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Dear member of the producer community, attached is an information letter about producer responsibility matters

Frequently asked questions about producer responsibility

Producer responsibility covers many products and hence numerous Finnish companies. Thousands of companies have taken care of their producer responsibility by becoming members of the producer association, and about a hundred companies have done this by submitting an application to Pirkanmaa's Centre for Economic Development, Transport and the Environment (ELY Centre). Producer responsibility often raises questions, and therefore, as the national authority for producer responsibility, Pirkanmaa's ELY Centre has compiled frequently asked questions about different product groups and producer responsibility in general. This 'Frequently asked questions about producer responsibility' letter should be shared with the members of producer associations and other parties based on their need.

What does producer responsibility mean?

Producer responsibility means companies' obligations to handle the waste management of the products falling within the scope of producer responsibility which they have imported or manufactured when the products are discarded. All companies with producer responsibility must either become a member of a producer association or submit an application for registration in Pirkanmaa's ELY centre's producer database. Organizing collection of products is not sufficient alone.

What are producer associations?

A producer association can be established only by producers within a given industry. For example, paper importers have established Suomen Keräystuote Oy and Suomen Keräyspaperi Tuottajayhteisö Oy, lead battery importers have established Akkukierrätys Pb Oy, and vehicle importers have established Autokierrätys Oy. The primary task of a producer association is to manage the producer responsibility obligations on behalf of their members, i.e. to arrange cost-free product reception facilities as well as product transport, recycling and other waste management, and to report on this to Pirkanmaa's ELY Centre.

Which product groups does producer responsibility cover?

Producer responsibility covers packaging, paper, tires, vehicles, batteries and accumulators, as well as electrical devices. The importers and manufacturers of these products have the producer responsibility. Regarding packaging, packers and importers of packaged products have the producer responsibility.

Can the producer responsibilities for different products be handled through a single producer association?

No. The packaging producer association takes care of the producer responsibility for packages, the tire producer association takes care of the tire producer responsibility, and the electrical device producer association takes care of responsibility for electrical devices. For example, membership of a vehicle producer association is not sufficient to fulfil the producer responsibility for tires and batteries within vehicles; it is necessary to join the producer associations of these specific industries as well.

Does producer responsibility concern products imported from within the EU?

Yes. Producer responsibility concerns products imported from any country that fall within the scope of producer responsibility and which are brought to the market for the first time in Finland.

Does producer responsibility include business products?

Producer responsibility concerns both household and company products.

Does producer responsibility cover accumulators and batteries imported within devices?

Yes. Both those imported within vehicles and those imported within electrical devices.

What are industrial batteries and accumulators?

Batteries and accumulators which are designed exclusively for industrial or professional use or which are used in electric vehicles are classified as industrial batteries and accumulators. These include batteries and accumulators designed for use in solar panels, measuring devices for professional use, emergency and backup power sources, electric vehicles, payment terminals, trains and aircraft. Apart from lead batteries, the producer responsibility must be taken care of by applying for registration in the producer database of Pirkanmaa's ELY Centre.

Which companies does the packaging producer responsibility concern?

It concerns companies with total revenues of over €1 million that import products with some kind of packaging or which use packaging materials to protect their products during production, storage, transport and distribution, for example. Packaging includes e.g. cardboard boxes, plastic bags, wraps and films around or inside a product, polystyrene and foam padding, as well as reusable boxes, trolleys and pallets.

Do used car importers have producer responsibility?

Used car importers have producer responsibility, and they have the same producer responsibility obligations regulated by the Waste Act as importers of new cars.

Where can I check whether producer responsibility concerns my company?

This can be checked by asking the producer association of the industry in question or by contacting Pirkanmaa's ELY Centre.

Where can I find information on all approved producer associations and producers who have taken care of their producer responsibilities?

Information on all producer communities, their members as well as producers who have taken care of their producer responsibilities can be found on the Ympäristö.fi website of Pirkanmaa's ELY Centre: www.ymparisto.fi/tuottajavastuu (from the front page, section "Tuottajarekisteriin hyväksytyt yritykset").

What are the consequences of neglecting producer responsibility?

If a company that is deemed to have producer responsibility nevertheless does not become a member of a producer association or does not submit an application for the producer database, Pirkanmaa's ELY Centre can assign a fee for negligence of 1% of the company's revenue. Before assigning the fee, the company is requested in writing to correct their negligence by a given deadline. (Waste Act (646/2011), sections 131–133).

Additional information

Pirkanmaa's ELY Centre's producer responsibility website: <http://www.environment.fi/producerresponsibility> and the phone number for customer service in environmental issues: 0295 020 900.