



**PPWR in Practice Webinar**  
**19 May, 9.30-11.00**

# Welcome to the PPWR in Practice Webinar!

- PPWR covers a wide range of requirements, and today we will focus specifically on PPWR from the **perspective of producer responsibility** and on the changes that **will enter into force on 12 August 2026**.
  - **Sumi, Jenni Lahtinen** - Welcome and practical information
  - **Tukes, Marita Hiipakka** - Market surveillance perspective on the packaging regulation
  - **Sumi, Anne-Mari Kulju** – PPWR and producer responsibility in practice
  - **Sumi experts** - Q&A session
- We received a large number of questions in advance. Some have already been answered individually by email, while others will be addressed at the beginning of the Q&A session.
- Questions can be submitted via chat throughout the webinar and will be answered during Q&A session.
- During the Q&A session, participants are welcome to ask additional questions using their microphones.

# Featured in the webinar



**Marita Hiipakka**

**Senior Inspector, Tukes**

Works in market surveillance related to SUP legislation and packaging and packaging waste legislation.



**Tiia Salamäki**

**Lead Specialist, Tukes**

Works as a Lead Specialist in Tukes' Chemical Products Unit.



**Mika Surakka**  
Chief Executive  
Officer



**Anne-Mari Kulju**  
Head of Communications  
and Sales



**Katja Laitinen**  
Recycling Coach



**Eeva Hanni**  
Materials Manager



**Anders Lundin**  
Information Systems  
Manager



**Annika Korte**  
Communications  
coordinator and  
Administrative Assistant



**Jenni Lahtinen**  
Customer Service  
Advisor



**Tiia Tankka**  
Customer Service  
Advisor

# TUKES

Marita Hiipakka

# Sumi

Anne-Mari Kulju

During a meeting with the Finnish Supervisory Agency last week regarding application of PPWR, a number of open questions remained unanswered and we are still awaiting official guidance. Such open issues have been highlighted in red throughout webinar materials.

**Finnish Supervisory Agency and Environment Ministry have indicated that responses to the open questions will be provided at a seminar on 28 May 2026 at 13:00.**

# 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

**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.

**12.8.2026 - new packaging types subject to reporting**

# Tea bags and coffee capsules to 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 capsule – Metal packaging
    - Plastic capsules – Plastic packaging
    - Biodegradable capsules (PLA) – Plastic packaging
    - Plastic body and aluminium lid – reported separately as plastic packaging and metal packaging
- Tea bags and coffee capsules placed on the market in 2026 are reported only for the period of 12 August–31 December 2026, not the entire calendar year.



# 12.8.2026 – PPWR definitions & terminology

# Definitions – Packaging

- PPWR applies to both business and consumer packaging. Regulation covers all packaging intended for containment, protection, handling, transport or presentation of products, regardless of whether it is supplied to consumers or businesses.

## Sales packaging

is packaging in which a product is sold to a consumer or other end user. Sales packaging protects the product, enables its handling, and often also serves as a means of communicating product information.



## Grouped packaging

may be sold as such to the end user, or it may be used to facilitate stocking, storage or distribution of products.

The essential characteristic is that the grouped packaging can be removed from the products without affecting the characteristics of the product.



## Transport packaging

is intended to facilitate the handling or transport of one or more sales units within the supply chain, excluding containers used in road, rail, sea and air transport.

**Packaging used in e-commerce for delivering products to the end user are also considered transport packaging.**



## Service packaging

means packaging intended to be filled at the point of sale for the distribution of products.

Under the PPWR, packaging also includes any disposable items fulfilling a packaging function that are sold, filled, or designed and intended to be filled at the point of sale.



## Primary production packaging

packaging used in agriculture and horticulture for the sale of untreated products.

This includes:

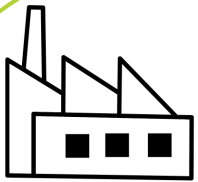
- production and rearing
- cultivation and harvesting
- milking and slaughtering
- hunting, fishing and gathering

The products have undergone only simple physical processing, such as washing, removal of leaves and sorting.



# Definitions – Economic Operators

- PPWR aims to identify a **producer for each packaging unit**, regardless of whether packaging is empty or contains a product.
- **Definitions of Supplier, Manufacturer, Importer, Distributor and End User are used to support determining the responsible for each packaging unit.** This makes it possible to identify the company responsible for EPR even in complex supply chains.



Supplier

- Physically manufactures the packaging or the packaged product in Finland **in accordance with the criteria defined by the manufacturer.**



Manufacturer

- Orders packaging or a packaged product from a supplier located in Finland **under its own brand or trademark and according to criteria it has defined.**



Importer

- Orders packaging or a packaged product from outside the EU and makes it available on the Finnish market for the first time.



Distributor

- Purchases packaging or a packaged product from a Finnish importer or wholesaler or imports it from another Member State.



End User

- A consumer or legal entity to whom the packaging or packaged product is supplied and with whom it remains until it becomes waste after use.

Note! If the End User of packaged product is a company, producer responsibility lies with the foreign distance seller supplying the product.

