

2B POLICY

EOG – FR Legislation

February 2023

INDEX

- 01 FR Decret 2022-748
- 02 Scope
- 03 Requirements
- 04 How to display the information
- 05 FR – Loi AGECE- art 17
- 06 Perspectives
- 07 Next steps & advice

01

FR – DECRET 2022-
748 – art 13

Overview

Objectives

- The FR authorities aim at **tackling “greenwashing”** and make environmental information more accurate, clear and understandable;
- Incentivising Ecodesign.

Main requirements

- Incorporation of recycled materials (except for leather products).
- Recyclability of the product (determined through a method from the “eco-organisme”).
- Traceability of manufacturing stages (specifies the origin where most manufacturing steps are carried out).
- The release of microplastics.

The information needs to be **available on a designated webpage** in a downloadable format.

Whilst there are still questions with regards to market surveillance & penalties the authorities have indicated that they would like to see companies **taking first steps and showcase the direction of travel**.

02 Scope

Scope

All products already submitted to an EPR scheme in France are subject to the regulation. This includes and is not limited to:

- Apparel and Footwear (EPR n11)
- Sport and leisure (EPR n13)

Other sectors are also included (toys, electrical equipment, etc.)

The requirements of the legislation vary for each EPR.

Thresholds

Timeline	Annual sales in France (For all products falling under the scope application of the legislation). <u>AND -></u>	Number of products (For all products falling under the scope application of the legislation s) placed on the French market
January 1 st 2023	> 50 M€	> 25 000 products
January 1 st 2024	> 20 M€	> 10 000 products
January 1 st 2025	> 10 M€	> 10 000 products

03

Requirements

Chemical Content

Consumer information relating to the presence of SVHC. (décret n° 2021-1285)

Either detailed in the product specific sheet via a tool such as Scan4Chem, linked to the REACH, via AskREACH

Recyclability

Evaluation of a product to meet 7 criteria listed in the regulation, such as

- Capacity to be collected all through the French Territory via access to collect point of proximity
- Capacity to be effectively treated
- [...]
- Capacity to be recycled at industrial scale and the absence if any substance that could prevent its recyclability



Marketing Restriction

It is forbidden to use the terms “biodegradable” or “respectful of the environment” on a product or its packaging or any equivalent terms as of the 1st of January 2023. Exemptions exist for a product with the EU Eco Label.

L’interdiction de faire figurer sur un produit ou un emballage, mis sur le marché français, les mentions « biodégradable », « respectueux de l’environnement » et leurs équivalents est entrée en vigueur le 1er mai 2022. Pour les produits et emballages fabriqués ou importés avant le 30 avril 2022, l’interdiction s’applique à partir du 1er janvier 2023.



Traceability

For Apparel and Footwear only

Consumer information relating to traceability for the products referred to in (11) [textile products] of Article L. 541-10-1 shall mean the geographical indication of the country in which each of the following operations is mainly carried out, where applicable:

- (1) dyeing and printing;
- (2) knitting & weaving;
- (2) Cut-and-sew.

For footwear included in (11) [textile products] of Article L. 541-10-1, these operations shall be as follows:

- (1) cutting;
- (2) stitching;
- (3) assembly;
- (4) finishing.



Microfibers

For Apparel and Footwear only

Mandatory mention that the product released microfibers in the environment during the washing shall the product have more than 50% in weight of synthetic material.



04

How to display the information

How to display the information

- On a dedicated webpage with an official title.
- Information can be given at an individual level (one webpage = one product) but must be given in an aggregated format.
- The information is to be given at SKU level (recommended EAN code)
- No template is given by the government.



