

Delivery of alcoholic beverages

Journal number LVV-S/82384/2026
Publication date 3/11/2026

Finnish Supervisory Agency

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1 Introduction

According to the Alcohol Act (1102/2017), the Finnish Supervisory Agency supervises the delivery of alcoholic beverages throughout the country, except for Åland, and its duties also include guidance related to the alcohol delivery passport exam for educational institutions and other operators. In addition, the Finnish Supervisory Agency supervises the retail sale and serving of alcoholic beverages, as well as their marketing.

The guide compiles the key provisions of the Alcohol Act and the regulations issued under it concerning the delivery of alcoholic beverages for use by business operators, deliverers of alcoholic beverages, and educational institutions. In sections based on legislation, the guide contains a reference to the legislation in question in brackets.

The purpose of the guide is to promote the fulfilment of the objectives of the Alcohol Act and clarify the Alcohol Act’s provisions and interpretation to industry operators as well as to function as study material for alcohol delivery passport exams. The content relevant to the alcohol delivery passport exam is found in chapters 2–3 of the guide.

The delivery licence for alcoholic beverages can be applied no earlier than from 3 November 2026. Delivery of alcoholic beverages based on a granted delivery licence can begin on 3 January 2027.

The guidelines replace the Finnish Supervisory Agency's instructions on the delivery of alcoholic beverages LVV-S/60079/2026. A new chapter 4 on applying for a delivery permit has been added to the instructions. In addition, the instructions have been clarified.

2 Delivery of alcoholic beverages

The purpose of the Alcohol Act is to reduce the consumption of alcoholic substances by limiting and supervising the related business activities to prevent alcohol's detrimental effects on its users, other people and society as a whole (Section 1 of the Alcohol Act). One of these restricted and controlled forms of business activity is the delivery of alcoholic beverages. Among other things, the provisions of the Alcohol Act prevent the consumption of alcohol by minors and the harm caused by alcohol consumption.

Delivery of alcoholic beverages refers to the transport and delivery of alcoholic beverages sold through domestic retail sales, at Alko or through cross-border remote sales, for commercial purposes from the seller to the buyer or another recipient (Section 3 of the Alcohol Act).

According to the main rule of the Alcohol Act, **Alko** has the exclusive right to sell alcoholic beverages in retail in Finland. As an exception, a licence for the retail sales of alcoholic beverages can in certain cases be issued and beverages with a maximum alcohol content of 2.8% can be sold without a licence issued by the authorities. (Section 6 of the Alcohol Act.)

For the purposes of the provisions on the delivery of alcoholic beverages, **domestic retail sale** means the sale of an alcoholic beverage at a retail outlet that has been granted a retail sale licence. A retail sales licence may be granted

- to a food outlet, such as a shop, kiosk or mobile shop
- to licensed premises, such as a restaurant or café
- in connection with the place of manufacture, such as a brewery (Section 17 of the Alcohol Act).

Cross-border remote selling of alcoholic beverages refers to sales under the Alcohol Act where a private individual residing in Finland who is not engaged in an independent economic activity has purchased alcoholic beverages for consumption from another Member State of the European Union, which the seller or someone on their behalf directly or indirectly sends or transports to Finland (Section 3 of the Alcohol Act).

The provisions of the Alcohol Act on cross-border remote selling also apply to sales from countries within the European Economic Area (Section 2 of the Alcohol Act). The provisions and obligations concerning cross-border remote selling presented in this guide also apply to the sale of alcoholic beverages from countries in the European Economic Area that are not member states of the European Union (Iceland, Liechtenstein, and Norway).

Deliverers of alcoholic beverages acting on behalf of a delivery licence holder must be familiar with the provisions related to the delivery of alcoholic beverages and the obligations specified in the self-monitoring plan (Section 57 of the Alcohol Act).

2.1 Alcoholic beverage

In the Alcohol Act, an alcoholic beverage is defined as any substance or product containing more than 1.2 per cent ethyl alcohol by volume. An alcoholic beverage means an alcoholic substance intended for drinking that contains no more than 80 per cent ethyl alcohol by volume. (Section 3 of the Alcohol Act.) An alcoholic beverage thus contains more than 1.2 per cent and no more than 80 per cent of alcohol by volume.

A mild alcoholic beverage is defined as an alcoholic beverage containing no more than 22 per cent ethyl alcohol by volume. A strong alcoholic beverage is an alcoholic beverage containing more than 22 per cent ethyl alcohol by volume. (Section 3 of the Alcohol Act.)

2.2 Licence requirement for delivery

Alcoholic beverages with an alcohol content exceeding 2.8% may not be delivered without a licence from domestic retail sale, Alko, or cross-border remote selling, nor may they be delivered or handed over for a fee (Sections 5, 6 and 84 of the Alcohol Act). The delivery licence for alcoholic beverages and the rights included in it may not be sold or otherwise transferred, in whole or in part, to another party (Section 10 of the Alcohol Act). Only the holder of the delivery licence and the person carrying out the delivery organised by the holder may deliver the beverage ordered from domestic retail sale, Alko, or cross-border remote selling, to the recipient (Sections 3 and 35a of the Alcohol Act).

Before starting the delivery of alcoholic beverages, a delivery licence for alcoholic beverages must be obtained from the licensing authority. The delivery licence for alcoholic beverages is issued by the Finnish Supervisory Agency upon application. If the applicant for the delivery licence is located in the Åland Province, the licence is issued by the State Department of Åland. (Sections 5 and 7 of the Alcohol Act.) Business premises refer to, for example, in the case of a company operating nationwide, the company’s head office.

The delivery licence for alcoholic beverages can be applied no earlier than from 3 November 2026. Delivery of alcoholic beverages based on a granted delivery licence can begin on 3 January 2027.

The delivery licence for alcoholic beverages covers the transport and delivery of alcoholic beverages sold through domestic retail sales, at Alko or through cross-border remote sales, to the buyer or another recipient (Section 17a of the Alcohol Act).

One of the conditions for an alcohol delivery licence is a self-monitoring plan (Section 17 of the Alcohol Act). A self-monitoring plan refers to a licence holder's written plan to ensure the legality of their activities (Section 56 of the Alcohol Act).

If a licence holder decides to materially change the nature or extent of their activities so that the licence issued to it no longer covers the altered activities, the licence holder must apply for a change to the licence prior to the change. No changes may be carried out until the licensing authority has approved the change to the licence. (Section 11 of the Alcohol Act.)

A licence is required for transportation and delivery of alcoholic beverages for commercial purposes only. For example, it is not considered a delivery of an alcoholic beverage if a consumer purchases alcoholic beverages from a retail outlet and delivers them to a friend without compensation. Such activity is permitted without a licence under the Alcohol Act.

The police are the competent authority for investigating potential violations when the operator does not have a delivery licence for alcoholic beverages. The penal provisions applicable to the unlawful sale and supply of alcohol are provided in Chapter 50a of the of the Criminal Code of Finland 39/1889. A person who sells, supplies or otherwise delivers an alcoholic beverage to another party contrary to the Alcohol Act may be sentenced to a fine or imprisonment for an alcohol offence. The proceeds of the crime are forfeited to the State as provided in the Criminal Code of Finland.

2.3 Receiving alcoholic beverages in a delivery

The delivery of alcoholic beverages is permitted only if the alcoholic beverage has been purchased and received from domestic retail sales, Alko, or cross-border remote sales (Section 35a of the Alcohol Act).

A deliverer of alcoholic beverages may receive and hand over an alcoholic beverage purchased from domestic retail sales to a buyer or other recipient only if it is a fermented alcoholic beverage with a maximum alcohol content of 8.0% or an alcoholic beverage produced in another way with a maximum alcohol content of 5.5% (Section 35a of the Alcohol Act). Stronger alcoholic beverages may not be received for delivery from domestic retail sales, even if there is a retail sales licence for fruit wines or craft beers.

The delivery of an alcoholic beverage containing more than 8.0% alcohol produced by fermentation and an alcoholic beverage containing more than 5.5% alcohol produced by other means is only permitted if the alcoholic beverage has been purchased and received from Alko or cross-border remote selling (Section 35a of the Alcohol Act).

