

Frequently Asked Questions (FAQs)

Decree on consumer information about the environmental qualities and characteristics of waste-generating products in application of article 13-I of the AGEC law

Decree no. 2022-748 of 29 April 2022 on consumer information about the environmental qualities and characteristics of products that generate waste is available in the Official Journal :

<https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000045726094>

This translated document has no legal value.

Part 1 - Mandatory information contained in the product sheet

1. General Questions

1.1. Scope

1.1.1 Which companies are concerned by the obligation to provide information on environmental qualities and characteristics on the one hand and on EPR scheme bonuses and maluses on the other? What is the deadline for these companies?

Producers, importers or other marketers of products mentioned in Article R. 541-221 of the Environmental Code	Cumulative criteria	
	Annual turnover threshold, achieved cumulatively for all products concerned in the last accounting year	Cumulative number of units of all products concerned placed on the French market annually
From 1 January 2023 (except for products whose last unit is placed on the market between 1 January and 31 March 2023)	50 M€	25 000
From 1 January 2024	20 M€	10 000
From 1 January 2025	10 M€	10 000

Products subject to extended producer responsibility within the sectors relating to construction materials, toys, sports and leisure articles, do-it-yourself and garden articles, cars, vans, 2, 3 and 4-wheeled vehicles, are subject to the obligation :

- from 1 January 2024 for companies with a turnover of more than 20 million euros for all of the products concerned (including the other sectors covered by decree no. 2022-748) and placing more than 10,000 units of all of the products concerned on the market (including the other sectors covered by decree no. 2022-748);
- from 1 January 2025 for companies with a turnover of more than 10 million euros for all of the products concerned (including the other sectors covered by decree n°2022-748) and placing more than 10,000

units of all of the products concerned on the market (including the other sectors covered by decree n°2022-748).

A producer is any natural or legal person who manufactures a product or has a product designed or manufactured and markets it under his own name or brand. A distributor is therefore a producer if it manufactures a product and markets it under its own brand. In this case, it is responsible for providing the information required.

1.1.2. What are the obligations applicable to producers and importers wishing to make voluntary use of claims related to environmental characteristics and qualities mentioned in Article R.541-221 of the Environmental Code?

Producers and importers concerned by the obligation to provide dematerialised information on certain environmental qualities and characteristics listed in Article R. 541-221 of the Environmental Code, for certain products, must comply with the definitions and mentions established in the same article. They must also comply with them for any voluntary information displayed on these same products and for these same environmental characteristics or qualities.

Producers and importers of products that are not concerned by the obligation to provide information on an environmental quality or characteristic listed in Article R.541-221 of the Environmental Code (for example, the voluntary claim of incorporation of recycled material for toys) are free to provide voluntary information on the latter, in compliance with the rules on deceptive commercial practices. These claims must therefore be reliable, clear, proportionate, unambiguous and justified by precise and measurable elements. Voluntary information that includes, where relevant, the definitions and criteria defined by Decree No. 2022-748 is a practice encouraged by the public authorities.

1.1.3. Is it necessary to create a product sheet for products in stock?

The obligation applies to new units of a product model placed on the market from 1 January 2023. Therefore, if new units of a model continue to be placed on the market after this date, the product sheet will have to be established. It may then also relate to units of products in stock. Only product models whose last unit is placed on the market by 31 March 2023 are not affected by the obligation.

1.1.4. Is the threshold for annual turnover considered for each category of product subject to the information obligations relating to the various qualities and characteristics or is it an overall turnover relating to the marketing of all the products of the producer or marketer? What about the threshold in units of products placed on the market?

The threshold relating to turnover is established in relation to the turnover achieved during the last accounting period by the producer, importer or any other marketer, on a cumulative basis for all the products mentioned in Article R. 541-221 of the Environmental Code placed on the French market. Similarly, the threshold in units of products placed on the market is established cumulatively in relation to all the products concerned placed on the market in France.

The producer is defined as any natural or legal person who manufactures the product or has it designed or manufactured and markets it under his own name or trademark. The importer is defined as any natural or legal person who places a product from a third country on the French market.

1.1.5. Which products are covered by the obligation to provide information via a dematerialised "product sheet"?

The products concerned are only new products intended for consumers. The consumer is defined as "any natural person who acts for purposes that do not fall within the scope of his commercial, industrial, craft, liberal or agricultural activity" as specified in the introductory article of the Consumer Code.

