

Legislation:

Legislative schedule: The Waste Act amendment of 2004 provided the legal framework for producer responsibility for a number of waste streams, including WEEE. Ordinance 852/2004, adopted in September 2004, transposed the WEEE and RoHS Directives. **A new Waste Act 646/2011, published in June 2011 and in force from May 2012, most notably clarifies 'ownership of wastes' subject to producer responsibility by not allowing other parties to manage these waste unless they do so in collaboration with producers.**

Registration: Registration began in early 2005 and is the responsibility of the Centre for Economic Development, Transport and the Environment for Pirkanmaa (formerly Pirkanmaa Region Environment Centre). Registration is only open to Finnish-based producers, but producers from other member states can join a collective system to assume the obligation on behalf of their distributors. This has not changed, despite an amendment of the Waste Act that, from 1 January 2010, explicitly requires the registration of each producer with Pirkanmaa. An online waste register (to include the EEE producer register), originally scheduled for early 2008, is not yet operational.

Management of B2C WEEE: Producers must organise and finance separate collection of all collectable WEEE by setting up 'bring' sites. **The new Waste Act requires producers to pay costs according to their market share, regardless of when products were placed on the market. A financial guarantee is required. The guarantor (insurance or pledged deposits) must be legally based in the European Economic Area.** Producers can transfer legal obligations to their collective systems. Systems must be approved by Pirkanmaa and offer the same terms to all members. **From May 2012, system must be solely controlled by producers and must have the means to finance operations for at least six months. There is no clearing house but the Government may require certain systems to cooperate to ensure the overall functioning of the collection infrastructure.** Local authorities have no responsibility to collect WEEE but if they do, they may not manage it on their own account. However, private scrap dealers may do so. Retailers must take back WEEE on a 1:1 basis or inform customers about local collection points.

Management of B2B WEEE: Individual compliance requires approval. Producers are responsible for WEEE placed on the market after 13 August 2005 and other WEEE on 1:1 replacement basis. Producers and users may agree on different financing methods but producers remain responsible for output reporting.

Compliance:

Collective compliance: There are three competing collective systems, Serty, ERP (formerly NERA) and Elker with a total of about **1,100** members. Elker provides WEEE services for producer associations SELT, ICT Producer Co-operative and Flip. The systems finance a nationwide network of collection facilities of which about 50% are operated by municipally-owned waste management companies. Until late 2008 systems operated more or less independently of each other, without clearing for over- or under-collection. By mid-2009 the systems had agreed on a regional allocation of CRTs, consumer electronics and cooling appliances. By the end of 2009 accumulated imbalances had been largely cleared.

Individual compliance: Around **115** B2B producers comply individually. If approved service providers are used, the waste plan application can be very simple.

Enforcement: Pirkanmaa, the responsible agency, largely relies on industry self-regulation. In mid-2008 it approached free-riders, requesting that they register with a collective organisation. Pirkanmaa has so far not issued any penalties.

Results:

Reported volumes placed on the market have been decreasing steadily from 31.2 kg per capita in 2007 to about 25 kg per capita in 2010. An estimated three quarters of the EEE is used in private households. Collection of B2C WEEE through the systems increased from 7.1 kg per capita in 2006 to about 10.2 kg in 2010. B2B collection remained at around 0.5 kg per capita from 2006 to 2008.

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Legislation

Transposition of the WEEE and RoHS Directives

Act 452/2004 amending the 1993 Waste Act was adopted by Parliament on 4 June 2004. It includes provision for producer responsibility for waste tyres, newspapers, magazines, office papers, packaging and vehicles as well as EEE. An Ordinance on Electrical and Electronic Waste (852/2004) transposing the WEEE Directive was adopted by the Government on 9 September 2004.

A further Ordinance on the Restriction of the Use of Hazardous Materials in Electrical and Electronic Equipment (853/2004), transposing the RoHS Directive, was also adopted by the Government on 9 September 2004.

Summary of Compliance Requirements

This summary reflects the provisions of the Waste Act 1390/1993 as amended 2009. The new Waste Act (646/2011) will change some requirements (see [below](#)) from 1 May 2012.

