1 Proposals and their impacts

1.1 Implementation of the Batteries Regulation

1.1.1 Main proposals

The proposal proposes the adoption of the national supplementary regulation necessary for the application of the Batteries Regulation. The Batteries Regulation and the Waste Act shall be applied in parallel. Insofar as the Batteries Regulation leaves room for national discretion, no regulation extending the requirements of the Regulation is proposed for national regulation. Several articles of the Regulation that provide national discretion, such as the fulfilment of obligations, where applicable, imposed on producers by an association of producers, correspond to the provisions of the Waste Act currently in force. The proposed amendments included in the proposal concern only batteries as well as waste electrical and electronic equipment. Possible broader amendments to the producer responsibility provisions laid down in Chapter 6 of the Waste Act — including provisions on sanctions for breaches of different regulations — will be assessed and prepared as part of the comprehensive reform[1] of the Waste Act initiated by the Ministry of the Environment. The aim of the reform is to convert the Waste Act into the Circular Economy Act.

The key proposed amendments to the Waste Act necessary for the implementation of the Batteries Regulation concern the regulation of producer responsibility. Several sections of the Waste Act would be supplemented with references to those articles of the Batteries Regulation that contain more detailed and directly applicable provisions than those currently in the Waste Act. In addition, certain articles of the Regulation require the amendment or repeal of existing provisions in the Waste Act concerning batteries where they conflict with the Regulation.

It is proposed that subsection 2 of section 47 of the Waste Act be amended to the extent that it conflicts with the Batteries Regulation. The Batteries Regulation sets out an obligation for operators collecting and receiving waste batteries to hand them over to the relevant producers or producer responsibility organisations. This obligation to hand over waste batteries is in conflict with section 47(2) of the Waste Act, which provides that an operator other than the producer may offer services related to the reuse or preparation for reuse of products, without prejudice to the producer's primary right. As a result, operators other than producers would continue to be allowed to offer services related to the reuse of batteries, but not services related to the preparation for reuse of batteries considered to be waste.

Section 53(2) of the Waste Act, which allows the producer of industrial batteries and batteries for vehicles not intended for private use, as well as the holder of such batteries, to agree on a different distribution of waste management costs than set out in section 46(1), is proposed to be repealed as it is contrary to the Batteries Regulation. Directive 2006/66/EC, on which section 53(2) of the Waste Act is based, will be repealed under Article 95 of the Batteries Regulation as of 18 August 2025. Under the derogation, the producer and holder of an industrial battery have been able to agree on the allocation of waste management costs in a manner contrary to section 46 of the Waste Act. The obligations set out in the Batteries Regulation for industrial batteries require that, going forward, a collective, nationwide collection system must be established for all industrial batteries, regardless of when they were placed on the market. Collective responsibility represents a significant change, requiring all producers of industrial batteries to join the producer responsibility system and participate in waste management costs.

The producer's obligation to organise the reception and transport of end-of-life products (section 49) and the distributor's obligation to receive such products (section 56) are set out in detail in the Batteries Regulation. Accordingly, references to the articles of the Batteries Regulation must be added to the relevant provisions of the Waste Act. Provisions clarifying the guarantee requirement imposed by the Batteries Regulation would be added to section 61 of the Waste Act, along with corresponding amendments to the existing provisions on guarantees. Sanctions required by the Batteries Regulation would be provided by supplementing the provisions on administrative fines (section 131) and penal provisions (section 147) in the Waste Act.

The Pirkanmaa Centre for Economic Development, Transport and the Environment (ELY Centre) supervises producer responsibility as a national authority under the current Waste Act. The Pirkanmaa ELY Centre's supervisory role over producer responsibility would be transferred to the national Permit and Supervision Agency as part of the reform of state regional administration, effective from 1 January 2026. In addition, according to the proposal, the Finnish Transport and Communications Agency would supervise compliance with the obligations imposed on online platform providers under the Batteries Regulation, using the powers provided in the Act on the Supervision of Online Intermediary Services (18/2024).

[1] Amendment to the Waste Act Part III – Circular Economy Act 2024–2026 – Ministry of the Environment

Furthermore, the necessary references to the Batteries Regulation would be added to the Environmental Protection Act and the Electrical Safety Act.

To implement the Batteries Regulation, the necessary amendments would also be prepared to Government Decrees concerning batteries and accumulators, waste electrical and electronic equipment, end-of-life vehicles, and the restriction of hazardous substances in vehicles, as well as to the Waste Decree.

These amendments are intended to enter into force on 1 January 2026.

