



Denmark – packaging EPR

Last checked 15 August 2026 **Keeper** Desk open — keeper wanted

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Denmark runs the tidiest register in this set and the least forgiving timetable. You must be registered **fourteen days before** your first Danish shipment, your representative has **seven days** to accept the request before it expires, and collective scheme membership is **compulsory**. Miss a report and you are not fined — you are **inactivated**, and an inactivated producer may no longer legally place products on the Danish market. It is also the one country in our first nine where a **non-EU** seller is treated more lightly than an EU one.

Does it apply to me?

Denmark's packaging producer-responsibility rules expressly cover businesses established in another EU member state **or outside the EU/EEA** that make empty or filled packaging available **directly to end users in Denmark** through distance selling. End users includes **businesses**, not only private consumers — selling B2B into Denmark does not put you outside this.

You ship to Danish consumers, no Danish establishment

Yes. Register with DPA, join a collective scheme, report annually.

You ship only to Danish businesses

Still yes. The Danish rules cover packaging made available directly to private *or* business end users.

You're established elsewhere in the EU or EEA

Caught, and you **must appoint a Danish representative**. See below.

You're established outside the EU/EEA

Caught for registration and scheme membership — but on DPA's own guidance, **no representative is required for packaging**. See [the non-EU exception](#).

You place only reusable packaging

You must still register. Collective-scheme membership is **not** compulsory for reusable packaging — the one carve-out in the Danish system.

You place under 8 tonnes a year

No exemption. You may report a single "Total packaging" figure instead of the full category breakdown, and that is all it gets you.

All the usual materials are in scope: paper, cardboard, plastic, glass, metals, wood, textiles and the other materials listed by DPA.

This desk covers EPR only. Everything below is the **producer** role. If your own name, logo or brand is on the packaging, PPWR also makes you the **manufacturer** of it: a separate set of EU-level conformity duties that took effect on 12 August 2026 and is not country-specific. See [manufacturer or producer?](#)

The non-EU exception

This is the most unusual finding on any of our first nine desks, and we want to state it carefully because it cuts against what almost every compliance vendor will tell you.

Denmark has not extended the representative duty to third-country producers of packaging

DPA's own guidance separates the two cases. A producer established in another **EU or EEA** country that sells directly to Danish end users **must** appoint an authorised representative, across all product areas. A producer established **outside the EU/EEA** is required to appoint one only for **batteries** — not for packaging.

The legal shape of this is Art . 45 (3) of the PPWR. Its **first** sentence imposes the representative duty on producers established in another member state — that is directly applicable and Denmark cannot disapply it. Its **second** sentence is an **option**: a member state *may* extend the duty to producers established in third countries. Germany took that option. France took it in the broadest form we have seen. Denmark, on its own published guidance, has not taken it for packaging.

What this does not do. It removes one duty, not the file. If you are a UK, US or Swiss seller shipping to Denmark you still register with DPA, still join a collective scheme, still report, and still pay. The representative is the only piece that falls away.

Two warnings. First, this is a **national option that can be exercised at any time**, and if Denmark exercises it the duty bites immediately — so re-check before you rely on it for a second year. Second, we have read this off DPA's guidance rather than out of the Danish Packaging Order itself. If you are making a commercial decision on it, that is the document to have someone read.

The representative

For an EU/EEA producer the Danish representative is not a formality — it is a specific legal entity with specific attributes, and the appointment happens **inside the register** rather than on paper.

What it must be

A legal entity **established in Denmark** and registered as an **active** business in the Central Business Register, with a Danish **CVR number**.

What it takes on

Legal responsibility towards the Danish authorities for your registration, reporting and compliance. It may also coordinate scheme membership and the annual report.

Who gets the bill

The representative. DPA invoices **it**, not you — invoices are not sent directly to the foreign company. Worth knowing before you go looking for one.

What it is not

A collective scheme. These are two distinct roles even where one provider sells both, and having a scheme does not give you a representative.

1**1. You create the registration in the DPA register**

The foreign producer starts it — not the representative.

2**2. You select the representative and send the request**

By CVR number, through the register itself.

3**3. It has seven days to accept, digitally**

If it does not, the request **expires** and must be resubmitted — which restarts your lead time. Tell the provider the request is coming and when.