Alcoholic beverages purchased from domestic retail sale or from Alko can be received for delivery either from a retail outlet approved by the licensing authority or from a pick-up point for the delivery of alcoholic beverages at a retail outlet (Sections 17, 26, and 35a of the Alcohol Act).

In order to enable supervision, the holder of a delivery licence for alcoholic beverages must be able to subsequently verify from which retail licence holder or remote seller, or from which Alko retail outlet, the alcoholic beverages were received for delivery (Section 35a of the Alcohol Act).

The retail licence holder, Alko, and the remote seller of alcoholic beverages must mark the delivery as containing alcoholic beverages. If a delivery contains a strong alcoholic beverage, Alko or the remote seller of the alcoholic beverage must mark it on the delivery. (Sections 17b and 35 of the Alcohol Act.) The purpose of the marking requirement is to ensure that the deliverer of the alcoholic beverage knows that the products being handed over contain alcoholic beverages. The marking must be clear and easily visible.

Alcoholic beverages may only be sold in retail in pre-filled, sealed packages (Section 41 of the Alcohol Act). As a result, alcoholic beverages to be delivered must always be in pre-filled, sealed packages, such as bottles or cans.

Additional information on the retail sale of alcoholic beverages can be found in the Finnish Supervisory Agency's guide on the retail sale of alcoholic beverages.

2.4 Staff

In operations relating to the delivery of alcoholic beverages, there must be sufficient staff to ensure effective supervision and the maintenance of order, taking into account the scope and nature of the operations (Section 38 of the Alcohol Act). A holder of a delivery licence is responsible for the deliveries of the alcohol deliverers, so the licence holder must ensure in their operations that the time spent on deliveries is taken into account in the delivery schedules, for example.

The holder of a delivery licence for alcoholic beverages and the deliverer of alcoholic beverages must ensure compliance with the prohibitions and obligations stipulated in the Alcohol Act (Section 39 of the Alcohol Act).

A person who has not reached the age of 18 is not allowed to transport or hand over alcoholic beverages to a customer. A person delivering alcoholic beverages or taking part in supervising the delivery of alcoholic beverages cannot be under the influence of alcohol or other intoxicating substances when on duty. (Section 38 of the Alcohol Act.)

The self-monitoring plan must include a description of the tasks of the persons involved in the delivery, as well as a plan for the number and tasks of the persons acting on behalf of the holder of the delivery licence, in order to supervise compliance with the prohibitions and obligations stipulated in the Alcohol Act during the delivery (Decree of the Ministry of Social Affairs and Health on the Enforcement of the Alcohol Act (158/2018)) (StmA), Section 5a).

2.5 Deliverer of alcoholic beverages and the alcohol delivery passport

A deliverer of alcoholic beverages is the holder of a delivery licence for alcoholic beverages and the party that carries out the delivery organised by the holder, who delivers the beverage ordered from domestic retail sale, Alko, or cross-border remote selling, to the recipient (Section 3 of the Alcohol Act). Thus, both the holder of a delivery licence for alcoholic beverages as well as the party they have organised to implement the delivery and who hands over the alcoholic beverage to the recipient are considered as deliverers of an alcoholic beverage. Transporting an alcoholic beverage without handing it over to a recipient is not considered as delivering an alcoholic beverage.

The delivery licence holder must ensure that the alcohol beverage deliverer acting on their behalf has an alcohol delivery passport, which is a certificate approved by the Finnish Supervisory Agency, demonstrating knowledge of the Alcohol Act's provisions on delivery and the written advice for delivery. Every deliverer of alcoholic beverages must hold an alcohol delivery passport. (Sections 38 and 57 of the Alcohol Act.)

As part of its self-monitoring, the delivery licence holder must ensure that the alcohol beverage deliverer acting on its behalf is aware of its obligations under the Alcohol Act and the self-monitoring plan. The licence holder must keep records of the training and skills of the persons delivering alcoholic beverages and present this information to the supervisory authority upon request. (Section 57 of the Alcohol Act.)

The holder of a delivery licence for alcoholic beverages must keep an up-to-date record of the induction of new deliverers of alcoholic beverages and the verification of alcohol delivery passports (Section 5a of the StmA). This obligation can be fulfilled, for example, by the license holder recording in the self-monitoring plan the names and dates of birth of the suppliers of alcoholic beverages, as well as the date on which the supplier completed induction familiarised and their alcohol delivery passport was checked. The information must be kept up to date and presented to the supervisory authority upon request.

The Finnish Supervisory Agency may request the licence holder to submit a copy of the alcohol delivery passport for inspection if there are deficiencies in the self-monitoring plan or if there is reason to suspect the accuracy of the accounting records.

The alcohol delivery passport is issued by a provider of vocational education as defined in the Act on Vocational Education and Training (531/2017), an educational institution as defined in Section 2, Subsection 1 of the Act on Liberal Education (632/1998), a university of applied sciences as defined in the Universities of Applied Sciences Act (932/2014), or a university as defined in the Universities Act (558/2009). An alcohol delivery passport is granted to a person who has successfully passed the alcohol delivery passport exam. (Section 58 of the Alcohol Act.)

The Finnish Supervisory Agency does not keep a register of issued alcohol delivery passports. If an alcohol delivery passport is lost, a copy can be requested from the educational institution that issued the passport. The alcohol delivery passport is valid indefinitely, meaning it does not expire and does not need to be renewed.

2.6 Delivery restrictions and customers

When delivering alcoholic beverages, an alcoholic beverage may not be handed over:

- to a person under the age of 18
- to a person under the age of 20, if the beverage contains more than 22% alcohol
- to a person who is visibly intoxicated or behaves in a disorderly manner
- if there is a justified reason to assume that the alcoholic beverage will be illegally delivered or supplied (Section 37 of the Alcohol Act).

A deliverer of an alcoholic beverage must hand over the alcoholic beverage to the buyer or other recipient in person (Section 35a of the Alcohol Act). Therefore, it is not possible to deliver alcoholic beverages, for example, by robot delivery. Alcoholic beverages may not be left at the door of the recipient of the beverage order, but the delivery of alcoholic beverages always requires the simultaneous presence of the alcoholic beverage deliverer and the recipient at the time of delivery. The buyer and the recipient do not have to be the same person, as alcohol can be ordered as a gift to another person, for example.

A deliverer of an alcoholic beverage must ensure, when delivering the alcoholic beverages, that there are no obstacles to the delivery as mentioned above. If an alcoholic beverage cannot be delivered to a recipient due to a lack of the required age limit, the alcoholic beverage must be returned to the seller (Section 35a of the Alcohol Act). In this case, it is not possible to deliver the alcoholic beverage at a later time. This also applies to alcoholic beverages ordered through cross-border remote selling.

If, however, the alcoholic beverage cannot be handed over for some other reason, the alcoholic beverage must either be returned to the seller or delivered to the customer at a later permitted delivery time (Section 35a of the Alcohol Act). In such situations, it may be agreed with the customer on how to proceed in the situation and what the delivery location is if the alcoholic beverages are delivered again. When alcoholic beverages are delivered again, it is also possible to agree on the delivery location for the alcoholic beverages, excluding prohibited locations for delivery. The delivery of alcoholic beverages can only be repeated at the next possible permitted time.

If alcoholic beverages are not directly returned to the seller, the requirements of food legislation must be taken into account when storing them temporarily. If necessary, more information on the requirements of the food legislation are available by contacting the food control authority. Alcoholic beverages may not be disposed of, taken for personal use, or given away.

A holder of a delivery licence may not impose economic or managerial sanctions on the party delivering the alcoholic beverage if the latter refuses to deliver the alcoholic beverage due to the aforementioned delivery prohibitions (Section 35a of the Alcohol Act). As economic sanctions may be considered, for example, the reduction of the wages, remuneration, bonus, work shifts, or commissions of the deliverer of an alcoholic beverage. Managerial sanction may include, for example, issuing a notice or warning, changing tasks or shifts in a manner that is disadvantageous to the deliverer or other measures of the holder of the alcoholic delivery licence caused by the deliverer of the alcoholic beverage refusing to hand over an alcoholic beverage in accordance with delivery prohibitions.