1.1.2 Principal impacts

Economic impact

The Permit and Supervision Agency would act as the competent authority supervising producer responsibility under the Batteries Regulation, to which the supervisory duties of the Pirkanmaa ELY Centre are proposed to be transferred as of 1 January 2026 (Government Proposal 13/2025). The Pirkanmaa ELY Centre has estimated that the monitoring tasks of producer responsibility will increase significantly when the provisions on producer responsibility in the Batteries Regulation enter into force. The Pirkanmaa ELY Centre has assessed the need for additional resources as follows:

EUR 1 000	One-time	Permanent from 2026 onwards
Staff expenditure		180 (2 person-years)
IT system (information system changes, maintenance, small development)	150	15
Total	150	195

The Pirkanmaa Centre for Economic Development, Transport and the Environment (ELY Centre) has assessed the need for additional resources as one person-year for supervisory duties and one person-year for reporting duties. The expansion of supervisory duties is estimated to increase the need for additional resources as follows: expansion of supervision due to increased and more detailed regulation, 0.4 person-years; increasing numbers of products placed on the market and producers, 0.3 person-years; strengthening the supervision of free-riding and especially distance sales, 0.3 person-years. The expansion of reporting duties is estimated as follows: significant expansion of reporting, 0.5 person-years; further expansion of reporting in accordance with the Commission’s forthcoming implementing act, 0.3 person-years; reporting by waste management facilities and collectors by process, 0.3 person-years; and quality control reporting (Article 76), 0.2 person-years.

In addition, the ELY Centre has assessed that the Regulation requires information system changes to the producer register, among other things due to the expanded reporting requirements. The additional funding need for information system changes is estimated at EUR 150 000. Maintenance and minor development funding for the producer register also needs to be increased. The ELY Centre estimates the annual need to be EUR 15 000.

Fees for chargeable public-law services referred to in section 6(3) of the Act on Criteria for Charges Payable to the State are laid down in Government Decree 794/2024 on the chargeable services of the Centres for Economic Development, Transport and the Environment and the Development and Administrative Centre for 2025. According to the Decree, the re-registration decision for producer responsibility organisations is subject to a fee (EUR 7 700), as is the annual verification of monitoring data (EUR 1 400). Based on the fees set out in the Decree, the Pirkanmaa ELY Centre estimates a one-off revenue of EUR 30 800 from re-registration decisions for producer responsibility organisations and an annual revenue of EUR 5 600 from the verification of monitoring data. Due to the implementation of the productivity programme, the resourcing of the Pirkanmaa ELY Centre would be managed by reallocating existing appropriations.

The proposed changes to national legislation are not, as such, expected to have direct economic impacts on households or businesses. Economic impacts on businesses arise directly from the binding requirements of the Batteries Regulation, which the national implementation complements.

As the collection, recycling, and safety requirements for end-of-life batteries tighten under the Batteries Regulation, there is likely to be upward pressure on the costs to be borne by producers. In addition, the safety requirements for collection infrastructure laid down in the Regulation will increase collection costs. On the other hand, the growth in recycling volumes, along with the use of automation and digitalisation, may significantly reduce costs within the recycling value chain. The costs of waste management and recycling consist of multiple factors, including collection, transport, sorting, pre-treatment, the recycling process, waste treatment, and compliance with quality, reporting, and environmental requirements. In addition, the costs are influenced by labour and administrative costs.

The Batteries Regulation requires producers to maintain a nationwide collection network for each battery category and to collectively cover the costs of recycling “orphan” batteries. Total costs vary significantly by battery type, depending on the complexity of the recycling process and the market value of the recovered raw materials. Some waste batteries have a positive value as waste, while for others — such as used lithium-ion batteries — recycling facilities may charge gate fees amounting to several euros. Over a longer timeframe of 10–20 years, the value of recycled raw materials classified as critical, such as cobalt, lithium, and nickel, is expected to cover the costs of the recycling value chain for lithium-ion batteries containing these materials.

Impact on the activities of public authorities

The Pirkanmaa ELY Centre has estimated that its work duties will increase with the entry into force of the provisions on producer responsibility in the Batteries Regulation. The supervisory and reporting duties required by the Regulation will expand as the scope and level of detail of the regulation increase. Compared to the current situation, the renewal of registration decisions and other decisions, guidelines, and instructions concerning producers, producer responsibility organisations, and other actors referred to in the chapter on producer responsibility, the growing supervisory duties, and the significantly expanded reporting requirements will clearly demand more resources.

