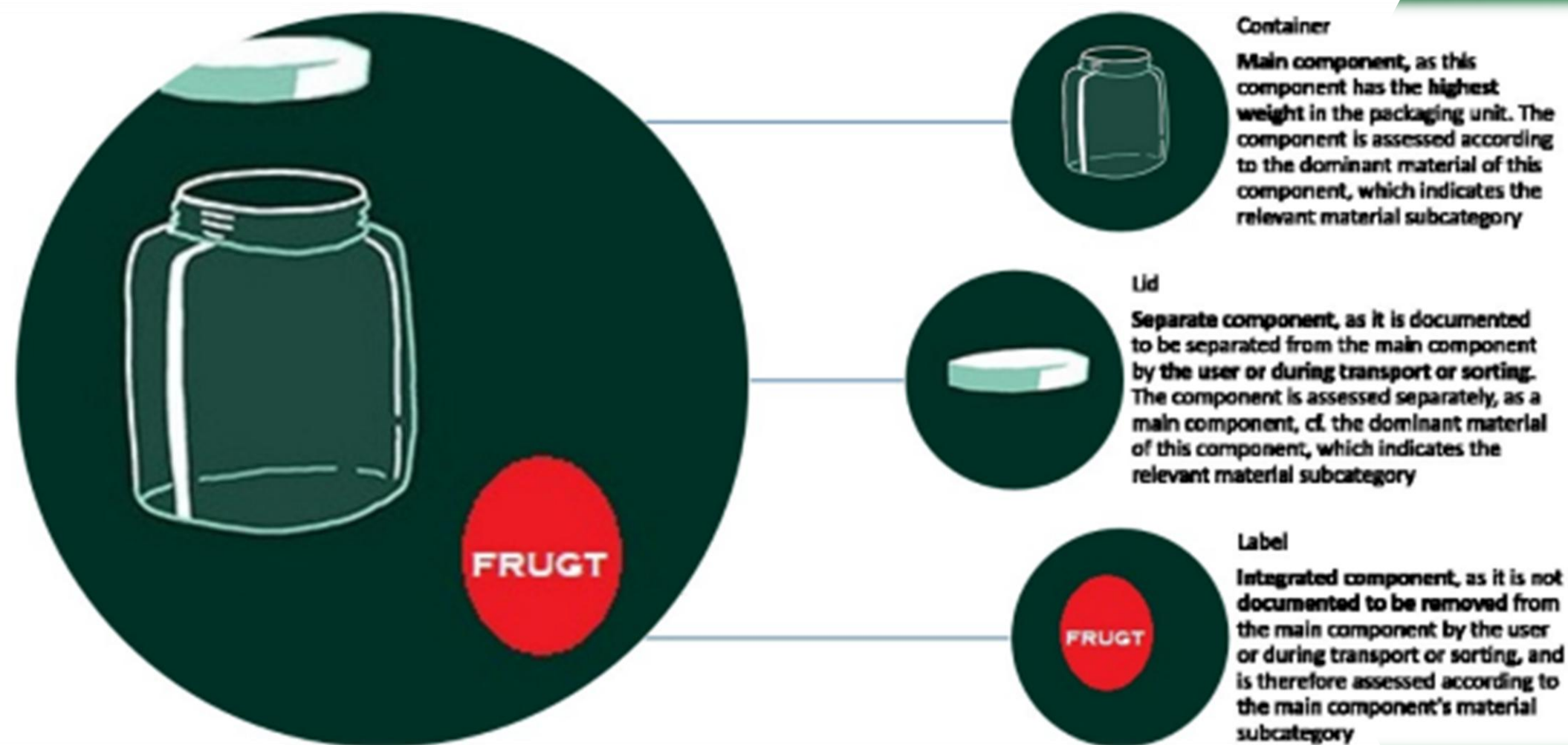
Figure 5. Levels for the 10 material subcategories

Source: [MST - vejledning-til-miljoegraduerede-bidrag-for-emballage.pdf](#)

CATEGORISATION OF PACKAGING

Packaging consist of several components:

- one **main component** and any **separate components**,
- The main component and any separate components can have **integrated components**



WHAT IS A COMPONENT?

