

EMBALLAGERETUR

DOCUMENTATION FOR ECO MODULATED FEES

16-09-2025



AGENDA

- 1 Types of documentation and requirements
- 2 Technical specifications - what should they contain?
- 3 Data requirements - what is needed?
- 4 The documentation process in practice
- 5 Procedure for control

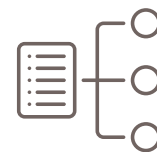
DOCUMENTATION

Documentation is required to report your packaging in the material categories for **green** and **yellow** level .

THIS MEANS:



You must ensure you have the correct documentation for each packaging unit and/or component that needs to be eco modulated

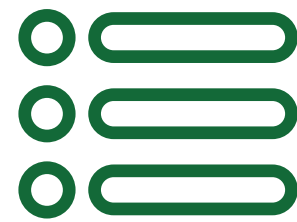


You must ensure that you understand the categorization of your packaging and components.



You must ensure that you obtain sufficient data from any suppliers/manufacturers.

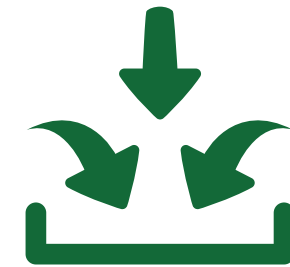
THE FRAMEWORK FOR DOCUMENTATION



As a PRO, we are obligated to ensure that you categorize your packaging correctly.



You get access to necessary information and cooperation agreements



It is the PRO's who assess what documentation is necessary.



PRO's must conduct self-audits at least once a year, which includes control of your reported data

TYPES OF DOCUMENTATION



Declaration of Conformity

- serves as assurance that the member has adhered to the design criteria
- continued requirement to have all technical documentation
- upon request from PRO or authorities, the member must provide the relevant documentation within a reasonable time



Technical documentation

- According to PPWR, manufacturers are obliged to prepare technical documentation (a standard will therefore come from here in the future)



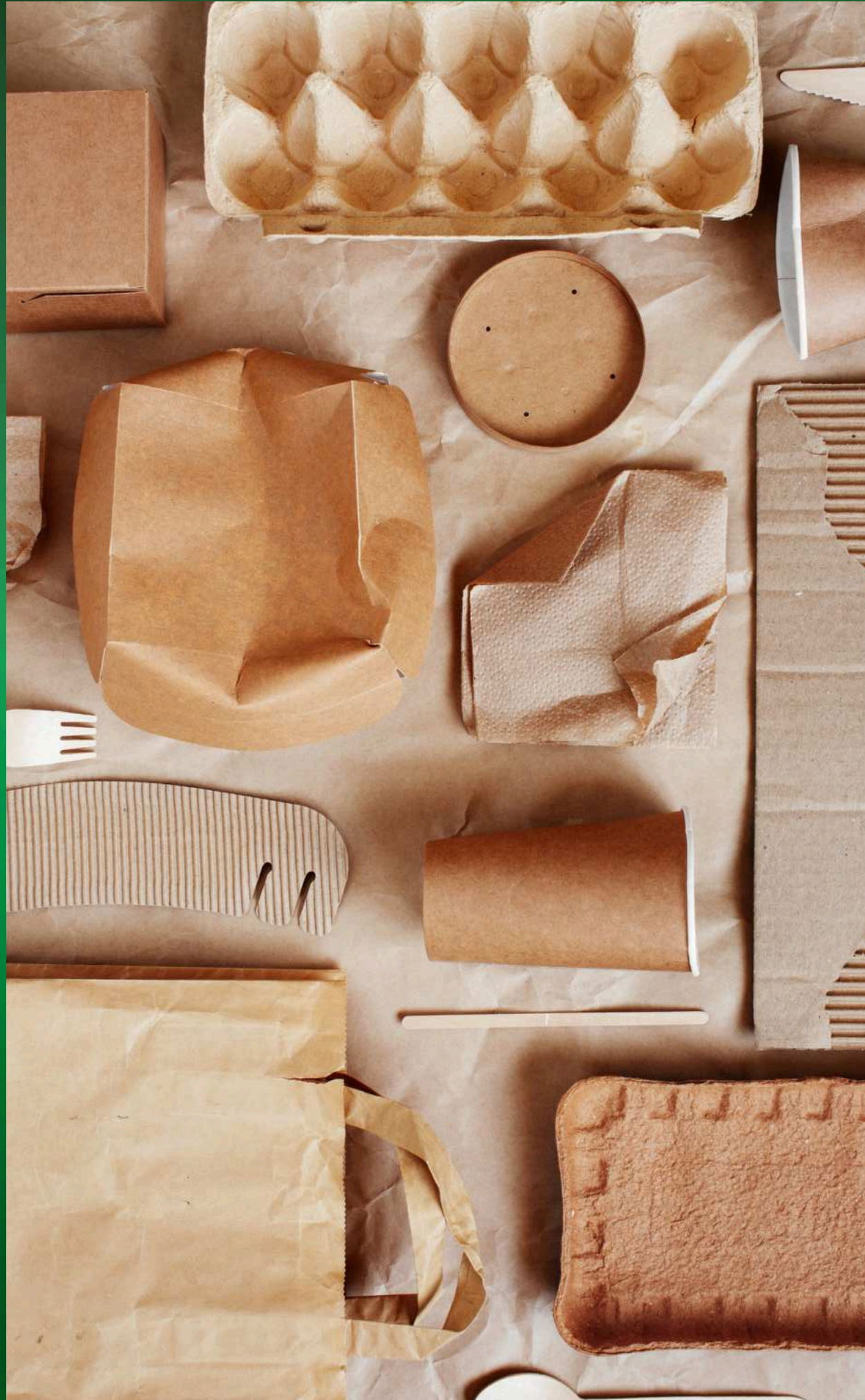
Documentation of separate components with and without test requirements

