



MUOVITEOLLISUUS RY
Finnish Plastics Industries Federation

The Growing Regulation Burden and How to Survive

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- Federation of Finnish plastics converters and recyclers
- 103 member companies
- Advocacy in economical, environmental and labour issues
- Our vision is to get #RightPlasticsInRightPlace

Are we overregulated by EU ?



- Yes, at least many SMEs feel that way
- Overregulation was one reason to Brexit, it caused farmer demonstrations and weakens the credibility of EU among people
- Better and fair regulation, please, not just more, and more complicated
- Why so much regulation? What wisdom lies behind this ?



A few regulative cases in which we as FIPIF are now involved

- National EoW, taxation and levies of plastics
- PPWR, SUP, Green Claims
- Waste and drinking water (EPR)
- REACH for polymers, updates
- PFAS
- Pellets IMO and EU
- Food Contact and similar with toys, medical...
- UN-treaty
- Custom tariffs CBAM
- And many many others

How many §'s there are for plastics sector and how do they effect, how to live with them?

Nobody really knows: Tens, maybe far over hundred.

Several different regulative areas : Materials/chemicals, product, labour issues , security, safety, finance etc

Rising sustainability ruling like CSRD, taxonomy, national defence

New ones coming for plastics industry like pellet lose EU-reg and IMO.

How to manage the regulative avalanche ?

Tactical options & Strategies

- Map what are the most relevant norms, e.g. when starting a business and later on
- Just keep on screening monitoring, avoiding traps and jumping over the pitfalls
- Adjust and customize own actions according to tracking
- Strongly influence on coming legislation
- Turn the awareness to business advantage
- Do something completely new, be “A Rulemaker”





More ways of acting

- In principle, the whole system of democratic parliamentary governance should support you. Of course, individual regulations and sub-areas are easier to follow, but extensive influencing is almost impossible
- Authorities: Highly siloed. Narrow sector help can be obtained, (for interpretation)Toiminnan
- Data management systems have some ready made available integration to regulative world
- Companies providing inspection and certification services

What it takes to act?



Rulemaker level: Actually, only the company itself can work in it. Usually requires significant size/power or new shaking innovation



Active advocacy level: Brand organizations can be effective channels in this level if they are given enough resources. Join, be active and steer according to branch needs.



Eyewitness level: Build own databases, monitoring and handling systems or outsource these services.



AI is coming to help, still a bit limited, but for example, a new generation of AI-advisors in extended producer responsibility in promising

AI-experiences

- Free AI's at least can help in a very limited way.
- They often refer to US-rules
- But is coming...
<https://sumi.fi/en/2024/04/30/sumis-artificial-intelligence-has-answered-nearly-4000-questions/>



Demo of SUMI AI

We needed AI application to help 30 000 companies to get their producer responsibilities done according to EU-laws in Finland.

We made an Apps with company **twoday** and their AI Agent, which is a learning super-intelligence that utilizes the GPT language model and the power of Poro (Reindeer), an open source language model developed in Finland.

The twoday AI Agent is “technology agnostic”. It works seamlessly together with various existing systems, platforms and language models, meaning that you are not stuck in the ecosystem of one operator or source, but flexibly do what you need to do.

The project took around ½ year and teaching/learning goes on constantly

This is just an example of one possible aid in avalanche. Should and can be developed a lot.

Questions to AI...

<https://sumi.fi/en/2024/04/30/sumis-artificial-intelligence-has-answered-nearly-4000-questions/>

My company imports plastics pellets in metal containers size 3m3 no other packaging. Do I need to pay some packaging fee? What is the size of container that is not anymore packaging?

According to the Finnish Waste Act, a packaging is defined as a product made of any material and used for the containment, protection, handling, delivery and presentation of goods from the producer to the user or consumer. However, the Waste Act does not specify a maximum size for a packaging.

In practice, the definition of packaging is often based on its use. If the container is used for the transport and protection of goods and is intended to be emptied or disposed of at the recipient, it is usually considered as packaging.

However, if the metal container you mentioned is used for repeated transport or storage of goods and is not intended to be disposed of at the recipient, it might not be considered as packaging.

For a more precise interpretation, I would recommend contacting Sumi's staff.

Can my company do all the legal producer's responsibilities alone?...



Thank you and enjoy Finland