- A component is a part of the packaging unit that can typically be separated by hand or simple tools, such as a lid, seal, label, etc.
- In contrast, items such as **glue, printing, barrier, coating**, etc., are not components but are constituents of the component.

HOW IS THE PACKAGING CATEGORIZED?

- "If the components can be **documented as separable**, the packaging is categorized based on each component independently – according to the dominant material (weight).
- If separation **cannot be documented for a separate component**, it is categorized in the same material category as the main component – the weight is included here.
- An **integrated component is documented as separable** if it can be detached from the component it is integrated with by simple mechanical influence during transport or sorting.

CATEGORISATION AND DOCUMENTATION

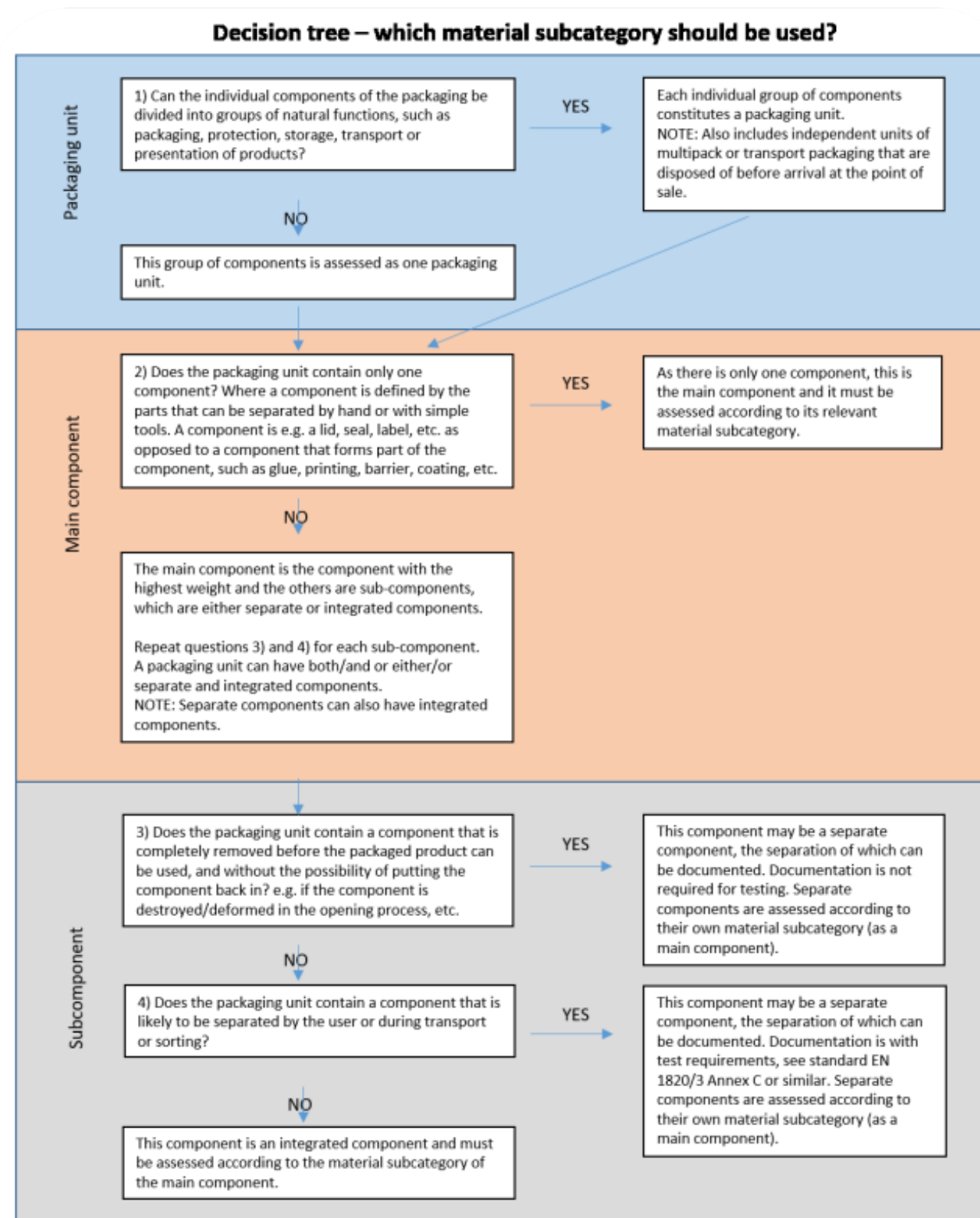


Figure 1 Decision tree of division between main component, special component and integrated component



Step 1 Each individual packaging and packaging component must be assessed according to the separation criteria.

First, it must be assessed whether the packaging can be divided into groups of natural functions, such as packing, protection, storage, transport, or presentation of products.



Step 2 Next, each component must be assessed according to whether it is a separate or integrated component.



Step 3 Once it has been assessed whether the packaging can be separated, component by component, you are ready to move on to the next phase – namely, which category (red, yellow, green) the individual or combined components should be eco-modulated according to.

DESIGN REQUIREMENTS – EX CARD BOARD

Main component and integrated component:		
	Green level	Red level
Material	- Consists of greater than or equal to 95 percent by weight of fibrous material, of the total weight, where tape does not count. and - Not intentionally added PFAS or mineral oils in the form of either mineral oils with saturated hydrocarbons (MOSH) or mineral oils with aromatic hydrocarbons (MOAH). The requirement does not include addition when using recycled content and - No additives have been intentionally added that make the cardboard difficult to dissolve	- Consists of less than 95% by weight of fiber material, of the total