4**4. Only then is the registration active**

The acceptance is what completes it. An unaccepted request is not a registration.

Registering with DPA

The register is run by **Dansk Producentansvar (DPA)**, a non-profit that operates Denmark's national producer register across electronics, batteries, vehicles, packaging and single-use plastics. The supervising authority is the Danish Environmental Protection Agency.

Fourteen days before, not the day before. DPA requires registration **no later than 14 days before** packaging is placed on the Danish market. And registration completes only once the **fee has been paid** and DPA has **issued proof of registration** — so the real lead time is the fourteen days plus payment plus, for an EU producer, the representative's seven-day acceptance window.

Plan on **three weeks** between deciding to sell into Denmark and taking the first Danish order. That is not a cautious estimate; it is the arithmetic of the published steps.

The registration itself asks for your packaging types, materials, end-user categories and **expected quantities for the current year**. The expected figure is an estimate and is fine as one — but it should be an estimate you can defend, because it is the first number DPA has about you.

Scheme membership is compulsory

Denmark does not let you register and then arrange the practical side later. Membership of one or more **registered collective compliance schemes** is **mandatory** for ordinary packaging, and the scheme has to be connected to your registration.

Scheme	Note
Emballageretur	Packaging collective scheme
VANA	Packaging collective scheme
ReturBat	Packaging alongside other EPR services

Check DPA's official list before contracting — the register of schemes changes, and a scheme is only useful to you if DPA currently recognises it. The scheme handles the practical EPR tasks: reporting and either financing or arranging waste management on behalf of its members.

The single exception in the Danish system is **reusable** packaging. Producers of reusable packaging must register, but collective-scheme membership is not compulsory for that packaging.

What it costs

Item	What we have
DPA one-off registration fee	Charged. Registration is not complete until it is paid
DPA annual administration fee	Quantity-based. A published DPA packaging rate we have seen is DKK 74.67 per tonne with a minimum annual fee of DKK 250 — see the caution below
Collective scheme membership	Commercial, varies by provider and quantity
Authorised representative	Not published. Commercial, quoted per provider. Invoiced to the representative, then on to you

Treat the DKK 74.67 / DKK 250 figures as an order of magnitude, not a budget.

They come from a published DPA rate schedule we could not re-confirm on the live fee page, and DPA states that rates are **recalculated annually**. Check the current calculator and fee page before you commit to a number.

For scale: a minimum annual administration fee around DKK 250 is roughly €34. Denmark is not an expensive market to be registered in. It is an unforgiving one to be late in.

The reporting window

What	When
Annual packaging report, in kilograms, for the previous calendar year	Window runs 1 January to 31 May

Note that it is a **window** rather than a single deadline — you can file from 1 January, and there is a good argument for doing it in January while the year is fresh rather than in the last week of May with everyone else.

Under **8 tonnes** a year you may register the quantity as "**Total packaging**" without breaking it down by material category. This is a genuine simplification and worth using — but it is a reporting simplification only. It removes no registration, scheme, fee or representative duty, and DPA describes it as a de minimis *reporting* option, not an exemption.

In the normal arrangement the collective scheme reports on behalf of its members and the representative is responsible for the register obligations. That does not make the numbers someone else's problem — they come from your shipping records either way.

Inactivation

Most member states answer "what happens if I don't" with a fine. Denmark answers it with a switch.

A producer that fails to report is inactivated in the register, and an inactivated producer **may no longer legally place covered products on the Danish market**. If your registration was deactivated, you must **create a new registration** to reapply — the old one is not revived.

Three things follow from that. It is **commercial** rather than financial: the consequence is that you stop selling, which for most small businesses is far more expensive than any realistic fine. It is **visible**: DPA's registers are searchable, so a marketplace or a Danish customer can see the status without asking you. And the recovery path is **a fresh registration** with a fresh fourteen-day lead time, not a phone call.

DPA's own framing of late registration is milder and worth quoting for balance: "the sooner you register, the lower the risk of an inquiry from the supervisory authorities." That is the pre-emptive case. The inactivation rule is the one that applies once you are in and stop filing.

Labelling

Denmark does not require voluntary packaging-material identification codes merely because packaging is placed on the Danish market, although recognised material codes may be used.

