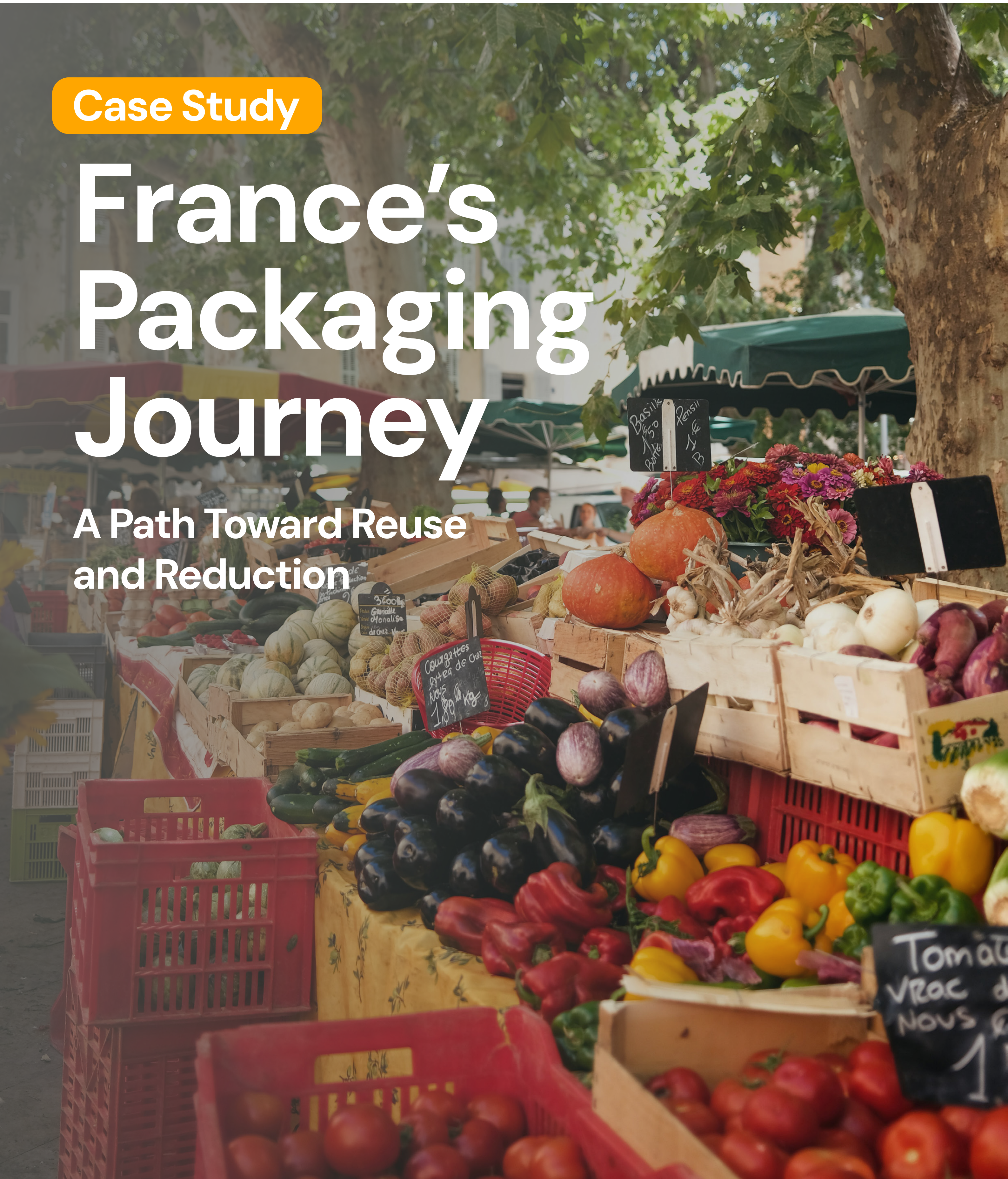
Case Study

France's Packaging Journey

A Path Toward Reuse and Reduction



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Introduction

In the last 10 years, France has emerged as a frontrunner in legislating against packaging waste, introducing an ambitious legal framework to phase out single-use packaging, promote reuse, and foster a circular economy. This case study explores the country's legislative actions, their implementation, impact on industry and consumers, and what Ireland and other countries might learn from this evolving model.

