

The logo for 'horizon futures' is located in the top left corner. It features a white circle containing a yellow semi-circle at the top. Below the semi-circle, the words 'horizon' and 'futures' are stacked in a bold, black, sans-serif font. The background of the entire page is a photograph of the Arc de Triomphe in Paris, France, taken from a low angle. The sky is a mix of blue and white clouds, and the foreground shows the cobblestone pavement of the Champs-Élysées. The overall color palette is warm, with a pinkish-orange tint. In the top left, there is a decorative graphic of a white circle with a yellow semi-circle, and a trail of white circles of varying sizes that curves across the top and left sides of the page.

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futures

# FRANCE 2024

Packaging Legislative Analysis

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## 2. Extended Producer Responsibility (EPR)

### 2.1. EPR Scheme Description

In France, any business that places packaged household goods (or Printed Paper and Paper for Graphic Use) onto the French market is obligated under Decree 2023-305 to fund the collection, sorting and recycling of packaging waste. France's EPR scheme for household packaging waste has been in place since 1<sup>st</sup> April 1992 with a recent update in December 2022, merging the EPR sectors for producers of household packaging and producers of printed and graphic paper.

#### 2.1.1. Obligated Companies

Companies obligated by France's packaging EPR scheme include producers, retailers, or bottlers with a registered office in France, but also importers who sell products directly to French end users, independent of whether they have a registered office in France or whether they have a French tax registration number. Obligated companies are defined by CITEO, France's PRO, as follows:

- Producers of packaged products placed on the French market for the products which:
  - they package
  - they have packed with their brands or without a brand
  - they package under a private label brand
- Importers for packaged products purchased abroad – inside and outside the European Union – and resold on the French market.
- The persons responsible for first putting the packaged product on the market, in the absence of the producer's or the importer's identification.

Distributors of packaging are also implicated in their capacity as producers for service packaging (sold or made available to households to be filled at the point of sale e.g. in-store packaging) or shipping packaging in the case of home delivery.

In France, no minimum amount of packaging material exists to be obligated by the EPR scheme, nor does a turnover limit. However, reporting requirements vary based on organisation size, as explained in the below sections.

#### 2.1.2. Packaging Definition

Within the French EPR scheme, there are distinctions between the obligations regarding household and non-household packaging. Household packaging is defined in Article R. 543-55 of the French Environmental Code as any packaging:

- Of a product sold or delivered free-of-charge to a household.
- Which is put on the market for the purpose of the consumption or use of the product that it contains by a household.

In the case of non-household waste, the obliged party must ensure that the packaging can either be re-appropriated or recycled. However, no obligation exists for non-household packaging to partake in a collection and recycling scheme under EPR.

### 2.1.3. Obligations/Requirements

**All household packaging of products put on the French market must be declared and EPR obligations must be met, with fees and declaration requirements being detailed in the following sections. Obligated businesses placing household packaging onto the French market have two options:**

- **Joining an existing scheme**
- **Establishing a private packaging return scheme**

**A new regulation came into effect on 11th December 2023 named; Approving Specifications for Eco-Organisations and Individual Systems in the Extended Responsibility Sector for Producers of Household Packaging, Printed Papers and Graphic Papers, Order. This regulation outlines the new conditions for packaging and printed paper PROs and also for individual systems established by producers to fulfil their EPR responsibilities.**

**The following conditions must be met in order for the above mentioned PROs and individuals to be approved by the French Ministry for Ecological Transition and Territorial Cohesion:**

- **Proposals must be submitted to the Minister for the Environment regarding premiums and penalties to improve the environmental performance, including use of recycled plastic materials, household packaging, printed papers and graphic papers**
- **Submit a report to the Minister detailing the actions taken by the organisation, including public information campaigns and technical specifications for reusable packaging.**
- **Contribute to R&D products to support eco-design and improve the environmental performance of household packaging, printed papers and graphic papers.**
- **Take all necessary actions to reach 18% of waste production reduction by 2030.**
- **Take all necessary actions to reach the 20% of reduction in the production of single-use plastic packaging waste by 2025.**
- **Take all necessary actions to achieve, by 2025, a 10% reduction target in the placing on the market of new single-use household packaging as a result of reuse operations.**
- **Take all necessary actions to meet the targets specified for the recycling and placing on the market of re-used household packaging.**
- **Cover the costs of take back operations for reusable packaging.**
- **Accelerate the deployment of waste sorting bins in public spaces.**