The European Commission has estimated that battery demand will increase fourteenfold between 2018 and 2030. This growth in volume means an increase in the number of entities to be supervised and requires, in particular, the strengthening of free-rider monitoring. A significant proportion of batteries are placed on the market through distance sales, the supervision of which also calls for additional resources. Compared to the current situation, reporting will multiply and become more detailed. Furthermore, the reporting obligation will also extend to waste management operators and recyclers — a requirement that did not previously exist. The growing reporting obligations will lead to an increased workload in reporting supervision and create a need for additional resources. In addition, the new producer responsibility obligations under the Batteries Regulation will require comprehensive communication, guidance, and information activities.

The Pirkanmaa ELY Centre’s supervisory role over producer responsibility would be transferred to the national Permit and Supervision Agency as part of the reform of state regional administration, effective from 1 January 2026. The proposal to transfer the producer responsibility supervision function is included in the Government Proposal on regional administration reform currently under consideration in Parliament (Government Proposal 13/2025).

According to the proposal, the Finnish Transport and Communications Agency would supervise compliance with the obligations concerning online platform providers laid down in the Batteries Regulation, using the powers provided in the Act on the Supervision of Online Intermediary Services (18/2024). This would constitute a relatively small new supervisory task for the Finnish Transport and Communications Agency, which could be managed within existing resources.

Impact on companies

The requirements on waste management and producer responsibility set out in the Batteries Regulation have a significant impact on battery producers and distributors. The Regulation expands the definition of a producer, includes detailed collection requirements for each battery category, specifies rules on the reuse of batteries, changes in their intended use, and remanufacturing, and tightens requirements on recycling efficiency and material recovery. In addition, the Regulation introduces recycled content requirements for materials such as cobalt, lead, lithium, and nickel.

The Regulation changes and broadens the cost, organisational, communication, and reporting responsibilities and obligations of producers and producer responsibility organisations, clarifies and supplements the fee modulation requirements applicable to producer responsibility organisations, and contains more detailed requirements than the Waste Act regarding producer registration. Furthermore, the Regulation requires producers and producer responsibility organisations to provide a financial guarantee to ensure that producer cost liabilities can be met in the event of insolvency or cessation of operations. For industrial batteries, the Batteries Regulation shifts responsibility from an individual to a collective model, meaning that the existing derogation concerning industrial batteries in the current Waste Act will be repealed. In addition, the Batteries Regulation requires distance sellers established in a Member State or a third country to appoint an authorised representative by written mandate to ensure compliance with producer responsibility obligations in each Member State where they sell batteries or accumulators.

In total, there are estimated to be several thousand producers in Finland whose operations are subject to the waste management and producer responsibility requirements of the Batteries Regulation. The number of producers can be estimated, for example, based on the membership figures of battery producer responsibility organisations. There are currently four producer responsibility organisations for batteries in Finland approved under the Waste Act: Akkukierrätys Pb Oy, ERP Finland ry, Recser Oy and Suomen Autokierrätys Oy. It is difficult to produce an exact estimate, as some companies are members of more than one producer responsibility organisation, while others are not members of any. For example, actors in the reuse sector and various repair services are not typically members of a producer responsibility organisation. Altogether, there are 1traction batteries577 producers registered across the four organisations. These include 405 members in Akkukierrätys Pb Oy, 177 in ERP Finland Oy's battery producer responsibility organisation, 1,168 in Recser Oy, and around 127 in the producer responsibility organisation for traction batteries in electric vehicles operated by Suomen Autokierrätys Oy.

The Regulation also introduces changes to the obligations applicable to distributors of batteries. It sets out the obligation for distributors to take back waste batteries and to hand over the returned waste batteries to the relevant producers or producer responsibility organisations. This obligation applies to those battery categories under the Regulation that are included in the distributor's product range. Where applicable, the obligations shall also apply to distributors who supply batteries to end-users under distance sales contracts.

In addition, the Regulation imposes new obligations on waste batteries handlers and recyclers. These include, among others, the obligation for operators of treatment facilities for waste electrical and electronic equipment and end-of-life vehicles to hand over the waste batteries generated during treatment to the appropriate producer or producer responsibility organisation of the relevant battery category, as well as targets concerning recycling efficiency and material recovery. The Regulation also lays down detailed reporting requirements for waste management operators and permitted facilities.