A comprehensive National Legislative Framework

2020 AGEC: the Anti-waste law

The AGEC law passed in February 2020 represented a turning point for France in their attitudes towards waste and packaging. This extensive piece of legislation tackles waste by prioritising reduction and reuse in an effort to promote and implement circular economy principles.

The legislation has a number of ambitious targets throughout multiple sectors but has some particularly interesting ones on packaging and single-use:

- ✓ Mandates producers to **halve the quantities of plastic bottles** placed on the market by 2029.
- ✓ Phase out of single-use plastic **completely by 2040**.
- ✓ Packaging reuse targets **fixed by sector**.

Normalises bulk sales through legal clarity

France's AGEC law provides a clear legal foundation for bulk sales, helping to reassure retailers about health and safety concerns. It officially defines bulk (or "loose") sales as: "the sale to the consumer of products presented without packaging, in quantities chosen by the consumer, in reusable containers" (L120-1 A of the French Consumer Code). The law states that any everyday product may be sold this way, unless specific health risks justify an exception. These exceptions include items like food supplements, deep-frozen goods, heat-treated liquid dairy, and raw milk (unless it's packaged directly in front of the customer or dispensed via a bulk machine).

The law also addresses the sometimes controversial practice of bringing your own container. It confirms that consumers have the right to request being served in their own container, as long as it's visibly clean and suitable for the product. The responsibility for hygiene and appropriateness lies with the consumer, though retailers may refuse service if the container is clearly dirty or unfit for use.

Prioritises Reuse

To build a strong market for reusable packaging, the AGEC law sets national targets that apply across all industries. By 2023, 5% of packaging placed on the market must be reused packaging, increasing to 10% by 2027. These figures are not optional. Annual reuse targets are set by government decree for each sector or product category, ensuring shared responsibility across the economy.

To help make this shift possible, France's packaging EPR operator is also required to invest in reuse: at least 2% of the contributions they collect must go toward developing solutions for packaging reuse and recycling. This combination of legal obligation and financial support is designed to build long-term infrastructure and demand for reuse nationwide.

2023: Law in favour of Climate Resilience

The AGEC law was followed in 2023 by the Climate and Resilience law which tackles a number of pressing issues such as improving air quality, combating soil concretisation etc... But another major measure of this law in relation to packaging waste, adding to previous ones is the obligation for stores of 400 m^2 and above to devote at least 20% of their floor to bulk and unpackaged products by 1 January 2030.

This law was presented as the result of the Citizens' Climate Convention and its 149 recommendations. Although many of these were not implemented in the end, the climate and resilience law reflected the following recommendation from thecitizen-led working group: 'Gradually introduce a requirement for bulk packaging in all shops and impose a percentage on central purchasing bodies.'

The Climate Resilience law also mandated the creation of the Packaging Reuse Observatory whose mission since its inception in 2023 is to track the evolution of packaging reuse in France.

> **By 2023, 5% of packaging placed on the market must be reused packaging, increasing to 10% by 2027.**

A coherent ecosystem

Supporting political decisions and actions

Under European Waste Framework Directive France, like Ireland needs to reach 90% collection rate. While countries like Ireland have set up Deposit Return Schemes to gather plastic bottles and cans separately and boost recycling rates, France has opted for another path.

In 2023 the government confirmed its intention to develop deposit return schemes on glass containers, launching pilot projects across the country involving major retailers like Carrefour. This approach focuses on reuse first in order to phase out of single use, therefore reducing the amount of packaging and need for recycling - an area where DRS can sometimes fall short. Although DRS is effective at capturing and recycling materials, it does not necessarily promote a decrease in overall production or use. This approach to DRS is coherent with their previous target to reduce the number of plastic bottles placed on the market by 50% by 2029.

Although this can be a promising approach if implemented properly, as it climbs the waste hierarchy and puts reuse front and centre instead of focusing on recycling plastic without changes in the use of it. But it also requires a more significant shift from industry. Without strong political backing and pressure, there's a risk this becomes more of a delay tactic than a real solution—leaving France falling short of its targets in the long run.

Industry's engagement and targets

Although no timeline has been announced, the government announced its intention to roll out this deposit return scheme (DRS) for glass containers, with new obligations for larger retailers to take them back. In response, Carrefour, one of France's leading food retail groups, began piloting a local reuse system in four of its hypermarkets in Brittany.

