



Centre for Economic Development,  
Transport and the Environment

# How to Manage Extended Producer Responsibility in Finland

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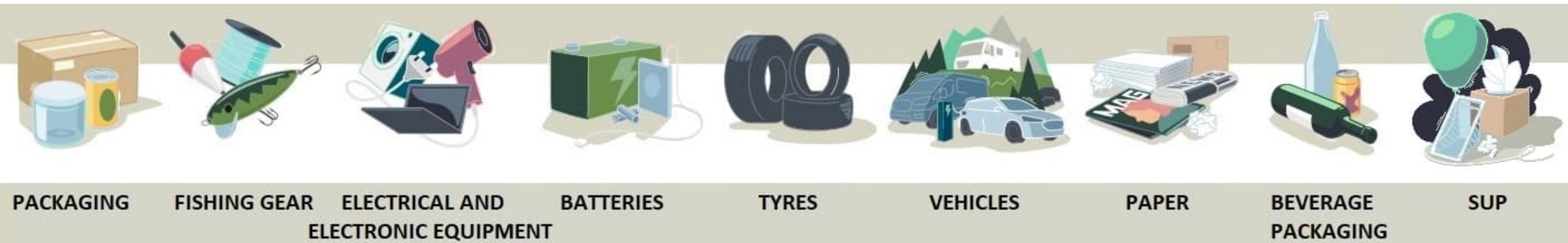
# What is EPR

- Legal obligation in the Finnish Waste Act
- EPR means that a business is responsible for organising the waste management of the products it places on the Finnish market.
- The responsibility applies also to distance sellers everywhere in the world
- Managing EPR is an important part of business compliance.



# EPR Product Groups

- EPR in Finland applies to packaging, electrical and electronic equipment, batteries, tyres, vehicles, paper and paper products, single use plastics and fishing gear containing plastic.
- There is no minimum limit of sales
- This means that EPR applies e.g. to all packaged products being sold to Finnish end users.
- EPR applies to B2C and B2B sales.



# Who is a Distance Seller?

- A distance seller is an operator who is based outside of Finland and sells products that fall under EPR **directly to Finnish end users** via distance selling
  - The seller and buyer are not physically present simultaneously
  - A distance seller isn't necessarily the original manufacturer
- EPR applies to distance sellers whether you sell through your own website or through an online platform.
- Excluded: distance sellers not acting on professional basis (not in the VAT register)



# 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 company which uses them to manufacture a new product | ✗            |

Rule of thumb: the responsible party for EPR is the one placing the product on the Finnish market

# How to Manage EPR

- EPR for each product group has to be managed separately (more details [here](#))

## Options:

- Joining a producer organisation (PRO). The PRO takes care of all EPR obligations on your behalf. Once you join a PRO, you are automatically in the producer register.
- Appointing an Authorised Representative (AR) to join a PRO on your behalf. Mandatory AR for:
  - Electrical and electronic equipment (EU)
  - SUP products (EU)
  - Fishing gear containing plastic (EU)
  - Batteries (From August 2025)



# What does an Authorised Representative (AR) do?

- An AR manages EPR on behalf of a foreign business (distance seller) and **assumes all the relevant producer responsibility obligations** on its behalf, including:
  - Waste management (collection, transport, handling, costs) by **joining a producer organisation**
  - Reporting of monitoring data
  - All payments related to EPR
- The AR is legally responsible for EPR and can be subject to coercive measures and penalties in accordance with Finnish legislation.
- The AR must be a natural or legal person established in Finland

# How to Choose an AR?

- The producer may choose an AR freely
- Many service companies of PROs act as ARs in Finland
- Some ARs can provide services for multiple product groups
- Guidance Document for Authorised Representative can be found on our [website](#)



# Product Groups and Options for Managing EPR

| Product Group            | Join a PRO | Appoint an AR | Remarks  |
|--------------------------|------------|---------------|--|
| EEE                      |            | x             | Sellers outside of the EU may join a PRO directly  |
| Batteries                | x          | x             | Mandatory AR for sellers worldwide from 17 <sup>th</sup> August 2025   |
| Packaging                | x          | x             | No turnover limit after 1.1.2024   |
| ELV                      | x          | x             |  |
| Paper and paper products | x          | x             |  |
| Tyres                    | x          | x             |  |
| SUP                      |            | x             | Comes into force 2023-2025, e.g. balloons, wet wipes, cups for beverages. Sellers outside of the EU may join a PRO directly    |
| Fishing gear             |            | x             | Comes into force 1.1.2025. Sellers outside of the EU may join a PRO directly   |
| Tobacco products         |            | x             | Sellers outside of the EU may join a PRO directly  |
| Beverage packaging       | x          | x             | No need to join a PRO or appoint and AR if you join a <b>deposit and return scheme</b> - more information <a href="#">here</a> |

# Example of Practical Steps

- Product: headphones
- Practical steps for managing EPR:
  - ✓ **WEEE** ➡ Appoint an Authorised Representative if the seller is based in the EU. If the seller is based outside of the EU, join a PRO or appoint an AR
  - ✓ **Batteries** ➡ Join a PRO or appoint an AR. From August 2025, an AR is obligatory for all distance sellers
  - ✓ **Packaging** ➡ Join a PRO or appoint an AR
- How to find contact information? Go to our [website](#)



# Terms of Membership Between PRO and Distance Seller

- According to the Finnish Waste Act the terms and conditions applied to new producers must be fair and equal in comparison with the terms and conditions applied to other producers in the PRO.
- This means that the PRO must ensure that the contract terms are the same for every producer, and the producer itself cannot present its own special conditions for joining.



# Enforcement of EPR

- EPR Legislation is enforced by the Finnish EPR Authority, Pirkanmaa Centre for Economic Development, Transport and the Environment (ELY Centre)
- Enforcement of distance selling is done in collaboration with EPR authorities in other countries.
- Failure to comply with legislation may result in sanctions
- [Whistleblowing form](#) for companies neglecting EPR in Finland



# What Do Online Platform Operators Need To Know About EPR?

- Vendors on online platforms carry the full responsibility for EPR for their products.
- An online platform provider may **voluntarily** handle EPR on behalf of a seller
- When selling *own products* to Finnish end-users, a platform operator is responsible for EPR as a distance seller.
- New obligations for online platform providers are coming



# New Obligations for Online Platforms

- The EU Battery Regulation includes a ban on placing on the market if the vendor is not registered in the national EPR register.
- From August 2025 on, the online platform provider is **required to verify** that businesses selling on the platform have fulfilled their EPR obligations (entry to national registers will be given).
  - You can already check compliance from the [Producer Register](#) (currently only in Finnish and Swedish)
- 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.
- How to proceed? Stay up to date on legislative changes and inform vendors on your platform!



# More Upcoming EPR Legislation

- Textiles in 2026
- Cosmetics and pharmaceutical products in 2027-2028



# More Information

- For a quick overview, watch an [animation](#)
- For more information, visit [www.producerresponsibility.fi](http://www.producerresponsibility.fi)
- Check [EPR product groups and PROs](#)
- [Guidance for distance sellers](#)
- [Guidance for online platform providers](#)

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# Thank you!

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