**12.8.2026 – Packaging where producer  
responsibility may transfer between economic  
operators**

# Producer responsible in Finland as of 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. A manufacturer, importer, or distributor established in another country** that first makes available directly to end users in Finland transport packaging, service packaging, primary production packaging, or a product packaged in packaging other than those mentioned above. **Distance seller.**
- **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, producer responsible is the packer, importer of a packaged product, distance seller or packaging manufacturer (primary production packaging and service packaging).

# Producer = company subject to producer responsibility

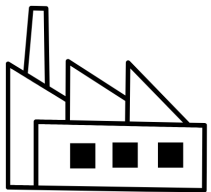
- A producer is the company in the supply chain that is responsible for costs of collecting and recycling packaging waste in the EU Member State where packaging is expected to become waste.
- Producer must register with a producer responsibility organization, annually report packaging volumes placed on the market and pay recycling fees in accordance with extended producer responsibility obligations.
- **Producer, and therefore company subject to producer responsibility:**
  - Is **manufacturer, importer or distributor** that makes packaging or packaged product available for first time in Member State where it becomes waste.

# Manufacturer = Legal Responsibility

- A manufacturer is a natural or a legal person that has packaging or a packaged product **manufactured**. The term 'manufacturer' can be misleading, as it is not necessarily same natural or legal person that physically manufactures packaging.
- **Manufacturer is the only economic operator with legal responsibility for the compliance of packaging.** Manufacturer as defined under PPWR is also generally considered the producer and therefore required to fulfil statutory producer responsibility obligations.
- If packaging or packaged product displays **company name or trademark (branded packaging)**, owner of that name or trademark may be presumed to be the manufacturer, as it exercises **decisive control in contractual relationship with its suppliers and therefore also has ability to determine characteristics of packaging.**

# Manufacturer – examples

- For **sales packaging and grouped packaging**, manufacturer is generally the economic operator that performs final processing steps on packaging supplied by the supplier, such as cutting, filling or sealing, and fills it with its products in order to place the packaging or packaged product on the Union market.
  - In other words, for sales packaging and grouped packaging, manufacturer is generally the filler, which is often also the brand owner.
- For **transport packaging, service packaging and primary production packaging**, manufacturer is generally the company that physically manufactures (supplier) transport packaging, service packaging or primary production packaging, unless packaging is clearly branded with name or trademark of its user.



Supplier

- Physically manufactures the packaging or the packaged product in Finland **in accordance with the criteria defined by the manufacturer.**



Manufacturer

- Orders packaging or a packaged product from a supplier located in Finland **under its own brand or trademark and according to criteria it has defined.**



Importer

- Orders packaging or a packaged product from outside the EU and makes it available on the Finnish market for the first time.



Distributor

- Purchases packaging or a packaged product from a Finnish importer or wholesaler or imports it from another Member State.



End User

- A consumer or legal entity to whom the packaging or packaged product is supplied and with whom it remains until it becomes waste after use.

# Branded packaging

- Branded packaging refers to any packaging displaying a company name, logo or trademark.
- From PPWR perspective, key factor for producer responsibility is not who physically manufactures the packaging (supplier), but who determines the packaging design and its characteristics (manufacturer).
- **Brand determines the company subject to producer responsibility**, as owner of the name or trademark can be presumed to exercise **decisive control in relation to its suppliers and therefore also determine the characteristics of the packaging.**

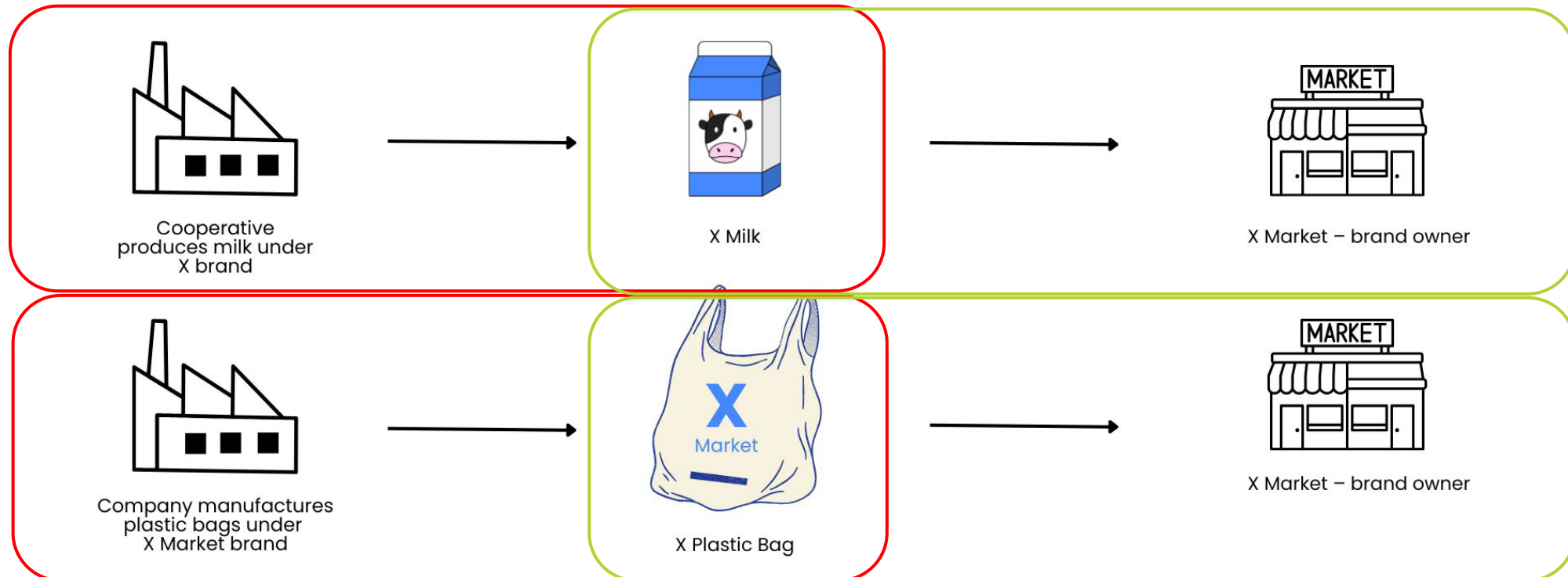
Further guidance is still awaited on which elements are considered 'branding'