Here's how it works: similarly to our DRS, customers return their used glass containers in-store. The shop sorts them, using machines that operate the same as recycling DRS systems, and hands them over to a cleaning or resale service. The containers are cleaned and then redistributed to producers for refill and reuse.

REUSE SYSTEMS

STEP 1
(RE)DISTRIBUTE
Clean containers are sent back to producers, who refill and reuse them for new products.

STEP 2
RETURN
Customers bring back their used glass containers to the store.

STEP 4
CLEAN
A specialised service collects the containers and cleans them for safe reuse

STEP 3
SORT
Containers are sorted on-site, often using automated machines similar to those used in recycling schemes

Source: VOICE Ireland

This simple, transparent loop doesn't just cut waste—it also supports local businesses and job creation. The reuse sector is expected to expand rapidly, with projections showing up to 30,000 local jobs in France over the next 15 years (compared to around 8,000 today).

Current applications and results

Results: A nuanced application

France's approach to reducing single-use packaging has led to notable progress. But the results are mixed, and the road ahead remains challenging.

Reuse Uptake: Progress, but Off-Target

In 2020, only 1.5% of packaging placed on the French market was reused packaging. By 2023, this had increased to 2.22%. This is an improvement, but still falling short of the 5% national target for 2025.

The Packaging Reuse Observatory, created under the AGEC law, has helped provide data related to the reuse sector, with encouraging figures:

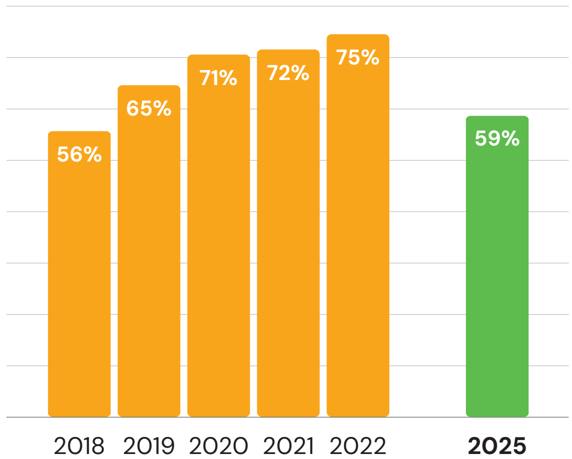
- **13 million reusable packages** were collected nationwide,
- **12.5 million were cleaned** and reintroduced into circulation,
- A network of **1,000 collection points**, mostly in stores, was mapped,
- **60 washing centres** now operate across 18 regions in France,
- The average return rate reached **35%**, with a goal of **62%** in 2024.

However, the existing cleaning facilities are only running at 19% of their full potential, with a full capacity of 300,000 products that could be cleaned and reused. This shows that the infrastructure is there but the demand is still slow to meet the offer.

Bulk in Retail: Peaks and Pitfalls

Following the introduction of the AGEC law, bulk sales rose quickly in supermarkets with bulk sections being present in 56% of shops in 2018 to 75% in 2022. Unfortunately, this figure has since reversed back to 59% only. Notably, larger hypermarkets still offer refill stations in 65% of cases, while smaller supermarkets have dropped to 52%.

Presence of refill and loose products stations in hypermarkets and supermarkets (excluding organic retailers)



Source: Data Grande conso

This downturn can be partly explained by external pressures like inflation and rising labour costs, but it also reflects a broader shift in political momentum. Over the past two years, policy signals have grown weaker, with government instability and a retreat from earlier commitments. This has led to a noticeable silence on circular economy issues. This would have relieved pressure on industry players and allow them to reverse back to their usual convenience-based approach to distributing food. Bulk remains more labour-intensive at a time when retailers are prioritising automation, and without stronger political backing, many see it as economically unviable.

Drawbacks

One of the most significant setbacks in France's reuse and packaging reduction agenda was the annulment of the decree requiring unprocessed fresh fruits and vegetables to be sold loose by 2026. After two years of pressure from plastic and food retail lobbies, the French State Council overturned the measure in 2024. While the European PPWR Directive adopted in 2024 mandates the same requirement across the EU by 2030, the delay weakens France's domestic momentum and signals that industry pushback can reverse environmental progress previously thought to be secured.

