



Finland – packaging EPR

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

Status ● Draft, not yet peer-checked

THE SHORT VERSION

Finland is mechanically straightforward and legally awkward. Straightforward, because you sign one contract with **Rinki**, pay a minimum of **€74** a year, and report once. Awkward, because Finnish national guidance still describes the representative as a **choice** for packaging while Art. 45(3) — directly applicable since 12 August 2026 — does not. Three other things bite: **no minimum sales limit**, **B2B counts**, and the deadline is **31 January**.

Does it apply to me?

Finland's **Waste Act 646/2011** places producer responsibility on packers, importers and **foreign distance sellers** that supply packaged products directly to users in Finland. The Finnish authority is unusually direct about the consequences of that, and about what does *not* get you out of it.

You ship to Finnish consumers, no Finnish establishment

Yes. Contract a producer organisation through Rinki, appoint a representative, report by 31 January.

You ship only to Finnish businesses

Still yes. Finnish producer responsibility covers packaged products sold to users in Finland, **whether consumers or businesses**. B2B is not a way out here.

You only sell a little

No help. Official guidance states there is **no minimum sales limit** — packaging EPR applies to all packaged products sold to Finland. The 50,000 kg figure you may have seen is a [reporting](#) simplification.

You're established elsewhere in the EU

Caught. [Art. 45\(3\)](#) first sentence applies with no threshold.

You're established outside the EU

Assume caught. Whether Finland took the third-country option in [Art. 45\(3\)](#) second sentence is **not published** as far as we can find.

You ship to the Åland Islands

A different system entirely. See [below](#) — check this before anything else.

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?](#)

Åland is not Finland

Check this first, not last. The **Åland Islands** operate their own producer-responsibility system. Everything on this page is **mainland Finland**. Shipments to Åland have to be checked separately.

It is an easy thing to miss because Åland is inside Finland for almost every other purpose you deal with — same country in your shipping software, same currency, Finnish postcodes. For packaging EPR it is a separate jurisdiction with a separate scheme.

The practical move is to look at your Finnish order history and check whether any of it went to Åland postcodes. For most small sellers the answer is none, and the question is then closed. For the ones where it is not, better to find out now than in a reconciliation.

The representative, and the gap

Finland is the clearest example in our first nine desks of national practice lagging behind a directly applicable EU rule, and we want to lay out both positions rather than pick the convenient one.

Product	Finnish national position
Electrical and electronic equipment	Representative compulsory for a distance seller
Single-use plastic products	Representative compulsory
Batteries	Representative compulsory for all distance sellers , EU and non-EU, since 17 August 2025
Packaging	Historically a choice : join a producer organisation directly, <i>or</i> appoint a Finnish representative

That last row is the gap. Under Finland's pre-PPWR rules an ordinary foreign packaging distance seller could comply either way, and Rinki's own onboarding reflects that — a distance seller joins on **Contract B**, with no Finnish representative demanded as a precondition.

Art. 45(3) does not offer a choice

The PPWR is a **regulation**: directly applicable in every member state without national transposition. From 12 August 2026 a producer not established in Finland that sells by distance contract to Finnish end users **shall** appoint an EPR authorised representative established in Finland. There is no threshold and no election. Where a national page still describes the matter as open, it is describing the position before that date.

The Finnish authority's own current framing is telling: for packaging, companies can "currently choose either way", but they "should verify in their target markets whether practices are changing with PPWR". That is an authority signalling movement rather than asserting the old position.

Our reading: appoint one. The cost of a representative you did not strictly need is a fee. The cost of not having one where it was owed is a market. If you disagree, do it with advice rather than on the strength of a page that has not been updated — and tell us, because we would genuinely like to know how Finnish enforcement treats this.

Rinki and Contract B

Finland has a national producer register supervised by the Finnish EPR authority — since 2026 the national permit and supervision agency, previously the Pirkanmaa ELY Centre. But for packaging,

individual registration is the exceptional route and is not practical for a small foreign seller.