- for components that are obvious seprable, no testing is required
- For components where there may be doubt, testing and documentation of separation are required.



NIR-sortable

- documentation that a color that contains, e.g. carbon black can be NIR-sorted (a CEN standard will be developed in the future)



DECLARATION OF CONFORMITY

- Can be used instead of obtaining all documentation every time
- For the design criterion regarding recycled content, the declaration must state who has third-party verified the use of PCR plastic in accordance with DS/EN 15343.
- **All technical documentation must be existing** - it must be submitted within a reasonable time, which is assessed according to the nature and scope of the documentation

The declaration of conformity must be digitally signed in the Returns Portal with each reporting.

TEMPLATE: DECLARATION OF CONFORMITY

1 Company information

Company Name: [Insert Name]
CVR number: [Insert number]
Contact person: [Name, email, phone]
Date of preparation of documentation: [Insert date]

2 Declaration of conformity

The undersigned hereby declares that the entered quantities of packaging have been assessed according to relevant design criteria and meet the requirements for the selected graduation in the collective scheme.

The company is in possession of the necessary documentation and undertakes to present it upon request from the collective scheme or the Danish Environmental Protection Agency within a reasonable time.

3 When using recycled plastic

It is hereby confirmed that the content of post-consumer recycled plastic has been verified by a third party in accordance with the standard DS/EN 15343.

Name of verifying third party: [Insert].

4 Disclaimer

This declaration does not constitute a guarantee of the product's suitability for specific purposes and does not exempt the company from producer responsibility for being able to document the technical specifications of the packaging upon request. The company is solely responsible for the accuracy of the information provided and for compliance with applicable legislation.

5 Signature

Place: [Insert]
Date: [Insert]
Name: [Insert]
Title: [Insert]

Signature: _____

TECHNICAL DOCUMENTATION

- With the implementation of PPWR, manufacturers are required to prepare technical documentation that documents the product complies with applicable legislation - which **can** be based on this documentation format, but not required

In the technical documentation, it is essential that it contains the information that is relevant documenting that the packaging meets a given design criterion for the exact material category.

The technical documentation will be requested occasionally as part of Emballageretur's self-audit.

TEMPLATE: TECHNICAL DOCUMENTATION

1 Company information

Company Name: [Insert Name]
CVR number: [Insert number]
Contact person: [Name, email, phone]
Date of preparation of documentation: [Insert date]

2 Packaging composition and structure

Product Name: [Insert Name]
Packaging type: [E.g. plastic bucket with lid, glass bottle with metal lid]
Materials: [E.g. rigid plastic, aluminum, glass per component]
Component(s): [Describe whether they are separate components or integrated components]
Weight: [g]

3 Compliance with design criteria (cf. BEK no. 323 of 20/03/2025, appendix 14)

For each relevant design criterion within the individual material category, specify: [e.g. density, additives, weight percentage, color, decoration, printing ink, etc.]