Scope	<ul style="list-style-type: none"> No guidance beyond the definitions used in the EC Directive.
Registration - <i>Schedule:</i>	<ul style="list-style-type: none"> New producers should register before placing EEE on the market. Producers' compliance organisations (collective systems) must also register, and producers who are members of a system do not currently have to register individually. Registration details can be found here
- <i>Who has to register:</i>	<ul style="list-style-type: none"> Producers or importers need a Finnish Y-code registration to register. They must supply name and contact details, business identity codes, information on products marketed, market areas, producers' turnovers and an estimate of market share in terms of euros and weight and by equipment or equipment group. Information on waste management arrangements and agreements concerning the organisation of waste management and guarantees set by the producer must also be supplied. Foreign entities: Producers from outside Finland who do not have a legal entity in the country can join a Finnish collective system on behalf of their distributor or end-user. Collective systems must supply information on the rules of the corporation, the agreements with producers and an indication of how obligations are to be divided between producers. Since 1-Jan-10 the Waste Act has explicitly required the registration of each producer and information about the compliance options chosen.
<i>Deadline:</i>	<ul style="list-style-type: none"> Original deadline was 13 August 2005
- <i>Body responsible:</i>	<ul style="list-style-type: none"> The Centre for Economic Development, Transport and the Environment for Pirkanmaa (formerly Pirkanmaa Regional Environmental Centre)
- <i>Fees</i>	<ul style="list-style-type: none"> EUR 440 (as stipulated by law 150/1992 and regulation 1387/2006).

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B2C Collection	<ul style="list-style-type: none"> Producers must organise separate collection of all collectable WEEE and deliver it to an authorised treatment facility, except where appliances can be reused. Producers obligated to organise collection and set up 'bring' sites. <i>[In practice, the Ministry of Environment expected them to contract local authorities and waste management companies.]</i> Local authorities have no responsibility for collection of WEEE from households.
- Producers individual collection system	<ul style="list-style-type: none"> Legally possible, but there is no incentive for individual collection as none of the systems allows deducting individually collected quantities from the collective obligation.
- Take-back at retailers:	<ul style="list-style-type: none"> Retailers must either take back WEEE on a 1:1 basis, or inform customers about local collection points.
Financing of historical B2C WEEE	<ul style="list-style-type: none"> According to market share. <p><i>[The Waste Act says "the producer obligations may cover products which the producer himself has put on the market as well as a proportion of all similar products put on the market that is considered reasonable in relation to the number or market share of the products, irrespective of the date on which the products were put on the market.]</i></p>
- Visible fee:	<ul style="list-style-type: none"> Optional. For products placed on the market before 13 August 2005, the actual costs of waste management for the product can be shown at the time of sale of a new product until 13 February 2011 (2013 for large appliances).
Financing of new WEEE	<ul style="list-style-type: none"> From 13-Aug-05. <i>[There is no distinction between historical and new WEEE as regards financing.]</i>
- Guarantee:	<ul style="list-style-type: none"> Producers of EEE must provide a guarantee for the financing of the future waste management of household appliances placed on the market after 13 August 2005. Options & Rules: Recycling insurance, frozen bank account, or a suitable financing system. Body responsible: The Centre for Economic Development, Transport and the Environment for Pirkanmaa <p><i>[In practice, collective systems are required to provide a guarantee of 6 months of their costs. Individually complying B2B producers must state in their waste plan that they have set aside 6 months of waste management costs in case of insolvency. Documentary proof is not required.]</i></p>
Collective Systems	<ul style="list-style-type: none"> Producers can transfer producer responsibility obligations to collective systems (Producer Co-operations). The systems must be open and the same terms must apply to all members. The Government can force systems to cooperate to avoid parallel systems that harm the overall functioning of waste management. <p>Systems must be approved by Pirkanmaa <i>[There are no requirements in the legislation as to ownership or financial conditions of a system.]</i></p>

