

# Understanding Extended Producer Responsibility in Finland: A Guide for Distance Sellers

Distance sellers are **required by law** to manage the waste generated by products placed on the Finnish market. It is crucial to understand this legal obligation known as Extended Producer Responsibility, or **EPR**. This guidance explains the concept and how to comply with existing and upcoming legislation.

#### What is EPR?

- EPR in Finland is based on EU-wide legislation called the Waste Framework Directive and subsequent product-specific legislation.
- In short, EPR means that businesses are jointly responsible for organising waste management for products placed on the Finnish market.
- The responsibility applies to both physical and online retailers and is not restricted to sellers within the EU. This includes distance sellers on online shops or platforms anywhere in the world. Both B2C and B2B sales are included.
- Products included in EPR in Finland are packaging, electrical and electronic equipment, batteries and accumulators, single use plastics products, fishing gear containing plastic, vehicles, paper and paper products\* and tyres\*. In the future, EPR in the EU will also apply to textiles and shoes, pharmaceutical products and cosmetics (legislation underway).
- This means that EPR applies e.g. to all packaged products being sold to Finland. There
  is no minimum limit of sales.

## Who is responsible for EPR?

- The responsible party for EPR is the one placing the product on the Finnish market.
- Distance seller: as a distance seller, you are responsible for products sold to end-users, whether it's through your own online shop or through an online platform. An end-user is a consumer or a business that uses the product for their own use.
- **Finnish business customer:** If a Finnish business customer acts as an importer or uses the product as a component, the business is responsible for EPR.
- Dropshipping and other sales models: The responsibility usually rests with the contractual partner of the consumer or business. Sometimes it is not directly clear who is responsible. In these cases, it is best to contact the <a href="National EPR Authority">National EPR Authority</a> for guidance.

#### How is EPR enforced?

 EPR Legislation is enforced by the Finnish EPR Authority. Enforcement of distance selling is done in collaboration with EPR authorities in other countries. Failure to comply with legislation may result in sanctions.

\*National EPR schemes in Finland. Other product groups listed are EU-wide: you can expect similar responsibilities in other EU countries.



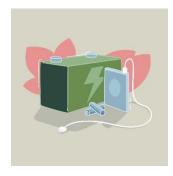
Checklist: Is your company responsible for EPR in Finland?	Responsible?
Selling products directly to a private consumer	✓
Selling to a Finnish company for the company's own use	✓
Selling to a Finnish importer	×
Selling through a Finnish subsidiary	×
Selling components to a Finnish manufacturer	×

## How do I manage EPR?

- Managing EPR in Finland is straightforward. The easiest way to comply is to join a <u>producer organisation</u> (PRO) or to appoint an **authorised representative** (legal entity based in Finland) to join one on your behalf.
- The PRO will take care of all responsibilities (such as collecting and recycling of waste) on your behalf. You will report the amount of products placed on the Finnish market to the PRO.
- Different product groups have different PROs. Often it is necessary to join more than one.
   For example, when selling a laptop, you must join PROs for electrical and electronic equipment, batteries and packaging.
- For certain product groups, appointing an authorised representative is mandatory for distance sellers based in the EU. These product groups include electrical and electronic equipment, single-use plastics and fishing gear containing plastic. From August 2025 on, an authorised representative will become mandatory for batteries and accumulators, and in the future the same is expected for packaging and textiles.

## Selling products containing batteries through an online platform? Take note:

A significant deadline is approaching in August 2025. According to the **EU Battery Regulation**, the online platform provider is required to verify that businesses selling on the platform have fulfilled their Extended Producer Responsibility in all EU countries. **The provider is required to exclude noncompliant sellers from their platform.** 



A similar approach is likely to be taken in the upcoming EU packaging regulation and textile EPR. **Now is the perfect time to sort out your responsibilities!** 

## Where do I find more information?

- For a quick overview, watch an animation
- For more information, visit www.producerresponsibility.fi
- For practical advice, contact a producer organisation
- For general questions, contact the EPR Authority at tuottajavastuu@ely-keskus.fi

## Coming up! Free Webinar for distance sellers

## Distance selling: Navigating Extended Producer Responsibility in Finland

Time: September 10<sup>th</sup>, 2024 at 14.30-15.45 (UTC+3)

Sign up here!

## **Agenda**

## 14.30 Opening Words

Eini Lemmelä, Senior Specialist, Ministry of the Environment

## 14.40 Sustainable Business in Finland

Kari Luoto, Managing Director, Finnish Commerce Federation

## 14.50 How to Manage Extended Producer Responsibility in Finland

Tiina Vermaete, Senior Officer, Centre for Economic Development, Transport and the Environment (EPR Authority)

## 15.10 Producer Organisations and Joining a PRO in Finland

Olli Alanen, Chairman, Advisory Board for Finnish PROs

### 15.35 Discussion

## 15.45 Webinar ends