Especially when documenting the content of recycled plastic (PCR material):

- Attach third-party certification [according to standard DS/EN 15343]

Especially when documenting contact-sensitive products, exempt for the design criterion for recycled plastic content:

- Reference to relevant EU legislation defining the product as contact-sensitive: [Eg: (EC) 1831/2003, (EC) 1935/2004, (EC) 1223/2009]
- Article and paragraph of the legislation where the product is defined contact sensitive
- Brief description of how the product falls within the scope of the legislation

DOCUMENTATION OF INDIVIDUAL COMPONENTS

- A component is not to be considered separate until it can be documented
- The following **applies to documentation without test requirements:**
 - the separation of the component is so clear that it is separate
 - the subcomponent must be completely removable before the packaged product can be used
 - the subcomponent must not be reattachable
 - the documentation must include a prose description and possibly a photo showing how the component is loose or deformed and therefore cannot be reattached.

Documentation will be requested occasionally as part of Emballageretur's self-control.

TEMPLATE: DOCUMENTATION OF SEPARATE COMPONENTS WITHOUT TEST REQUIREMENTS

1 Company information

Company Name: [Insert Name]
CVR number: [Insert number]
Contact person: [Name, email, phone]
Date of preparation of documentation: [Insert date]

2 Packaging information

Product Name: [Insert Name]
Packaging type: [E.g. plastic bucket with lid, glass bottle with metal lid]
Materials: [E.g. hard plastic, aluminum, glass]
Component(s): [Describe the component(s) you wish to assess separately]

3 Assessment of separation without testing requirements

- **Description of component disassembly:** [E.g. "The hard plastic cover can be completely removed and cannot be replaced."]
 - **Reason for exemption from testing:** [E.g. "The component is loose and not secured with threads, glue or welding."]
 - **Visual documentation:** [Insert photo or reference to attachment]
 - **Comparability with known packaging:** [E.g. "The packaging is similar to traditional glass packaging with a metal lid."]

4 Appendix

- Photos
- Test reporter
- Certificates
- Material specifications
- Prose descriptions

DOCUMENTATION OF INDIVIDUAL COMPONENTS

- A component is not to be considered separate until it can be documented
- For **documentation with test requirements the following applies:** components that are not guaranteed to be separated by either the consumer, during transport or during sorting require testing
- The documentation must contain descriptions of:
 - test protocol
 - test facility, as well as justification for it being representative in DK
 - information for identification of packaging and all components
 - sample
 - result of the test

TEMPLATE: DOCUMENTATION OF SEPARATE COMPONENTS WITH TEST REQUIREMENTS

1 Company information

Company Name: [Insert Name]
CVR number: [Insert number]
Contact person: [Name, email, phone]
Date of preparation of documentation: [Insert date]

2 Packaging composition and structure

Product Name: [Insert Name]
Packaging type: [E.g. plastic bucket with lid, glass bottle with metal lid]
Materials: [E.g. rigid plastic, aluminum, glass per component]
Component(s): [Describe whether they are separate components or integrated components]
Weight: [g]

3 Assessment of separation with test requirements

- **Test protocol:**
 - **Performed by:** [Name of testing institute]
 - **Date and place:** [Insert]
 - **Description of test method:** [E.g. sorting test, user separation]
- **Test facility:**
 - **Name and location:** [Insert]
 - **Justification for representativeness:** [E.g. "The plant treats Danish household waste under normal conditions."]
- **Identification of packaging and components:** [E.g. "Plastic bucket with lid made of PE, tested for separation during sorting."]
- **Sample description:**
 - **Sampling:** [E.g. "100 samples taken from sorting facilities at appropriate intervals."]
 - **Representativeness:** [E.g. "Samples taken from standard waste stream."]

DOCUMENTATION OF SEPARATE COMPONENTS -CONTINUED (WITH TEST)

For sampling at each of the different steps in the waste treatment chain, the following applies:

- For user/consumer separation testing, as many individual samples as needed must be taken until 100 samples (main components) are recovered.
- For separation testing during collection and transport, 100 samples must be marked and thrown out with other waste in the collection bin prior to collection and transport. The test applies to only one collection truck (3 trips). Collection and transport must take place under normal conditions. This waste must be kept separate until counting has taken place.
- For separation during sorting tests, the sample shall be taken at the sorting facility. Note that separation of the sample shall be prevented during sample collection and at appropriate intervals between sampling. As many individual samples as necessary shall be taken until 100 samples (major components) are recovered.