<p>Individual systems</p>	<ul style="list-style-type: none"> • Possible for B2B; requires approval. • Difficult in practice for B2C producers as “producers shall ensure that the network of collection facilities ... is of such extent that the last holders ... have a reasonable opportunity to deliver discarded products ... in all parts of country.”
<p>Clearing House</p>	<ul style="list-style-type: none"> • None. Pirkanmaa expects systems to find a solution themselves.
<p>Marking - Bin symbol, date & producer ID:</p>	<ul style="list-style-type: none"> • Must be shown on all EEE placed on the market after 13-Aug-05 (or on the packaging, instructions for use and warranty if product is too small)
<p>- Information for consumers:</p>	<ul style="list-style-type: none"> • Producers must provide information to users of the EEE about the obligation for separate collection of WEEE and the collection facilities that are available; the consumer’s role in collection and recovery of WEEE; the potential effects on the environment and health of dangerous substances in WEEE, and also the meaning of the crossed-out bin symbol shown on the product. • Producers must also provide treatment facilities with dismantling information for each new product within one year of it being placed on the market. They must also inform treatment facilities about the type and location of any dangerous substances used in the product. Information must be delivered in the form of a manual or by electronic means.
<p>- Info to recyclers</p>	<ul style="list-style-type: none"> • As Directive
<p>- Proof of compliance to business partners:</p>	<ul style="list-style-type: none"> • Producers must inform distributors of their registration in producer register
<p>Reporting - Input and output</p>	<ul style="list-style-type: none"> • Producers report to their collective system on EEE placed on the market. Collective systems have different reporting schedules • By 30 April each year, producers, or treatment facilities or other third parties acting on their behalf, must submit to Pirkanmaa the following information for the previous year: quantity (weight and units) of new EEE put on the domestic market; estimated accumulated tonnage of WEEE; quantity of collected WEEE, including (by weight and units) the quantity reused, recycled or otherwise recovered; the amount of WEEE (by weight and units) exported; changes to the guarantee arrangements and amount of guarantee.
<p>- Weight calculation</p>	<ul style="list-style-type: none"> • Weight-based reporting is based on the whole product, including batteries and all functional parts.
<p>Distance sellers</p>	<ul style="list-style-type: none"> • Included in definition of producer, but foreign companies selling into Finland cannot register there. However, they can join a collective system to fulfil their obligations. In the case of B2B direct sales, either the end-user or the producer can fulfil the obligation, subject to agreement. • Finnish B2C producers selling direct to customers in other member states must register and provide evidence of how they fulfil their obligations in those member states. B2B producers do not have to register as it can be assumed that the B2B end-user becomes obligated as the importer. In practice, most Finnish distance sellers will also be selling to Finnish customers and so will register anyway.

Treatment & reuse	<ul style="list-style-type: none"> WEEE must be stored in such a way that reuse or recycling of whole appliances or components is optimised. <p><i>[Pirkanmaa has complained repeatedly that there are not adequate facilities for ensuring that WEEE is maintained in a fit state to be reused.]</i></p>
B2B EEE:	<ul style="list-style-type: none"> Producers shall meet the costs of recovery and other forms of waste management of WEEE from users other than households, if the product was placed on the market after 13 August 2005. For products placed on the market before this date, <ul style="list-style-type: none"> producers shall meet the costs of recovery and other forms of waste management only if the discarded product is replaced with an equivalent product or a product used for the same purpose. Otherwise, users other than households shall be liable for the costs of recovery of the WEEE. Producers and users may also agree on a different distribution of costs <i>[but producer remains responsible for output reporting.]</i> Individual compliance requires approved waste plan (see also section on individual compliance)
Treatment	<ul style="list-style-type: none"> Producers must organise treatment of WEEE at an authorised facility, giving priority to facilities that have introduced certified environmental management systems. Annexes 2 and 3 of Decree 852/2004 provide detailed requirements for treatment.
Penalties	<ul style="list-style-type: none"> Suspension, prohibition and fines (unspecified) are provided for in Act 452/2004 amending Waste Act 1072/1993.
Enforcement	<ul style="list-style-type: none"> In mid-2008 Pirkanmaa approached a few large possible free-riders, requesting that they register with a collective organisation. No penalties have been issued.

Waste Decree 1390/1993 (amended 2004 & 2009)

The *Waste Decree 1390/1993* imposes a general duty of care on producers to use the smallest amount of raw materials possible and to use secondary raw materials where feasible. Products should be durable, repairable, recyclable and non-hazardous after disposal. The Government shall promote fulfilment of these objectives and will use recyclable products and products manufactured from recyclable materials.