weight, where tape does not count. or - intentionally added PFAS or mineral oils in the form of either mineral oils with saturated hydrocarbons (MOSH) or mineral oils with aromatic hydrocarbons (MOAH). The requirement does not include addition when using recycled content or - intentionally added additives that make the cardboard difficult to dissolve
Surface treatment	- Not surface-treated with wax or paraffin	- - Surface treated for wet resistance with wax or paraffin



CATEGORIZE YOUR CARDBOARD BOX:

- ✓ Start by evaluating the red level and assess whether you can answer **NO** to all the criteria.
- ✓ If you can answer no – assess whether you can answer yes to all the criteria in the green level.
- ✓ If you can answer **YES to all the criteria** in green, your packaging is categorized in the green level.
- ✗ If there is **just one** criterion you cannot meet, your packaging will be placed in the **RED** level.
- ✗ **Failure to document** that your packaging meet all criterion will result in your packaging being caterogized in the **RED** level.

DESIGN REQUIREMENTS – EX HARD PLASTIC

Main component:

	Green level	Yellow level	Red level
Material	- Greater than or equal to 95% PP by weight or - Greater than or equal to 99% by weight PE	- Less than or equal to 30% by weight PE in PP main component or - Less than or equal to 5% by weight PP in PE main component	- Biodegradable plastic and/or - All other materials of mono or mixed materials
Density	- Density of PP or PE of less than or equal to 0.97 g/cm3	- Density of PP or PE of less than or equal to 0.97 g/cm3	- Density of material greater than 0.97 g/cm3
Color	- No added color or - Added color without carbon black content or - Color that is NIR-sortable	- No added color or - Added color without carbon black content or - Color that is NIR-sortable	- Added color with carbon black content or - Color that is not NIR-sortable
Barrier	- No barrier Or one or more of the following: - AlOx - SiOx - EVOH without binder or with compatible binder, less than or equal to 6% by weight of the entire main component	- Other barriers than specified in "green" or "red" and/or - EVOH with compatible binder, of more than 6% by weight of the entire main component	One or more of the following: - ON - PVC - PVdC - EVOH with non-compatible binder