What did start on 12 August 2026 is the EU-level information requirement — the identification of the responsible manufacturer or importer and a contact postal address — where your own branding makes you the manufacturer under Art . 15. That is not Danish and it is not optional; see [manufacturer or producer?](#)

The EU harmonised sorting label under Art . 12 (1) applies from **12 August 2028** at the earliest. Do not design for it yet — the implementing acts fix the artwork.

The rules are still settling

Danish packaging EPR is recent. Registration for packaging opened in 2024, and the governing **Packaging Order was remade in autumn 2025**. That is a young system by European standards, and it shows: guidance pages change, the list of registered collective schemes changes, and the fee rates are recalculated every year.

Re-read before you file, don't trust a saved note. This desk included. Denmark is the country in our first nine where a document six months old is most likely to be quietly wrong, and DPA's own pages are short and readable enough that re-checking costs ten minutes.

Known traps

Registering the week you want to ship

Fourteen days minimum, plus payment, plus proof of registration, plus a seven-day acceptance window if you use a representative. Three weeks is the honest planning number.

Letting the seven-day acceptance lapse

The request expires and has to be resubmitted, and your lead time starts again. Warn the representative that it is coming — this is a calendar failure, not a legal one, and it is entirely avoidable.

Assuming a scheme is a representative

Two different roles, even when one company sells you both. A collective scheme does not discharge Art. 45(3) and a representative does not discharge the mandatory membership.

Reading 8 tonnes as an exemption

It is permission to report one total figure instead of a category breakdown. Everything else — registration, scheme, fees, representative — is unchanged.

Thinking B2B keeps you out

Denmark covers packaging made available directly to private *or business* end users. Selling only to Danish companies does not help.

Non-EU sellers assuming they need a representative anyway

This one costs money rather than compliance. On DPA's guidance a third-country packaging producer does not need one. Confirm it for your own case before you buy a service you may not require — and re-check it each year, because it is an option Denmark could still take.

Sources

DPA is both the register operator and the clearest publisher of Danish requirements, so it carries most of this page. Where a claim rests on a rate schedule we could not re-confirm, we have said so in the body text.

- 1 **DPA — producer responsibility for packaging** (<https://producentansvar.dk/en/products-and-responsibility/packaging/>)

Official. Source for the scope covering distance sellers established in another EU member state or outside the EU/EEA selling to private or business end users, for registration no later than 14 days before placing packaging on the market, for mandatory collective-scheme membership, for the under-8-tonne "Total packaging" de minimis reporting option, and for the materials in scope

- 2** **DPA — authorised representative** (<https://producentansvar.dk/en/products-and-responsibility/organising-your-producer-responsibility/authorised-representative/>)

Official. Source for the requirement that EU/EEA producers appoint a representative across all product areas, for the statement that producers established outside the EU/EEA need one **only for batteries**, for the Danish establishment and active CVR requirement, for the in-register request and the seven-day digital acceptance window, for expiry and resubmission, for the need to create a new registration after deactivation, and for DPA invoicing the representative rather than the foreign company

- 3** **DPA — search the registers** (<https://producentansvar.dk/en/search-dpa-registers/>)

Official. The public register search. How a marketplace or customer checks your status, and how you check a representative's

- 4** **Danish Environmental Protection Agency (Miljøstyrelsen)** (<https://mst.dk/>)

Official. The supervisory authority, and the publisher of the Danish Packaging Order — Order No. 1146 of 29 September 2025

- 5** **Regulation (EU) 2025/40 (PPWR) — EUR-Lex** (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040)

Read in full, 14 August 2026. Source for Art. 3(1)(15)(c)–(d) on the distance-selling producer, Art. 44(2) and 44(4) on registration, Art. 44(3) on delegated registration, Art. 44(8) on the 10-tonne reporting threshold, **Art. 45(3) first and second sentences** — the distinction the non-EU exception turns on — and Art. 12(1) on the 2028 harmonised label

- 6** **European Commission — PPWR Frequently Asked Questions, 2nd edition** (https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en)

DG ENV Unit B01, August 2026 (KH-01-26-068-EN-N). Read in full

- 7** **European Commission — PPWR guidance (Commission Notice), 30 March 2026** (https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en)

The guidance document, distinct from the FAQ above. **Not read in full by us**



An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.