The Council of State is empowered to issue regulations on labelling and deposit systems, and may restrict or ban the manufacture, trade-in or use of products generating waste which may significantly hinder the organisation of waste management or result in damage to health or the environment. It can also issue regulations on the duty of the manufacturer, importer, placer on the market, wholesaler, retailer, deliverer or user of a product to partly or entirely organise waste management, or to meet the costs arising from it, and on the duty of the waste generator to deliver the waste in a specified way.

The Decree already makes the waste holder responsible for organising waste management unless otherwise provided for. Waste shall be recovered if it is technically feasible and does not entail excessive costs compared with other waste management methods. Recycling has priority over energy recovery. Waste shall be collected and stored separately at all stages to the extent necessary for health and safety and where technically and economically feasible.

In principle, local authorities or groups of local authorities organise or contract out the collection and transport of household waste and commercial/industrial waste 'of a comparable nature, composition and quantity'. They may also organise the recovery, transport or disposal of other waste. However, local authorities can decide not to organise waste

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transport in areas with difficult communications, few waste holders or low waste arisings, unless transport is necessary for health or environmental reasons.

Regulations on landfill were issued which anticipated the requirements of the draft EC Landfill Directive. Since October 1997, all recyclable materials must be recovered.

Act 452/2004, adopted in September 2004, amends the 1993 Waste Act, and includes provision for producer responsibility for waste tyres, newspapers, magazines, office papers, packaging, vehicles and EEE (*see below*).

Act 1583/2009 amending the Waste Act came into force on 1 January 2010. It amends the Producer responsibility chapter of the Waste Act (3a):

- Names of producers of EEE, vehicles, packaging, tyres newspapers and magazines must be individually registered with Pirkanmaa (a producer organisation can arrange the registration).
- The register must be notified about the functioning of the take-back system. EEE producers must also provide evidence of a security guarantee (i.e. recycling insurance or a blocked bank account).

Waste Act 646/2011, in force from May 2012

In late 2007 the Ministry of Environment began a comprehensive reform of the Waste Act. After the end of the consultation period in November 2009, the original taskforce continued working on the draft until December 2010. It was approved by Parliament in March 2011, published on 16 June as [Waste Act 646/2011](#) and will come into force on 1 May 2012. Minor amendments have also been made to the Environmental Protection Act 86/2000 for consistency with the new Waste Act.

The new Waste Act revises the chapter on producer responsibility which was first introduced in the 2004 amendment of the previous Waste Act; transposes [Directive 2008/98/EC](#) (the Waste Framework Directive); modifies provisions applicable to waste shipments and generally streamlines existing provisions of the previous Act.

As regards *producer responsibility* - which applies to tyres, vehicles, EEE, batteries and accumulators, newspapers, magazines, office papers and packaging - key provisions of the new Act are:

- Most notably a clarification of the much debated issue of the '*ownership of waste*': The Act gives producers the '*primary responsibility for the right*' to organise waste management of products that are subject to producer responsibility. Other parties - except those engaged in reuse - may only collect waste products separately when doing so in collaboration with producers. As such, the new Act will change the role of privately-owned waste collectors who historically operated about half of all WEEE collection points and sold collected WEEE on their own account which also meant that these volumes did not appear in WEEE statistics. However, the new Act allows municipalities to arrange separate collection of these wastes if producers fail to do so. The current Waste Act prevents this.
- *Financing*: Producers share waste management costs proportionate to market share, regardless of when products were placed on the market. Exemptions from this rule apply to

B2B EEE¹, industrial batteries and vehicles that are not used by private individuals. Given the requirement to finance B2C EEE proportionate to market share regardless of the date when products were placed on the market, it is surprising that the new Act also requires a *financial guarantee* from producers. A guarantor (insurance or pledged deposits) must be legally based in the European Economic Area which suggests the register may allow non-Finnish legal entities to comply for products placed on the Finnish market.