Example of a product sheet

Name of the product and commercial reference [XXXX]

Incorporation of recycled materials	produit comportant au moins [%] de matières recyclées
Recyclable	produit majoritairement recyclable
Traceability (<i>exemple for textile</i>)	- Tissage = INDE - Teinture et impression = INDE - Confection = FRANCE
The release of microplastics	rejette des microfibres plastiques dans l'environnement lors du lavage

No format required. The product sheet must be accessible, readable on the producer's website and in a format that can be reused, exploited and automatically aggregated

Exemple of implementation: Carrefour

<https://www.carrefour.fr/engagements/qualites-caracteristiques-environnementales#categories>

Fiche produit relative aux qualités et caractéristiques environnementales

Pour obtenir des informations sur les qualités et caractéristiques environnementales d'un produit à marque du groupe CARREFOUR, recherchez-le via son code-barre (Gencod) ou via la référence indiquée sur son étiquetage.

Pour traiter les données par un système de traitement automatisé sous une forme agrégée, il existe des logiciels permettant d'exploiter les données d'un document .pdf.

(1) Les informations relatives à l'éventuelle présence de substances dangereuses ou de perturbateurs endocriniens peuvent être obtenues via l'application Scan4Chem (à télécharger sur votre téléphone portable ou sur votre tablette).

PE 23Màj : 23/12/2022			Emballage				Produit							Date de l'information
Nom du produit	Marque	Gencod ou référence produit	Incorporation de matière recyclée	Présence de substances dangereuses ou de Perturbateurs Endocriniens (PE)	Primes (eco-modulations)	Pénalités (eco-modulations)	Incorporation de matière recyclée	Présence de substances dangereuses ou de Perturbateurs Endocriniens (PE)	Primes (eco-modulations)	Pénalités (eco-modulations)	Chaussures			
											Traçabilité Pays où s'effectue principalement chacune des opérations suivantes			
											Piquage	Montage	Finition	
BOTTILLON BEBE	TEX BASIC	I249668	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
BOTTILLON BEBE GARÇON	TEX BASIC	I249669	Emballage comportant au moins 76% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
BOTTILLON GARÇON BASIC	TEX BASIC	I516348	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
MULE HOMME RAYE 1ER PRIX	TEX BASIC	I516706	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
HOMME CITY COMFORT LOAFER	TEX	I564481	-	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
MULE HOMME IMPRIME	TEX	I580808	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
TONG ERGO GARÇON	TEX BASIC	I584856	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
MULE PREMIER PRIX FEMME	TEX BASIC	I771680	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
MULE HOMME PROMO 1ER PRIX	TEX BASIC	I771681	Emballage comportant au moins 91% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
CHILDREN'S RAINBOOT	TEX BASIC	I784175	Emballage comportant au moins 86% de matières recyclées	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022
BOTTE DE PLUIE FEMME TEX BASIC	TEX BASIC	I784176	Emballage comportant au moins 96% de matières	(1)	-	-	-	(1)	-	-	CHINE	CHINE	CHINE	23/12/2022