The self-monitoring plan must include a description of the operating methods for handling various risk situations and situations where the sale of alcoholic beverages must be refused. In addition, the plan must include a description of the methods used to prevent the handing over or distribution of alcohol in violation of the Alcohol Act, as well as a description of how age verification is implemented in the operations. The plan must also describe the procedures used to ensure compliance with the prohibitions and obligations of the Alcohol Act in the delivery of alcoholic beverages. (Section 5a of StmA.)

The Finnish Supervisory Agency may, under certain conditions, impose conditions and restrictions on the delivery licence for alcoholic beverages. The terms and restrictions may concern age-limit checks, monitoring of intoxication, self-monitoring, or information to be provided to the supervisory authority in connection with the delivery. Conditions or restrictions may be imposed if necessary to ensure supervision in situations where the authority has reason to believe that a holder of an alcohol delivery licence or a alcohol deliverer acting on its behalf does not comply with the obligations stipulated by law regarding the delivery or handing over of alcoholic beverages. (Section 17a of the Alcohol Act.)

2.6.1 Age limit

Alcoholic beverages with an alcohol content exceeding 1.2% may not be handed over to persons under the age of 18 during a delivery. Alcoholic beverages with an alcohol content of over 22% may not be delivered to person under the age of 20 during a delivery. (Section 37 of the Alcohol Act.)

The recipient of the delivery of an alcoholic beverage is obliged to prove their age to the deliverer of the alcoholic beverage. Age must be proven with an official photo ID, such as a driver's licence, passport, or other reliable official document with a photo. (Section 40 of the Alcohol Act.)

Other reliable documents with photos issued by an authority may include, for example, a refugee travel document or an alien's passport. The document may also be digital. A foreign photo ID, passport, or driving licence may be used as proof of age if it does not appear easy to forge and if it indicates the person's age. However, a Kela card or student ID are not acceptable documents for proof of age.

The holder of a delivery licence may themselves determine which other documents with photos, issued by the authorities, they accept as proof of age. The policies may nevertheless not be discriminatory.

It is recommended that before handing over an alcoholic beverage, the deliverer of an alcoholic beverage checks the recipient's age and makes sure that the photo in their ID matches the recipient. It is recommended to check the age of all recipients regardless of their estimated age. Particular care should be applied when the customer can be suspected to be under the age 18, or under the age 20 when delivering strong alcoholic beverages, on the basis of their appearance or some other factor. If the recipient does not have an age verification document, alcohol should not be handed over to them.

If the document indicating the age is clearly fake, the deliverer of the alcoholic beverage may contact the police and notify them of the fake document. However, the deliverer of the alcoholic beverage is not entitled to seize the document presented.

If an alcoholic beverage cannot be delivered to a recipient due to a lack of the required age limit, the alcoholic beverage must be returned to the seller (Section 35a of the Alcohol Act). In this case, it is not possible to deliver the alcoholic beverage at a later time. This also applies to alcoholic beverages ordered through cross-border remote selling.

If the recipient of the alcoholic beverages does not present an ID when requested at the time of delivery, the alcoholic beverage shall be returned to the seller or delivered to the customer at a later permitted delivery time. When alcohol is delivered again, the recipient of the alcohol must present an ID to the deliverer of the alcohol, and the deliverer must verify that the recipient is of legal age.

If a deliverer of alcoholic beverages hands over the alcoholic beverage in violation of the age limits stipulated in the Alcohol Act, they may be held criminally and otherwise legally liable.

2.6.2 Intoxicated or disorderly customers

Alcoholic beverages with an alcohol content exceeding 1.2% must not be delivered to a person who is visibly intoxicated or who behaves in a disorderly manner (Section 37 of the Alcohol Act).

Intoxication is usually clearly visible if:

- a person has difficulty fixing their eyes on something or has a glazed look in their eyes;
- a person behaves disruptively, loudly, and is overly confident;
- a person has difficulty understanding things and what another person is communicating;
- a person's movements are unsure and clumsy, they have difficulty grabbing objects or pieces of furniture;
- a person staggers or totters and cannot walk straight, or falls without support;
- a person's speech is slurred and no longer understandable;
- a person is incoherent or has difficulty controlling their emotions;
- a person's reflexes are slow;
- a person is slouching;
- a person is feeling unwell.

If a person receiving an alcoholic beverage appears to be intoxicated, talking with them may provide additional clarity to the situation. One should be vigilant when assessing a customer's level of intoxication. For example, a customer smelling of alcohol is not a sufficient indicator of their level of intoxication. The characteristics of intoxication are always evaluated on a case-by-case basis. The evaluation must account for the possibility that the characteristics pointing towards intoxication may be caused by an illness or injury/disability. The application of the characteristics must not result in discrimination based on an illness or injury/disability. However, handing over alcoholic beverages to a person whose intoxication is clearly detectable should always be refused.

Special attention should be paid to monitoring intoxication if it becomes evident that large quantities of alcoholic beverages are delivered to the same address frequently within a short period of time.

Disorderly behaviour can manifest itself as defiance, aggression, or violence. Attention should also be paid to possible signs of domestic violence or other forms of violence directed at a person. Alcoholic beverages must not be handed over to a person who is behaving in a disorderly manner. Where necessary, the deliverer of an alcoholic beverage may contact the police or social services if concerns arise regarding the safety or well-being of the person or those close to them.

If a deliverer of an alcoholic beverage cannot deliver the alcoholic beverage to the recipient due to the recipient's intoxication or disruptive behaviour, the alcoholic beverage must either be returned to the seller or delivered to the customer at a later permitted delivery time (Section 35 a of the Alcohol Act).

2.6.3 Passing on alcoholic beverages

Passing on alcohol means purchasing and then delivering alcoholic beverages to another person.

A deliverer of an alcoholic beverage may not deliver an alcoholic beverage containing more than 1.2% alcohol to a recipient if there is a justified reason to assume that the alcohol will be illicitly handed over or passed on to a person under 18 years of age or to a person who is visibly intoxicated or behaves disruptively. Strong alcoholic beverages containing more than 22% alcohol must not be delivered to a recipient if there is a reasonable reason to assume that they will be handed over or passed on to a person under the age of 20. (Sections 37 and 84 of the Alcohol Act.)

A deliverer of an alcoholic beverage may not deliver an alcoholic beverage containing more than 2.8% alcohol to a recipient if there is a reasonable reason to assume that the recipient will pass on or hand over the alcoholic beverage in exchange for a fee (sections 37 and 84 of the Alcohol Act). Special attention should be paid to preventing passing on when large quantities of alcohol are delivered.

Minors, and persons who are visibly intoxicated, most often receive alcoholic beverages with the help of family members and friends. However, there is generally no reason to suspect the passing on of alcohol because there are children in the family who appear to be underage. A suspicion of the party passing on the alcohol must be assessed case by case on the basis of all observable circumstances.

If a recipient of an alcoholic beverage is accompanied by young people, the deliverer of the alcoholic beverage must assess whether the recipient intends to pass on alcoholic drinks to their companions. In the case of a group of several young people, it is necessary to verify that all of them meet the age limit for the handing over of alcoholic beverages, especially when the quantity of alcoholic beverages is large.

If the recipient of alcoholic beverages is accompanied by a person who is clearly intoxicated, the deliverer of an alcoholic beverage must assess whether they have a justified reason to expect that alcoholic beverages will be handed over to this person.

In uncertain cases, talking with the recipient of the alcoholic beverage may offer required additional information for making a decision about handing over the alcohol.

If a deliverer of an alcoholic beverage has a justified reason to assume that an alcoholic beverage will be illegally handed over or passed on and cannot therefore hand over the alcoholic beverage to the recipient, the alcoholic beverage must either be returned to the seller or delivered to the customer at a later permitted delivery time (Section 35 a of the Alcohol Act).

2.7 Delivery restrictions and locations

2.7.1 Delivery restriction locations

Alcoholic beverages containing more than 1.2% alcohol may not be delivered to the following locations (Section 37 of the Alcohol Act):

Healthcare service units

A health care service unit refers to, for example, hospitals and health centres.