Documentation will be requested occasionally as part of Emballageretur's self-control.

DOCUMENTATION OF NIR SORTABILITY

- Applies to the material subcategories **soft plastic, rigid plastic, rigid PET** and **glass**
- The criterion of NIR sortability is chosen to create more flexibility regarding the use of colors in the categories.
- The documentation must be based on current industry practice until an official CEN standard is available.
- The documentation must contain a description of:
 - test protocol
 - test facility
 - justification for representativeness
 - relevant information for identifying the packaging that has been tested

Documentation will be requested occasionally as part of Emballageretur's self-control.

TEMPLATE: DOCUMENTATION OF NIR SORTABILITY

1 Company information

Company Name: [Insert Name]
CVR number: [Insert number]
Contact person: [Name, email, phone]
Date of preparation of documentation: [Insert date]

2 Packaging composition and structure

Product Name: [Insert Name]
Packaging type: [E.g. plastic bucket with lid, glass bottle with metal lid]
Materials: [E.g. rigid plastic, aluminum, glass per component]
Component(s): [Describe whether they are separate components or integrated components]
Weight: [g]

3 Test information

- **Test protocol**
 - **Test method:** [E.g. RecyClass sorting evaluation protocol or equivalent]
 - **Performed by:** [Name of testing institute or laboratory]
 - **Date and place:** [Insert]
- **Test facility**
 - **Name and location:** [Insert]
 - **Justification for representativeness:** [E.g. "The test facility uses equipment and sorting conditions that correspond to Danish waste streams."]
- **Packaging identification**
 - **Description of the packaging:** [E.g. "Transparent PET bottle with blue lid"]
 - **Components tested:** [E.g. "Bottle and lid tested together and separately"]
 - **Batch/Model Number:** [if applicable]

YOUR NEED FOR DATA

- To ask your supplier for technical documentation on your packaging, it is essential that you **uncover the data needs a material subcategory poses according to the design criteria for the respective category...**

...and what does that mean?

- It is the design criteria that determine what information is relevant to obtain for the technical documentation.
- Knowing the specific requirements for eco modulation means you can obtain the information you need.



DATA NEEDS

| Flexible plastic | |
|---|--|
| Main component | Material type: _____ |
| | Weight: _____ (g) |
| | Weight percentage between PP and PE: _____ (g/pct) |
| | Density: _____ (g/cm3) |
| | Biodegradable plastic: YES ____ NO ____ |
| | Color: No added color ____ Added color without carbon black ____ Added color containing carbon black or not NIR-sortable: _____ |
| Main component and integrated component | Barriers: None ____ Type _____ Weight percent of the entire main component: _____ (g/pct) |
| | By metallization: _____ (µm) |
| | For adhesives for multilayer materials: Weight percentage of total weight of main component: _____ (g/pct) |
| Main component and integrated component | Printing ink for labels and foil decoration: No printing ____ Complies with the current EuPIA list of printing inks ____ YES ____ NO ____ |
| | Recycled content from PCR plastic: Percentage by weight of recycled plastic of total weight of packaging: _____ (g/pct). |



The guide will be available in Mit Retur

THE DOCUMENTATION PROCESS IN PRACTICE

What is going to happen?

