



Initiative: Call for evidence for an evaluation - Ares(2025)11556597

Rules on single-use plastics and fishing gear (evaluation)

Statement from the Advisory Board for Finnish PROs

Statement on the Call for Evidence for an Evaluation of Rules on single-use plastics and fishing gear (Ares(2025)11556597)

The Need for Harmonized SUP Producer Responsibility Systems in the EU

The use of Producer Responsibility Organizations (PROs) offers a practical and cost-effective way to implement the extended producer responsibility (EPR) requirements set out in EU SUP directive. However, the current patchwork of national systems—where some Member States lack PROs altogether and others have incomplete or inconsistent frameworks—creates significant competitive imbalances.

Companies that comply with their obligations and invest in sustainable waste management are placed at a disadvantage compared to those operating in member states where jurisdictions are weaker or systems non-existent. This not only undermines the environmental goals of the directives but also distorts the EU internal market, penalizing responsible businesses.

To ensure fair competition and effective implementation of EPR across the EU, it is essential to:

- **Harmonize PRO systems across Member** states to guarantee consistent coverage and standards.
- **Close existing gaps** by supporting Member States in establishing robust and transparent PRO frameworks.
- **Monitor and enforce compliance** to prevent free-riding and ensure fair competition.

The EU must take decisive action to align national systems and uphold the principles of the single market.

The Urgent Need for Predictable SUP Producer Responsibility Fees

The current system of producer responsibility fees in Finland poses a significant challenge for businesses due to its lack of predictability. Fees are calculated retroactively, with results finalized only after lengthy delays. This approach leads to substantial annual fluctuations, undermining companies' ability to forecast costs, plan budgets, and maintain financial transparency.

The Finnish Government proposed concrete simplifications to EU legislation, as to reduce administrative burdens on businesses and boost EU competitiveness ahead of the March European Council. We support the proposals put forward by the Finnish Government regarding repealing the producer's cost responsibility for waste collection. We support the proposed PRO obligation to cover the costs arising from the awareness raising measures to reduce litter instead.



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To create a fair and efficient system, it is crucial to:

- **Repeal the producer's cost responsibility for waste collection** and to narrow the scope to cover the costs arising from the awareness raising measures to reduce litter instead.
- **Introduce forward-looking fee calculations** to provide businesses with timely and reliable cost estimates.
- **Reduce processing delays** to ensure fees are communicated and applied without unnecessary uncertainty.
- **Enhance transparency** in the fee-setting process to build trust and enable better financial planning.

Challenges of Distance Selling and Foreign Online Retail in Finland's SUP Implementation

A significant share of single-use plastic (SUP) products placed on the Finnish market comes from foreign online retailers. Distance selling and foreign e-commerce pose a major challenge for Finnish companies. Without effective enforcement and a requirement for foreign producers to appoint an authorized representative, producer responsibility is not implemented on equally. This results in:

- **Competitive disadvantages** for Finnish producers
- **Gaps in cost coverage** for waste management
- **Weaker environmental governance** and compliance

Clear definition of Product Categories and Producer Responsibility at EU Level

The definitions in the directive have proven to be open to interpretation, particularly in two product categories: Fishing gear and filters for tobacco products. A clear definition of the product group helps identify which companies are obligated to fulfill their producer responsibility. We need a clear, EU-level guideline for product categories.

For detailed product group-specific comments, we kindly refer to the position statement by the Finnish SUP Producer Community (Suomen SUP-Tuottajayhteisö Oy).

Producer responsibility is the superpower of the circular economy

Producer responsibility is the superpower of the circular economy and a crucial part of security of supply. Each year, Finnish producer responsibility systems channel over 1,2 million tonnes of materials into reuse, recycling, and recovery, directly supporting Finland's circular economy. Securing the collection and utilisation of valuable materials is vital for national security of supply, ensuring both the availability of critical raw materials and the smooth operation of waste management.



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Advisory Board for Finnish PROs (in Finnish: Tuottajayhteisöjen neuvottelukunta TYNK) is a cooperation network of producer responsibility organizations (PROs) operating in Finland. We use our joint expertise to enable the efficient implementation of producer responsibility in Finland. highlights three fundamental pillars of producer responsibility that make circular economy real:

- 1. Producer Responsibility as a Proven Driver of Circular Economy** Producer responsibility covers a wide range of products, including electrical and electronic equipment, batteries and accumulators, vehicles, tyres, packaging, and paper products. Most obligations are fulfilled through producer compliance schemes, which have established tens of thousands of collection points across Finland. These systems are closely monitored and ensure that waste is only delivered to licensed, compliant recycling facilities. It is essential to safeguard the operation of these collection and recovery chains, especially during societal disruptions.
- 2. Effective Implementation and Enforcement of Legislation** While producer responsibility has been in place for years, not all of the more than 50,000 Finnish companies and foreign distance sellers subject to these obligations are registered or fulfilling their responsibilities. Robust legislation and effective enforcement tools are needed to combat free riding. Reducing free-riding is crucial to ensure fair cost-sharing in waste management.
- 3. Producers' Primary Right to Organise Waste Management and Functional Markets for Recycled Materials** Producers must retain the primary right to organise the waste management of their products. High-value waste attracts illegal activity, so it is important to empower responsible companies to manage their own waste streams and ensure proper treatment. To advance the circular economy, we need long-term incentives to replace virgin materials with recycled ones and to strengthen markets for secondary raw materials. Well-functioning circular economy markets enhance security of supply and reduce dependence on global supply chains, securing access to essential materials even in exceptional circumstances.