Substance abuse units and residential units in child welfare institutions

The term substance abuse unit refers to a social welfare unit that provides substance abuse and addiction services. A child welfare institution refers to children's homes and reform schools, as well as other comparable child welfare institutions (Section 57 of the Child Welfare Act 417/2007).

Daycare centres, pre-primary or primary education institutions, as well as institutions providing vocational education or upper secondary education

Daycare centres refer to the daycare centres referred to in Section 1, paragraph 2, subparagraph 1 of the Act on Early Childhood Education and Care (540/2018). Pre-primary education can be organised in a daycare centre, school, or other suitable location. Basic education is usually provided in comprehensive schools. The delivery prohibition does not apply to family daycare.

Public playgrounds

Public playgrounds refer to playgrounds maintained by a municipality.

Food restaurants and other places where food or beverages are made available to the public for a fee

Examples of such places include licensed premises and other cafes or restaurants, as well as events where food or drink is served to the public for a fee.

Pre-approved licensed areas when used for serving alcohol

A pre-approved licensed area refers to premises or a location that has been approved as a serving area for alcohol. Under certain conditions, the Finnish Supervisory Agency may approve an event, meeting, or party venue and a similar area as a licensed area, where holders of alcohol serving licenses can serve alcohol by notifying the Finnish Supervisory Agency of the serving (Section 20 of the Alcohol Act). The delivery of alcoholic beverages is prohibited to a pre-approved licensed area when it is being used for serving alcohol.

If the pre-approved licensed area is a food restaurant or another place where food or beverages are made available to the public for a fee, the delivery of alcoholic beverages to the area is prohibited at all times, regardless of whether alcohol is served there or not.

Public events

In the Assembly Act (530/1999), public events refer to “events, competitions, performances and other similar events that are open to the public and which cannot be considered public meetings”. An event is a public event when it is open to anyone, either free of charge or by purchasing a ticket. Participation in a public event does not require a separate invitation or membership in a particular community. A public meeting, or so-called demonstration, is not a public event.

Public places where the police have prohibited the consumption of alcoholic beverages

The delivery of alcoholic beverages to a public place is prohibited when the police have prohibited the consumption of alcoholic beverages in that place in order to maintain public order. A public place is an area, building, vehicle or other similar place that is available for public use (Public Order Act 612/2003).

2.7.2 Operations in prohibited delivery locations

The holder of a delivery licence and the deliverer of an alcoholic beverage are responsible for ensuring that alcoholic beverages are not delivered to places where the delivery of alcoholic beverages is prohibited. This must be confirmed by the latest before the alcoholic beverage is handed over to a recipient. The supervisory authority has no possibility to maintain a list of places to which the delivery prohibition applies, which is why the application of the delivery prohibition must be assessed case by case on the basis of all observable circumstances.

Alcoholic beverages may not be delivered to the places to which the delivery prohibition applies listed in chapter 2.7.1. regardless of the purpose for which the premises or its facilities are used at any given time or the time of day of the delivery. For example, it is not allowed to deliver alcoholic beverages to a daycare centre even when events not related to early childhood education are arranged in the daycare centre facilities in the evenings. An exception is a pre-approved licensed area to which delivery is prohibited only when the area has ongoing serving.

Alcoholic beverages may also not be delivered to the yard of a daycare centre, educational institution or other facility to which the delivery prohibition applies or to another area that is part of the place in question to which the delivery prohibition applies.

If a deliverer of an alcoholic beverage cannot deliver an alcoholic beverage to the recipient due to a delivery location prohibition, the alcoholic beverage must either be returned to the seller or delivered to the customer at a later permitted delivery time to a location in which it is allowed to deliver alcoholic beverages (Section 35a of the Alcohol Act). In such situations, it may be agreed with the customer on how to proceed in the situation and what the delivery location is if the alcoholic beverages are delivered again. When alcoholic beverages are delivered again, it is also possible to agree on the delivery location for the alcoholic beverages, excluding prohibited locations for delivery. The delivery of alcoholic beverages can only be repeated at the next possible permitted time.

If alcoholic beverages are not directly returned to the seller, the requirements of food legislation must be taken into account when storing them temporarily. If necessary, more information on the requirements of the food legislation is available by contacting the food control authority. Alcoholic beverages may not be disposed of, taken for personal use, or given away.

The holder of a delivery licence may not impose economic or managerial sanctions on a party delivering an alcoholic beverage if they refuse to hand over an alcoholic beverage due to a prohibited delivery location (Section 35a of the Alcohol Act).

The self-monitoring plan must include a description of the operating methods for handling various risk situations and situations where the sale of alcoholic beverages must be refused. In addition, the plan must include a description of the methods used to prevent the handing over or passing on of alcohol in violation of the Alcohol Act. The plan must also describe the procedures used to ensure compliance with the prohibitions and obligations of the Alcohol Act in the delivery of alcoholic beverages. (Section 5a of StmA.)

2.8 Delivery time

Beverages containing more than 2.8% alcohol can be delivered to the recipient only between 9 a.m. and 9 p.m. (Section 42a of the Alcohol Act). The delivery of alcoholic beverages is therefore permitted at the same time as their retail sale. This also applies to alcoholic beverages purchased through cross-border remote selling. Alcoholic beverages may be delivered to a holder of a delivery licence or to a party acting on their behalf, and may be transported at other times, but they may not be handed over to a customer before 9 a.m. or after 9 p.m. For example, a delay in delivery does not justify the delivery of an alcoholic beverage outside the delivery time.

If an alcoholic beverage cannot be delivered to a recipient within the delivery period due to a lack of the required age limit, the alcoholic beverage must be returned to the seller (Section 42a of the Alcohol Act). This also applies to alcoholic beverages ordered through cross-border remote selling.

If, however, the alcoholic beverage cannot be handed over during the delivery time for some other reason, the alcoholic beverage must either be returned to the seller or delivered to the customer at a later permitted delivery time (Section 42a of the Alcohol Act). In such situations, it may be agreed with the customer on how to proceed in the situation and what the delivery location is if the alcoholic beverages are delivered again. When alcoholic beverages are delivered again, it is also possible to agree on the delivery location for the alcoholic beverages, excluding prohibited locations for delivery. The delivery of alcoholic beverages can only be repeated at the next possible permitted time.

If alcoholic beverages are not directly returned to the seller, the requirements of food legislation must be taken into account when storing them temporarily. If necessary, more information on the requirements of the food legislation are available by contacting the food control authority. Alcoholic beverages may not be disposed of, taken for personal use, or given away.

Beverages containing more than 1.2% but not more than 2.8% alcohol may be delivered to recipients at any time of the day (Sections 3 and 42a of the Alcohol Act).

The self-monitoring plan must include a description of the operating methods for complying with the delivery times for alcoholic beverages and what to do if a recipient cannot be reached or an alcoholic beverage cannot be handed over within the delivery times (Section 5a of the StmA).

2.9 Alcoholic preparations

The Alcohol Act contains a separate section for solid alcohol preparations or ones containing sold material which are intended for consumption as is or which can be rendered drinkable by separating ingredients from them or by adding liquid to them (Section 55 of the Alcohol Act). Such alcohol preparations include chocolate sweets and ice cream containing alcohol.

If a solid alcohol preparation contains more than 2.8 per cent of alcohol by weight, the provisions concerning the retail, delivery, serving, cross-border remote sales and marketing of alcohol beverages apply to it. The preparation's alcohol content in percentage by weight will be regarded as its alcohol content in percentage by volume. (Section 55 of the Alcohol Act.) For example, the delivery of chocolate sweets and ice cream containing more than 2.8 per cent alcohol by weight from domestic retail sales, Alko, or cross-border remote sales is only possible with a delivery licence for alcoholic beverages. The delivery of such alcoholic preparations must comply with the rules governing the delivery of alcoholic beverages, such as delivery times and prohibitions, for example, with regard to age limits and intoxication.