- *Collective organisations:* Producers may transfer their waste management obligation to an approved and registered collective system. A system must be controlled by producers only and have the financial means to finance operations for at least six months (no upper limit is set for reserves). Systems must submit financial and operational plans annually to Pirkanmaa. The Government may require certain systems to cooperate to ensure among other things the overall functioning of the collection infrastructure.
- *Retail take-back:* Retailers must take-back B2C EEE (on 1:1 basis) and portable batteries (on 0:1 basis) from end-users at their own cost.
- *Public awareness:* Producers are responsible for informing the public about available collection facilities and must submit an annual report about these activities to Pirkanmaa.
- *Registers:* Registers must be publicly accessible. *Registers of producers* (not just systems) are to be maintained by the Pirkanmaa (Swedish: Birkaland) region's Centre for Economic Development, Transport and the Environment (ELY Keskus); the *register for international waste shipments* by the Finnish Environment Institute and the *Register of (domestic) waste shipments* by all Municipal Waste Management Authorities.

As before, the producer responsibility provisions do not apply to producers of packaging with an annual turnover of less than EUR 1 million.

Other changed provisions include

- an export ban on waste for recovery (unless there are no processing facilities available in Finland or if facilities in the recipient country are substantially better than those in Finland, or the purpose of the export is of experimental nature to test new treatment methods),
- more stringent supervision and disclosure instruments, revised fines and sanctions (failure to be registered may result in products being prevented from being placed on the market) and monitoring obligations for waste processors.
- in line with Directive 2008/98/EC the five-step waste hierarchy of the Waste Directive. The hierarchy stipulates that, first and foremost, generation of waste should be prevented. If prevention is not possible, waste must be prepared for re-use or recycling. The disposal of waste is the last option.

¹ End user remains responsible for B2B WEEE placed on the market before 13 August 2005 unless similar replacement product is purchased. In any event, producer and final holders may agree on sharing the cost of B2B WEEE.

Waste Plan 2008

In April 2008, Parliament approved a new waste plan. It aims to reduce the amount of municipal solid waste being sent to landfill to 20% in 2016 (from the current 60%). Municipal waste incineration is planned to triple to 30% (new incinerators to be added to the one already in operation to allow the proportion of biowaste going to landfill to be reduced to less than 25%). The remaining 50% of municipal solid waste will be recycled.

The plan sets a waste prevention target, first stabilising the volume of municipal waste then reducing it to the 1999 level by the year 2016. Waste prevention will be promoted through the use of new steering methods to increase materials efficiency in production processes, construction and consumption, and by making the enforcement of current legislation more effective.

Product eco-efficiency will be enhanced by promoting the use of eco-efficiency criteria in product standards, in eco-labels and in tendering for public procurement. Economic instruments to promote the sustainable use of natural resources will be examined, and materials efficiency for specific sectors will be intensified via voluntary agreements.

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Compliance

Registered producers

	Aug-05	2006	2007	2008	2010	Jul-11
Elker	290	705	770	900	919	938*
Serty			108		121	121
ERP (NERA)			13		16	19
Individual compliance (B2B only)			99		110	115
Total			~990		~1,160	~1,190

* Selt: 680; ICT: 244; FLIP: 14

Individual compliance

There are no individual systems for B2C EEE. As of July 2011 around 115 B2B producers comply individually. Individual compliance requires an approved waste plan. Most producers use approved service providers, in which case the waste plan application can be very simple. Producers must state that 6 months of waste management costs have been set aside in case of insolvency. Documentary proof is not required. A B2B producer may only shift operational and financial responsibility for WEEE to the end-user: the obligation to report WEEE arising in each year remains with the producer. Forms (in English) for trans-boundary shipments are available [here](#).

Collective compliance

Collective systems did not start operations until late 2005, after the August producer registration deadline. There are 3 competing systems: Elker (an umbrella WEEE organisation for industry associations Selt, ICT and Flip), SERTY and ERP (formerly NERA).

In September 2006, the Pirkanmaa Region's Environment Centre, which oversees producer responsibility for WEEE and meets the systems monthly, warned collective systems that they were failing to fulfil their obligations on two important points:

- Systems were not doing enough to ensure reuse of equipment where this was possible. The Centre threatened to fine two systems, Serty and NERA, if improvements were not made.
- The existing collection network was not providing enough coverage nationwide. The Centre said that the network should cover at least 235 counties, with a minimum of 340 static sites. In addition, the remaining counties should be covered by a sufficient rotating collection. Again, fines were threatened if improvements were not made by November 2006. According to Pirkanmaa, this goal has now been achieved. The systems have now set up a [common website](#) under the Finnish Solid waste Management Association, through which all collection points can be located.