The normal route is a producer-responsibility contract with **Finnish Packaging Producers Ltd**, administered through **Finnish Packaging Recycling RINKI Ltd**. Rinki handles customer registration, contracts, declarations and invoicing. The producer organisation organises recycling for paper and carton, plastic, metal, glass and wood packaging.

1

1. Confirm you are not shipping to Åland

Or handle that separately. Everything else assumes mainland Finland.

2

2. Appoint a representative established in Finland

Owed under Art . 45 (3) from 12 August 2026, whatever the national page still says. Cover registration, organisation membership, reporting, fees and communication with the authority in the written mandate.

3

3. Sign Contract B and send it to Rinki

The distance-seller contract, returned to info@rinkiin.fi. Rinki confirms by email once it is registered and the contract's application starts.

4

4. Report through the Rinki Extranet

Once a year for a small producer, by 31 January. Registration with the authority follows from the contract — you do not file separately.

A second packaging producer organisation, **Sumi Oy**, also operates. Rinki is the route the official guidance describes for distance sellers, and the one everything published is written around.

What it costs

Item	2026 price	Note
Registration fee	€0	There is no registration fee
Business service fee	€0.00199 / kg	Minimum €74, maximum €3,890 per contract per year, excl. VAT

Item	2026 price	Note
Recycling fee — consumer paper-fibre	€0.102 / kg	Light declaration form rates
Recycling fee — consumer plastic	€0.238 / kg	
Recycling fee — consumer metal	€0.030 / kg	
Recycling fee — consumer glass	€0.076 / kg	
Recycling fee — consumer wood	€0.0021 / kg	
Authorised representative	Not published	Commercial, quoted per provider

The €74 minimum is where almost every small seller lands: at €0.00199/kg you would need to place around 37 tonnes of packaging before the variable fee overtakes the floor. So budget €74 plus the recycling fees on your actual materials, plus whatever the representative asks.

The material rates are worth reading rather than skimming, because the spread is wide: plastic costs more than **twice** paper-fibre per kilogram and over a hundred times wood. In Finland, more than in most of these markets, switching a void filler changes the bill.

All three levels of packaging

Sales, grouped and transport packaging. Finnish producer responsibility covers all three. A distance seller reports all packaging that ends up directly with users in Finland.

This is the most common way to under-report in Finland. A seller weighs the retail box and forgets the outer carton, the tape, the void fill and any grouping — which for a typical parcel is a substantial share of the total weight, and often the majority of the **plastic**, which is the expensive material.

Do the weighing once, properly, on a representative parcel of each type you ship, and keep the working. It takes an afternoon and it is the number everything else in Finland is calculated from.

31 January

Producer size	Route	Frequency
Under 50,000 kg a year	Light declaration form	Once a year
Larger producers	Full declaration	Annual or quarterly, by choice

Data is submitted through the **Rinki Extranet**. The deadline for 2026 packaging data is **31 January 2027**.

One of the earliest deadlines in the Union. Most member states run to spring or summer — Denmark to 31 May, Estonia to 31 March, the EU Art . 44 (7) backstop to 1 June. Finland wants it on 31 January, while you are still closing the previous year's books.
Set the reminder for December.

The 50,000 kg figure is a **reporting simplification, not an exemption**. It does not remove registration, the producer-organisation contract, the fees or the representative — it lets you use a shorter form. Quantities must cover packaging remaining on the Finnish market and be separated by material and, where required, by consumer or business packaging.

Deposit packaging is separate

Finland runs a mandatory **deposit** system for beverage packaging. Deposit beverage packaging is handled through that system and is **not reported to Rinki** — declaring it in your Rinki return would be wrong in both directions.

Certain single-use plastic products also carry their own EU marking and fee rules, separate from packaging EPR. If either applies to what you sell, treat this page as the floor rather than the answer.

Labelling

No Finland-only recycling logo applies to ordinary e-commerce packaging. Deposit beverage packaging has its own marking requirements as part of that system.