Exemple of implementation: VFc

https://dpp.vfc.com



Nom du Produit:
M MERINO WOOL 1/2 ZIP

SKU:
AL0A85QY0001. L

Code Produit-Style-Couleur
AL0A85QY000

CODE 13-EAN / 13-GTIN / UPC-12
196573753617

Qualités et caractéristiques environnementales du produit

Information	Revendication															
Contenu recyclé	Produit comportant au moins 0% de matière recyclées.															
Recyclabilité	Refashion considère qu'il n'y a donc aucune information relative à la recyclabilité à faire figurer au sein de la fiche intitulée « fiche produit relative aux qualités et caractéristiques environnementales » concernant les produits textiles d'habillement, linge de maison et chaussures. A la suite de cet conseil, aucune information à la récyclabilité est figurée ci-dessous pour l'instant.															
Substances extrêmement préoccupantes / Substances dangereuses	Les Substances extrêmement préoccupantes et les substances dangereuses sont gérées par les programmes de gestion des produits chimiques de VF pour ne pas être présentes au-dessus des seuils réglementaires requis. Plus d'informations sur les programmes de gestion des produits chimiques de VF, rendez-vous sur https://www.vfc.com/responsibility/governance/policies-standards .															
Traçabilité	Produits textiles <table><tbody><tr><td>Tissage (tissu principal)</td><td>Teinture & Impression (tissu principal)</td><td>Assemblage du produit)</td></tr><tr><td>Pays d'origine</td><td>Pays d'origine</td><td>Pays d'origine*</td></tr><tr><td>Vietnam</td><td>Vietnam</td><td>Vietnam</td></tr></tbody></table> Produits de chaussures <table><tbody><tr><td>Piqûre</td><td>Finition</td><td>Assemblage du produit</td></tr><tr><td>Pays d'origine</td><td>Pays d'origine</td><td>Pays d'origine*</td></tr></tbody></table> * Comme certains produits proviennent de plusieurs pays, le COO affiché est celui où la majorité des produits sont fabriqués. Regardez l'étiquette intérieure du produit pour connaître le COO où votre produit particulier est fabriqué.	Tissage (tissu principal)	Teinture & Impression (tissu principal)	Assemblage du produit)	Pays d'origine	Pays d'origine	Pays d'origine*	Vietnam	Vietnam	Vietnam	Piqûre	Finition	Assemblage du produit	Pays d'origine	Pays d'origine	Pays d'origine*
Tissage (tissu principal)	Teinture & Impression (tissu principal)	Assemblage du produit)														
Pays d'origine	Pays d'origine	Pays d'origine*														
Vietnam	Vietnam	Vietnam														
Piqûre	Finition	Assemblage du produit														
Pays d'origine	Pays d'origine	Pays d'origine*														

05

FR – Loi AGECE – art 17

TRIMAN

Overview

- The Triman logo was originally introduced as a recycling symbol in France by Decree No. 2014-1577 in 2015.
- Label with sorting instructions for packaging ("Triman" logo & sorting instructions) already applicable in France.

Timeline

- As of 1st February 2023: all new products placed on the French market including textiles, footwear & (household) linen & packaging need to be marked with the Triman information.
- **6-month transition period** for products that were produced or imported before 1 February 2023 **until 1st of August 2023**.

Fines

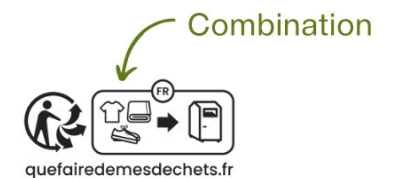
For legal persons: up to 15,000 euros

For natural persons: up to 3,000 euros.

More info can be found here: <https://refashion.fr/pro/en/sorting-info-textile-sector-validated>



Product categories on the sorting info



TRIMAN

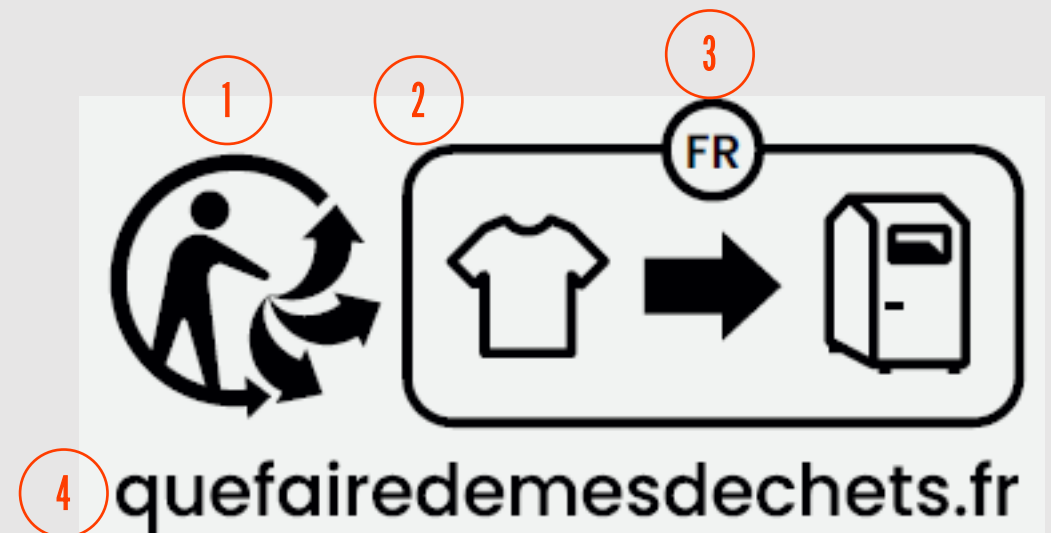
What needs to be communicated? Please see the red numbers on the right.

