



PPWR-webinar

Changes to packaging producer responsibility

29 September, 9.30-11.00

Featured in the webinar



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Welcome to the PPWR webinar!

- Today, we will focus specifically on the **latest PPWR guidelines and key changes from the perspective of packaging producer responsibility**. We will also look at how these changes affect packaging data reporting.
- Webinar content:
 - **Jenni Lahtinen** – Welcome and practical information
 - **Anne-Mari Kulju** – PPWR: key changes and updates to pending guidelines
 - **Anders Lundin** – PPWR and packaging data reporting
 - **Anne-Mari Kulju** – Pre-submitted questions
 - **Sumi experts** – Q&A session
- Pre-submitted questions will be answered after the presentation.
- **During the Q&A session, participants can use their microphones and the webinar chat to ask questions. The chat will be closed during the presentation.**

PPWR – Packaging and Packaging Waste Regulation

The PPWR (Packaging and Packaging Waste Regulation) is a European Union regulation aimed at reducing packaging waste, improving recyclability of packaging, and promoting the circular economy across the EU. The Regulation introduces stricter and harmonised obligations for all market operators in the coming years.

As an EU regulation, the PPWR has entered into force directly in all EU Member States and takes precedence over national packaging legislation.

PPWR application timeline

The Regulation starts to apply

12.8.2026

- EPR responsibility for transport and branded packaging will shift from one economic operator to another.
- Tea bags and coffee capsules will fall within the scope of EPR and reporting.
- Distance sellers within the EU must appoint an Authorized Representative.
- Heavy metals will be prohibited in all packaging, and PFAS compounds will be restricted in food contact packaging.
- A Declaration of Conformity for packaging will be required regarding the above-mentioned substances and compounds, including type, batch, and serial number information enabling the identification of the manufacturer.

1.1.2028

- Packaging placed on the market from this date onwards must be reported using the new reporting method.
- The threshold for light declaration reporting will drop to 10,000 kg of packaging placed on the market annually

Draft implementing regulation with the Commission, followed by an 18-month transition period for the new reporting requirements – new reporting categories postponed until 2029

12.2.2028

- Sales packaging must be designed to be as minimal as possible, and transport packaging may contain a maximum of 50% empty space.
- Tea bags and coffee pods must be biodegradable.
- Obligation to offer customers takeaway food and beverages in reusable containers begins.

12.8.2028

- Pictograms into use; packaging and waste bins must display labels indicating the packaging material to clarify sorting.

12.2.2029

- Reusable packaging must be marked indicating its reusability.
- Calculation of recycled plastic content will be required.
- The list of products prohibited under SUP Directive will be expanded to include: XPS (extruded polystyrene) food and beverage containers and cups, polystyrene chips, and plastic rings in multipack beverage containers.

1.1.2030

- Packaging must be reported in recyclability classes A–C. Packaging falling outside these classes may no longer be placed on the market.
- A mandatory minimum share of recycled plastic content will be introduced.
- Reuse targets will be established for transport, grouped, and beverage packaging.
- Several single-use packaging formats will be prohibited.

1.1.2038

- Packaging must meet recyclability criteria corresponding to classes A or B (minimum 80%). Class C packaging may no longer be placed on the market.

PPWR – Responsibilities from 12 August 2026

Producer – Company subject to producer responsibility

- Determined on a country-by-country basis
- Is either a Manufacturer, Importer or Distributor that first makes packaging or a packaged product available in the Member State where it becomes waste.
- **The Producer must:**
 - register with a producer responsibility organization
 - report packaging volumes placed on the market
 - pay recycling fees for packaging in accordance with extended producer responsibility (EPR) obligations

These are not necessarily the same economic operator. One economic operator may also have several roles depending on the supply chain

Manufacturer – Legal responsibility for compliance

- Only one Manufacturer in the EU for each packaging type
- A Manufacturer is a natural or legal person that **manufactures or has packaging or a packaged product manufactured.**
- The Manufacturer is not necessarily the economic operator that physically manufactures the packaging.
- **The Manufacturer must demonstrate that the packaging meets the applicable requirements by preparing:**
 - Technical documentation
 - EU Declaration of Conformity (EU DoC)

PPWR – Producer responsibility

Since the previous PPWR webinar held in May, the Commission has updated its FAQ document and the Finnish Supervisory Agency (LVV) has issued official guidelines and interpretations. The materials for this webinar have been updated accordingly.

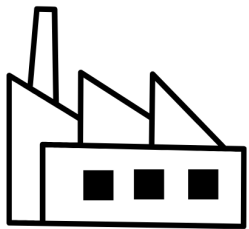
Producer responsible in Finland from 12 August 2026

- **1. A Manufacturer, Importer or Distributor established in Finland that first makes available in Finland** transport packaging, service packaging, primary production packaging, or a product packaged in packaging other than those mentioned above.
- **2. Distance seller. A Manufacturer, Importer or Distributor established in a country other than Finland that first makes available to an End User in Finland** transport packaging, service packaging, primary production packaging, or a product packaged in packaging other than those mentioned above.
- **3. A Manufacturer, Importer or Distributor established in Finland that unpacks a packaged product** without being the End User, if none of the definitions in the previous points apply.

Until 11 August 2026, the company subject to producer responsibility was the packer, importer of a packaged product, distance seller, or packaging manufacturer (primary production and service packaging).

PPWR – Economic operators

- Of the economic operator roles defined in PPWR, the clearest in terms of producer responsibility are **Importer** and **Distance Seller**. In cross-border trade, a company in either of these roles is subject to producer responsibility for all packaging in the shipment.



Supplier

- manufactures/supplies packaging or packaging material to another company.

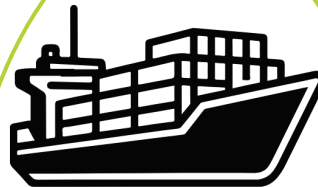
packaging
manufacturer



Manufacturer

- manufactures or has packaging or a packaged product manufactured and is responsible for compliance of the packaging.

brand owner



Importer

- imports packaging or a packaged product from another EU country or from outside the EU to the Finnish market.

Finnish importer



Distributor

- makes packaging or a packaged product available further along the supply chain.

wholesaler



Distance Seller

- sells a packaged product directly to an End User in another EU country.

online store



End User

- a consumer or company that uses the product and does not make it available again in the same form.

restaurant, factory or
consumer

Distance selling to end users

- Under PPWR, an End User can be either a consumer or a company.
- A company is an End User when it uses the purchased product in its own operations and does not sell or otherwise make the product available on the market in the form in which it received it. For example, an industrial company that uses purchased raw material in its own production is an End User.
- Producer responsibility for Distance Sellers in other countries is not a new requirement introduced by PPWR.

- **Distance Selling and Authorised Representative**

For distance selling within the EU, the Producer must appoint an Authorised Representative in each Member State where it sells packaged products directly to End Users. The Authorised Representative must be established in that Member State.

- Example in the image: **Company Ltd. sells its products online directly to End Users in Finland, Sweden, Norway and Denmark.**
 - Company Ltd. is subject to producer responsibility.
 - It must join the producer responsibility system in each country where it sells its products.
 - The reporting obligation covers both transport packaging and the packaging of products inside the transport packaging.



Imports into Finland

- From Finland's perspective, purchases from both within and outside the EU are considered imports, even though the official PPWR term for an operator purchasing from within the EU is Distributor.
- According to the Finnish Supervisory Agency (LVV), an Importer/Distributor established in Finland is subject to producer responsibility for all packaging in the shipment.
- Note! Producer responsibility for Importers also applies to micro-enterprises.
- Example in the image:
Company Ltd. orders products for resale in its stores from suppliers in Asia and Italy.
 - As the Importer, Company Ltd. is subject to producer responsibility and reporting obligations for all packaging in both shipments, including transport packaging.

