

To the Ministry of Environment, Finland

Subject: Respond on the public consultation of
the Waste Act

Uppsala, 2 June 2020

chapters 6 and 7 The Waste Act

1. Government Decree on Waste (179/2012, Waste Regulation)

Objectives for material recycling of municipal waste

Separate collection of municipal waste

ACE Nordic comments:

ACE Nordic urges Finland to consider a mandatory separate collecting target for beverage cartons 70%. This would minimize the risk of that the beverage cartons ending up in incineration and it will lead to better material recycling and thus increase the possibility of achieving the new collection goals as well as Finland's high demands for a circular society. Several countries in Europe can demonstrate that this works, i.g. Austria, Belgium and Germany. Separate collection is an essential tool to reach the high recycling targets mandated by the EU waste legislation and is technically feasible as proven by the existence of well-functioning collection systems across Europe (This is also supported by the Eunomia report, ENV.F.1/FRA/2014/0063 published in April 2020 "beverage cartons are recycled at scale across the EU, (...) so based upon this consideration they should be categorised as recyclable packaging").

4 Government's regulations on producer responsibility

4.1 Changes that apply to all producer responsibility areas

4.2 The Government's regulation on packaging and packaging waste (518/2014)

Objectives for material recycling of packaging waste, Rules for calculating material recovery rate

ACE Nordic comments:

ACE Nordics supports traceability and transparency and hence supports the reporting of waste effectively recycled into materials, products or substances for all packaging solutions. The new criteria have to apply to all. We call for a level playing field for all packaging formats and hence call on Finland to apply the new methodology and criteria to all packaging formats and materials, including the beverage carton, without exemption or threshold. This will avoid market distortion.



Well-established existing standards should be used e.g. to define the average loss rate or the humidity rate. In the case of paper-based products, the CEN EN 643 standard is a well-functioning, widely recognised & applied standard that delivers the needed reference for paper-based products, including beverage cartons.

ACE Nordic acknowledges the requirement to separately report on the recycling rate for each material used in composite packaging. It notes however that the impact of such separate reporting on the recycling rate of the non-predominant material will be marginal, while the burden will be significant. To ensure a sound reporting system and secure collection of beverage cartons, a specific collection target for beverage cartons should be set by Finland.

Obligations for separate collection of packaging waste

Submission of follow-up information and reporting to the Commission

Basic requirements for manufacturing, composition, the possibilities to reuse and recycle packaging and other requirements

ACE Nordic comments:

ACE Nordic urge Finland to consider collection target for beverage cartons of 70%. It is a way to make sure that this type of products are truly separately collected and do not end up in incineration. Separate collection is an essential step in the transition to a circular economy, as it increases the volume and the quality of materials available for recycling. In line with the Waste Framework Directive, separate collection can also be achieved through the collection of certain types of waste together (e.g. in Finland together with similar material as paper and cardboard packaging), when this allows achieving high quality recycling. Separate collection is an essential tool to reach the high recycling targets mandated by the EU waste legislation and is technically feasible as proven by the existence of well-functioning collection systems across Europe. (This is also supported by the Eunomia report, ENV.F.1/FRA/2014/0063 published in April 2020 “beverage cartons are recycled at scale across the EU, (...) so based upon this consideration they should be categorised as recyclable packaging”. Thanks to collection targets for beverage cartons, some Member States reach annual recycling rates of beverage cartons above 70%. Separate collection is economically practicable, as its costs are covered by producer fees under Extended Producer Responsibility (EPR) schemes. This will increasingly be the case thanks to the obligation on EU Member States to ensure that all packaging is covered by EPR schemes as of 2024. Separate collection is environmentally beneficial, since recycling of used beverage cartons into new paper products (such as cardboard boxes) keeps materials in the loop.

Best regards,

Lina Bergström

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