1. Triman logo
2. The sorting info box (“Infotri” box) including (1) pictogram of the **product category** and (2) drop-off point where the product is to be handed in for recycling.
3. Above the ‘Infotri’ country code “FR” indicates that these regulations only apply in France.
4. a link to the French website quefairedesdechets.fr (engl. “what to do with my waste”).

Where does the information needs to be displayed?

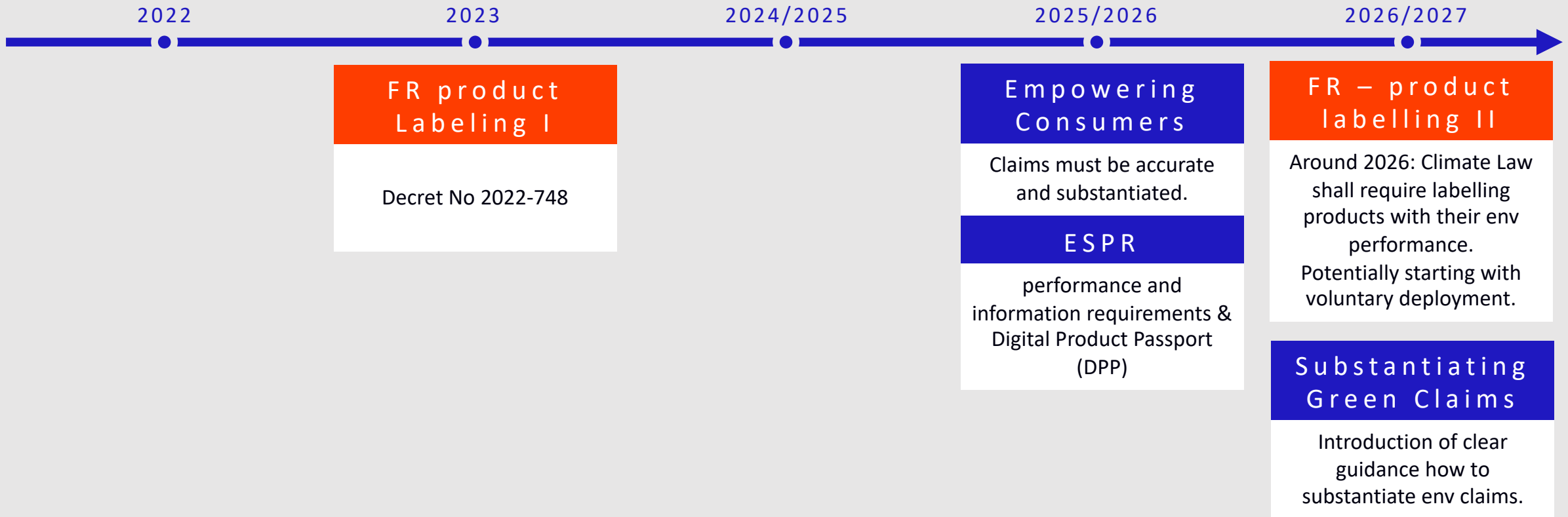
The Triman symbol and sorting-info must be physically present when the customer purchases the item. These can be displayed on different media:

- on the textile label showing the fibre composition,
- on the temporary label (such as the cardboard label or «hangtag»),
- printed or embroidered onto the product,
- on the packaging in which the product is sold to customers (name tag, box, bag, etc.)
- or in the form of a sticker.