Environmental effects

According to the Commission's impact assessment, the regulatory framework established by the Batteries Regulation is expected to have positive environmental effects. The new obligations under the Batteries Regulation are expected to prevent and reduce the adverse impacts arising from the generation and management of waste batteries. The Regulation aims to advance battery recycling in Europe, as in addition to the environmental benefits of recycling, the use of recycled raw materials can enhance strategic autonomy. Its obligations seek to establish a safe and sustainable value chain for all batteries, taking into account factors such as the carbon footprint of battery production, the ethical sourcing of raw materials, and supply security. Moreover, the Regulation may facilitate the reuse, repurposing, and recycling of batteries and improve their environmental performance. The Regulation is intended to raise the level of environmental protection across the life cycle of all batteries and for all actors involved—producers, distributors, end-users, and those engaged in the collection, treatment, and recycling of waste batteries. It promotes the circular economy and mitigates environmental and social impacts at every stage of the battery life cycle. The Regulation lays down more ambitious targets than existing legislation for collection rates, recycling efficiency, and material recovery for each battery category.

In 2022, a total of 3 738 tonnes of portable batteries and accumulators were placed on the Finnish market, either as standalone units or integrated into equipment, and 1 964 tonnes were collected from consumers and other stakeholders. Under current waste legislation, at least 45% of portable batteries and accumulators must be collected. According to statistics from the Pirkanmaa ELY Centre[2], Finland has consistently met the collection targets for portable batteries every year.

[2] Batteries – Producer Responsibility – ELY Centre

The majority of batteries are still lead-acid batteries, although the number of lithium batteries has increased in recent years. In 2022, recycling facilities processed 22 337 tonnes of lead-acid batteries, achieving a recycling efficiency of approximately 75%. By 2030, the recycling efficiency for lead-acid batteries must be increased to 80%.

The quantities of nickel-cadmium batteries recycled have remained relatively low. In 2022, recycling facilities processed 126 tonnes of nickel-cadmium batteries, achieving a recycling efficiency of approximately 80%. From 2025 onwards, the Batteries Regulation requires a recycling efficiency of 80% for nickel-cadmium batteries. In addition, the Regulation sets material-specific recovery targets for nickel, with 90% to be achieved by 2027 and 95% by 2031. Other types of batteries, such as lithium batteries, alkaline batteries, and nickel-metal hydride batteries, met the current minimum recycling efficiency target of 50%.

Not all waste batteries are collected separately or appear in official statistics. Batteries that are not recycled may end up being carried along with electrical equipment for reuse. Waste batteries may also be processed under an incorrect waste code or end up being exported outside Europe, in which case they may become part of waste-related crime. Some waste batteries also end up in mixed waste.

Social effects

The circular economy of batteries is considered a significant enabler of new business for Finland's battery sector[3]. In Finland, expertise in metallurgy is particularly advanced, which may contribute to recycling material flows being directed to Finland, provided that the collection and treatment network for end-of-life batteries and related logistics solutions are in place. Research on battery recycling is also of a high standard in Finland.

One of the objectives of the Batteries Regulation is to increase the reuse, repurposing, and recycling of batteries. New business opportunities could emerge at various stages of the battery value chain, from design to battery repair, preparation for reuse, or remanufacturing. Batteries designed in an environmentally sustainable and material-efficient way are also a competitive advantage in the international market. Solutions in the machinery and transport equipment industry based on electrification and battery use, along with related charging and grid connection infrastructure, also create new business opportunities.

1.2 Implementation of the WEEE Directive Amendment

1.2.1 Main proposals

The proposal suggests limiting the producer's financial responsibility for the waste management costs of waste electrical and electronic equipment (WEEE) as required by the WEEE Directive amendment. The proposal suggests that the producer's liability for the costs of the waste management of electrical and electronic equipment be limited as required by the amendment to the WEEE Directive. In order to define the producer's financial responsibility in accordance with the WEEE Directive amendment, it is proposed to add new annexes 2-3 to the Waste Act, which correspond to the respective annexes of the WEEE Directive.

Waste solar panels placed on the market before 13 August 2012 would be excluded from the producer's financial responsibility. Producer responsibility would also not apply to electrical and electronic equipment belonging to device categories listed in Annex 2 of the WEEE Regulation that were placed on the market before 15 August 2018. However, an exception would be made for electrical and electronic equipment that is included in the device categories listed in Annex 1 of the WEEE Regulation. The producer would be responsible for the waste management costs of electrical and electronic equipment categories listed in Annex 1 of the WEEE Regulation, placed on the market before 13 August 2005, only if the discarded equipment is replaced with a new device serving the same or similar purpose. The costs of waste management for electrical and electronic equipment excluded from the producer's financial responsibility would be borne by the holder of the equipment.