2.10 Marketing and prohibition of practices contrary to good practice

According to Section 4 of the Alcohol Act, the sale, delivery, and marketing of alcoholic beverages and preparations must not be done in a manner contrary to good practice. An action is considered contrary to good practice if it is clearly at odds with generally accepted social values. An action contrary to good practice is, in particular, one that is approving of or indifferent to endangering health when under the influence of alcohol, narcotics, medicinal products, or chemicals.

The marketing of alcohol delivery is generally permitted. The marketing and pricing provisions of Sections 50 and 51 of the Alcohol Act are, as a general rule, applied not only to the marketing of alcoholic beverages, but also to the marketing of the delivery of alcoholic beverages when specific identifiable alcoholic beverages or their brands are presented in connection with the marketing of the delivery. In addition, the provisions of the Consumer Protection Act (38/1978) must be taken into account in the marketing of deliveries, so that marketing may be prohibited if, for example, it uses inappropriate sales promotion methods or ones that are contrary to good practice, or if advertising is aimed at minors, even if it does not advertise specific alcoholic beverages at the same time.

The advertising of alcohol beverages is prohibited in public places. Traditionally, advertising and brand names on the exterior of delivery vehicles operating in public places and on public transport, such as buses or trams, have been considered prohibited advertising. This marketing provision also applies to the exterior surfaces of an alcohol deliverer's delivery vehicle, bicycle, or other similar means of transport when operating in a public place, as well as to the driver's clothing. Using the official name of a company is generally not considered to be prohibited marketing in a public place even if the name contains the name of an alcoholic beverage. However, the name of the company may not be used for the clear purpose of advertising an alcoholic beverage, which is prohibited by the Alcohol Act.

Advertising for the delivery of alcoholic beverages must be decent and restrained. The advertising may not attract so-called vulnerable consumer groups, such as minors, young people or heavy drinkers of alcohol. Advertising must not be presented in connection with content aimed at minors, such as television programmes, online games, music, or videos. The marketing of alcohol delivery services must not depict minors or other vulnerable consumer groups, even if the minor is not depicted as the user of the beverage.

Advertising of mild alcoholic beverages is prohibited on television and radio between 7 a.m. and 10 p.m., and in movie theatres when the film being shown is permitted for viewers under 18. Advertising of strong alcoholic beverages is completely prohibited in television and radio broadcasting, as well as in the public presentation of moving images in cinemas. The restrictions also apply to the marketing of the transport of alcoholic beverages if, at the same time, the alcoholic beverage is marketed, for example, by highlighting the brand names, labels, or other elements referring to specific alcoholic beverages.

The image given of the properties or effects of an alcoholic beverage may not be misleading and heavy consumption of alcohol may not be depicted in a positive light. In the marketing of alcoholic beverages, the alcohol content must not be emphasised as a positive feature or linked to driving a vehicle. The marketing of alcohol delivery services must not depict driving under the influence or consuming alcohol before driving, during a break from driving, or while transporting a vehicle. Creating such an impression is also prohibited. Alcoholic beverages may not be handed out for free. Alcoholic beverages may also not be given as a free product together with the delivery of another product.

The delivery of alcoholic beverages must not be made attractive by drawing consumers' attention to non-essential additional benefits, such as delivery benefits or free products. A free gift cannot be promised as a random benefit in the delivery of an alcoholic beverage, e.g. "a free glass for the first 100 buyers of the product". The giveaway must not reward the buyer for increasing their alcohol purchases. Ancillary products may not be advertised as "free" or otherwise gratuitous, because consumer must pay for the main product to receive them.

Any advertising of alcoholic beverages which involves consumers entering a game, raffle, or contest is prohibited. A deliverer of an alcoholic beverage can thus not organise games, raffles, or contests which are related to certain alcoholic beverages or include alcoholic beverages as prizes. Organising contests, games and price draws in social media services or on websites is also prohibited. An alcohol delivery operator may also not use visual or verbal content produced by consumers in the network service, nor share such content, if the advertisement for the transport service also promotes specific alcoholic beverages.

According to Section 68 of the Alcohol Act, the consequences of violating marketing regulations can be directed at both the orderer and the executor of the marketing, as well as any person employed by them, such as the deliverer.

The Finnish Supervisory Agency has drawn up a guide on the marketing of alcohol, which include examples of how the regulations are interpreted. However, the overall impression of marketing is generally decisive in the assessment of when an activity must be deemed unlawful.

2.10.1 Pricing of alcoholic beverages

Advertising the special prices of alcoholic beverages outside the sales outlet in retail is prohibited if the sale is valid for a period of less than two months. These prices cannot be advertised on television, radio, newspapers, websites, or social media channels, among others. The prices of alcoholic beverages may only be advertised if the sale is valid for a period of at least two consecutive months.

The Finnish Supervisory Agency recommends that the advertisement includes the validity period of the price. If the intended validity of the price of an alcoholic beverage is indefinite, the start date of the price should be mentioned in the advertisement. It must be possible to determine the validity period of the price of an alcoholic beverage if the supervisory authority request it.

Joint discount prices are prohibited in the pricing of alcoholic beverages. A joint discount price refers to a situation in which, for example, the buyer gets five ciders for the price of four, or the same beer sold in packs of 24 cans is cheaper than when buying single cans of beer.

The price of an alcoholic beverage when sold and delivered individually must not be higher than the price of a similar beverage when delivered in a multi-package. For example, if beer is sold and delivered in a multipack of 24 cans for the price of 24 euros, the price of an equivalent beer can sold and delivered individually cannot exceed one euro.

The provision does not apply to a situation in which the same alcoholic beverage is sold in individual packages of different sizes, for example 0.33-litre and one-litre cans. The price per litre of an alcoholic beverage in a bigger individual package may be cheaper than its price per litre in a smaller individual package.

The sales outlet may not refuse to sell and deliver multi-packaged items individually.

The delivery of alcoholic beverages may not be advertised so that the price of delivery is lowered or the delivery is free on the basis of the quantity of alcoholic beverages that is purchased. If the delivery includes other products in addition to alcoholic beverages, the price of alcoholic beverages cannot be included in the purchased amount on the basis of which a discounted or free delivery will be offered.

It is prohibited to offer and grant rebates on the price of alcoholic beverages, calculated on the basis of purchases of alcoholic beverages or other consumer goods or services. Alcohol sales may not be promoted in the context of delivery loyalty cards or bonus programmes in such a way that the purchase rebates would make the purchasing and delivery of alcohol cheaper the more alcoholic beverages or other consumer goods are bought. In addition to offering such rebates, their payment is also prohibited.

In delivery sales, benefits arising from ordering or purchasing products other than alcohol or the transportation itself cannot be used to offset the price of alcoholic beverages.

In Finland, no purchase rebates may be paid in connection with a benefit programme, even for purchases and transportation of alcoholic beverages that have taken place abroad.

2.11 Annual report of the delivery licence holder

The delivery licence holder must report to the Finnish Supervisory Agency the total number of deliveries they have made on an annual basis by 31 January. (Appendix of the Alcohol Act). If there have been no alcohol deliveries during a reporting period, the licence holder must report this by the prescribed date.

One delivery refers to a delivery of alcoholic beverages on the basis of one order. The annual report must include all deliveries, regardless of whether the alcoholic beverages were purchased from a domestic retailer or Alko, or through cross-border remote sales. A delivery also includes a delivery in which alcoholic beverages could not be handed over, for example, on the basis of a delivery prohibition.

The annual report must be submitted in electronic format in the e-services of the alcohol trade register Allu at lvv.fi/allu. More detailed instructions on the content of the information required in the annual report will be made available later in Allu. Electronic services for annual reports are currently being prepared.

If the licence holder fails to make the report within the specified time, the Finnish Supervisory Agency may require the licence holder to report the total number of deliveries under the threat of a periodic penalty payment. The Finnish Supervisory Agency must issue a reminder to the licence holder and allow a reasonable period of time for the aforementioned information to be provided before imposing a periodic penalty payment. (Appendix of the Alcohol Act.)

Repeated failure to submit the annual report of a delivery licence holder despite official reminders may also result in the revocation of the licence for a specified period or permanently (Section 72 of the Alcohol Act).