Note! If a Finnish company is the End User of the product, the foreign company selling the product is considered a Distance Seller and is subject to producer responsibility for the packaging in Finland.



**PPWR – Branded and transport packaging where
producer responsibility may have transferred
from one Finnish operator to another
from 12 August 2026**

PPWR – Economic operators

- In domestic trade, the definitions of Supplier, Manufacturer, Importer, Distributor, Distance Seller and End User are used to identify the company subject to producer responsibility. This way, the correct operator can be identified even in a long supply chain.

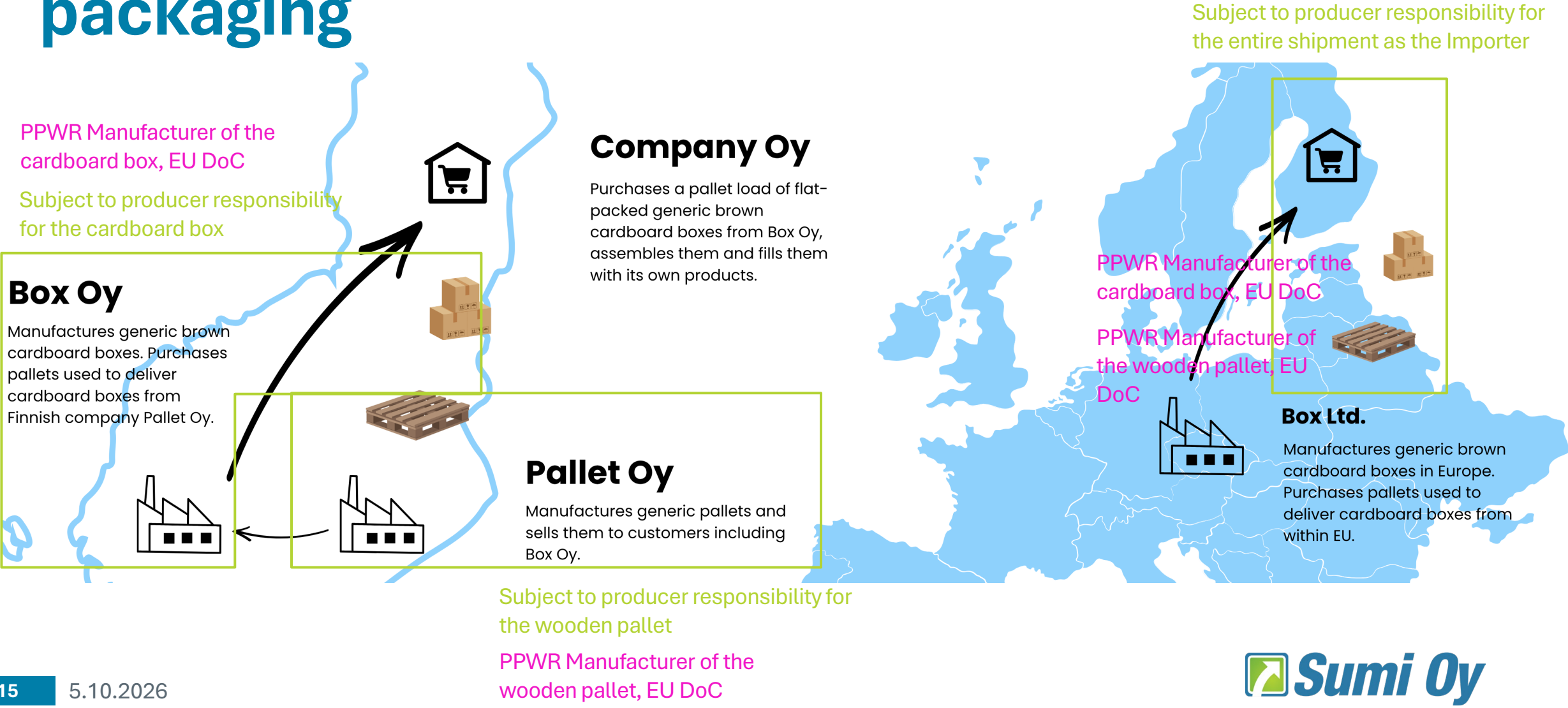


Transport packaging

- Transport packaging is intended to facilitate the handling and transportation of sales units. It is used to protect, store and transport products.
- **Transport packaging is typically removed in an industrial or commercial environment before the product reaches the End User.**
- Examples of transport packaging:
 - cardboard boxes and containers
 - pallets
 - plastic transport crates
 - stretch wrap and protective film
 - **Note! Delivery packaging used in e-commerce**
- **For transport packaging, service packaging and primary production packaging, the Manufacturer is the company that physically manufactures the transport or service packaging, unless the packaging is clearly branded with the name or trademark of its user.**

