



Import/Eksport
J.nr. 2024 - 40579
Den 20. september 2024

New Danish legislation regarding corporate structure of Danish incineration and recovery facilities

The Danish Government has enacted new national legislation regarding recovery facilities in Denmark, which will enter into force on January 1, 2025. As a result of this new legislation, any recovery facilities involving municipal participation in Denmark will be required to adopt a new corporate structure. Consequently, some recovery facilities may undergo changes to their names and Danish CVR number (equivalent to VAT numbers).

In light of these changes, The Danish Environmental Protection Agency has issued guidance concerning the potential impacts on shipments of waste to and from the Danish recovery facilities.

In this regard, The Danish Environmental Protection Agency has emphasized that it is the responsibility of each notifier to ensure that all notifications are amended accordingly and that any notifications that have not yet been completed are updated to reflect the new requirements.

Given the upcoming legislative changes, we anticipate a significant number of amendment requests in accordance with article 17 in the regulation no 1013/2006 on shipments of waste, particularly in November and December and possibly at the beginning of January.

The Danish Environmental Protection Agency has initiated a series of guidance measures to ensure that the amendment request include relevant documentation, allowing these requests to be processed with minimal delay.

Furthermore, The Danish Environmental Protection Agency is establishing a “fast track” procedure for these specific amendments and expect to approve all amendments that are solely due to changes in the facility’s name and/or CVR number.

The Danish Environmental Protection Agency generally finds that a change of name and/or CVR number for parties specified in Annex 1A does not require a new notification, provided that no other changes are made. Furthermore, it is a

condition that a declaration is submitted confirming that the new legal entity, has assumed all rights and obligations of the originally designated legal entity.

In order to best guide the affected parties, it would be helpful for the Danish Environmental Protection Agency if you could provide feedback on whether you consider it immediately feasible to accept a modification of a notification, if the change is solely due to a change in the facility's name and/or CVR number, or whether, in your assessment, this would require a new notification.

If you have any questions regarding this matter, please do not hesitate to contact us.

Best regards,

The Danish Environmental Protection Agency
Waste & Data
impeksp@mst.dk