3 Supervision and sanctions

A holder of a delivery licence has primary responsibility for ensuring that the Alcohol Act is followed in the delivery of alcoholic beverages. In practice, a licence holder's systematic self-monitoring means the preparation, maintenance, and implementation of a written self-monitoring plan in cooperation with the deliverers working on behalf of the delivery licence holder.

Nevertheless, systematic self-monitoring does not negate the need for supervision carried out by the supervisory authorities. The key principle of the monitoring carried out by authorities is the steering and development of licence holders' activities to prevent violations of the Alcohol Act. Defectively planned self-monitoring and previous omissions in the self-monitoring plan also constitute grounds for targeted supervision by the authorities.

3.1 Systematic self-monitoring

A holder of a delivery licence must have sufficient and accurate details of their activities and the related statutory obligations, as well as the risks associated with their practical implementation (Section 56 of the Alcohol Act).

A party or person applying for a delivery licence and a licence holder must draw up a written self-monitoring plan to ensure the legality of their activities, comply with it, and keep records of its implementation. The plan needs to be kept up to date. The self-monitoring plan must be submitted as an attachment to the licence application. (Sections 17a and 56 of the Alcohol Act.)

A licence holder must ensure that an alcohol deliverer acting on its behalf is aware of the contents of the delivery licence and its obligations under the Alcohol Act and the self-monitoring plan (Section 57 of the Alcohol Act). The self-monitoring plan and the delivery licence for alcoholic beverages must be kept available for the personnel implementing the plan and the supervisory authorities (Section 1 of the StmA).

The self-monitoring plan must include a description of the operating concept, the scope of the operations, and the area of operations. The self-monitoring plan must also include a description of the operating methods for handling various risk situations and situations where the sale of alcoholic beverages must be refused. In addition, the plan must include a description of the methods used to prevent the handing over or distribution of alcohol in violation of the Alcohol Act, as well as a description of how age verification is implemented in the operations. It must also include a description of the operating methods for complying with the delivery times for alcoholic beverages and what to do if a recipient cannot be reached or an alcoholic beverage cannot be handed over within the delivery times. (Section 5a of StmA.)

In addition, the self-monitoring plan must clarify the tasks of the persons carrying out the delivery and the number of persons acting on behalf of the holder of the delivery license. The plan must also state how the prohibitions and obligations of the Alcohol Act are ensured in the delivery of alcoholic beverages: for example, how to ensure that alcoholic beverages are not handed over contrary to age limits, delivered to visibly intoxicated persons, or delivered to places where alcoholic beverages must not be delivered. (Section 5a of StmA.)

The self-monitoring plan must explain the risks of the emergence of the detrimental effects of the delivery of alcohol, how compliance with law will be monitored, how the management of critical risks will be realised, and how any deficiencies detected will be remedied (Sections 1 and 56 of the Alcohol Act).

A self-monitoring plan must include a plan on any measures to be carried out due to critical situations and observations made by the authorities, as well as on the annual assessment of the self-monitoring plan's execution and on keeping it up to date. If a self-monitoring plan is changed, it must be possible to determine the date of the change later. (Section 1 of the StmA.)

The self-monitoring plan must include a description of how the licence holder and the person in charge of the self-monitoring plan follow that the personnel comply with the self-monitoring plan and other instructions given to them. The plan must also include an explanation of how the staff's competence in accordance with the Alcohol Act is ensured and how the records of employee training and competence are kept. (Section 1 of the StmA.)

When necessary, the self-monitoring plan may be combined with a self-monitoring plan pursuant to the Food Act (297/2021) and Tobacco Act (549/2016) and may also be drawn up electronically (Section 56 of the Alcohol Act).

In addition to a self-monitoring plan, a holder of a delivery licence for alcoholic beverages must keep an up-to-date record of the induction of new deliverers of alcoholic beverages and the verification of alcohol delivery passports (Section 5a of the StmA).

The Finnish Supervisory Agency has drawn up a template form for self-monitoring plans. By carefully filling in and updating this form, licence holders can meet the requirements set for the self-monitoring plan.

The Finnish Supervisory Agency may impose self-monitoring conditions or restrictions to a delivery license for alcoholic beverages, if necessary to ensure supervision in situations where the authority has reason to believe that a holder of an alcohol delivery licence or an alcohol deliverer acting on its behalf does not comply with the obligations stipulated by law regarding the delivery or handing over of alcoholic beverages (Section 17a of the Alcohol Act).

3.2 Supervision by the authorities

The Finnish Supervisory Agency supervises the retail sale, delivery, serving, marketing, and cross-border distance selling of alcoholic beverages throughout the country, as well as on vessels that are registered in Finland, as referred to in the Aviation Act (864/2014) and the Maritime Act (674/1994) (Section 60 of the Alcohol Act). In the Åland Province, the serving of alcohol is supervised by Åland's Environmental and Health Protection Authority, and the sale, delivery, and marketing of alcoholic beverages are supervised by the State Department of Åland.

The Alcohol Act requires extensive executive assistance and stakeholder cooperation for the realisation and enforcement of the licensing administration, steering and supervision. To prevent the detrimental effects of alcohol and to combat the underground economy and white-collar crime, cooperation has been intensified with the tax, distraint, customs, police, labour protection, and health protection as well as food safety authorities.

Supervisory authorities can audit licence holders' facilities, activities, and documents, as well as the transport of alcohol-containing substances. Representatives of the supervisory authorities must be provided with unimpeded access to the premises and documents to be monitored, as well as the right to save the information required in monitoring activities. (Section 62 of the Alcohol Act.)

Authorities monitor the delivery of alcoholic beverages in a systematic manner. Supervision is conducted both as scheduled and without advance warning. Remote inspections which aim to support licence holders in the planning and implementation of self-monitoring, among other things, are also conducted according to an agreed schedule.

Surprise inspections are carried out, for example, through test purchases. The supervisory authority has the right to make test purchases if necessary to monitor compliance with the age-related delivery prohibition or delivery time. The supervisory authority has the right to use adult volunteers to conduct test purchases. Volunteers may be used to make test purchases of alcoholic beverages that they are legally entitled to purchase. (Section 62 of the Alcohol Act.)

The supervisory authority has the right to receive from the holder of the retail licence the name and licence number of the delivery licence holder who delivers the alcoholic beverage. In addition, the supervisory authority has the right to obtain the name and contact information of the deliverer who delivered the alcoholic beverage from the holder of the delivery licence for the purpose of supervision. (Section 62 of the Alcohol Act.)

The police may report any violations and irregularities observed during the delivery of alcoholic beverages to the Finnish Supervisory Agency for possible further action in accordance with the Alcohol Act. In addition, a deliverer of alcoholic beverages who has provided an alcoholic beverage to, for example, a minor or a person who is clearly intoxicated may be subject to criminal penalties such as a fine.

3.3 Penalties for violating the rules

The starting point for the supervision carried out by the authorities is to guide and advise, but in cases involving clear violations, the licence holder's activities are intervened in by means of sanctions pursuant to the Alcohol Act. Recurring minor deficiencies and violations also constitute grounds for issuing a warning or imposing a penalty. In the most serious cases, a licence may be revoked for a fixed period of time or permanently. If a licence holder is unable to achieve a satisfactory level of compliance with the Alcohol Act through self-monitoring despite the recommendations, conditions or restrictions may also be imposed on the licence.

The supervisory authority may prohibit a licence holder from continuing the business activity referred to in the Alcohol Act to the extent that the activity is materially contrary to good practice and has not been remedied or ceased within the set, reasonable period of time, despite the supervisory authority's request to this effect (Sections 4 and 68 of the Alcohol Act). The prohibition can be made more effective with a periodic penalty payment (Section 70 of the Alcohol Act).

The supervisory authority may order the licence holder to pay a penalty payment of at least EUR 300 and at most EUR 1,000 if the provisions on the delivery of alcoholic beverages or the competence of the deliverer of alcoholic beverages or the conditions or restrictions set in the delivery licence have been violated, or if the set obligations have been neglected (Section 71 of the Alcohol Act).