Integrated component:

	Green level	Yellow level	Red level
All	- No integrated component or - Integral component of same material as main component with density of integral component less than 1 g/cm3 and/or - Material of label in PE to PP main component or PP label to PE main component	- Material of integrated component in PE, PP or PE/PP with density less than 1 g/cm3 and/or - Material with a density greater than or equal to 1 g/cm3, e.g. PET, PETG, PLA, PS	- Material of other plastics with density less than 1 g/cm3 and/or - Material with metal or metallization and/or - Material with fiber or paper - And/or - Material with PVC and/or - Biodegradable plastic

Main component and integrated component:

	Green level	Yellow level	Red level
Recycled content from Post-consumer recycled plastic	- More than or equal to 20 percent by weight of recycled plastic of the total weight of the packaging, excluding contact-sensitive products	- Less than 20 percent by weight of recycled plastic of the total weight of the packaging, excluding contact-sensitive products or - None	

CATEGORIZE YOUR PLASTIC PACKAGING (HARD PLASTIC):



- ✓ Start by evaluating the red level and assess whether you can answer **NO** to all the criteria.
- ✓ If you can answer **NO** – assess whether you can answer YES to all the criteria in the yellow level.
- ✗ If you cannot answer **YES** to all the criteria in the yellow level, you will end up in the red level.
- ✓ If you can answer **YES** to all the criteria in yellow, proceed to the green level.
- ✓ If you can answer **YES** to all the criteria in green, your packaging is categorized in the green level.
- ✗ If you **CANNOT** answer **YES** to all the criteria in green, your packaging ends up in the yellow level.
- ✗ If you cannot document that you meet all the criteria in either the green or yellow category, you will end up in the **RED level**.

DOCUMENTATION OF SEPARATION



CRITERIA

Does the packaging unit contain a component that can be completely removed before the packaged product can be used, and without the possibility of reattaching the component?

If YES:

- ✓ documentation **without** test requirements
- ✓ The components are **reported according to their own material category** (as main component).

If NO:

Does the packaging unit contain a component that **is likely** to be separated by the **user** or during **transport** or **sorting**?

If YES:

- ✓ **Documentation of separation with test requirements** according to standard EN 1820/3 Annex C or similar.
- ✓ **When separation is documented, the components are reported according to their own material category** (as main component).

If NO

- ✓ The component is considered an integrated part of the packaging unit and must therefore be assessed according to the main category's material category.

PACKAGING EXEMPT FROM MODULATING

- Producers placing less than 8 tonnes of packaging on the market annually.
- Inner packaging as defined in Article 1, point 23) of Directive 2001/83/EC and in Article 4, point 25) of Regulation (EU) 2019/6.
- Primary contact packaging for medical devices covered by Regulation (EU) 2017/745.
- Primary contact packaging for in vitro diagnostic medical devices covered by Regulation (EU) 2017/746.
- Outer packaging as defined in Article 1, point 24), of Directive 2001/83/EC and in Article 4, point 26), of Regulation (EU) 2019/6, in cases where such packaging is necessary to meet specific requirements to preserve the quality of the medicinal product.
- Primary contact packaging for infant formula and follow-on formula, processed cereal-based foods and baby food, as well as food for special medical purposes, as defined in Article 1, points (a), (b), and (c), of Regulation (EU) No. 609/2013.

A producer responsibility organization must apply differentiated economic contributions, pursuant to paragraph 2 or 3, if requested by the producer.





2) THE ECONOMIC MODEL

ECONOMIC MODEL

WE ARE OBLIGATED TO ECO-MODULATE YOUR FINANCIAL CONTRIBUTIONS!



