

FINN's Supplementary Submission to the Expert Group on Circular Economy

I. Introduction: Accelerating Circularity in Norway

FINN thanks the Expert Group for the 13 January discussions and the opportunity to submit additional feedback, building on our [2024 contribution](#).

At FINN, our mission is to make circular consumption the obvious choice, with tackling overconsumption at the core of this goal. This is especially critical when considering that if all of humanity lived like Norwegians in 2024, [Earth Overshoot Day](#) would arrive as early as April 12th, just four months into the year. While secondhand trade can be a valuable tool to combat overconsumption by extending product life, saving energy, and conserving natural resources, it does not automatically provide a full solution. For secondhand trade to truly drive change, it must replace new consumption rather than merely adding on top of it. Otherwise, it may inadvertently fuel overconsumption and undermine sustainability efforts.

We believe that companies like ours have an important role to play in ensuring that secondhand is used as a powerful tool to promote a more sustainable society. However, companies cannot achieve this alone. To guide consumers away from linear consumption and toward more circular practices, stronger regulatory support is essential, particularly through the following two measures.

II. Increase Consumer Awareness through Public Campaigns

According to a [2020 Deloitte study](#) that established a fact base for Norway's circular strategy, the lack of knowledge about the environmental impact of products and inputs is a key barrier to circularity, as it prevents Norwegian businesses and consumers from making circular choices. Furthermore, entrenched cultural attitudes and habits also contribute to preventing businesses and consumers from demanding or prioritizing more circular solutions. To overcome these barriers, we believe that raising public awareness to boost participation in the circular economy is essential.

Schibsted Marketplaces, which FINN is a part of, has worked for decades to raise awareness through public campaigns and its annual SecondHand Effect report, which, as detailed in our 2024 submission, highlights the environmental benefits of buying secondhand over new.

Beyond industry efforts, there are also examples of government-funded educational campaigns contributing to increasing awareness by highlighting the economic and ecological advantages of sustainable practices, like reuse and repair. For instance, initiatives like the UK's "[Love Food Hate Waste](#)" campaign have successfully shifted consumer behaviour through targeted messaging and community engagement.

The government should, therefore, adopt a similar approach, focusing on relatable success stories and practical tips for incorporating circular practices into everyday life. Integrating reuse and repair principles into school curricula would further amplify these efforts, equipping future generations—but also families in general—with the knowledge and skills needed to participate in a circular economy. Encouragingly, initiatives of this nature already exist, such as in the Netherlands, where the country’s largest online marketplace, Marktplaats, is [used in public education campaigns in primary schools](#).

Moreover, raising public awareness to address the lack of knowledge and attitudes that hinder circularity, is already aligned with current EU legislation. For example, under the EEA-relevant [Right to Repair Directive](#), applying from 31 July 2026, Member States are required to take at least one measure promoting repair, such as information campaigns (see [recital 36](#)).

While we encourage the government to launch an information campaign on repair, we also urge them to take a broader approach to raising public awareness about circularity. To effectively address the knowledge gaps and cultural barriers hindering the circular economy, public awareness campaigns should encompass all sustainable practices—including secondhand trade—and not be restricted to repair.

III. Aligning Regulation with Circular Economy Goals

Another key barrier to circularity outlined in [Deloitte’s 2020 study](#), is that most of today’s regulations are adapted to a linear economy. Since 2020, the Government has taken encouraging steps to adapt regulations to the circular economy, including [changing the Second-Hand Goods Trade Act \(NO. Brukthandellova\)](#) to make it easier for Norwegian businesses to sell used goods. However, if Norway is to reach the goal of making it easier to conduct business with used goods—an objective that is stated in the country’s own [strategy for a circular economy](#)—further regulatory action is needed to ensure that rules actively promote circular practices while also preventing any unintended harm to them.

One example of a regulatory change with potentially negative consequences for circular businesses is [the Ministry of Finance’s proposal](#) to implement rules that mirror the EU’s DAC7 directive. In the EU, DAC7 requires online marketplaces to provide tax authorities with certain information about users who sell items or rent out accommodations via online marketplaces. Currently, for sellers using marketplace payment services, reporting occurs if they either complete 30 transactions or more, or receive €2,000 or more in compensation during a calendar year.

While FINN supports the proposal’s overall objective of collecting data on income that has historically been under-taxed in certain sectors, the rules are ill-suited to secondhand marketplaces. This is because users of FINN typically carry out several

transactions of very low value without making any profits. In fact, secondhand products are usually sold at a loss compared to their original purchase price.

Subsequently, imposing this obligation on secondhand marketplaces would only entail a significant administrative burden for such marketplaces, without adding any societal value in terms of increased taxation. Schibsted Marketplaces, of which FINN is part, already has experience implementing EU's DAC7 in Sweden and Finland and found that adjustments for DAC7 have required between 3 to 5 FTEs for 3 to 6 months to ensure compliance. These are resources that could have been spent on developing circular services, but instead, they are diverted to meeting regulatory requirements that offer no clear benefit in terms of increased taxation.

Furthermore, in many EU countries such as Germany, Belgium, and the Netherlands, misleading media reports about DAC7 have created the false impression that it introduces a new "secondhand tax", potentially deterring users from participating in secondhand trade. Schibsted Marketplaces has, therefore, made detailed [remarks and suggestions](#) about how to address these issues in its response to the consultation on the Finance Ministry's proposal.

These suggestions aim to adjust the reporting thresholds to prevent burdening circular business models and secondhand trade while ensuring clear communication from authorities to avoid negative effects on circularity. We urge the Expert Group to bring these concerns and proposed solutions from Schibsted Marketplace's consultation to the government's attention, as the proposed rules could complicate, rather than facilitate, business with used goods.

IV. Conclusion

The transition to a circular economy requires a multifaceted approach, and the measures outlined in this paper should thus be interpreted as a strong starting point. At FINN, we are committed to combating overconsumption, a root cause of the environmental crisis. However, to fully realize the potential of the circular economy, businesses need stronger regulatory support to amplify their efforts. To this end, FINN presents five consolidated measures to the Expert Group, drawing from both our current submission and our September 2024 proposal.

1. Increase Consumer Awareness through Public Campaigns.
2. Aligning Regulation with Circular Economy Goals.
3. Zero/Reduced VAT Rate for Secondhand Goods and Repair.
4. Zero/Reduced VAT Rate for Transportation of Secondhand Goods.
5. Changing the Tax and VAT on Donations (Uttaksskatt og Uttaksmva).

We acknowledge that further clarification is needed for practical application and are happy to engage with the Expert Group to expand on these proposals and explore effective implementation.

Contact Information

- **Nóra Dakos**, Head of Strategy — Recommerce: nora.dakos@schibsted.com
- **Jeremie Jourdan**, Director of Competition Law and Public Policy:
jeremie.jourdan@schibsted.com
- **Joe Malmkvist**, Public Policy Manager: joe.malmkvist@schibsted.com