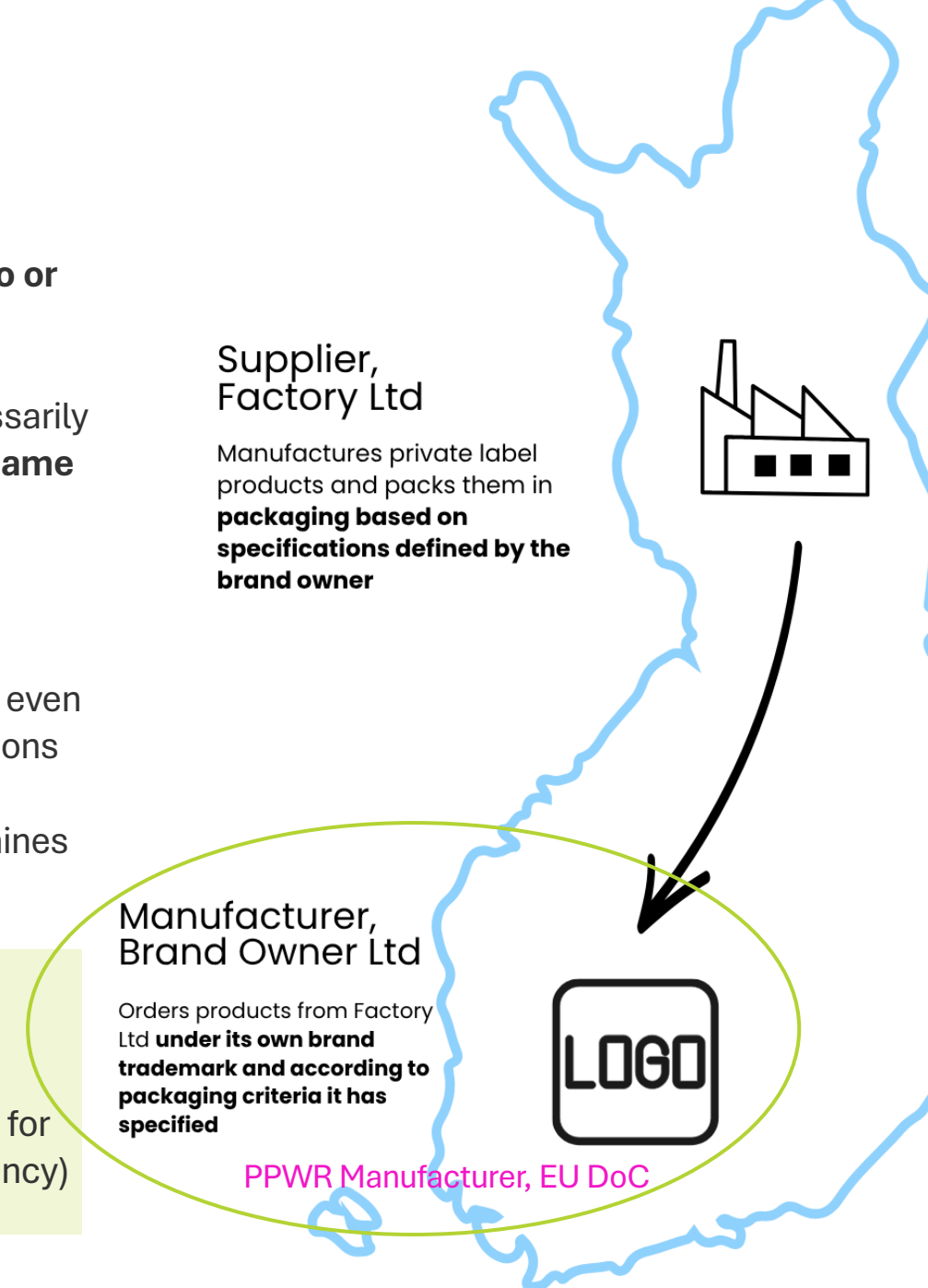


Producer responsibility for generic transport packaging



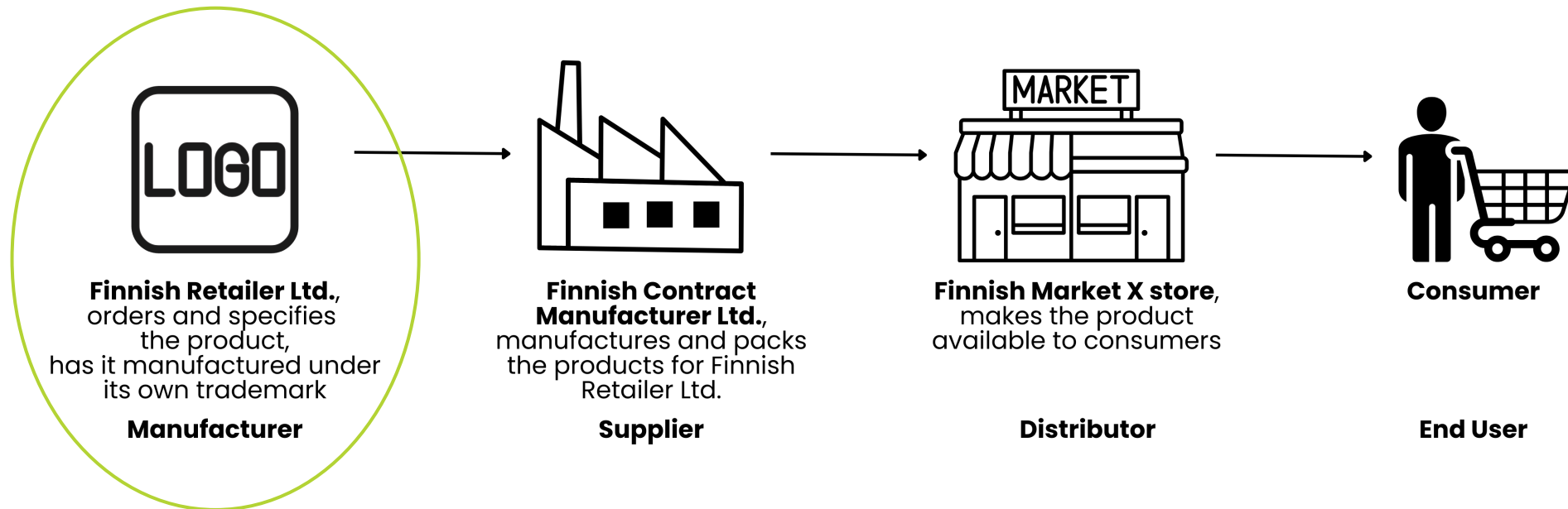
Branded packaging

- Branded packaging refers to **any packaging displaying a company name, logo or trademark**.
- For branded packaging, the Manufacturer as defined under PPWR is not necessarily the physical manufacturer of the packaging, but **the company under whose name or trademark the packaging or packaged product has been designed or manufactured**.
- Updated according to the Commission's FAQ document 08/2026:
 - **Custom-made packaging:** The customer is considered the Manufacturer even for generic packaging if the packaging is custom-made to specific dimensions and the customer determines the design specifications of the packaging.
 - **Multiple brands on packaging:** The Manufacturer is the party that determines the design and characteristics of the packaging.
- **For sales packaging and grouped packaging**, the Manufacturer is:
 - the brand owner (or licence)
 - for generic packaging, generally the company that packs the product
 - Note! Producer responsibility for generic sales or grouped packaging used for branded products also lies with the brand owner (Finnish Supervisory Agency)



Producer responsibility for branded packaging

- **Domestic trade:** When a Finnish company has a packaged product manufactured under its own name or trademark by a Finnish contract manufacturer, it is considered the Manufacturer under PPWR. According to Finnish authority guidelines, the brand owner is then generally also subject to producer responsibility.