In assessing the amount of the penalty, the nature, harmfulness, and recurrence of the action are taken into account. A penalty payment shall not be imposed if the action is considered minor or if imposing a penalty is unreasonable considering the nature of the action, its frequency, its planning, compliance with the self-monitoring plan, and other circumstances. The licence holder may be given a warning if there is reason to do so. (Section 71 of the Alcohol Act.)

The supervisory authority may revoke the licence for a specified period if, after a warning or the imposition of a penalty, the operator continues to breach or fail to fulfil its obligations and the breach is considered to be of a serious nature. A licence may also be revoked for a fixed period of time if the operator violates their essential obligations provided in the Alcohol Act in a manner that shows a blatant disregard for the obligations related to self-monitoring. When determining the length of the period, particular consideration is given to the seriousness of the action on which the cancellation is based and the circumstances of the act. (Section 72 of the Alcohol Act.)

The supervisory authority may permanently revoke a licence if, after the imposition of a penalty payment or the revocation of a temporary licence, the operator continues to intentionally violate or neglect their obligations and the conduct is also considered grossly negligent overall. A licence may also be revoked permanently if the operator violates the Alcohol Act with an act or omission that causes a serious threat to human health and the action overall has been aggravated. (Section 72 of the Alcohol Act.)

A licence may also be permanently revoked if the conditions for the licence are not met and the situation is not corrected within the specified time limit (Section 72 of the Alcohol Act).

The sanctions for marketing violations are provided for in section 68–70 of the Alcohol Act. The sanctions may be imposed on both the party ordering and the party executing the marketing and a person who works for them.

When detecting shortcomings or activity contrary to the marketing provisions of the Alcohol Act, the Finnish Supervisory Agency may provide informal guidance for remedying the activity. If the guidance is insufficient for ending the unlawful activity, the Finnish Supervisory Agency may prohibit the party which has ordered the marketing activity or the party executing it, and a person working for them, from continuing or repeating the activity contrary to the provisions. The prohibition can be made more effective with a periodic penalty payment.

In addition, a deliverer of alcoholic beverages who has provided an alcoholic beverage to, for example, a minor or a person who is clearly intoxicated may be subject to criminal penalties such as a fine.

4 Applying for an alcohol delivery licence

Before starting the delivery of alcoholic beverages, a delivery licence for alcoholic beverages must be obtained from the licensing authority. The delivery licence for alcoholic beverages can be applied no earlier than from 3 November 2026. The delivery licence for alcoholic beverages covers the transport and delivery of alcoholic beverages sold through domestic retail sales, at Alko or through cross-border remote sales, to the buyer or another recipient. (Sections 5, 7 and 17 a of the Alcohol Act.)

The alcohol delivery licence is specific to the licence holder and entitles them to carry out the licensed activity throughout Finland. The delivery licence for alcoholic beverages and the rights included in it may not be sold or otherwise transferred, in whole or in part, to another party. (Sections 10 and 17 a of the Alcohol Act.) Only the holder of the delivery licence and the person carrying out the delivery organised by the holder may deliver the beverage ordered from domestic retail sale, Alko, or cross-border remote selling, to the recipient (Sections 3 and 35a of the Alcohol Act).

An alcohol delivery licence may be granted to a natural person or a legal person (Section 12 of the Alcohol Act). The alcohol delivery licence is granted as a permanent or temporary licence (Section 9 of the Alcohol Act).

The delivery licence for alcoholic beverages is issued by the Finnish Supervisory Agency upon application. If the applicant for the delivery licence is located in the Åland Province, the licence is issued by the State Department of Åland. (Section 7 of the Alcohol Act.) Business premises refer to, for example, in the case of a company operating nationwide, the company's head office.

An application for an alcohol delivery licence should be submitted well in advance of the start of operations or change of the business operator, as delivering alcoholic beverages without a licence is illegal. An alcohol delivery licence is granted only when the applicant and the operations have been found to meet the requirements for obtaining a licence.

To assess the prerequisites of granting a licence, the licence application must include a statement concerning the applicant, the operations and its effects, and other relevant matters that are not already available to the licensing authority (Section 8 of the Alcohol Act).

The application for a licence must be made on a form approved by the Finnish Supervisory Agency. Alcohol delivery licence applications and notifications should be submitted in electronic format in the e-services of the alcohol trade register Allu at lvv.fi/allu. Using electronic services requires a business ID. A person who acts on a company's behalf must have the right to sign for the company or an authorisation to act on the company's behalf issued by a person with a right to sign for the company. Such an authorisation can be issued in the suomi.fi service. Electronic services are not used in Åland's delivery licence matters.

The documents to be attached to the application are specified in the electronic forms. The forms have been prepared in such a way that the information and attachments to be filled in them cover the requirements for information attached to applications and notifications set out in the Government Decree on the Implementation of the Alcohol Act (151/2018).

In order for the licence administration under the Alcohol Act to be effective, the alcohol authorities engage in extensive cooperation with other authorities and stakeholders. In connection with the processing of the permit application, the Finnish Supervisory Agency forms an overall assessment of whether the conditions for granting the permit are met. The purpose of examining the applicant's general prerequisites is to prevent alcohol-related harm and to combat the grey economy and economic crime. In forming the overall assessment, the Finnish Supervisory Agency uses information received from both other authorities and the applicant.

A supervisory authority may impose conditions and restrictions for the alcohol delivery licence if necessary to ensure supervision in situations where the authority has reason to believe that a holder of an alcohol delivery licence or an alcohol deliverer acting on its behalf does not comply with the obligations stipulated by law regarding the delivery or handing over of alcoholic beverages. The licence terms and restrictions may concern age-limit checks, monitoring of intoxication, self-monitoring, or information to be provided to the supervisory authority in connection with the delivery. (Section 17a of the Alcohol Act.)

The conditions and restrictions referred to above shall be designed in such a way that they do not prevent or unreasonably hinder the licence holder from carrying out its activities. If conditions and restrictions are imposed on the licence holder's ongoing activity, they may be made effective no earlier than 30 days after the service of notice. The licensing authority shall, at the request of the licence holder, amend or remove the conditions and restrictions attached to the licence without delay if the nature of the activity or other special circumstances have changed to such an extent that the conditions and restrictions are no longer necessary. The supervisory authority may require the licence applicant to provide necessary additional explanations to assess the necessity of the conditions and restrictions. (Section 17a of the Alcohol Act.)

The penal provisions applicable to the unlawful sale and supply of alcohol are provided in Chapter 50a of the of the Criminal Code of Finland. A person who sells, supplies or otherwise delivers an alcoholic beverage to another party contrary to the Alcohol Act may be sentenced to a fine or imprisonment for an alcohol offence. The proceeds of the crime are forfeited to the State as provided in the Criminal Code of Finland.

4.1 Requirements for applicants

A trader must take care of their statutory obligations. These obligations mean both compliance with the provisions of the Alcohol Act and, for example, the timely payment of taxes and other public charges.

An alcohol delivery licence must be granted to a natural person or legal person referred to in Section 2, subsection 1 or Section 3, subsection 1 or 2 of the Enterprise Act (565/2023), who meets the requirements set out in the Alcohol Act (Section 12 of the Alcohol Act) concerning the applicant and the business operations.

The conditions for granting a licence to a natural person are that:

- The applicant is of legal age, their legal capacity has not been restricted pursuant to Section 18 of the Guardianship Service Act (442/1999), and a guardian has not been appointed for them pursuant to Section 8, subsection 1 of the aforementioned Act
- The applicant is not bankrupt and is able to manage the business and fulfil its statutory obligations based on their assets
- The applicant is known to be reliable and is suitable for the position in terms of personal qualities (Section 13 of the Alcohol Act).

The conditions for granting a licence to a legal person are that:

- The applicant is not bankrupt and is able to manage the business and fulfil its statutory obligations based on their assets
- The members of its administrative bodies and the managing director, as well as the partners in an open company and the active partners in a limited partnership, meet the aforementioned requirements for natural persons (Section 13 of the Alcohol Act).

The conditions for granting a licence are not met in the manner referred to above if the applicant’s or the person’s previous conduct as a whole indicates that the applicant or the person is manifestly unfit to carry out the business activity in accordance with the Alcohol Act (Section 13 of the Alcohol Act).