Producers must cover the operational costs associated with the management of their packaging waste.



The contributions collected must not exceed the total operational expenses related to the handling and treatment of the packaging waste.



Thus, producers collectively pay 100%, but the contribution is redistributed based on the recyclability of the packaging.



ECONOMIC MODEL FOR CONTRIBUTIONS



NOTE: The total billing cannot exceed 100% of the calculated operational costs – regardless of the category.

YOUR TASK

PRODUCER RESPONSIBILITY OBLIGATIONS



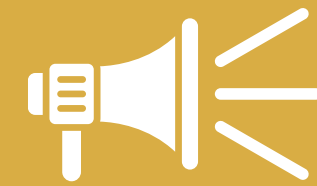
REGISTRATION OBLIGATION

Your company must be registered as a producer in the Environmental Protection Agency's producer register (Danish Producer Responsibility – DPA).



REPORTING OBLIGATION

Your company must report sold, collected, and treated products.



INFORMATION OBLIGATION

Your company must inform your customers about how to dispose of the products of the covered items.

Emballageretur helps your company meet the producer responsibility requirements.

WHAT DOES THIS MEAN FOR YOU IN PRACTICE?

It means that:

- You must collect relevant data on the packaging for which you become responsible for marketing – the basis for eco-modulating.
- You must report your accumulated quantities to Emballageretur every month.
- You will then be invoiced for your eco-modulated fees by Emballageretur.
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DATES TO BE AWARE OF

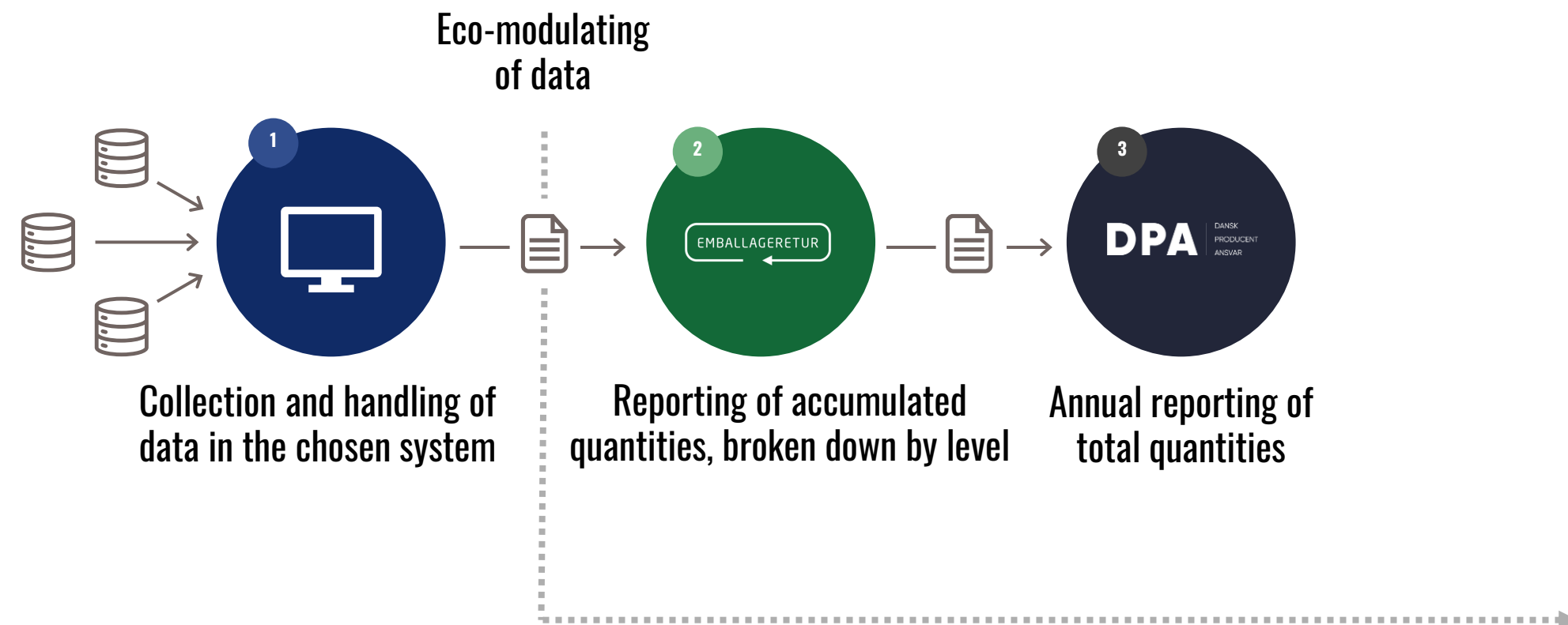
October the 1st 2025:
EPR enters into force