1

The declaration of conformity is used as primary documentation - every time

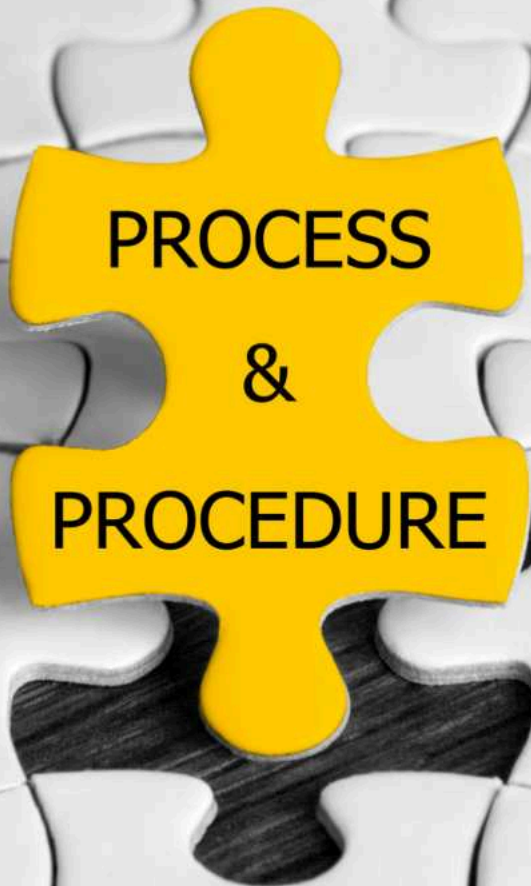
2

Selected companies will be asked for additional documentation annually - with prior notification.

3

The documentation is assessed and any deviations are recorded and dealt with in dialogue.

You will receive a notification with the status of your inspection, including approval of the documentation or instructions for additional documentation, etc.



PROCEDURE FOR OBTAINING ADDITIONAL DOCUMENTATION

- 1** You will receive an email stating that you have been selected for a random check.
- 2** The inquiry will state what you need to provide documentation for, e.g. category
- 3** You will receive a deadline for when the requested documentation must be received.
- 4** The documentation is assessed by professionals in Emballageretur
- 5** In case of deviations or further questions regarding you will be contacted.
- 6** In the event of major deviations or errors, a plan for handling is drawn up in collaboration.
- 7** In case of discrepancies, the competent authority will be involved.
- 8** Upon completion, you will receive a report on the process and results.

SELECTION PROCEDURE

- Identified criteria that are used to determine whether you are selected for a random check

| Criterion | Description | Justification of risk |
|---|---|---|
| Industry | E.g. food and medical devices | Complex packaging that must also comply with other legislation and high variation increases the risk of errors |
| Company size | Based on packaging volume / number of product items | High packaging volume can lead to significant errors, and many product items increase the risk of mistakes |
| Geographical location | Companies established in another EU member state or third country | May affect access to guidance and understanding of regulations |
| Material type | Plastic | The plastic category is divided into subcategories with many design requirements, placing high demands on technical understanding" |
| Historical deviations | Previous misclassifications | Indicates systematic issues |
| Newly registered members | Membership < 12 months | Lack of experience with the system and its requirements |
| Lack of documentation | Not submitted in previous requests | High risk of incorrect categorization of level |
| Changes in packaging or business expansion | Updates without new categorization | Potential misclassification |
| Automation of classification | Use of automated systems for classification | When using unofficial collaborations not formally established with Emballageretur, there is an increased risk that the systems do not contain the correct data points for accurate classification |

WHEN DOES WHAT HAPPEN?



Request for
documentation

Follow-up and
reporting



*Expected yearly procedure

STAY UPDATED!



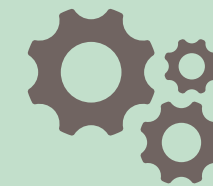
Webinar

Remember to stay updated on coming webinars at:
<https://emballageretur.dk/webinar/>



Knowledge

We are continuously expanding our knowledge platform on producer responsibility both internally and in strong collaborations with external partners.



Tools

To make it easier for you to be compliant with the producer responsibility we continuously share tools on *Mit Retur* at:
<https://emballageretur.dk/>

There are many new and exciting things coming up that we will also share regularly in our newsletter

[**Subscribe Newsletter**](#)

MATERIAL FOR EXTERNAL SUPPLIERS

Producer Responsibility for Packaging in Denmark

EMBALLAGERETUR

WHAT DO YOU NEED TO KNOW AS A FOREIGN SUPPLIER?

? WHAT IS PRODUCER RESPONSIBILITY FOR PACKAGING

Companies that for the first time brings packed products to the Danish market, has the responsibility to handle and pay for the packaging waste.

This applies no matter of the sales method - also by distance selling directly to an end-user.

As a company established outside of Denmark, you can therefore have a producer responsibility in Denmark, if you perform a distance sale to a direct end-user.