Further guidance is still awaited on which characteristics are considered determining factors. For example, it remains unclear whether a custom size alone, without logos or other branding elements, is sufficient.

# Example – branded packaging

- **Example 2: Branded products**

Retailer sells products under its own brand, even though manufacturing is outsourced.  
→ Retailer is considered the Producer because its trademark is on the packaging.



# Branded packaging and micro-enterprises

- If a company that designs packaging or has packaging or packaged product manufactured under its own name or trademark is a **micro-enterprise**, and **supplier of the packaging is established in the same Member State**, the Supplier is considered the Manufacturer and subject to producer responsibility.
- Note! Micro-enterprise is nevertheless subject to producer responsibility for imports from another EU Member State or from outside EU, because the supply chain is always assessed by identifying primarily the economic operator established in Finland that makes packaging available on the Finnish market, where it becomes waste.



# Transport packaging

- Transport packaging is packaging intended to facilitate handling and transportation of one or more sales units within the supply chain. It is used to protect, store and transport products **and is generally not intended for the end user.**
- Examples of transport packaging:
  - cardboard boxes and containers
  - pallets
  - plastic transport crates
  - stretch wrap and protective film
  - pallet covers and other protective materials
  - delivery packaging used in e-commerce
- Containers used in road, rail, sea and air transport are not considered packaging.

