

Q&A FROM WEBINAR

AUGUST 26TH 2025

Emballageretur.dk
Skagensgade 39, 2. sal
2630 Taastrup

CVR-nr.: 44502275
Tlf: +45 33 36 91 98
Mail: info@emballageretur.dk

02/09-2025

Definitions of Residual, Hazardous, and Normal Packaging Waste

- **Residual packaging waste:** Packaging that is not sorted for recycling and typically ends up in general waste.
- **Hazardous packaging waste:** Packaging containing hazardous substances, requiring special handling.
- **Normal packaging waste:** Standard packaging waste that can be recycled in the waste stream of the material.

Responsibility for Transport and Sales Packaging

- **Transport packaging (tertiary packaging):** The responsibility lies with the company that **first places the packaging on the Danish market**. If a non-Danish company sells to a Danish retailer, the **non-Danish company is responsible** for the transport packaging, if the transport packaging is discarded as waste in the company that ordered the packed products.
- **Sales packaging:** The **Danish retailer** is responsible for the packaging around the product if further distributed on the Danish market (sold to an end-user).
- **NOTICE** → A company established outside Denmark **can only have the responsibility for packaging** when the following is fulfilled: **the foreign company is performing a distance selling directly to and end-user.**

Industrial Packaging and Waste

Industrial packaging is covered by the extended producer responsibility if it becomes waste in Denmark. It is typically categorized as commercial packaging, and producers must report and manage it accordingly.

Correction of 2024 Reporting and DPA Fees

I am not sure if you will have the chance to correct numbers for 2024 by now. I know that they earlier did some corrections if there were very big mistakes in the reporting. I imagine that they will make corrections in line with actual reporting, but we are not informed about their procedures in any way. Therefore, I will suggest that you contact DPA for answers, as the legislation does not clearly state this.

Annual Confirmation of Quantities – Non-Danish Companies

Non-Danish companies must confirm annual quantities either **directly** or via an **authorized representative** established in Denmark, depending on if they are in another EU-member state or third country. The representative is responsible for ensuring compliance with registration and reporting obligations.

Monthly Reporting – Over 8 Tonnes

Companies placing **more than 8 tonnes of packaging** on the Danish market annually must report **monthly**. Companies under 8 tonnes report **quarterly**.

Advance Payments – Under 8 Tonnes

We have set a limit for advance payment, therefore some companies with very small amounts of packaging have not received an advance payment.