Waste management companies owned by municipalities operate about 50% of WEEE collection points. These waste management companies have formed an association with which collective systems have a framework agreement. The terms are not disclosed. We estimate that the agreement envisages a payment of around EUR 100 per tonne of WEEE for collection.

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Clearing for over- or under-collection

Pirkanmaa does not act as a clearing house. Until late 2008 systems had operated more or less independently of each other. This created challenges for integrating the systems' and municipal ('common') collection networks and for clearing for over- or under-collection between the systems.

By March 2009 the systems had agreed on a regional allocation of waste CRTs and consumer electronics collected from the municipal collection network. The same principle was applied to cooling appliances from July 2009. All large appliances had always been taken back by the municipal network. By the end of 2009 accumulated imbalances had largely been cleared for CRT as well as ICT WEEE.

Collection (tonnes)	2006	2007	2008	2009	2010
Elker	4,645	8,000	8,000	7,500	6,900
Serty	21,420	18,000	21,500	-	23,000
ERP	13,500	16,500	23,000	-	25,000
Collection / POTM* all systems			41%		41%
Elker			23%	26%	17%
Serty			43%		43%
ERP			55%		63%

* estimates based on POTM data from systems

Elker

www.elker.fi

- **Founders:** Producers' umbrella organisation Elker Oy was set up and is owned by the producer associations SELT, ICT Producer Co-operative and FLIP. Elker provides administrative, logistics and reporting and registration services for the producer associations' members. It has set up an extensive nationwide collection network for household and B2B WEEE.

SELT

For producers and distributors of EEE in categories 1, 2, 5, 6, 7, 8 & 9

ICT

For producers of 'teleinformatic' and telecoms equipment.

FLIP

For producers of lamps and lighting equipment.

- **Membership fees:**

	Turnover	Joining fee
For SELT	< EUR 150,000	EUR 250
	> EUR 150,000	EUR 500
For ICT	< EUR 1 million	EUR 500
	< EUR 10 million	EUR 1,500
	> EUR 10 million	EUR 3,000

B2B producers have to pay an annual reporting fee of EUR 250.

- **Recycling fees:** Elker's recycling fees for household waste also cover dual-use EEE (i.e. WEEE from trade, industry or other commercial activity which corresponds in type and volume to WEEE from households). The fees include

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the cost of guarantees and administration. All products in categories 2 and 5 are classified as consumer products. Elker also handles category 10 (automatic dispensers) but these are only subject to the annual B2B fee.

- Many fees were reduced in 2006, but even so SELT was able to invoice producers only 50% of the published fees.
- In 2011 the fees for some categories were further reduced, including those for IT equipment, lighting equipment, tools, medical devices and monitoring/control instruments. Selected fees below, detailed fees are available to SELT members from contact info@elker.fi.

	EUR, excl. VAT (23%)	2006 (2 nd half)	2007 (1 st half)	2010	2011
1	Large household appliances (SELT) Large household appliances (washing machines etc.) Cooling appliances	0.13 / kg 0.40 / kg	0.07 / kg 0.28 / kg	0.04 / kg 0.40 / kg	0.04 / kg 0.40 / kg
2	Small household appliances (SELT)	0.35 / kg	0.14 / kg	0.04 / kg	0.04 / kg
3	IT and telecommunications equipment (ICT) Class 1- e.g. mouse, keyboard Class 2 – e.g. telephones Appliances with displays	0.36 / kg 0.44 / kg 0.52 / kg	0.25 / kg 0.12 / kg 0.37 / kg	0.08 / kg 0.06 / kg 0.73 / kg	0.00 / kg 0.06 / kg 0.54 / kg
4	Consumer equipment (ICT) Consumer equipment – e.g. cameras, music players TV equipment	0.31 / kg 0.31 / kg	0.13 / kg 0.37 / kg	0.13 / kg 0.66 / kg	0.10 / kg 0.66 / kg
5	Lighting equipment (FLIP) Lamps - e.g. fluorescent, luminaires Lighting equipment up to EUR 10 sales price	0.30 / unit 5% of retail	0.25 / unit 0.02 / unit	0.15 / pc 0.02 / kg	0.10 / pc 0.005 /kg
6	Electric and electronic tools 0 – 4.99 kg Electric and electronic tools 20 – 39.99 kg Electric and electronic tools over 40 kg	0.50 / unit 3.50 / unit 1.12 / kg	0.30 / unit 2.50 / unit 0.09 / kg	0.02 / kg 0.02 / kg 0.02 / kg	0.01 / kg
7	Toys, leisure and sports equipment (SELT)	0.35 / kg	0.18 / kg	0.01 / kg	0.01 / kg
8	Medical Devices (SELT)	0.35 / kg	0.60 / kg	0.15 / kg	0.05 / kg
9	Monitoring and control instruments (SELT)	0.4 / kg	0.28 / kg	0.10 / kg	0.005 /kg