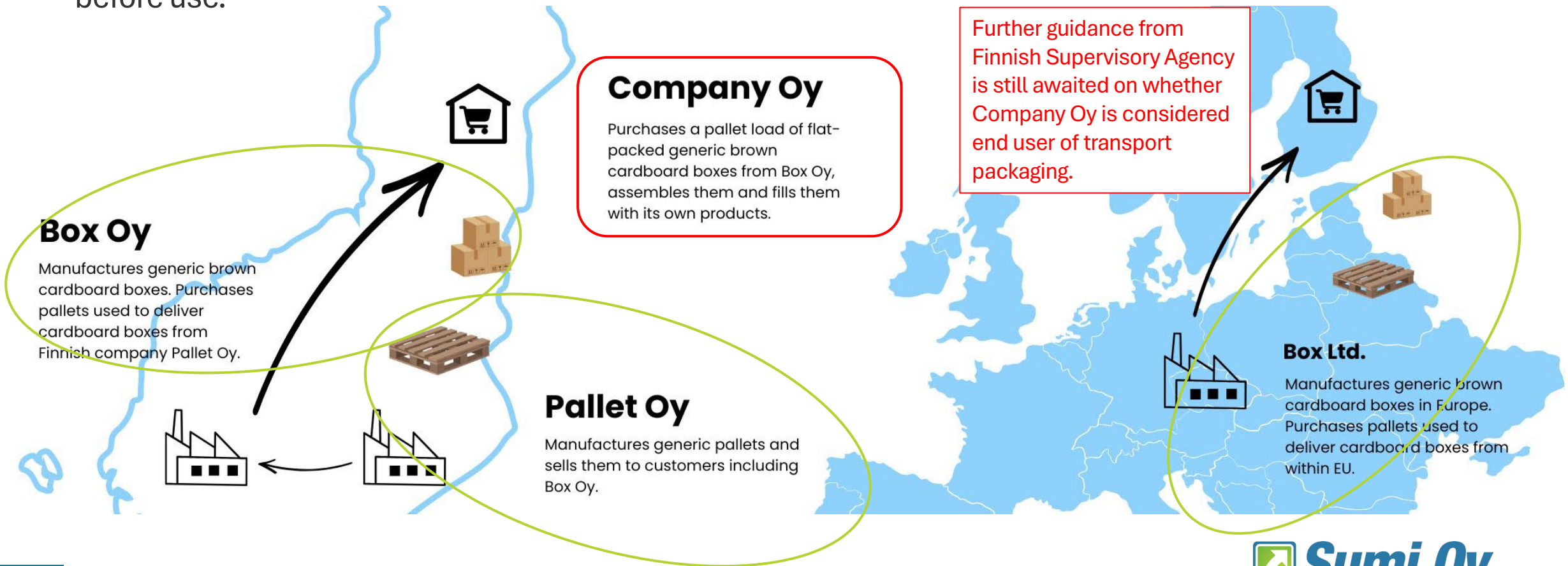


# Transport packaging

- To identify the producer, the following factors should be considered:
- **1. Is the product ready to function as packaging?**
  - Transport packaging may consist of several components that do not individually fulfil the function of packaging.
  - If the packaging only functions as packaging after additional components are added, **the assembler is the manufacturer and first potential producer. Further guidance and clarification are still awaited.**
- **2. Who is the manufacturer of transport packaging?**
  - If the packaging displays a name or trademark, the producer is generally **the company that had packaging manufactured** (often also the filler).
  - If the packaging cannot be identified by a name or trademark, the producer is generally **the actual manufacturer of the packaging.**
- For transport, service and primary production packaging, the manufacturer is typically the company that **physically produces packaging**, unless it is clearly branded with the name or trademark of its user.

# Transport packaging – example

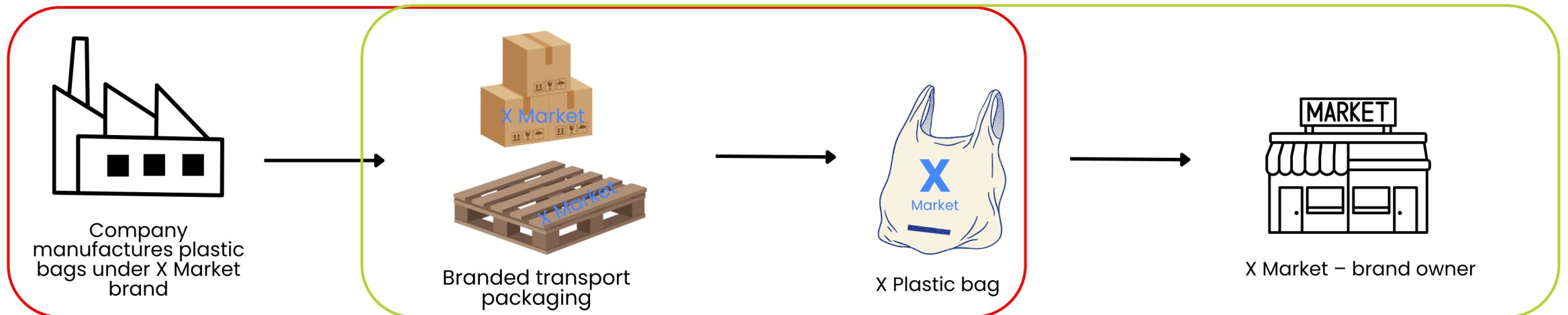
Finnish Supervisory Agency's preliminary view appears to be that producer responsibility for cardboard box sold flat lies with the packaging manufacturer, even if the box is assembled by another economic operator before use.



# Transport packaging – branded

X Market orders transport packaging printed with its logo.

→ X Market is subject to producer responsibility for this transport packaging.



# Transport packaging – imports and exports

- **Example 1: Imported transport packaging**

Finnish company imports transport packaging **from outside EU and sells it to Finnish end user.**

→ Importer is the Producer for this packaging.

- **Example 2: Supply to another Member State**

Finnish company supplies products in transport packaging to Swedish company **that is not an End User.**

→ Swedish recipient is the producer in Sweden because it makes packaging available there for the first time. Packaging is reported to Sweden.

# End User – distance selling

- End User is a natural person residing in EU or a legal entity established in EU to whom a product has been made available, either as a consumer or a professional end user, **and who does not make the product available on the market again in the same form.**
- Under PPWR, End User may therefore be either a private individual or a **company.**
- Example: Corporate gift for employees. If a Finnish company purchases a packaged product from abroad for its own use, and packaging becomes waste in Finland after use, **foreign distance seller is the Producer in Finland in this case.**
  - Finnish company must ensure that the foreign seller has joined Finnish producer responsibility system and fulfils its EPR obligations appropriately.

# Identifying company subject to producer responsibility

Is manufacturer of empty packaging or packaged product established in Finland?



Is packaging or packaged product branded?



Is there another economic operator established in Finland that makes packaging available on market for first time?



Manufacturer is producer.

- For transport, service and primary production packaging, producer is manufacturer of empty packaging.
- For sales and grouped packaging, producer is manufacturer of packaged product.

Brand owner is producer.

Distributor, importer or unpacker is producer.

Is product supplied directly to end user?



Distance seller is producer. Operator of online marketplace must ensure that sellers using platform are registered with producer responsibility system.