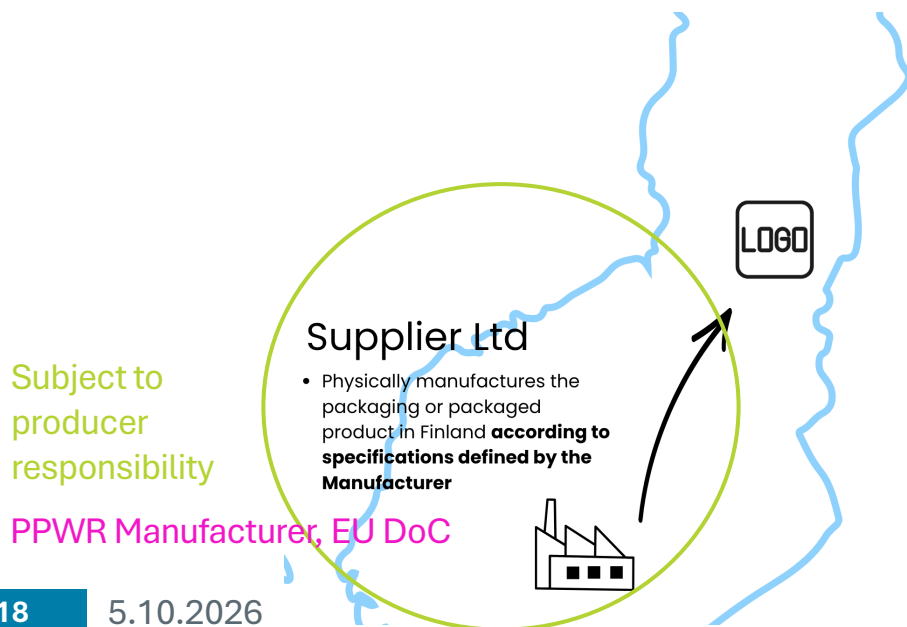


Subject to producer responsibility

PPWR Manufacturer, EU DoC

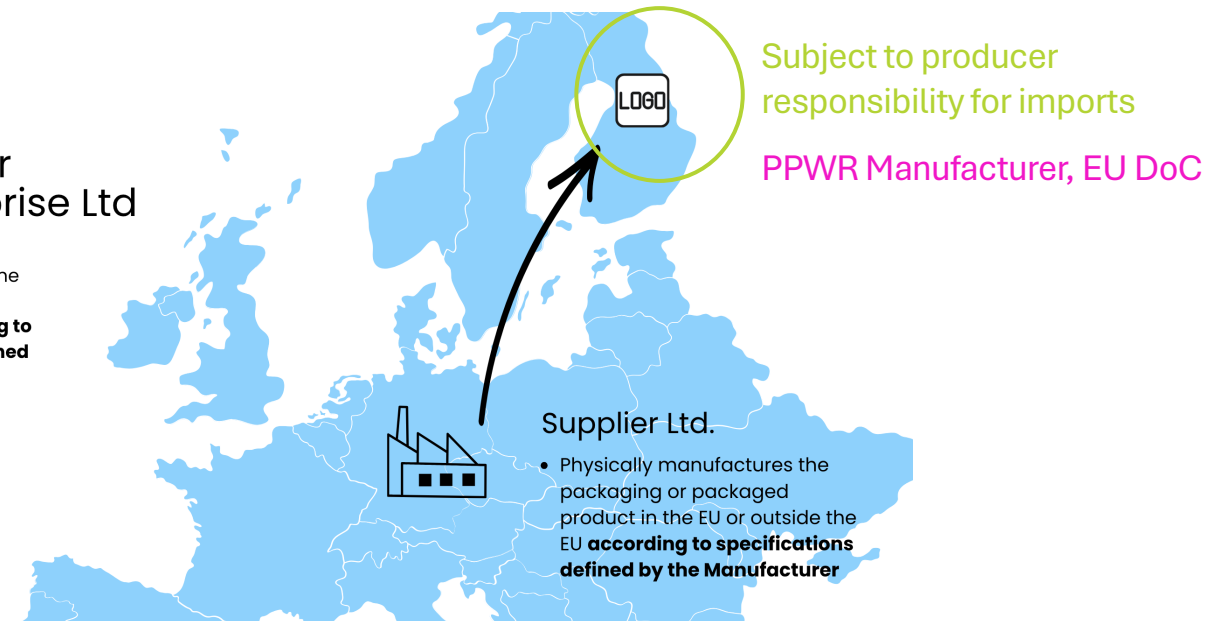
Micro-enterprise exemption

- Under PPWR, a micro-enterprise is a company that employs fewer than 10 people and has an annual turnover or annual balance sheet total of no more than EUR 2 million. The employee criterion and at least one of the financial criteria must be met
- The micro-enterprise exemption applies to the definition of Manufacturer for branded packaging in domestic trade: when a micro-enterprise has packaging or a packaged product manufactured under its own brand and the packaging Supplier is established in the same Member State, **the Supplier is considered the Manufacturer under PPWR**. This affects both the party responsible for packaging compliance and the determination of producer responsibility in Finland.
- Micro-enterprise Ltd has packaging or a packaged product manufactured under its own brand by a Finnish Supplier. Supplier Ltd is then considered the Manufacturer and is subject to producer responsibility for the packaging or packaged products. If Supplier Ltd is also a micro-enterprise, responsibility remains with the Supplier.



Manufacturer Micro-enterprise Ltd

- Orders the packaging or packaged product from the Supplier **under its own trademark and according to specifications it has defined**



Packaging types – Producer responsibility checklist

Sales and grouped packaging



1. The Importer is subject to producer responsibility
- In domestic trade:**
 1. If branded, the brand owner is subject to producer responsibility for both sales and grouped packaging, except in the case of the micro-enterprise
 2. If generic, the company that packs the product is subject to producer responsibility

Service and primary production packaging



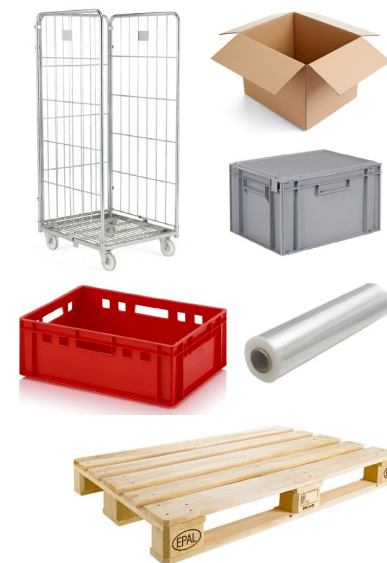
1. The Importer is subject to producer responsibility
- In domestic trade:**
 1. If branded, the brand owner is subject to producer responsibility, except in the case of the micro-enterprise
 2. If generic, the actual manufacturer is subject to producer responsibility

Transport packaging

1. The Importer is subject to producer responsibility
2. For e-commerce shipments abroad, the sender is subject to producer responsibility (reported in the country of destination)
- In domestic trade:**
 1. If branded, the brand owner is subject to producer responsibility, except in the case of the micro-enterprise
 2. If generic, the actual manufacturer of the pallet, transport crate or cardboard box is subject to producer responsibility

For transport packaging, reuse must also be taken into account: the actual manufacturer reports the first use, for which a recycling fee is charged.

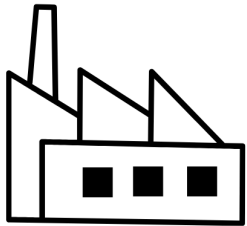
Other users report subsequent reuse, for which no recycling fee is charged, but which is important for statistical purposes.



PPWR – Manufacturer's legal responsibility

PPWR – Economic operators

- The PPWR Manufacturer is the company legally responsible for the compliance of the **packaging**. The Manufacturer may be the physical manufacturer of the packaging or packaged product **or a company that has it manufactured under its own name or trademark**.



Supplier

- manufactures/supplies packaging or packaging material to another company.

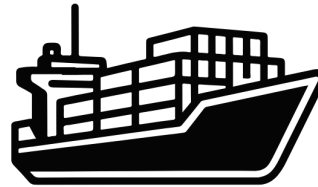
packaging
manufacturer



Manufacturer

- manufactures or has packaging or a packaged product manufactured and is responsible for compliance of the packaging.

brand owner



Importer

- imports packaging or a packaged product from another EU country or from outside the EU to the Finnish market.

Finnish importer



Distributor

- makes packaging or a packaged product available further along the supply chain.

wholesaler



Distance Seller

- sells a packaged product directly to an End User in another EU country.

online store



End User

- a consumer or company that uses the product and does not make it available again in the same form.

restaurant, factory or
consumer

Packaging compliance

- **The PPWR Manufacturer** must demonstrate that the packaging meets the applicable requirements by preparing technical documentation and an EU Declaration of Conformity (EU DoC).
- **During the transition period (from 12 August 2026), the declaration in practice covers PPWR Article 5: restricted substances**
 - Heavy metal limits (lead, cadmium, mercury, hexavalent chromium)
 - PFAS restrictions in food contact materials
- Packaging recyclability and minimization requirements already stem from the Packaging Directive. During the PPWR transition period, compliance with these requirements is demonstrated in accordance with the current requirements and standards.
 - Minimization requirements and the related harmonised standard EN 13428:2004
 - Valid until the end of 2029
- The new PPWR requirements on recyclability and minimization will apply at a later stage.



Packaging compliance

Article	Current requirement	What this means in practice
5 – Substances in packaging	YES	The combined concentration limit for heavy metals (Pb, Cd, Hg, Cr VI) is 100 mg/kg. In addition, PFAS restrictions for food contact packaging have applied since 12 August 2026.
6 – Recyclability	YES, but under the transitional arrangements	All packaging placed on the market must be recyclable. However, the actual PPWR Design for Recycling criteria do not yet apply. During the transition period, assessment is based on the current requirements and harmonised standards.
7 – Minimum recycled content in plastic packaging	NOT yet	The PPWR minimum recycled content requirements will apply from 1 January 2030 at the earliest.
8 – Bio-based feedstock in plastic packaging	NO requirement	At present, the Article mainly requires the Commission to examine the matter. The Commission's review is due by 12 February 2028.
9 – Compostable packaging	NOT yet	Compostability requirements for certain tea and coffee bags and similar packaging, as well as fruit and vegetable stickers, will apply by 12 February 2028.
10 – Packaging minimization	YES, but under the transitional arrangements	The PPWR minimization requirement will apply from 1 January 2030. The current essential requirements under the Packaging Directive and EN 13428:2004 continue to apply during the transition period.
11 – Reusable packaging	YES	If packaging is considered reusable under PPWR, it must meet the criteria set out in Article 11. The rules apply to reusable packaging placed on the market after 11 February 2025. Compliance must be demonstrated in the technical documentation.
12 – Labelling and claims	Partially	The new harmonised material composition/sorting label is not yet mandatory. It will apply from 12 August 2028 or 24 months after the implementing acts enter into force, whichever is later.
14 – Environmental claims	YES	If a claim is made about an environmental property regulated by PPWR relating to recyclability, recycled content or reusability, it must exceed the PPWR minimum requirements. Compliance must be demonstrated in the technical documentation.

