

VANA™

DANSK  
EMBALLAGEANSVAR

A man with a beard, wearing a white hairnet and a green lab coat, stands with his arms crossed in a factory setting. He is surrounded by rows of green plastic crates. The background is a dark green wall with vertical pipes and more crates.

# Guide Reporting of packaging volumes 2024

Version 1.1

## Registration and reporting obligations 2024

From the period 1 April to 31 August 2024, companies covered by the producer responsibility for packaging in Denmark are obliged to:

1. Register company
2. **Report expected available packaging volumes in Denmark in 2024 (this guide)**

Both registration and reporting are done in VANA's Member Portal, after which VANA handles the reporting to Dansk Producentansvar (DPA). The Member Portal opens on March 25.

The reported quantities will form the basis for the allocation of municipalities to the PROs (Producer Responsibility Organisations), which will apply from 1 July 2025. There will be no payment for the quantities in 2024.

Guide to the actual registration of a company can be found on our website, read more [here](#).

In addition to registration and reporting, the company must carry out self-monitoring. Read more [here](#)

**NOTE:** We are awaiting clarifications in relation to, among other things, the requirement to report distance sales to other EU/EEA countries, and therefore there may be updates to the guide.

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### Step-by-step guide to reporting

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## 1. Household or commercial waste

Packaging quantities must be categorised according to whether **you expect** the end-user of the packaged product to be **households** or **businesses**.

This does not mean that you must indicate whether you *sell* to households or businesses, but that you must give your best guess as to whether the packaging *ends up* in household or commercial waste **when the packaging becomes waste**.

For example, a producer responsible company that sells packaged products to a supermarket will most likely have households as end users. A producer responsible company who sells packaged products for use in a production will most likely have commercial as end users.

[Read more about waste treatment of household and commercial waste here.](#)

### Definitions:

End user: The one who turns the packaging into waste.

Household: the packaging ends up as waste in a private household.

Business: the packaging ends up as waste at a company.

## 2. Below 8 tonnes

If your total expected available packaging quantities are less than 8 tonnes, you can choose to report only the quantities by household and commercial and not by material categories.

The 8 tonnes are the **total amount of** available packaging deducted packaging covered by the deposit refund system and reusable packaging, which does not have to be reported until 2025. **NOTE:** Remember that reusable packaging is only packaging which is collected and refilled or recycled in the same form.

### Reporting:

Registration by material category, end user and waste type.

Registration of total quantity distributed by end user (only for under 8.000 kg).

Category	Packaging for households		Packaging for business	
	Forecast amounts	Total	Forecast amounts	Total
Total amounts (only under 8.000 kg.)	--	--	--	--

You can choose voluntarily to report by material categories. Then click in the field *"Registration by material category, end user and waste type"* in the portal and see instructions below.

### 3. Above 8 tonnes – reporting by material categories

Packaging is reported by material categories for general sorting, divided into household and commercial. If packaging is to be sorted as residual or hazardous waste, this must be stated. The quantities must be expressed in kilograms. See section 4 for a review of packaging for general sorting, hazardous and residual waste.

#### Reporting:

Registration by material category, end user and waste type.

Registration of total quantity distributed by end user (only for under 8.000 kg).

Category	Packaging for households				Packaging for business			
	General waste	Residual Waste	Hazardous W..	Total	General waste	Residual Waste	Hazardous W..	Total
Cardboard	--	--	--	--	--	--	--	--
Paper	--	--	--	--	--	--	--	--
Ferrous metals	--	--	--	--	--	--	--	--
Aluminium	--	--	--	--	--	--	--	--
Glass	--	--	--	--	--	--	--	--
Plastics	--	--	--	--	--	--	--	--
Food and drink cartons	--	--	--	--	--	--	--	--
Wood	--	--	--	--	--	--	--	--

If the packaging consists of several materials, which cannot easily be separated, the combined weight must be reported in the material category of which the packaging **mainly** consists of.

In other areas of implementation, the authorities have defined weight as the decisive factor. Until there is a guide, we would therefore recommend that you evaluate "mainly" based on the material that weighs the most in the packaging.

VANA is awaiting guidance and will update this guide continuously.



## 4. Definitions: General sorting packaging, residual waste, and hazardous waste (waste types)

### Packaging for general sorting

The starting point is that all packaging is reported in this category. It is only in cases where a package is designed in such a way that it must be sorted as residual or hazardous waste according to the sorting instructions that it does not have to be reported in the category of ordinary sorting.

Most packaging in this column will therefore probably have to be categorised and divided into the following material categories:

1. cardboard
2. paper
3. ferrous metals
4. aluminium
5. glass
6. plastics
7. food and beverage cartons
8. wood

### Packaging for residual waste

Waste, which is not recyclable, not hazardous, or not subject to another producer responsibility scheme. See the Danish Environmental Protection Agency's sorting guidelines [here](#)

It could e.g. be pizza boxes.

The packaging must be designed to fall into this category. It does not matter what you expect the end user to do with the packaging.

### Packaging for hazardous waste

Substances, materials or products which have reached the end of their life, such as chlorine-containing detergents, paints and aerosols, etc., see the Danish Environmental Protection Agency's sorting guidelines [here](#)

Hazardous waste must not contain products which may present a hazard during collection and treatment e.g. fireworks.

The packaging must be designed to fall into this category. It does not matter what you expect the end user to do with the packaging.

## **5. Distance selling**

Dansk Producentansvar (DPA) requires companies subject to the producer responsibility in other EU/EEA countries to register the country and the authorised representative they use.

This field should only be filled in, in cases where you know for sure that you are subject to the producer responsibility in another country and have an agreement with an authorised representative.

If not, answer no.

## **6. Brand**

Dansk Producentansvar allows companies to fill in under which brand they make packaging available.

This is not a requirement in the legislation and therefore you do not need to fill it in.

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