# Key considerations for 2026 reporting

- Producer responsibility, and therefore reporting obligation, may transfer from one economic operator to another on 12 August 2026.
  - The brand owners will report all branded packaging themselves from 12 August 2026 onwards.
  - Packaging manufacturers will no longer report packaging bearing brands owned by other companies after 11 August 2026.
  - Based on current interpretation, manufacturer of transport packaging will report packaging it manufactures that enters Finnish waste management system.
- It is important to ensure that packaging volumes do not 'disappear' during this transition and that no companies become free riders.
- **Maintaining continuity of producer responsibility during this transition is everyone's responsibility.**

**Other requirements taking effect on  
12 August 2026**

# Restricted Substances

- **Heavy metals in all packaging**
  - The combined concentration of the following substances present in packaging or its components must not exceed 100 mg/kg:
    - Lead (Pb)
    - Cadmium (Cd)
    - Mercury (Hg)
    - Hexavalent chromium (Cr6)
- **PFAS compounds (per- and polyfluoroalkyl substances) in food contact packaging**
  - From 12 August 2026, packaging that comes into contact with food must not be placed on the market if it contains PFAS compounds above the following limits:
    - 25 ppb for an individual PFAS substance
    - 250 ppb for the sum of PFAS substances (targeted analysis)
    - 50 ppm for total PFAS (including polymeric PFAS)
  - If the total fluorine content of packaging exceeds 50 mg/kg, operators must be able to demonstrate the source of the fluorine (PFAS compounds vs. other substances) for technical documentation purposes.
- **Packaging placed on the market before 12 August 2026 that does not comply with these requirements may still be sold until stocks are depleted and does not need to be withdrawn from the market.**



# Declaration of Conformity

- Going forward, **the manufacturer** must demonstrate that the packaging complies with the applicable requirements by preparing an EU Declaration of Conformity.
- **During the transitional period (from 12 August 2026 onwards), the declaration applies only to Article 5 – Restricted Substances:**
  - heavy metal limits
  - PFAS restrictions in food contact materials
- The manufacturer may prepare a single company-level declaration, provided that it clearly identifies:
  - **Which packaging is covered by declaration**  
→ identified, for example, by type, batch or serial number
  - **Packaging types**  
→ classified according to Annex II of PPWR

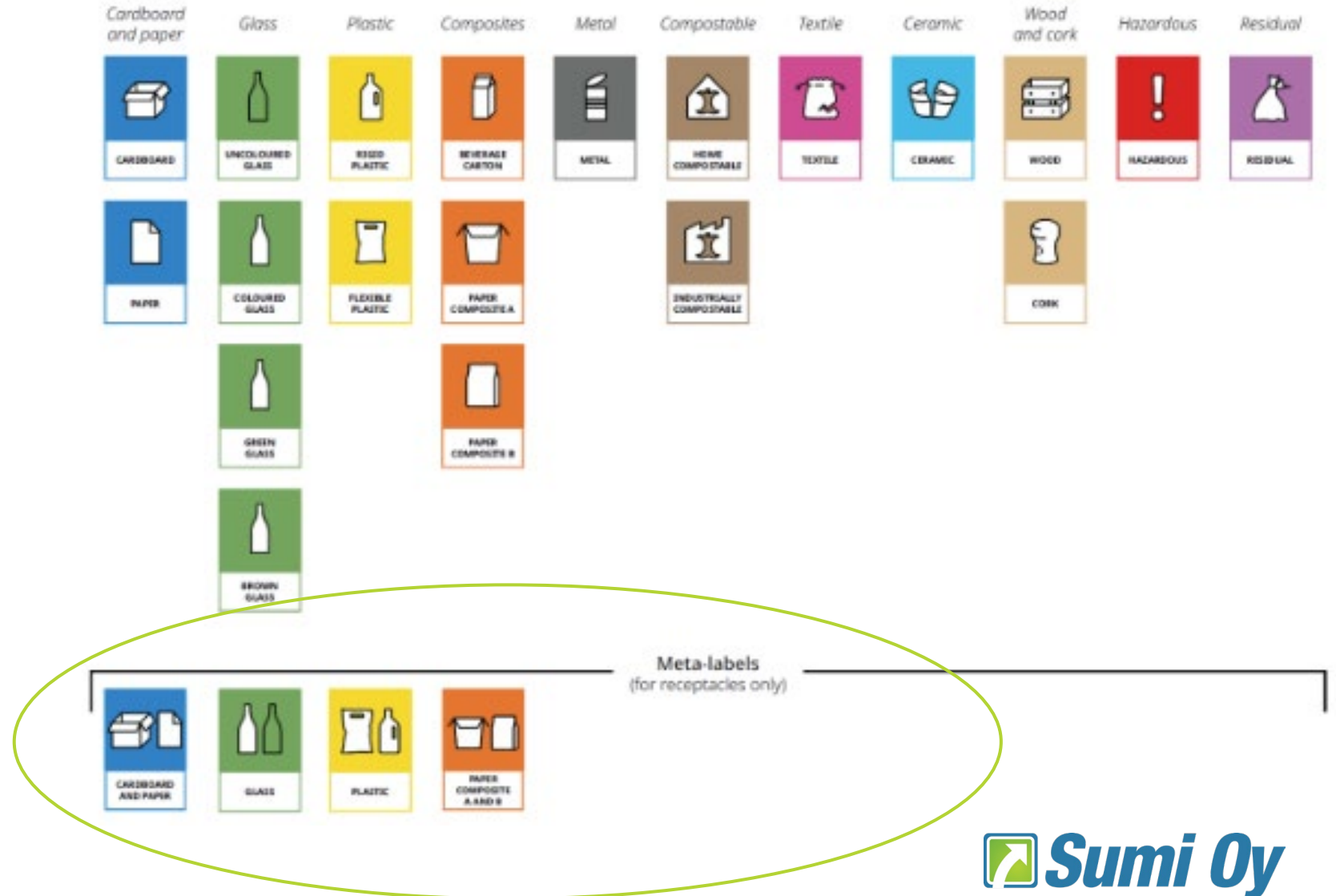


# Q&A Session

We will begin by addressing pre-submitted questions. After that, we will go through questions from chat, and you are welcome to ask additional questions using your microphone and camera. You can request speaking turn using the 'raise hand' feature.