According to the proposal, the producer would also be required to include in their waste management system equipment that falls outside their financial responsibility but belongs to their sector. In such cases, the producer could charge the last holder of the discarded equipment a reasonable fee for organising waste management. The producer and the holder of a non-household electrical and electronic device could agree otherwise on the sharing of waste management costs, regardless of when the device was placed on the market.

[3] National Battery Strategy 2025

Additionally, the necessary amendments to the Government Decree on waste electrical and electronic equipment would be prepared.

1.2.2 Principal impacts

Economic impact

The Commission has not prepared an assessment of the proposal's economic impacts.

The change in cost responsibility for waste electrical and electronic equipment under the proposal affects the distribution of costs between producers and waste holders. However, since the total amounts of waste equipment affected by the change are small and spread over several years, the economic impacts of the directive change are not expected to be significant. The impacts will fall on producers and producer organisations of waste electrical and electronic equipment, who have not assessed the economic impacts as significant. In Finland, there are five approved producer organisations for electrical and electronic equipment: SELT ry, ICT producer cooperative TY, Flip ry, ERP Finland ry and SER producer association ry.

According to statistics maintained by Pirkanmaa ELY Centre on electrical and electronic devices, the average amount of devices placed on the market was 125 000 tonnes per year in 2015–2018 (before the open scope) and an average of 160 000 tonnes per year in 2019–2022, which shows how many devices have come under producer responsibility with the introduction of the open scope. Such devices include certain building automation equipment. There is no data on the quantities of solar panels placed on the market before 2019, as previously they were reported as part of equipment category 4 (consumer electronics). However, collection volumes of solar panels have so far been very small; on average, about 10 tonnes per year were collected during 2019–2022.

According to Customs import statistics, the quantities of solar panels imported have been increasing at least since 2022, when the Customs classification method for solar panels was clarified. In particular, there is an increase in the quantities imported from outside the EU.

Photovoltaic cells assembled into modules or panels (CN 8541 4300):			
2022	Imports by country of origin	UU-27	1 460 t
2022	Imports by country of origin	External trade	14 905 t
2023	Imports by country of origin	UU-27	1 732 t
2023	Imports by country of origin	External trade	20 522 t

Solar panels are long-lasting devices whose technology is continuously evolving. Over time, increasing amounts of these devices will be scrapped. It is already necessary to prepare for the future development of recycling methods for end-of-life solar panels as well as the costs arising from their collection and recycling. Depending on the case, the costs would be borne either by the producer or the holder of the device.

Impact on the activities of public authorities

The proposal would have only a minor impact on the authority's operations. The Pirkanmaa ELY Centre already supervises producer responsibility for electrical and electronic equipment waste. The change would require updates to the authority's guidelines and possibly minor modifications to reporting forms, which Pirkanmaa ELY Centre estimates would cost approximately EUR 20 000. The Pirkanmaa ELY Centre's supervisory role over producer responsibility would be transferred to the national Permit and Supervision Agency as part of the reform of state regional administration, effective from 1 January 2026.

Impact on companies

The proposal’s impacts on producers and producer organizations of electrical and electronic equipment would not be significant. The proposal would limit the producer’s cost responsibility, but in practice, it may be very difficult or impossible to determine the timing when the end-of-life electrical and electronic equipment was placed on the market. The proposal would include a producer obligation to accept also those end-of-life electrical and electronic devices for which, under this proposal, the waste holder would bear the cost responsibility. For these products, producers would have the right to recover the waste management costs from the waste holders.

Environmental effects

The Commission has not prepared an environmental impact assessment of the proposal.

Improper treatment of waste originating from photovoltaic solar panels and from electrical and electronic equipment within the open scope can cause significant harmful effects on health and the environment. Therefore, it is important to ensure the proper collection and treatment of waste originating from photovoltaic solar panels and electrical and electronic equipment within the open scope, as well as to maximise the utilisation of the resulting waste. For this reason, the proposal includes an obligation for producers to also accept devices that are not subject to the producer’s cost responsibility but fall within their sector into the waste management system. In such a case, the producer could charge the last holder of the discarded equipment a reasonable fee for organising waste management.

In the future, more attention must be paid to the proper collection of electrical and electronic waste, as Finland has not met the collection targets set by the WEEE Directive, and the Commission initiated infringement proceedings against Finland in July 2024. The collection rate calculation method chosen by Finland has required a 65 percent collection rate, but the collection rate in Finland was 54.7 percent in 2021, which was the year selected by the Commission for review. Going forward, Finland aims to meet the collection targets of the WEEE Directive and has already initiated several measures to achieve these targets.