Technical documentation:

- Technical documentation is **more detailed than the EU DoC** and is used by the Supplier/Manufacturer to **demonstrate** that the packaging meets the applicable PPWR requirements.

- Technical documentation does not mean just one specific form.** Annex VII of the PPWR specifies **what the documentation must contain**, but in practice, a company can structure it as it sees fit and include:

- required supplier documentation
- test reports
- calculations
- other evidence



- Technical documentation provides the supporting information for the EU DoC.

- Note! Questions concerning technical documentation should be directed to Tukes, the authority responsible for market surveillance of packaging compliance under PPWR.**

TECHNICAL DOCUMENTATION – EXAMPLE

PPWR (EU) 2025/40, Annex VII

Fictitious example prepared for training purposes

Packaging	1 L liquid carton packaging with tethered plastic cap
Packaging type / identifier	NK-1000-01
Version	2.1
Manufacturer	Esimerkki Oy
Date	25.9.2026

1. Description and intended use of the packaging

1 L single-use consumer packaging for a liquid food product. The packaging consists of a liquid packaging board body, polymer layers, and a plastic neck and tethered cap.

2. Structure and materials

Packaging component	Material	Weight*
Body	Paperboard	xx g
Coating / barrier layers	PE / other polymer layers	xx g
Neck and cap	Plastic	xx g
Total		xx g

*Weights are fictitious example data.

3. Applicable requirements

- PPWR Art. 5 – substances present in packaging
- PPWR Art. 6 – recyclability
- PPWR Art. 10 – packaging minimisation
- PPWR Art. 12 – applicable packaging labelling
- SUP Directive – requirement concerning tethered plastic caps

4. Conformity assessment

The conformity of the packaging has been assessed against the applicable requirements, standards and technical specifications. The assessment has used information and declarations provided by material suppliers, structural and composition data for the packaging, and the necessary tests and assessments.

Risks of non-conformity have been identified and assessed. Changes to the packaging or its materials are assessed before a new version is placed on the market.

5. Annexes to the technical documentation

- Annex 1: Packaging structure and material specification
- Annex 2: Substance and composition information from material suppliers
- Annex 3: Declarations / test results concerning restricted substances
- Annex 4: Recyclability assessment
- Annex 5: Packaging minimisation assessment
- Annex 6: Test report / documentation demonstrating conformity of the tethered cap
- Annex 7: Applied standards and technical specifications
- Annex 8: Assessment of risks of non-conformity

On the basis of the technical documentation, the manufacturer assesses the conformity of the packaging. Once conformity has been demonstrated, the manufacturer draws up an EU Declaration of Conformity (EU DoC) for the packaging.

NOTE. This is a fictitious example of the structure of technical documentation prepared for training purposes. The PPWR does not require the use of this template. The content of the technical documentation depends on the packaging and the requirements applicable to it.

EU DoC



- **The EU DoC is based on technical documentation.** The EU DoC is the **Manufacturer's declaration** that the packaging has been demonstrated to meet the applicable PPWR requirements.
- **The Manufacturer prepares an EU DoC for each packaging type.** A packaging type could, for example, be the liquid packaging board package with an attached plastic cap used in this example. A single EU DoC can cover different sizes of the same packaging type, provided that the characteristics of the packaging do not change.
- **The EU DoC must follow a specific format.**
A template is provided in Annex VIII of the PPWR.
 - It identifies the packaging, Manufacturer, applicable EU legislation, and standards or other technical specifications used
 - It is updated when necessary
- **The packaging and its EU DoC must be clearly linked.** The packaging must bear a type, batch or serial number, or another unique identifier that links it to the EU DoC.
- **The EU DoC must be provided to the authorities upon request.** It does not normally need to accompany each individual package.
- **Retention period from the date the packaging is placed on the market:**
single-use packaging: **5 years**
reusable packaging: **10 years**

- **Note! Questions concerning the EU DoC should be directed to Tukes, the authority responsible for market surveillance of packaging compliance under PPWR.**

EU DECLARATION OF CONFORMITY – EXAMPLE

PPWR (EU) 2025/40, Annex VIII

Fictitious example prepared for training purposes

1. No. of the EU Declaration of Conformity

EU-DOC-NK-1000-01-2026-01

2. Unique identification of the packaging

NK-1000-01, versio 2.1

3. Name and address of the manufacturer

Esimerkki Oy
Example Street 1
00100 Helsinki, Finland

4. Manufacturer's responsibility

This EU Declaration of Conformity is issued under the sole responsibility of the manufacturer.

5. Object of the declaration

1 L single-use liquid carton packaging for a liquid food product. The packaging consists of a liquid packaging board body, polymer layers, and a plastic neck and tethered cap. Packaging identifier: NK-1000-01, version 2.1.

6. Relevant Union legislation

The object of the declaration complies with the applicable requirements of Regulation (EU) 2025/40 of the European Parliament and of the Council on packaging and packaging waste.

Other applicable Union legislation requiring an EU Declaration of Conformity: [complete where applicable].

7. Applied standards and other technical specifications

[List the harmonised standards, common specifications and/or other technical specifications, including their versions, used in the conformity assessment of the packaging.]

8. Notified body

Not applicable / [complete where applicable if a notified body has been involved in the conformity assessment].