- **Elker's B2B Service:** End-of-life dual-use EEE, i.e. products of a type and quantity that could be used in households, are treated as B2C WEEE. For EEE that can only be classified as B2B (such as automatic dispensers), Elker Oy has set up a nationwide recycling network of 30 pre-processing facilities where B2B WEEE can be returned either by the end-user or the producer. Producers then fund the treatment and recycling of the B2B WEEE.
- **Reporting:** Quarterly and one annual report, with the exception of B2B producers who only need to report once a year. Reports are made on Elker's web-based reporting system. Producers are required to report on:
 - B2C and B2B EEE put on the national market;
 - B2C & B2B EEE put on the market in the Åland Islands, and
 - EEE supplied directly to households in other EU countries by distance selling (i.e. mail order or e-commerce)

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- **Reporting must be carried out between 15 February and 15 March.** Companies who fail to submit their report by the deadline face a fine of EUR 1,500 from the system of.
- **Research:** Elker Oy's report [Modelling and developing a WEEE collection network in the Oulu region in Finland](#) identifies problems of WEEE collection and suggests changes including guidelines for the collection process and instructions for collection centre staff, a common, electronic system for documenting collected WEEE, sorting and labelling of WEEE at the collection points rather than further downstream (this would help identify reusable items as early as possible), improved communication between all stakeholders and closer co-operation between collective systems. The report was written as part of the Sytrim project, which aims to develop and create social enterprises in the field of recycling. Sytrim is funded by the European Social Fund.
- **Collection:** [Elker services about 400 collection points.](#)

<i>Tonnes</i>	<i>POTM (Approx)</i>	<i>Collection (Approx)</i>	<i>POTM/Collection</i>
2007	25,500	8,000	31%
2008	35,000	8,000	23%
2009	28,500	7,500	26%
2010	41,700	6,900	17%

ERP Finland (formerly NERA)



- **Founders:** The Nordic Electronics Recycling Association (NERA) has established collective systems in most Nordic countries and in the Baltic States. In Finland it established a collection and logistics network in partnership with Stena Technoworld Oy. In spring 2008, NERA Finland signed a cooperation agreement with ERP and in May 2009, the collective system changed its name to ERP-Finland.
- **Members:** [19 members](#), including Dell, Electrolux, Giganti, Hong Kong Import, Hewlett-Packard and Sony Nordic. ERP-Finland is an open system, as legally required, but is not actively seeking new members. Its members account for roughly 45% of the market.
- **Coverage:** B2C EEE only.
- **Fees:** Members pay an annual fee and a joining fee according to turnover:

<i>Turnover</i>	<i>Membership fee</i>
Under EUR 1 million	EUR 1,000
Under EUR 10 million	EUR 2,000
Over EUR 10 million	EUR 3,000
- **Guarantee:** Each member of ERP-Finland provides the required guarantee (6-months of WEEE costs) separately in the form of a bank guarantee.
- **WEEE costs:** ERP-Finland allocates actual WEEE costs to members every month based on WEEE collected and treated.
- **Collection:** [To date 451 collection points are serviced by ERP](#) in over 230 municipalities, complemented by mobile collections in particular to remote areas.