**December the 1. – 15th
2025:** First 'actual' reporting
(period: 1.nov.-30.nov. 2025)

**November the 1. – 15th
2025:** First 'actual' reporting
(period: 1.okt-31.okt. 2025)

Anually before May 31st:
reporting of total quantaties
to DPA – is done by
Emballageretur and must
be confirmed by you.

DATA FLOW AND TASKS



Methods for eco-modulating of your data:

Manual handling – the collected packaging data is reviewed based on the criteria set in the packaging regulation.

Suitable only for very few data points.

System handling – uses an external data system that has built-in eco-modulating within the platform.

For example, **Varefakta** and **GS1** have developed digital platforms for handling packaging data, including eco-modulating.

This means that you can easily and simply have your master data eco-modulated and accumulated into the correct reporting format for Emballageretur.

MASTER DATA

- The design requirements for eco-modulated fees are crucial for determining which data points you need to collect – **if you wish to achieve an economic benefit.**
- Examples of data points:
 - ☐ Material type
 - ☐ Weight
 - ☐ Density
 - ☐ Color
 - ☐ Barrier
 - ☐ Additives
 - ☐ Coatings
 - ☐ Recycled content in %
 - ☐ Etc.

Main component:			
	Green level	Yellow level	Red level
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Recycled content from Post-consumer recycled plastic	- More than or equal to 20 percent by weight of recycled plastic of the total weight of the packaging, excluding contact-sensitive products	- Less than 20 percent by weight of recycled plastic of the total weight of the packaging, excluding contact-sensitive products or - None	

REPORTING FORMAT

MUST BE REPORTED:

- ✓ Packaging quantities (in kilograms)
- ✓ End users* (household/commercial)
- ✓ Packaging that must be sorted as either hazardous waste or residual waste.

NOTE: *Exemption threshold of 8 tons and micro-enterprises

**End users refer to where the packaging ends up as waste.*

Emballageretur requests your accumulated packaging data to grade your economic contribution!

Packaging categories	Regular packaging waste (kg)	Packaging in residual waste (kg)	Hazardous packaging waste
Household waste / Commercial waste			
Single-use packaging / Reusable packaging			
Cardboard	Modulating in 2 levels: Green level Red level		
Paper			
Ferrous metals			
Aluminium			
Glass			
Flexible plastic	Modulating in 3 levels: Green level Yellow level Red level		
Rigid plastic (-PET)			
Foam plastic			
Rigid PET			
Food and beverage cartons			
Wood	No modulating		
Textile	No modulating or fees		
Porcelain			
Cork			
Ceramics			
Other			

RETURPORTALEN

What can be reported?