Another area of concern lies in the implementation of the Climate and Resilience Law, particularly the requirement for shops to dedicate shelf space to bulk and loose products This flagship measure is a model to be followed in the development of reuse and packaging free sales. However, seeing that most, fruits and vegetables are already sold loose in the country, many large retailers may continue business as usual, meeting the requirement without meaningful change. To avoid this loophole, authorities could define a clear list of categories and ingredients that must be offered in bulk.

Another structural barrier remains when it comes to refill stations in supermarkets: labour. Selling products using refill stations or setting up reuse systems within the shop tends to be more labour-intensive. At a time when many supermarkets are automating operations and cutting staff, they argue that these changes are too costly to scale.

However, this perspective overlooks bulk's potential benefits for both consumers and the economy as a whole. Refill and reuse systems can reduce overall food costs by cutting out packaging and excess transportation. Organic products sold in bulk are already shown to be more affordable than their packaged counterparts, with savings ranging from 4% to 22%. Moreover, bulk purchasing helps consumers avoid overbuying, allowing for better food budgeting and less food waste.

As one reuse advocate put it:

> **"The price difference comes from the extra handling, yes, but that creates jobs. If we want bulk to be accessible and affordable, we need to scale up."**

To make bulk viable and equitable, stronger political will and structural support for the retail transition are needed. The first steps have been taken through clear guidelines and minimal investments, yet more funding is required and demand stirred through public procurement and other mechanisms.

Perspectives

Several AGEC measures have already been rolled out and are helping to drive systemic change:

- bans on plastic straws and disposable foodware,
- mandatory reusable dishware in fast food outlets,
- and clearer consumer information via the Triman label.

These actions point to a more ambitious, structural shift away from single-use packaging. Yet despite the law's strong intentions, key limitations remain.

The creation of the Packaging Reuse Observatory was a welcome step forward, but data remains limited—particularly when it comes to actual reductions in packaging use or measurable shifts in consumer behaviour. As a result, tracking progress against national targets is difficult.

What we do know is that several targets have not been met, and so far, there's been little clarity or accountability. While the AGEC law states that penalties should be applied through the EPR scheme, there is currently no transparency around how, or even if, these sanctions are enforced.

Take away from the French case

The main takeaways from the French case are that while ambitious reuse and packaging reduction laws like AGEC can set important systemic changes in motion, their success hinges on strong implementation, consistent political backing, and clear accountability mechanisms. France's early momentum gained through bans, targets, and reuse pilots has been undermined by industry resistance, weak enforcement, and a lack of reliable data to track progress. Bulk sales, despite their environmental and cost-saving potential, face structural barriers such as labour intensity and supermarket automation trends. Ireland could learn from these lessons to build a more resilient and effective reuse system tailored to its own context.

Is France all words but not results?

The French case study is interesting because it shows a pro-active approach to reducing packaging waste at the source. Despite the drawbacks and shortcoming in the application of some key measures, the interesting thing about this case study is the consistency in approaches up until a couple of years ago, with multiple pieces of legislation that come together as a comprehensive legal framework with clear targets to be reached and actions to be taken. Therefore, even if some disappointments occur and more campaigning needs to happen to accelerate change, there is a shift that can be felt in the attitudes and initiatives taken by stakeholders and the public.

Recommendations

Ireland tends to take a reactive approach—waiting for EU-level action before moving on national waste policy. But with Ireland generating the highest amount of packaging waste per capita in Europe (67 kg vs. 40 kg in France), this strategy is no longer tenable. Delaying action means delaying solutions. Ireland must take proactive steps that reflect its own context, not just EU timelines—especially as we face rising waste, limited infrastructure, and a pressing need for reuse systems.

Set clear, ambitious, and enforceable targets.
Targets must be both ambitious and grounded. Avoid vague goals, define timelines, thresholds, and responsible actors from the outset to ensure implementation doesn't stall.

Plan for implementation beyond the law.
Publishing a law is only the beginning. Develop a detailed roadmap for change, including the necessary decrees and enforcement tools to reaffirm and update targets annually across all sectors.

Build robust monitoring and accountability mechanisms.
From the start, ensure systems are in place to track progress, measure impact, and make data public. This includes setting up a dedicated observatory or central body to gather and publish sector-wide reuse and reduction data regularly.

Integrate reuse within the mission of the Deposit Return Scheme (DRS).

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