✓ YOU HAVE THE PRODUCER RESPONSIBILITY IF:

- ✓ You are established outside Denmark (another EU-memberstate or third country)
- ✓ You sell packed products directly to end-users in Denmark through distance selling
- ✓ The packaging is discarded as waste by the customer in Denmark, irrespective of whether the customer is a private individual or a business entity

WHAT ARE YOU SUPPOSED TO DO IF YOU HAVE A RESPONSIBILITY IN DENMARK?

1 Register in Dansk Producentansvar (DPA)

You must register in DPA and inform your expected packaging quantities and type of packaging.

There is a registration fee on 1000 DKK if you are not already in the register, and a fee on 500 DKK if you are already in the register.

2 Sign a membership in a Producer Responsibility Organisation (PRO)

By law, you are obligated to be part of a PRO if you place single use packaging on the Danish market.

The PRO are obligated to manage and oversee you producer responsibility obligations.

OBS! All companies from the EU must have an Authorized Representative in Denmark. Emballageretur we can assume that role, with no extra fees.

SIGN UP IN EMBALLAGERETUR AND LET US HELP YOU

Emballageretur helps companies operating in Denmark manage your Extended Producer Responsibility for packaging.

We are a non-profit collective scheme based on almost 20 years of experience with handling the Extended Producer Responsibility for our members.

On behalf of our members, we carry out:

- mandatory registrations
- handle your waste responsibly and cost-effectively
- work to ensure that we together reach reuse and recycling targets
- we advise and keep you updated on applicable laws and new regulations

← SIGN UP HERE:

<https://emballage retur.dk/en/signup>

EMBALLAGERETUR

6 THINGS YOU MUST KNOW TO UNDERSTAND YOUR RESPONSIBILITY

1 DISTANCE SELLING - WHAT DOES IT MEAN?

To have producer responsibility in Denmark, you must sell packaged products directly to an end-user (a consumer or a business) in Denmark. The packaging must become waste at the same location as the buyer.

This also means that you may only be responsible for some of your packaging. If your customer resells the products in their original packaging, you are not responsible for that packaging.

2 PACKAGING TYPES COVERED

Your responsibility covers all packaging — including household packaging and commercial packaging.

For household packaging (waste from consumers), you have financial, organisational, and legal responsibility. For commercial packaging, your responsibility is financial only.

3 REPORTING FORMAT

You must report to your PRO the actual quantities of packaging you place on the Danish market, stated in kilograms (kg). If your total is less than 8 tonnes per year, you may choose simplified reporting.

When reporting, you must state:

- whether the packaging is single-use or reusable
- whether the end-user is household or commercial
- whether the packaging should be sorted as general waste (for recycling), residual waste, or hazardous waste

The reporting format includes:

- Flexible plastic, rigid plastic, rigid PET, foam plastic, and food/beverage cartons (eco-modulated in green, yellow, red level)
- Cardboard, paper, ferrous metals, aluminium, and glass (eco-modulated in green and red level)
- Wood, cork, textiles, ceramics, and other (no eco-modulation)

Simple reporting (if less than 8 tonnes/year): report only total amounts, divided by end-user (household or commercial).

4 REPORTING AND PAYMENT FREQUENCY

You will be invoiced by your PRO based on the data you report.

- If you place less than 8 tonnes per year on the market: reporting and invoicing take place quarterly (April 1–15, July 1–15, October 1–15, January 1–15).
- If you place more than 8 tonnes per year: reporting takes place monthly (1–15 of each month).

6 YEARLY REPORTING TO THE DPA

Every year before 1 June, your PRO reports your total packaging quantities from the previous year to the Danish register (DPA).

Between 15 March and 30 April, you must check your data and make any corrections before it is uploaded.

5 ECO-MODULATED FEES - HOW IT WORKS

By law, fees must be eco-modulated to encourage more environmentally friendly packaging.

Soft plastic, rigid plastic, foam plastic, rigid PET, and food/beverage cartons:

- Red level: +35% of operational waste management costs
- Yellow level: Operational waste management costs
- Green level: Operational waste management costs

Paper, cardboard, ferrous metals, glass, and aluminium:

- Red level: +35% of operational waste management costs
- Green level: Operational waste management costs

Note: Reporting at green or yellow level requires proper documentation.

Bonus system:

- Reimbursement: Excess fees from red level are reimbursed once a year.
- Settlement: Based on annual reporting to DPA and done per material category.
- Redistribution: Follows the methodology set by law.

THANK YOU FOR TODAY!

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