The EU harmonised sorting label under Art . 12 (1) applies from **12 August 2028** at the earliest, or 24 months after the implementing acts, whichever is later, with the reusable-packaging label under Art . 12 (2) following on 12 February 2029. The artwork will be fixed by those acts — do not design for either yet.

If you don't

We do not have a verified Finnish maximum fine and will not invent one. Two enforcement features are worth knowing about instead.

First, the Finnish EPR authority **cooperates with customs and with EPR authorities in other member states**. Cross-border information sharing is part of how Finland finds non-participating distance sellers, which makes "they'll never notice a small foreign shop" a weaker assumption here than elsewhere.

Second, and more immediately, **late declarations can trigger additional fees from the producer organisation** — a contractual consequence that arrives long before any administrative one.

And underneath, Art. 44(4): until you are registered you may not make packaging available on the Finnish market at all.

Known traps

Missing 31 January

It is months earlier than most of Europe and lands in the middle of year-end. A compliance calendar built around a spring deadline will miss it every single year.

Reading 50,000 kg as an exemption

It is the threshold for the light declaration form. Finland states expressly that there is **no minimum sales limit** for packaging producer responsibility.

Weighing only the retail packaging

Sales, grouped and transport packaging all count. The outer carton and the void fill are usually where the plastic is — the expensive material.

Assuming B2B is outside it

Finnish producer responsibility covers packaged products sold to users in Finland, consumers or businesses alike.

Forgetting Åland

Separate producer-responsibility system. Same country in your shipping software, different jurisdiction for this.

Taking "you can choose" from the national page as the current answer

That was the pre-PPWR position for packaging. Art. 45(3) is directly applicable and does not offer a choice. The Finnish page itself now tells you to check whether practice is changing.

Reporting deposit beverage packaging to Rinki

It belongs to the deposit system. Putting it in the Rinki return is a double-count in one place and a gap in another.

Sources

Finnish legislation and the EPR authority establish the obligations. Rinki is used for the practical route, the deadlines and the published 2026 price list, because it administers the contract — useful, and not a neutral source.

- 1** **Waste Act 646/2011 — Finlex** (<https://www.finlex.fi/fi/laki/ajantasa/2011/20110646>)
The national statute placing producer responsibility on packers, importers and foreign distance sellers supplying packaged products directly to users in Finland

 - 2** **Finnish EPR authority — producer responsibility** (<https://elinvoimakeskus.fi/web/tuottajavastuu>)
Official. The national producer register and supervision, since 2026 under the national permit and supervision agency, previously the Pirkanmaa ELY Centre. Source for the representative being compulsory for distance sellers of electrical and electronic equipment and single-use plastic products, for batteries since 17 August 2025, for packaging having been a choice under national rules, and for the authority's advice to verify whether practice is changing with the PPWR

 - 3** **Rinki — companies' producer responsibility** (<https://rinkiin.fi/en/producer-responsibility/>)
Scheme source. Source for the producer-responsibility contract with Finnish Packaging Producers Ltd, for Contract B as the distance-seller route returned to info@rinkiin.fi, for coverage of sales, grouped and transport packaging, for the absence of a minimum sales limit, and for Åland operating a separate system

 - 4** **Rinki — reporting packaging data** (<https://rinkiin.fi/en/producer-responsibility/reporting-packaging-data/>)
Scheme source for reporting through the Rinki Extranet, for the light declaration form below 50,000 kg reported once a year, for larger producers choosing annual or quarterly reporting, and for 2026 packaging data being due by **31 January 2027**

 - 5** **Rinki — price lists** (<https://rinkiin.fi/en/producer-responsibility/price-lists/>)
Scheme source for the 2026 figures: no registration fee, a business service fee of €0.00199/kg with a minimum of €74 and a maximum of €3,890 per contract per year excl. VAT, and the light-declaration consumer recycling rates of €0.102/kg paper-fibre, €0.238/kg plastic, €0.030/kg metal, €0.076/kg glass and €0.0021/kg wood
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6 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(8) on the 10-tonne reporting threshold, Art. 45(3) on the representative and Art. 12(1)–(2) on the 2028 and 2029 labels

7 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

8 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.