<sup>1</sup> <https://www.legifrance.gouv.fr/download/pdf?id=uiD5wfsteTETmbehEJOBXWcZU3ry4LrlzsNm2wvZUaE=>



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- Ensure the free collection of yellow bins in establishments open to the public.
- Organise information campaigns regarding selective collection, residual household waste and recycling centres financed by the ERP.
- Provide support and guidance for local authorities to improve recycling performance.

The Order also states that in addition to the above, PROs must also provide support to the development of solutions for the reuse of household packaging by 30th June 2025.

## 2.2. Fees

Obligated businesses must pay a fee to cover the packaging that they place on the market to cover the collection and recycling costs. Although the EPR scheme covers all materials (glass, plastic, card/paper, aluminium and steel), plastic bottles were the only plastic type included until 2012, when the scheme was expanded to include all plastic packaging. As a new introduction from 2021, plastic fees have also been split out by polymer and other eco-modulation criteria such as substrate colour. An overview of the latest available CITEO fees by material type is shown in the table below:

Material	Fee (€/kg)
Steel	0.0499
Aluminium	0.1289
Paper & Cardboard	
Paper & Cardboard	0.1771
Liquid cartons	0.2662
Plastic	
Bottle and vial in clear PET	0.3862
Bottle and vial in coloured PET, in PE or PP	0.3826
Rigid packaging in PE, PP or PET	0.3798
Flexible PE packaging	0.4169
PS rigid packaging	0.4325
Complex packaging or other resins excluding PVC	0.4741
Packaging containing PVC	0.5551
Glass	0.0143
Other Materials	
Unprocessed materials from renewable resources and sustainably managed with recycling channel or organic recovery in development (wood, cork)	0.3855