9. Additional information

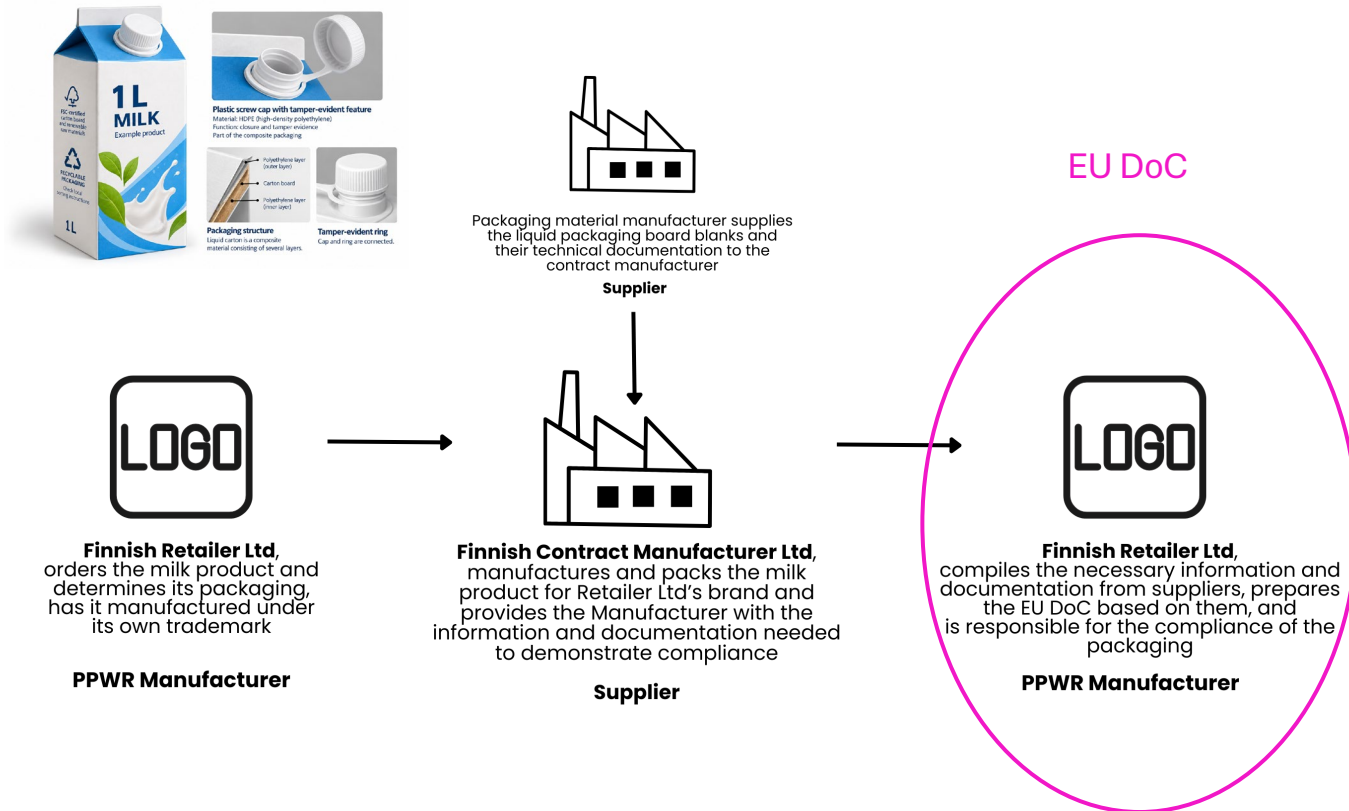
The conformity of the packaging is demonstrated in the manufacturer's technical documentation TD-NK-1000-01, version 2.1.

Signed for and on behalf of the manufacturer	Esimerkki Oy
Place and date	Helsinki, 25 September 2026
Name and function	Maija Mallikas, Packaging Compliance Manager
Signature	_____

NOTE. This is a fictitious example prepared for webinar and training purposes. It illustrates the structure of an EU Declaration of Conformity in accordance with Annex VIII to the PPWR. In an actual EU DoC, the information, applicable legislation, standards and other technical specifications must be completed on the basis of the actual conformity assessment of the packaging.

Technical documentation, EU DoC and the supply chain – who prepares the documents?

- **Example in the image:**
Finnish Retailer Ltd has milk packed in a 1-litre liquid packaging board package under its own brand by Finnish Contract Manufacturer Ltd.
- Suppliers of liquid packaging board blanks, plastic caps and other packaging materials provide the technical information, declarations and test results for their components to the contract manufacturer that packs the milk and/or to the brand owner.
- **Finnish brand owner – PPWR Manufacturer**
 - uses the technical information and test results provided by suppliers and compiles them into a technical document that serves as a kind of “cover sheet” for the supporting documentation.
 - assesses compliance
 - prepares the EU DoC, declaring that the packaging complies with the applicable requirements
 - bears legal responsibility



PPWR – Impact on packaging data reporting

Packaging data reporting in practice

- PPWR defines who is subject to producer responsibility and the relevant packaging types, which determine **who** reports and **which packaging** must be reported.
- Packaging data itself must be reported by material.
- In Finland, producers are divided into small and large producers based on the amount of packaging they place on the market each year. The threshold is 50,000 kg per year.
 - Small producers (under 50,000 kg) may use the light reporting method and pay recycling fees according to the light reporting rates
 - Large producers use detailed eco-modulation reporting and the corresponding fee rates
- Note! Sumi customers report their packaging data in SumiOn, while SPT customers report their data in Rinki's Extranet. Both systems require the same information, but they look and work differently.

Packaging data – Light reporting

- When using the light reporting method, the following information is needed:
 - whether the packaging is consumer or business packaging
 - the main material**
 - if parts made of different materials can be easily separated, they are reported separately by material
 - the total weight of the material in kilograms for the reporting period** (month, quarter or year)



Suminen chocolate bar example / Import



- Material: Plastic packaging**
- Consumer packaging (ends up with the consumer):** 600 kg



- Material: Fibre packaging**
- Business packaging (box unpacked at the store):** 1000 kg



- Material: Wooden packaging**
- Business packaging:** 2000 kg
 - (reported upon import or first use; reuse is not reported under the light reporting method)

The screenshot shows the Sumion web application interface. On the left is a dark blue sidebar with the Sumion logo and navigation links: Summary, All reports, Products, Organizations, and Users. The main content area is divided into two sections: 'Consumer packaging' and 'B2B packaging'. Each section has a table with 'Materials' and 'Total weight (kg)'. In the 'Consumer packaging' section, 'Plastic packaging' is highlighted with a green background and shows a value of 600 kg. In the 'B2B packaging' section, 'Paper fibre packaging' is highlighted with a green background and shows a value of 1000 kg, and 'Wood packaging' is also highlighted with a green background and shows a value of 2000 kg. Three large green arrows point from the example boxes on the left to the corresponding entries in the Sumion interface: from the chocolate bar to 'Plastic packaging', from the cardboard box to 'Paper fibre packaging', and from the wooden pallet to 'Wood packaging'.

Consumer packaging ⓘ	
Materials	Total weight (kg)
Paper fibre packaging	0
Plastic packaging	600 kg
Metal packaging	0
Glass packaging	0
Wood packaging	0
Other packaging	0

Empty cups sold to the end consumer	
Materials	Total weight (kg)
Empty paper cups, paper	0
Empty paper cups, plastic	0

B2B packaging ⓘ	
Materials	Total weight (kg)
Paper fibre packaging	1000 kg
Plastic packaging	0
Metal packaging	0
Glass packaging	0
Wood packaging	2000 kg
Other packaging	0

Packaging data – Detailed reporting

- With the detailed reporting method, each material is reported under its corresponding material tab
- For each package, you need to know:
 - Is it **consumer or business packaging**
 - Is it **single-use or reusable**
 - Was it **packed in Finland or imported**
 - **The eco-modulation category of the main material**
 - secondary materials in packaging made of multiple materials
 - **The total weight in kilograms for the reporting period** (month, quarter or year)
- Only packaging designed for reuse can be reported as reusable, such as EUR/FIN pallets, bread and meat crates, and roll containers.
 - The first use is reported, for example, when a Finnish pallet manufacturer places a new pallet on the market for the first time
 - All subsequent uses are reported as reuse

Sumion

Sumi test 2

Summary
All reports
Products
Organizations
Users

Logout

Paper fibre **Plastic** Metal Glass Wood Other Empty paper cups, paper Empty paper cups, plastic

Consumer packaging 1

Single material 1

Single use packaging 1

Reusable packaging 1

Packaged in Finland Imported packages First usage Imported packages Reuse

Mono-plastic packaging
Multi-plastic packaging
Single-material combination packaging
Biodegradable plastic packaging
Single-material PVC-/PVDC-packaging
Conventional shopping bags
Conventional small bags
Biodegradable shopping bags
Biodegradable small bags

Containing multiple materials 1

Single use packaging

Reusable packaging

Packaged in Finland Imported packages First usage Imported packages Reuse

Multi-material PVC-/PVDC-packaging

[Add secondary material](#)

Save as draft

Next material

Move to SUP reporting

Reporting branded packaging – What changes?