07 Perspectives

UPCOMING POLICIES: IMPLEMENTATION TIMELINE



FR LABELLING

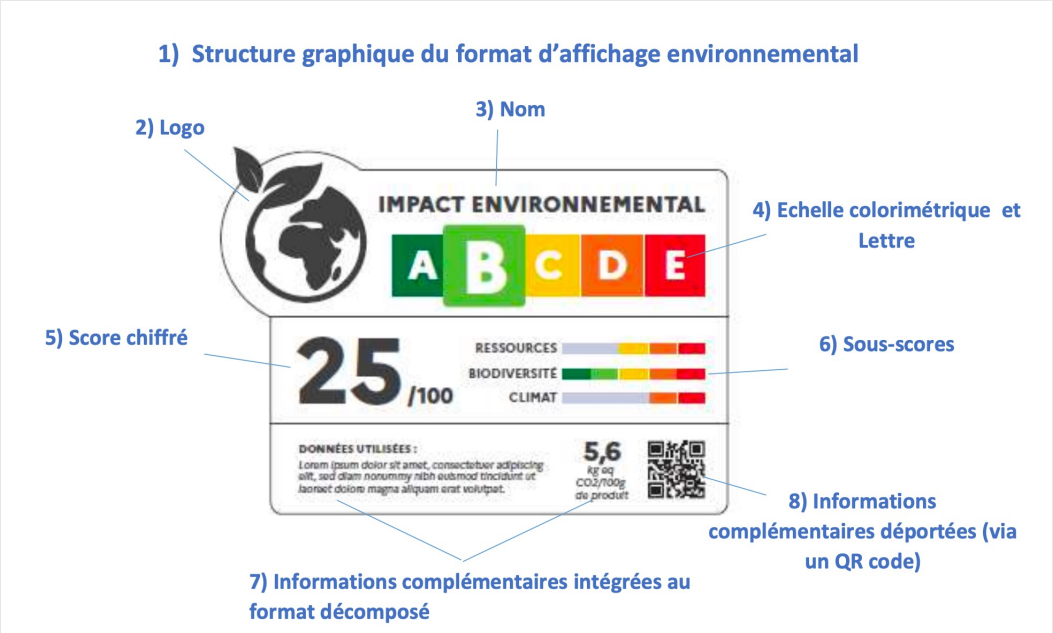
MANDATORY LABELLING LAW – passed.

Summary: Every product and service available on the French market shall disclose at minima its environmental performance.

- Mandatory implementation of an information relative to (environmental impact) OR (environmental impact and respect of social criteria)
- This labelling is to be implemented by marking, labelling or any other appropriate mean. It is visible OR accessible for the consumer, particularly at the time of purchase.
- The information provided shows clearly to the consumer, in a reliable and easy-to-understand way by the consumer the impact of the environment of goods and services considered on their entire life cycle.
- The garment sector (wearable textiles) is prioritised

STATUS: Implementing decree expected early 2024, with application in the following years.

PRACTICALLY: Start creating scenarios for systemic calculation of the footprint of all of your collections. How long before your customers and the public do you want to have the information?



LCS	Data to be collected
LCS1	Material type and quantity (weight) per bill of material including trims and material provenance (distance and provenance share) - Includes detailed fabric information like yarn size, finishing technique, etc. to enable the selection of the most relevant dataset from the EF database
LCS 2	Processes and technologies used to enable the selection of the most relevant dataset from the EF database; specific location and loss rates (to edit energy mix) Optional – exact energy type and amount
LCS 3	Air cargo distances and provenance
All LCS	Deadstock rate and deadstock fate (shares landfilled, incinerated, recycled and associated recycling pathway, used)
Optional	LCS 4 - Care instructions and physical durability tests – optional but recommended

06

Next Steps and Advice

Next Steps

- The French Ministry of environment still plans to publish an updated Q&A. No date was communicated.
- This legislation has illustrated that sometimes the delay of implementation is short and that organisations risk learning about some information on their product at the same time as their stakeholders, shareholders and consumers.
- This legislation is the first of many regarding mandatory or incentivised disclosure of information.
- There is a clear need to anticipate and plan for future legislation.



THANK YOU

REACH OUT!

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2B POLICY