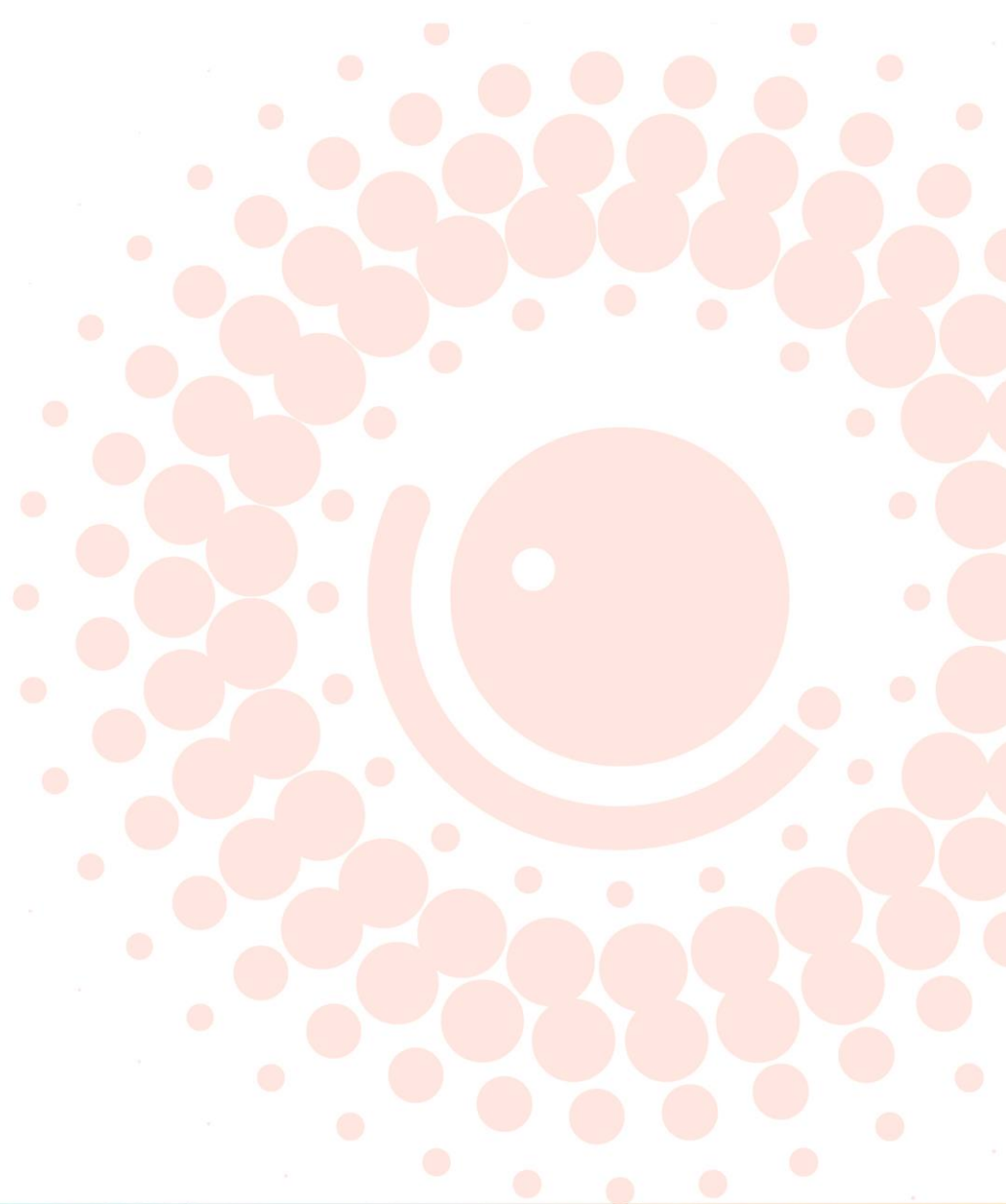


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Without recycling channel and energy recoverable (textile, other materials..)	0.4741
Without recycling channel and non-recoverable (stoneware, porcelain, ceramics)	0.5531
<b>*The weight of paper and cardboard incorporation raw materials from recycling is reduced by 10% if more than 50% of the packaging's total weight consists of recycled material. To benefit from the discount a certificate may be sent from the packaging supplier.</b>	

**In addition to EPR fees, France was the first country to implement a "bonus/maius" fee modulation system in 2011, introducing the concept of eco-modulation much earlier than other markets.**



# Appendix



## Introducing aura

### About Us

At the heart of our business is a sheer fascination with packaging and the impact it has on our world. Packaging's relationship with the environment is complex and we work with true ethical partners to educate, unite like-minded thinkers and share knowledge.

A global business, the reference point for packaging sustainability, utilising knowledge and data to provide the justification required to drive positive change.

### Services

Our expertise falls into three categories designed to deliver a strategic programme focused on the sustainability goals of our clients. These services are supported by a multi-disciplinary team made up of packaging, sustainability, technology and retail experts committed to making a measurable difference every day.

#### Consulting – Pioneering Packaging Strategy

We are packaging sustainability pioneers committed to true partnerships, focused on the delivery of mutual goals.

Our breadth of packaging sustainability knowledge across substrates, design, technical packaging, legislation, and recyclability allows us to evolve strategies to make a measurable difference both now and in the future.


Our Consultants build road maps for global change, our Technical Engineers develop specifications to refine the impact of your packaging and our Supplier Success Managers are on hand to assist with client education, communications and engagement.

As a result, we will deliver a robust strategy compliant with your sustainability goals aligned to current and future legislation.





### Technology – Managing Sustainability Everyday



We provide live data and control to deliver the accurate information you require to make real time decisions that impact your business and our planet.

**e-halo** is an unrivalled packaging sustainability platform combining state-of-the-art technology with consulting services, designed to manage the changing landscape of global packaging legislation, compliance, and sustainability commitments.

**e-halo** provides packaging component data at a granular level, making sustainable packaging part of everyday decision making.

**e-halo** manages compliance to evolving legislation and recyclability requirements with a comprehensive reporting suite allowing for real-time measurement against your business and sustainability targets.

### Insights – Data Driven Decisions



We utilise knowledge and data to provide the justification required to drive positive change.

**Data Management** – We interact with digital information every day. We gather, check, manage and translate data into valuable insights that our clients can use to measure and motivate positive change.