- Under PPWR, the operator with producer responsibility for branded packaging changed on 12 August 2026.

Operators that had producer responsibility until 11 August 2026:

- Companies that pack products in packaging branded with another company's name or trademark
- Companies that manufacture branded service packaging or primary production packaging

→ If any of the above applies to your company, report branded packaging placed on the market until 11 August 2026.

Operators with producer responsibility from 12 August 2026:

- Companies that have packaging manufactured or designed under their own name or trademark
- Companies that order custom-made packaging

→ If any of the above applies to your company, report branded packaging placed on the market from 12 August 2026 onwards.

Reporting transport packaging – What changes?

- Under PPWR, the operator with producer responsibility for transport packaging changed on 12 August 2026.

Operators that had producer responsibility until 11 August 2026:

- Companies that pack products in transport packaging

→ If the above applies to your company, report transport packaging placed on the market until 11 August 2026.

Note on imports: The Importer reports both branded and unbranded transport packaging that comes with imported products, unless the Importer itself is the End User. Imported empty transport packaging has been the Importer's responsibility since 12 August 2026.

Operators with producer responsibility from 12 August 2026:

- Branded transport packaging: companies whose name or trademark appears on the packaging
- Unbranded transport packaging: companies that manufacture or import generic transport packaging

→ If any of the above applies to your company, report transport packaging placed on the market from 12 August 2026 onwards.

New packaging subject to reporting – Tea bags and coffee capsules

- From 12 August 2026, tea bags and coffee capsules must also be included in producer responsibility reporting.
- **Tea bags are reported as:**
 - Consumer packaging
 - Single-use
 - According to main material
 - Paper-based tea bags – Fibre packaging
 - Mesh and pyramid bags (nylon, PET, PLA) – Plastic packaging
 - In detailed reporting, other materials should also be taken into account (e.g. label and string)
- **Coffee capsules are reported as:**
 - Consumer packaging
 - Single-use
 - According to main material
 - Aluminium capsules – Metal packaging
 - Plastic capsules – Plastic packaging
 - Biodegradable capsules (PLA) – Plastic packaging
 - Plastic body and aluminium lid – reported separately as plastic packaging and metal packaging

A portal that guides you

SumiOn

Sumi test 2

English

Front page

Sumi customer service:

Customer service is available on weekdays from 8:30 AM to 4:00 PM
Tel. **030 635 8100** (local/mobile call rates apply) | Email: info@sumi.fi

Current announcements:

EU-DoC storage feature coming soon
SumiOn will soon allow you to save your company's EU DoC (Declaration of Conformity) in your company information.
Read more about EU-DoC in Sumi's PPWR knowledge base: [link](#)

Changes to reporting under PPWR from 12 August 2026
Does your company have branded packaging or transport packaging? Producer responsibility for this packaging changed on 12 August 2026, along with related reporting requirements.
Read the detailed reporting instructions here: [link](#)

Reporting instructions

SumiOn instructions
Download SumiOn instructions: [link](#)

SumiOn webinar and reporting workshops – 8 January 2026
Watch the recordings of the webinar and reporting workshops: [link](#)

Additional instructions
Reporting instructions for pallets: [link](#)
Reporting instructions for consumer and business packaging: [link](#)

SumiOn AI expert

Under the Packaging and Packaging Waste Regulation (PPWR), producer responsibility for transport packaging is defined based on the following principles:

- 1. Definition of Transport Packaging:**
Transport packaging is defined as packaging designed to facilitate the handling and transport of one or more sales units or grouped packaging to

Please note the PPWR reporting changes

Please note that the PPWR entered into force on 12 August 2026! This should be taken into account especially when reporting transport and branded packaging. You can find more detailed PPWR reporting instructions [here](#).

Continue

Please note that, under the PPWR, from 12 August 2026 producer responsibility for branded shopping bags lies with the party that had the shopping bags manufactured, i.e. the brand owner.

Please note that, under the PPWR, from 12 August 2026 producer responsibility for transport packaging lies with the company whose name or trademark appears on the packaging. For unbranded transport packaging, the responsibility has shifted to the manufacturer, importer or distributor of the transport packaging. You can find more information in Sumi's PPWR knowledge base [here](#).

Pre-submitted questions

We will first go through the answers to the pre-submitted questions.
After that, you can ask questions in the chat or using your
microphone and camera.

**As a reminder, questions concerning packaging compliance
should generally be directed to Tukes.**

Pre-submitted questions – Distance selling

- **Is exporting to another country considered distance selling? Or is the recipient responsible for the packaging materials that come with the product if they are unpacked and sorted as waste?**
 - Answer: If products are sold to an End User in another EU country, this is considered distance selling, and the Finnish company is subject to producer responsibility in that country for all packaging in the shipment. If the receiving company in the destination country resells the product, that company is subject to producer responsibility as the Importer/Distributor.
- **Have any EU countries introduced lighter requirements for sole traders to make small-scale e-commerce viable?**
 - Answer: Producer responsibility for online sellers in EU countries is not a new requirement introduced by PPWR. It has already been in place for a long time. What is new is the requirement for a Distance Seller to appoint an Authorised Representative in each country where it engages in distance selling. This requirement has been widely discussed across the EU, including at Commission level, but it remains in force in all Member States.

Pre-submitted questions – Authorised Representative

- **Where can companies with an online store and distance sales to other countries find Authorised Representatives and producer responsibility organizations in those countries?**
 - Answer: In the Nordic countries, Sumi offers the Nordic PRO Solution, which allows companies to manage their producer responsibility obligations and reporting not only in Finland but also in Sweden, Norway and Denmark free of charge.

Sumi's partners elsewhere in Europe are [Reclay](#) and [Pronexa](#). Together, their services cover all EU Member States. Both also offer various paid reporting services, for which you can request a separate quote directly from them.

Tip:

Reclay's Authorise Me service offers Authorised Representative services in several countries. Pricing is also clearly available on [the Pricing page](#).

Pronexa's PRO Network map helps you find producer responsibility organizations in different countries that you can contact: [PRO Network – Pronexa AG](#)

Pre-submitted questions – Branded packaging:

- **Is packaging considered branded if a retailer buys products from EU countries and adds a product label to the packaging with the retailer's product code and website?**
 - Answer: In this case, the packaging is not considered branded. If the packaging has an SSCC label, address label or other similar label, it is not considered branded. However, as the Importer, the retailer is subject to producer responsibility for this packaging.
- **Who has the reporting obligation when a company packs a customer's private label product in unprinted grouped packaging (a cardboard box): the packer, customer or packaging manufacturer?**
 - Answer: A similar example has been submitted to the Finnish Supervisory Agency (LVV): A Finnish retail chain has private label products manufactured by a Finnish food company. The food company first packs the products in sales packaging and then in grouped packaging. The sales packaging is branded with the retail chain's brand, but the grouped packaging is not. Who is responsible for the unbranded grouped packaging?

LVV's answer: "The trademark owner is responsible for both the sales packaging and the grouped packaging." LVV further explains the general principle: "For sales packaging and grouped packaging, the aim is to have one party responsible for both. In other words, if a brand owner has a packaged product manufactured and the product displays a trademark or similar branding, the brand owner is responsible for both the sales packaging and the grouped packaging. The same applies to the different components of the sales packaging."