# Harmonized pictograms across the EU

- Pictograms designed to facilitate sorting will be introduced on packaging and waste containers on **12 August 2028**.
- Note! These pictograms are currently only a proposal and have not yet been officially adopted.



# Pre-submitted questions:

- **How does PPWR affect packaging that does not reach consumers, for example products sold to hospitals?**
  - Answer: PPWR applies to both business and consumer packaging. Regulation covers all packaging intended for containment, protection, handling, transport or presentation of products, regardless of whether it is supplied to consumers (B2C) or businesses (B2B).
  - PPWR provides certain exemptions for pharmaceutical products regarding recyclability requirements, recycled content, labeling and market surveillance where those requirements would conflict with safety, quality or regulatory requirements for medicinal products.
- **PPWR does not apply to dairy products packaged in liquid carton packaging. Does it apply to carton-plastic composite packaging used for juices and seasonings?**
  - Answer: Only exemptions provided by PPWR for perishable dairy products and their plant-based alternatives relate to reuse targets and mandatory deposit and return systems.
  - In all other respects, PPWR also applies to dairy products packaged in beverage cartons and to composite packaging used for juices and seasonings.

# Pre-submitted questions:

- **Can packaging state “contains X% recycled content”, and what documentation or verification is required? What environmental claims does PPWR restrict or prohibit, and under what conditions may such claims be used?**
  - Answer: This question relates partly to PPWR, but also to Green Claims Directive, which is expected to enter into force in September 2026. Directive prohibits unsubstantiated generic environmental claims, unclear sustainability labels and compensation-based “climate neutral” claims without proper justification.
  - This topic is addressed in PPWR Article 14 – Environmental Claims  
Claims on packaging such as “recyclable”, “bio-based” or “compostable” **are permitted only** if they **exceed minimum requirements set by Regulation in accordance with PPWR calculation rules**. Claim must also clearly specify which part of packaging it refers to. Annex VII of PPWR contains conformity assessment procedure.
- **Can packaging be recycled or reused by forwarding it to customers, resellers or other operators? How should such forwarding or reuse of packaging be taken into account in reporting from perspectives of supplier, importer and producer subject to producer responsibility?**
  - Answer: At present, reuse can only be reported for pallets, meat and bakery crates, dairy industry crates and roll containers. Cardboard box is reported as single-use packaging when it is first placed on market. Any subsequent forwarding or reuse is not reported.

# Pre-submitted questions:

- **What will be responsibilities of contract manufacturers going forward?**
  - Answer: As a general rule, contract manufacturers will not be subject to producer responsibility going forward. Producer responsibility lies with owner of brand.
- **Does a black-and-white label with product or company information attached to a standard brown cardboard box make it branded packaging?**
  - Answer: If label is an address label or SSCC label, no. Otherwise, yes. **Further guidance and clarification from Finnish Supervisory Agency are still awaited.**

# Pre-submitted questions:

- **How does PPWR affect producer responsibility reporting?**
  - **12 August 2026** In many cases, company subject to producer responsibility, and therefore reporting, will change.
  - **1 January 2028**
    - **Simplified reporting:** threshold for simplified reporting will change from current 50,000 kg/year to 10,000 kg/year. This means that all companies reporting more than 10,000 kg per year will move from simplified reporting to detailed reporting.
    - **Detailed reporting:** new reporting categories.
  - **1 January 2030** reporting according to recyclability performance grades A–C.