The following is considered to be such a previous action:

- The applicant or person has significantly or repeatedly failed to pay taxes or other public payments, or the person has exercised control over a legal person that has similarly failed to pay taxes or other public payments.
- The applicant or person is, according to a foreclosure or other investigation, otherwise than temporarily unable to meet their debts.
- The applicant or person has had a permanent licence under the Alcohol Act revoked in the last five years, or the person has exercised control over a legal person whose permanent licence under the Alcohol Act has been revoked during the same period.
- The person has been sentenced to a penalty for a crime related to the intentional operation of a business during the last five years, which may result in imprisonment.
- A person can be considered to be abusing intoxicating substances based on crimes or offences committed while intoxicated or arrests made under Chapter 2, Section 2 of the Police Act (872/2011) due to intoxication (Section 13 of the Alcohol Act).

The conditions for granting the licence may be assessed in accordance with the actual circumstances if it is otherwise clear from the application or the circumstances that the applicant's business is managed or administered by someone other than the person mentioned above and the arrangements related to the procedure have been presented contrary to the conditions for granting the licence in order to circumvent the provisions on the conditions for granting the licence (Section 13 of the Alcohol Act).

In accordance with the requirement of a comprehensive assessment, the application for a licence cannot be rejected solely on the basis that the applicant has failed to pay taxes in their previous business activities, for example. An additional condition for making a negative decision is that the activity demonstrates that the applicant is manifestly unfit to carry out the licensed activity.

The conditions concerning the licence holder must also be valid after the licence has been granted. The absence of conditions may lead to the permanent revocation of the licence due to changed circumstances (Section 72 of the Alcohol Act).

An alcohol delivery licence cannot be granted to a limited company, general partnership, limited partnership, cooperative or association that is being set up, as they will only have legal capacity after their registration.

4.2 Temporary delivery licence

An alcohol delivery licence is primarily issued as valid until further notice. The licence is issued for a fixed period of time if the applicant has applied for a temporary licence or if the activities are of a temporary nature. For a legitimate reason, the licensing authority may also decide that the licence is issued for no more than one year for the purpose of monitoring the applicant or the conditions for the activity subject to a licence or the effects of the activities. (Section 9 of the Alcohol Act.)

The basis for granting and monitoring a temporary licence may be, for example, the licence holder's significant tax debt, which they are repaying according to a payment plan. The shortcomings in the financial conditions can be corrected by following the payment plan. The granting of a temporary licence may also be justified for the purpose of monitoring the reliability of the licence holder. The reason for this may be, for example, that the applicant has previously committed crimes that the licensing authority must take into account in the licensing decision, or that they are reasonably suspected of having a substance abuse problem.

4.3 Requirements for conducting operations

A delivery licence is granted if, in addition to meeting the conditions applicable to the applicant, the following requirements for conducting operations are also met:

- the applicant has drawn up a self-monitoring plan
- the applicant has prepared a report on how it ensures that deliverers of alcoholic beverages acting on its behalf have a delivery licence (Section 17 a of the Alcohol Act).

The content of the self-monitoring plan is described in more detail in section 3.1.

It is sufficient that the licence applicant explains in its licence application how it will ensure that the suppliers of alcoholic beverages acting on its behalf have a delivery passport. In its licence application, the licence applicant does not need to provide a detailed list of the suppliers of alcoholic beverages that have completed the delivery passport.

4.4 Changes in operation

If a licence holder decides to materially change the nature or extent of their activities so that the licence issued to it no longer covers the altered activities, the licence holder must apply for a change to the licence prior to the change. No changes may be carried out until the licensing authority has approved the change to the licence. (Section 11 of the Alcohol Act.)

To assess the prerequisites of the licence, the licence holder must attach to the change application a statement concerning the applicant, the operations and its effects, and other relevant matters that are not already available to the licensing authority. The licensing authority may require additional information as necessary to assess the conditions for granting or approving the licence and the necessity of the provisions, conditions, and restrictions concerning the licence or approval. In this context, an explanation may also be required for any activity related to the change that remains unchanged. (Section 11 of the Alcohol Act.)

If the licence holder reduces its operations or ceases them other than temporarily, the licence holder must notify the licensing authority of this within one month of the reduction or cessation of operations (Section 11 of the Alcohol Act). The obligation has been established to ensure that the information in the alcohol trade register remains up to date. The obligation to notify of the cessation or reduction of activity only concerns permanent changes.

If the location or contact information of the operating site or other information changes, this must also be reported to the licensing authority. The information is stored in the alcohol trade register, the accuracy of which is important, for example, for the receipt of notifications from the licensing authority.

Applications for changes in licences are submitted and notified in electronic format in the e-services of the alcohol trade register Allu at lvv.fi/allu. Changes are made by selecting the licence to be changed and clicking the “Make a change” button.

4.5 Bankruptcy or death of a licence holder

If the holder of a delivery licence is declared bankrupt or the private trader acting as the licence holder dies, the bankruptcy estate or the estate of the deceased may, if it so wishes, continue the operations. The activity may continue for a maximum of one year from the commencement of bankruptcy or the death of the licence holder. The bankruptcy estate or estate of the holder of a temporary licence may continue operations until the end of the temporary period, but no longer than one year from the commencement of the bankruptcy or death. (Section 72a of the Alcohol Act.)

A bankruptcy estate or an estate of a deceased person must immediately notify the licensing authority after the bankruptcy or death if it wishes to continue operations (Section 72a of the Alcohol Act). The notification must generally be made within one month. In order to continue operations, the bankruptcy estate or the estate of a deceased person needs a new licence number from the licensing authority.

4.6 Ceasing operations

If the delivery of alcoholic beverages is terminated other than temporarily, a notification must be made to the licensing authority within one month of the termination of the activity (Section 11 of the Alcohol Act).

The notification must be submitted in electronic format in the e-services of the alcohol trade register Allu at lvv.fi/allu. The notification is submitted by selecting the licence to be discontinued, selecting “Notification of termination” and by entering an end date for the licence.

The licensing authority may also, on its own initiative, mark the licence as expired if the operator has ceased its activities other than temporarily and has failed to notify the cessation of activities (Sections 11 and 72 a of the Alcohol Act). The licensing authority may then impose a penalty on the licence holder for the failure to notify (Section 71 of the Alcohol Act).

In the annual report, the licence holder must submit to the licensing authority information on deliveries made up to the end date.

4.7 Licence and supervision fees

The Finnish Supervisory Agency charges a fee for the processing of the licence applications and a statutory annual supervision fee. The fees can be distrained without a court order or decision.

The Finnish Supervisory Agency’s processing fees are regulated by a government decree. The current fee tables can be found on the website of the Finnish Supervisory Agency and in the Annex to the Regulation.

If the party liable to pay considers that there has been an error in the determination of the processing fee, they may request a correction from the authority that determined the fee within six months of the determination of the fee in accordance with the Act on Criteria for Charges Payable to the State (150/1992).

The Finnish Supervisory Agency collects a supervision fee for the delivery of alcoholic beverages from all licence holders whose licence has been valid during the relevant supervision fee period. The supervision fee period is the calendar year. The fee consists of a fixed base fee and an additional fee depending on the scope of the activity. (Section 74 of the Alcohol Act and the Appendix to the Act.)

The base fee per licence holder is 100 euros. The amount of the additional fee, which depends on the scope of the activity, is determined during the supervision fee period based on the volumes of alcoholic beverages delivered annually and reported to the licensing authority. In addition to the base fee, the supervision fee per delivery volume is 0.10 euros per delivery per year for the share exceeding 1,000 deliveries. The payment is rounded down to the nearest ten euros. (Appendix of the Alcohol Act.)

The delivery supervision fee is invoiced retrospectively by 30 April at the latest, with the calculation period based on quantities being the previous calendar year (Alcohol Act, appendix).

A correction of the supervision fee can be requested from the authority that imposed the fee. In a case concerning the determination of a payment, an appeal must be lodged within three years from the beginning of the calendar year following the determination of the payment, but no later than 60 days from the receipt of the decision. (Section 80 of the Alcohol Act.)

Finnish Supervisory Agency