Pre-submitted questions – Branded packaging:

- **Who has producer responsibility for unbranded stretch film in transport packaging?**
 - Answer: Stretch film is considered transport packaging while still on the roll (Commission FAQ 08/2026). If the film is purchased in Finland, the actual manufacturer of the film is subject to producer responsibility. If the stretch film is purchased from abroad, the Importer is subject to producer responsibility.
- **If a company has a product manufactured under its own brand in a European country and the product is delivered to other European countries, is this treated in the same way as if the product were exported from Finland?**
 - Answer: If the product is intended for resale, the recipient in the destination country is subject to producer responsibility as the Importer/Distributor. If the recipient is considered the End User, the sender is subject to producer responsibility and must join the producer responsibility system in that country as a Distance Seller.
- **Does branding affect which operator is considered the Producer, or does it only affect which operator is considered the Manufacturer?**
 - Answer: Branding affects the Manufacturer's legal responsibility for compliance. According to the Finnish Supervisory Agency (LVV), branding is relevant to producer responsibility only within the Finnish supply chain and therefore also affects producer responsibility in domestic trade. In international trade, producer responsibility is determined by the operator that first places the packaging on the market in the country where it becomes waste.

Pre-submitted questions – Branded packaging:

- **For custom-made packaging, the company ordering the packaging may be considered the Manufacturer and therefore subject to producer responsibility. Is this considered branded packaging, and does the micro-enterprise exemption apply?**
 - Answer: The company ordering the packaging is considered the Manufacturer even for unbranded packaging if the packaging is custom-made to specific dimensions. If the company ordering the packaging is a micro-enterprise and the packaging Supplier is established in the same Member State, producer responsibility may transfer to the Supplier. However, the micro-enterprise is still subject to producer responsibility for imports.
- **At what point does packaging become branded? For example, is branded tape used on an otherwise unbranded cardboard box enough to make it branded packaging?**
 - Answer: We are still waiting for guidance from the Finnish Supervisory Agency (LVV) on whether logo tape added to packaging at a later stage makes it branded packaging.

Pre-submitted questions – Transport packaging:

- **If a company exports products in flexible intermediate bulk containers (FIBCs) to several European countries, what needs to be taken into account to meet the requirements?**
 - Answer: Producer responsibility depends on who the product is delivered to. If the recipient is a reseller or another operator that makes the product available on the market in the same form, the company is not subject to producer responsibility in that country. If the product is sold directly to an End User, for example a company that uses the material in the FIBC in its own operations and does not make the product available on the market again in the same form, the sending company is subject to producer responsibility in the destination country as a Distance Seller.
 - In addition to producer responsibility, the PPWR obligations of the Manufacturer and the EU Declaration of Conformity (EU DoC) must be considered separately. If the FIBC is branded, the brand owner is the Manufacturer. For generic sales packaging, the packer is the Manufacturer.
 - **If packaging can function as both transport packaging and sales packaging, it is considered sales packaging.** Producer responsibility organizations have interpreted FIBCs as sales packaging (the Finnish Supervisory Agency has not confirmed this interpretation).
- **Who is responsible for reporting new transport boxes, tape and document pouches purchased in Finland and used to pack shipments delivered to stores?**
 - Answer: The actual manufacturer of the transport boxes is subject to producer responsibility for them. However, if the transport packaging bears a name or trademark, producer responsibility lies with the company that had the packaging manufactured (the brand owner). Producer responsibility organizations have interpreted tape, string, labels, document pouches and shipping pouches as the responsibility of the packer (the Finnish Supervisory Agency has not confirmed this interpretation).
- **If a company does not pack a product it manufactures in sales packaging, but only protects it during transport using generic packaging material purchased from a Finnish Supplier, does the company report this packaging after 12 August 2026?**
 - Answer: In this case, it is transport packaging, and the company is not subject to producer responsibility for it. From 12 August 2026, producer responsibility for transport packaging generally lies with the actual manufacturer of the transport packaging.

Pre-submitted questions – EU DoC:

- **Is an EU Declaration of Conformity required for the stretch film used around a pallet and the cardboard placed on top of a wooden pallet?**
 - Answer: If unbranded stretch film is used to wrap the pallet, the company using the film is not responsible for preparing the EU DoC. Stretch film is considered packaging while still on the roll, and as transport packaging, its EU DoC is the responsibility of the physical manufacturer of the film. The same applies to the cardboard placed on top of the wooden pallet.
- **What documentation should be kept as evidence of when packaging was placed on the market, in case the status of old stock needs to be demonstrated later?**
 - Answer: Keep traceable evidence of when the packaging or batch of packaging was first placed on the EU market, such as order, invoice, delivery and batch records. For imports, customs documents are also relevant. The manufacturing date alone does not show when the packaging was placed on the market.

Pre-submitted questions – General:

- **Will packaging data need to be entered into multiple national systems in the future?**
 - Answer: Packaging data is entered only once per reporting period in the reporting system of your producer responsibility organization. For Sumi customers, this is SumiOn, while SPT customers use Rinki's Extranet. The producer responsibility organizations report the data to the authorities, which then report it at EU level.
- **Different interpretations of Manufacturer responsibility between manufacturers and wholesalers**
 - Answer: More information about the packaging type in question would be needed, but assuming that the wholesalers sell generic transport packaging, primary production packaging and/or service packaging, the Manufacturer – i.e. the company with legal responsibility – is the actual manufacturer of the packaging in all these cases.

Producer responsibility, however, is determined differently. If a Finnish wholesaler buys the packaging from a Finnish packaging manufacturer, the manufacturer has producer responsibility. If the wholesaler buys the packaging from abroad, the wholesaler has producer responsibility.

Pre-submitted questions – General:

- **Is there guidance on which figures should be used to determine whether a company qualifies as a micro-enterprise (e.g. which financial year)? The information available in public registers varies.**
 - Answer: The definition of a micro-enterprise is based on European Commission Recommendation 2003/361/EC.

A micro-enterprise has fewer than 10 employees. The number of employees is calculated in annual work units (AWU): one person working full-time in the company for the entire year counts as one annual work unit. Part-time employees, employees who worked for only part of the year, and seasonal workers are counted as fractions of an annual work unit. In addition to employees, the headcount includes, among others, owner-managers and partners who regularly work in the company and receive financial benefits from it.

The figures from the latest closed and approved financial year are used, and the figures are calculated on an annual basis. Turnover is calculated excluding VAT and other indirect taxes.

A company's ownership and group relationships may affect whether it qualifies as a micro-enterprise. The two-year rule is also important: if a company exceeds or falls below the threshold in a single year, its status does not change immediately. Micro-enterprise status is gained or lost only if the threshold is exceeded or fallen below in two consecutive financial years.

Pre-submitted questions – Recycled content requirements:

- **What proportion of cardboard packaging material must be recycled material, and when do these requirements take effect?**
 - Answer: The recycled content requirements under PPWR apply only to plastic packaging.
- **When will harmonised recycling labels be introduced so that they can already be taken into account in future production planning without creating waste?**
 - Answer: EU-wide harmonised material labels for packaging will become mandatory from 12 August 2028 at the earliest. The exact date depends on when the Commission's implementing acts enter into force: the requirement for packaging will apply from 12 August 2028 or 24 months after the implementing acts enter into force, whichever is later. The corresponding labels for waste receptacles have a separate transition period of 30 months.
- **Does the sterile pouch of an implantable medical device need to be recyclable?**
 - Answer: PPWR includes an exemption for packaging for medical devices. The recyclability requirements in Article 6 of PPWR do not apply to contact-sensitive packaging for medical devices. For example, the sterile pouch of an implantable medical device may fall under this exemption if the packaging is in contact with the device.

Thank you!

- As a reminder, PPWR is a very broad topic, and today we focused specifically **on packaging producer responsibility** and the changes **that took effect on 12 August 2026**.
- **The webinar materials and recording will be sent to participants after the webinar.**
- We will answer any questions left unanswered during the Q&A session by email after the webinar.
- More information about PPWR is available on Sumi's website: [PPWR – Packaging and Packaging Waste Regulation](#)