Glass
Plastic
Paper/cardboard
Ferrous metal
Aluminium
Wood
Other

Simplified reporting form – new reporting categories

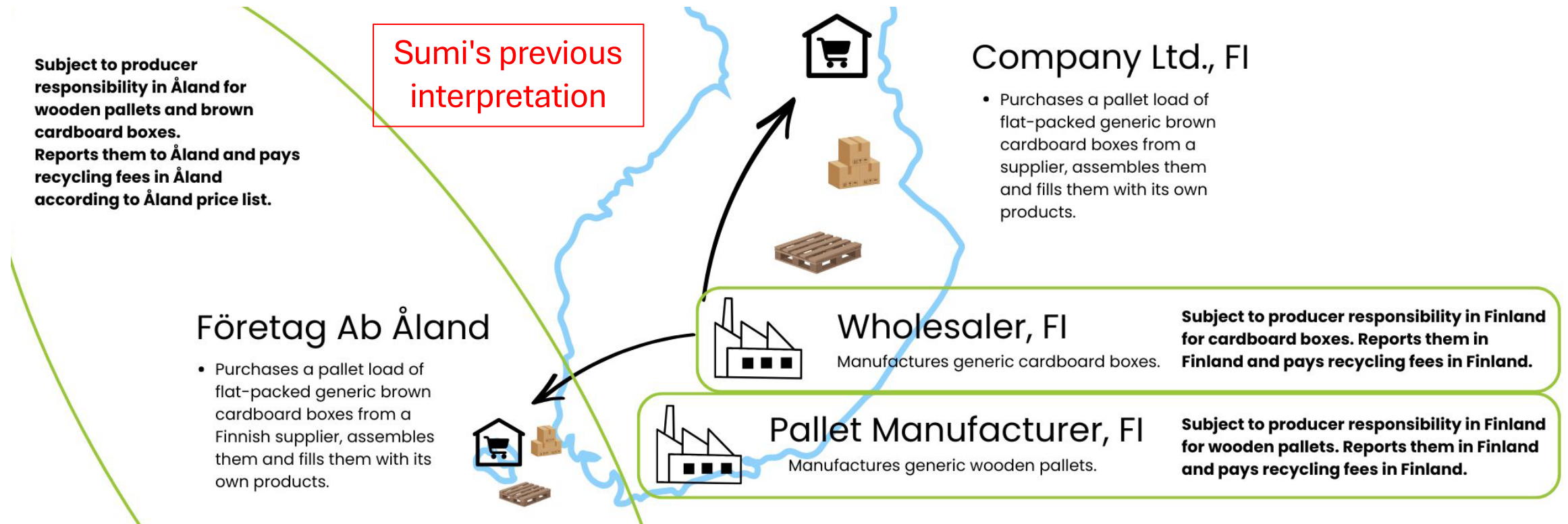
# New detailed reporting categories from 1 January 2028

- Producer responsibility organization must report these categories to Finnish Supervisory Agency as part of annual report.
- **However, these are not necessarily direct reporting categories for producers, and not all of them will necessarily have their own recycling fee category.**

Material	Category
Plastic	PET – rigid
	PE – rigid, PP – rigid and HDPE
	Films and flexible packaging
	PS, XPS, EPS
	Other rigid plastics
	Biodegradable (rigid and flexible)
Paper and cardboard	Paper and cardboard
	Liquid packaging board
Metal	Aluminium
	Steel
Glass	
Wood, cork	
Other	Textiles, ceramics, porcelain, etc.

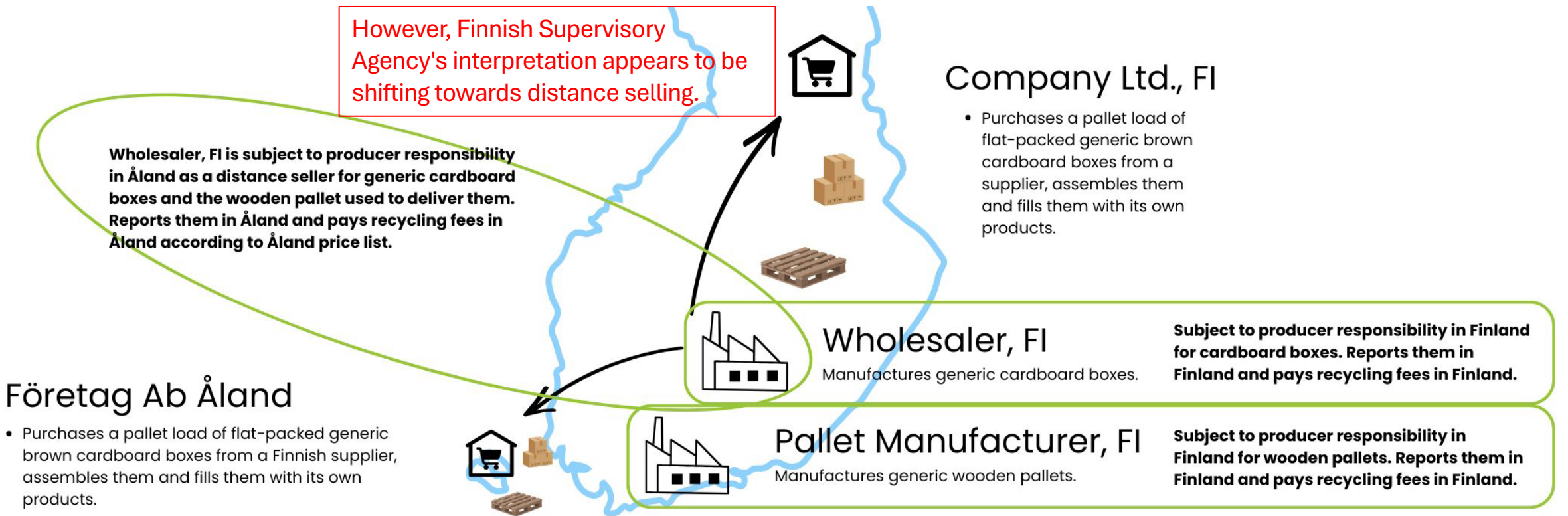
# Pre-submitted questions:

- **How should transport packaging that moves from one country to another be reported? Producer responsibility fees are collected only for packaging that remains in Finland. As a wholesaler, how can we obtain information from our customers on packaging that remains in Finland?**
  - Answer: Only packaging that remains in Finland is reported in Finland. Diagram below applies both to Åland and to other countries. In discussions with Finnish Supervisory Agency, two alternative approaches have been suggested for wholesalers for same product to differ packaging staying in Finland and exported packaging: 1. Recycling fee paid (packaging remains in Finland) 2. No recycling fee (exported abroad)



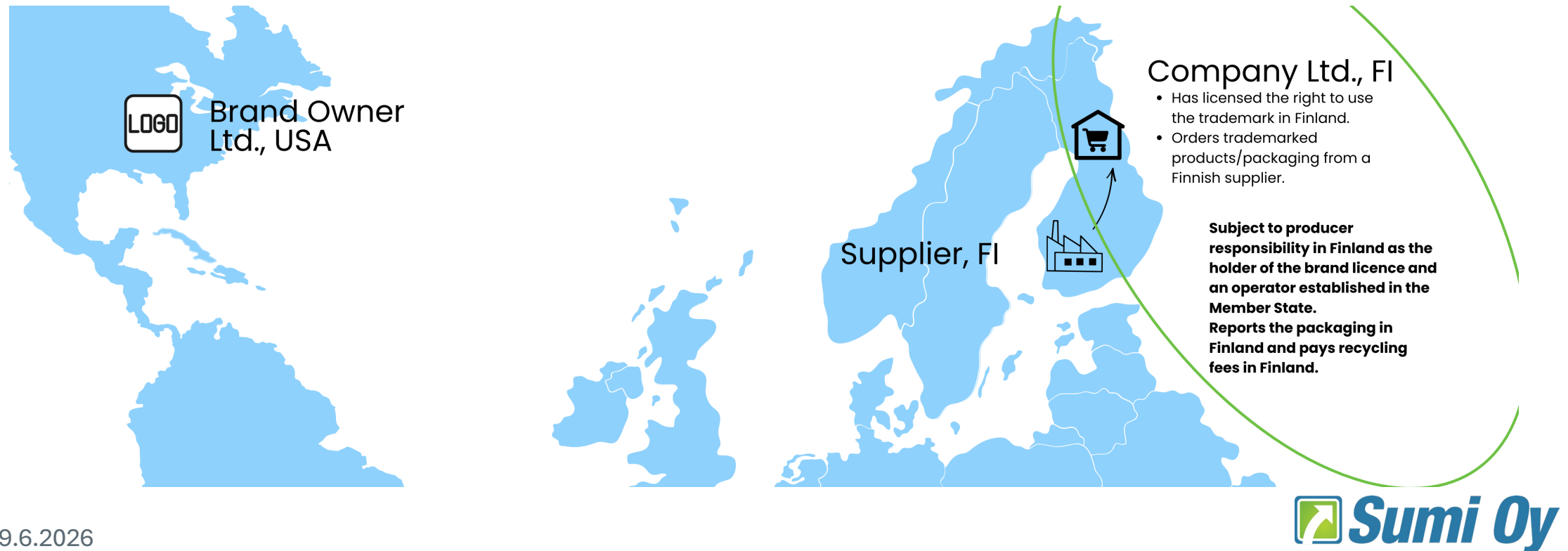
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  - Answer: Only packaging that remains in Finland is reported in Finland. Diagram below applies both to Åland and to other countries. In discussions with Finnish Supervisory Agency, two alternative approaches have been suggested for wholesalers for same product to differ packaging staying in Finland and exported packaging: 1. Recycling fee paid (packaging remains in Finland) 2. No recycling fee (exported abroad)



# Pre-submitted questions:

- An e-commerce shipping or gift package displays only a registered trademark logo and has been commissioned by an operator that has the right to use logo under a licensing agreement. Producer responsibility would fall on owner of trademark/brand. How does licensing affect producer responsibility?
  - Answer: This is not addressed directly in PPWR, but Sumi's interpretation is as follows: Under PPWR, producer responsibility lies with owner of trademark. Through licensing agreement, producer responsibility transfers to Finnish operator that has acquired right to use logo.



# Q&A Session

We will now go through questions collected from chat, and you are welcome to ask additional questions using your microphone and camera. **You can request speaking turn using raise hand feature.**

# Thank you!

- **As a reminder:** PPWR is an extensive regulation, and today we focused specifically on PPWR from the perspective of **packaging producer responsibility** and changes **taking effect on 12 August 2026**.
- **Webinar materials and recording will be sent to participants afterwards.** We will also include **official Finnish translation of PPWR** and **compliance declaration guidance** prepared by Finnish Packaging Association in the material package.
- Any outstanding questions will be addressed by email after the webinar.
- More information about PPWR is available on Sumi website under [PPWR – Packaging and Packaging Waste Regulation](#).
- We will keep Sumis customers informed about PPWR changes as additional guidance becomes available from authorities.



**PPWR Reporting Workshop will be organized for Sumi customers in autumn.**