**Horizon Futures** – We offer horizon scanning services for global packaging legislation across 54 countries and for this we are unique. We interpret legislation rather than just quoting a legal directive, to help you understand the current and future packaging landscape. We then consider how emerging trends might potentially affect current policy and practice, enabling our clients to take a longer-term strategic approach to packaging sustainability.

## Our Management Team

- We are packaging sustainability pioneers committed to true partnership, which means to us a relationship focused on the delivery of the mutual goals of our business and that of our clients.
- Visionary
- Pioneering strategies which educate, unite and influence change
- Responsible
- Real-time data drives the changes needed to positively impact our planet
- Honest
- Decisions are informed, and our communications are authentic
- Collaborative
- Ethical Partnerships unify our mutual goals to create a vision fit for the future



**Greg Lawson**  
Managing Director



**Gillian Garside-Wight**  
Consulting Director



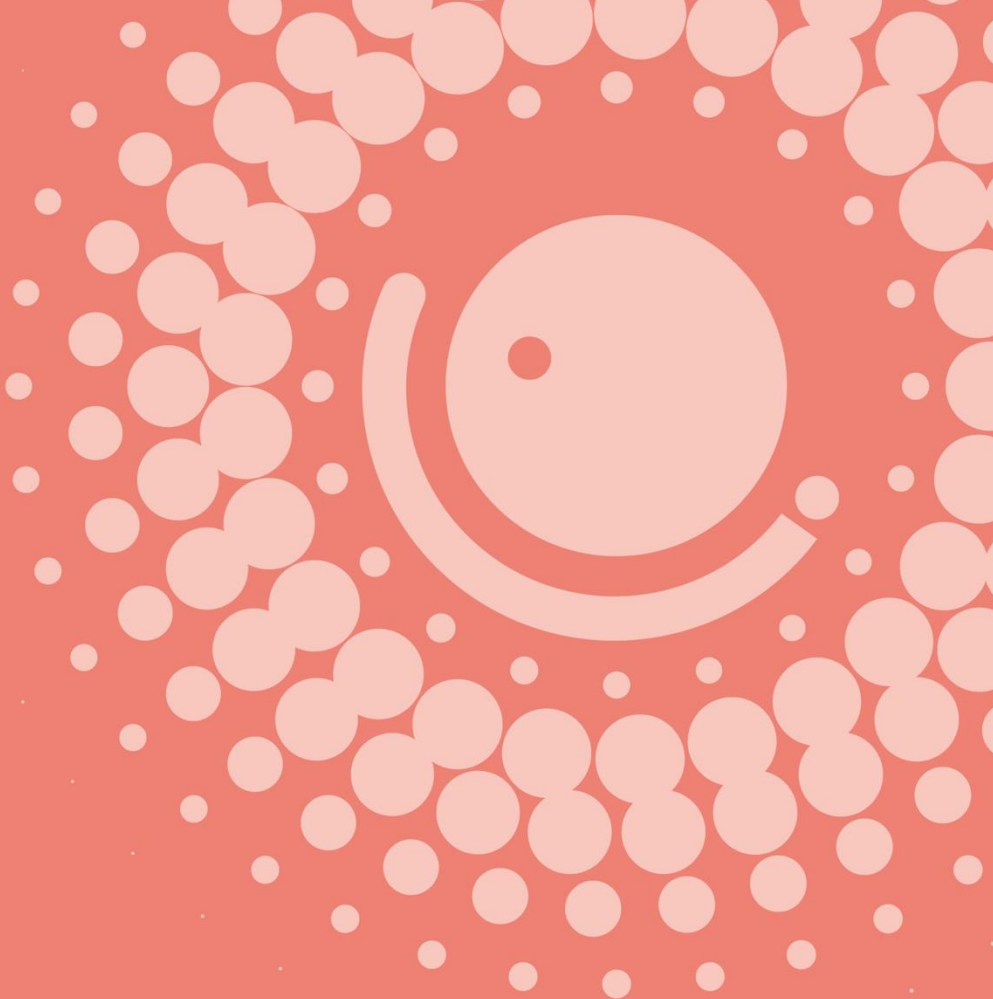
**Harriet Young**  
Marketing Director



**Sarah Kroon**  
Operations Director



**Trevor Yong**  
Business Development Director



Thank you from Team Aura