Serty


www.serty.fi

- **Founders:** SER-TUOTTAJAYHTEISÖ (SERTY Oy - Society of WEEE Producers) was set up in 2005 to take responsibility for the collection of household WEEE in most categories except 3 (IT and telecoms), collecting only B2C products.
- **Members:** Currently 121 members, including: Ikea, Gorenje, Sharp, Sony Ericsson Mobile, Whirlpool, LG, Miele, BSH, Kaercher, Black & Decker.
- **Fees:** Members pay a joining fee according to turnover of EEE, varying from EUR 1,000 - 5,000. An annual fee of EUR 100 also applies. Extract from price lists:

Cat.	FEES EUR per unit, incl. VAT	1-Jul-08	1-Sep-09	1-Jan-11
1	Large cooling appliances	15	16	21
	Small cooling appliances	6	8	11
	Small equipment	0.1	0.1	1
2	Cookers	0.15	0.15	0.5
4	Large CRT	16	16	16
	Small CRT	8	8	8
	Flat Screen TVs, > 28"	9	9.5	9
	Flat Screen TVs, 19" to 27"	1.5	3	6.5
	Flat Screen TVs and Monitors, < 18"	0.5	2	3
5	Luminaires for Fluorescent Lamps	0.2	0.2	0.5
	Luminaires for Incandescent Lamps	0.1	0.1	0.25
	Lamps, except filament bulbs	0.05	0.1	0.15
6	Electrical Tools - handheld	0	0	0.25
	Electrical Tools - non-handheld when in use	0.5	0.7	1
7	Radio controlled toys	0.2	0.2	0.25
8	Medical Equipment	0.5	0.5	0.5
9	Monitoring Instruments	0.5	0.5	2.5

- **Collection:** 367 collection points nationwide.
- **Operations:** Of the collective organisations in Finland, Serty collects the majority of categories 1 and 4 (household appliances and consumer electronics).

Legislation and Compliance

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Results

Volumes placed on the market and collected

Reported volumes placed on the market have decreased steadily from 31.2 kg per capita in 2007 to about 25 kg per capita in 2010. An estimated three-quarters of the EEE is used in private households.

Collection of B2C WEEE through the WEEE systems increased from 7.1 kg per capita in 2006 to about 10.2 kg in 2010. Collection through private scrap dealers is not counted.

Reported B2B collection remained at 0.5 kg per capita up to 2008.

(Tonnes)	2006	2007	2008	2009*	2010*
POTM	139,000	164,700	162,600	154,000	~135,000
- per capita (kg)	26.4	31.2	30.7	28	25
Collected B2C	37,200	46,300	52,000	51,000	~55,000
- per capita (kg)	7.1	8.8	9.8	9.5	10.2
Collected B2B	2,500	2,300	2,600	-	-
- per capita (kg)	0.5	0.4	0.5	-	-
Total Collected	39,700	48,600	54,600	51,000	~55,000
- per capita (kg)	7.5	9.2	10.3	9.5	10.2

* 2009 & 2010 data from collective systems - official figures have not yet been released.

Recycling Companies

L&T Finland

Founded in 1905, [L&T](#) operates in Finland, Sweden, Latvia and Russia. It specialises in waste management and recycling services including the processing, recycling and recovery of WEEE and hazardous waste as well as data erasure. It provides WEEE services for individually complying businesses.

LHJ Group

Founded in 1905 and now operating widely throughout Finland and the Baltic States, [LHJ Group](#) consists of several waste management companies, namely Cool Finland Oy and Electronics Processing Oy, which offer WEEE recycling for businesses and collective systems, providing treatment for refrigeration appliances, CRT devices and small electronics among others.

Kuusakoski

[Kuusakoski](#) operates in Finland, the Baltic States, China, the UK, Poland, Russia, Sweden and Taiwan. The company offers a range of treatment and recycling services including WEEE and batteries.

Stena

Northern European recycling and environmental management group [Stena](#) operates in Finland, Sweden, Norway, Denmark, Poland, Russia, Germany and Austria. It owns Stena Technoworld Ltd, which specialises in metal recovery, e-waste, hazardous and chemical wastes and data erasure. Services include transport and storage.