Virksomheder Brugere Logbog Import/eksport Administration				
Startside medlem Indberetning Rapporter Indstillinger &TRADITION A/S				
Indberetninger				
Kategori	Type	Periode	Status	
Markedsførte mængder	WEEE	2025	Åben	>
Budgettal	WEEE	2025	Åben	>
Tilbagetagne og behandlede mængder	WEEE	2025	Lukket	>
Re-eksporterede mængder	WEEE	2025	Lukket	>
Markedsførte mængder	BAT	2025	Åben	>
Budgettal	BAT	2025	Åben	>
Tilbagetagne og behandlede mængder	BAT	2025	Lukket	>
Markedsførte mængder	WEEE	2024	Lukket	>
Budgettal	WEEE	2024	Lukket	>
Tilbagetagne og behandlede mængder	WEEE	2024	Åben	>
Re-eksporterede mængder	WEEE	2024	Åben	>
Markedsførte mængder	BAT	2024	Lukket	>

Markedsførte mængder

Budgettal

Tilbagetagne og behandlede mængder

Re-eksporterede mængder

2025

2025

2025

2025

2024

2024

2

EMBALLAGERETUR

RETURPORTALEN

How do you report your quantities in operation?

StartsideIndberetningRapporterIndstillinger

AAA elretur

Registreringer / Markedsførte mængder 2024

Markedsførte mængder 2024 Packaging

GemEksportér

Kategorier	Maj		Jun		Jul		Aug		Sep		Okt		Nov		Dec		Total 2024	
Aluminium																		
Erhverv Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Emballage i res. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Farligt emballage , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Emballage i. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Farligt emb. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Miljøbidrag , DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK
Graderet miljøbidrag , DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK
Plast																		
Erhverv Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Emballage i res. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Farligt emballage , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Emballage i. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Farligt emb. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Miljøbidrag , DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK
Graderet miljøbidrag , DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK	0,00	DKK
Mad - og drikkekartoner																		
Erhverv Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Emballage i res. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Erhverv Farligt emballage , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Almindelig , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Emballage i. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg
Husholdning Farligt emb. , kg		kg		kg		kg		kg		kg		kg		kg		kg	0,00	kg

ECO-MODULATED FEES & DESIGN

Use the design requirements as a business strategic tool.

- Use your master data to optimize your packaging portfolio for the greatest economic and environmental impact.
- Develop a strategy for how you will manage your future procurement or production of packaging.

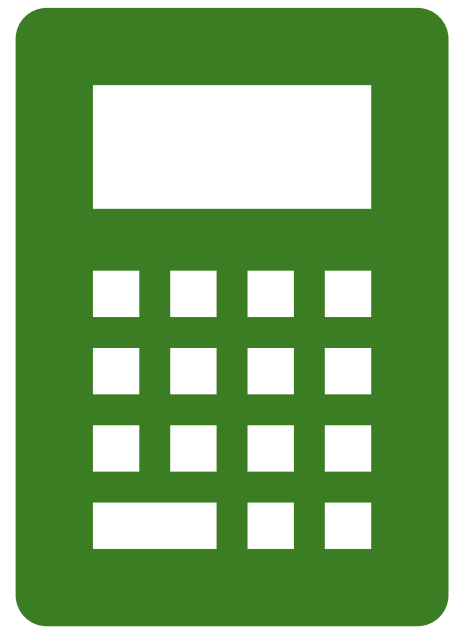


TOOLS & KNOWLEDGE



DIGITAL TOOL – THE PRICE INDICATOR

The price indicator gives businesses an indication of how much producer responsibility could potentially cost.



1. Provides a qualified estimate of the cost impact of producer responsibility for packaging at the **product level**.
2. Can be used to compare packaging choices in the **design phase**.
3. Provides a qualified estimate of the cost impact of producer responsibility for packaging on the company's **total packaging consumption**.

Emballageretur's Price Indicator can be used by our members.
It can be accessed via our member pages on www.emballageretur.dk/en/

WEBINARS

Webinars

We have published new webinars in English, where we dive into the various aspects of the producer responsibility for packaging and help you prepare to manage your company's producer responsibility.

View the webinars and register here:

<https://emballageretur.dk/webinar/>



CONTACT

If you have any further questions, please feel free to contact us.



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