The obligation to provide a product sheet does not apply to refurbished products (within the meaning of Article R. 122-4 of the Consumer Code) or second-hand products sold to consumers by professionals.

The products concerned are detailed in the summary table below.

Environmental quality or characteristic / Products	II - Compostability	III – Incorporation of recycled material	V – Possibility of re-use	VI - Recyclability	VII- Presence of precious metals	VIII – Presence of rare earths	IX – Presence of dangerous substances	X – Traçability	XI – Presence of micro plastic fibres
EPR – 1° Household packaging	Only packaging mentioned in the order of 15 March 2022 listing compostable and methanisable packaging and waste that can be collected together with biowaste that has been sorted at source	X	X	X			X		
EPR - 3° Printed paper		X		X			X		
EPR – 4° Building materials				X			X		

EPR - 5° Electrical and electronic equipment		X		X	X	X	X		
EPR - 6° Batteries and accumulators		X		X			X		
EPR - 7° Contents and containers of chemical products		X		X			X		
EPR - 10° Furnishing elements		X		X			X		
EPR - 11° Textile products for clothing, linen, shoes		X (with the exception of leather goods)		X			X	X	X
EPR - 12° Toys				X			X		
EPR - 13° Sport and leisure articles		X		X			X		
EPR- 14° DIY/garden art		X		X			X		
EPR - 15° Cars, vans, 2,3,4 wheelers		X		X	X	X	X		
Other products containing dangerous substances							X		

EPR : « *Extended producer responsibility* »

1.1.6. Are the components of a product subject to the information obligation?

The obligation applies to the consumer products mentioned in Article R. 541-221 of the Environmental Code. These are listed in the summary table and in the FAQ section, which describes each environmental quality and characteristic. The obligation does not apply to each component of a product, but to the product as a whole. Only the information on recyclability - since it depends on the information given by each EPR eco-organisation - can be given at the level of each component covered by an EPR scheme.

1.2 Information arrangements

1.2.1. What are the mandatory information requirements? What format of "product sheet" should be used? Will a ministerial ruling order be issued to define the format?

Article L.541-9-1 of the Environmental Code specifies that information on environmental qualities or characteristics must be made available to the public electronically, so as to be accessible by the consumer at the time of purchase, in a format that is easily reusable and exploitable by an automated processing system in an aggregated form.

Article R.541-222 thus provides for the establishment of information by dematerialised means in the form of a "product sheet", accessible free of charge at the time of the act of purchase, made available on a dedicated website or web page. The title of the website or page or the section of the dedicated page should be "product sheet related to environmental qualities or characteristics", with the name and reference of the model concerned.

No "standard" format is imposed. Public authorities shall ensure that the formats used to make available the mandatory information provided for in Article R.541-221 of the Environmental Code are effectively usable, reusable, and automatically aggregable.

The term "accessible" should be understood as opposed to "visible": the information does not have to be visible in a physical shop or online, but must be easily accessible on the producer's website at the time the consumer makes his or her purchase.

In addition, as provided for in Article R. 541-222 of the same code, a ministerial ruling may specify these dematerialised display methods if this proves relevant.

1.2.2 At what scale (range of products, model, individual unit, etc.) should the information be given on the "product sheet"?

A single product sheet must be provided for each product model concerned by the information obligations defined in Articles R. 541-221 and R. 541-222 of the Environmental Code. The information provided in a sheet - for each model - must be provided at the scale of the model or, failing that, at the smallest scale available.

1.2.3 Should specific information be displayed between the product and the packaging?

For products placed on the market with primary packaging or sales packaging within the meaning of Article R. 543-43 of the Environmental Code (e.g. container, bottle, flask), the indication of the environmental qualities and characteristics of this packaging (proportion of recycled material, recyclability and possible presence of hazardous substances in the packaging) must be done separately, within the same product sheet. The product sheet then has two separate parts: "environmental qualities and characteristics of the packaging" and "environmental qualities and characteristics of the product".

1.2.4. Can other information on the characteristics of products subject to obligations be included in the product sheet?

The "product sheet" must include all the mandatory information required by Article R.541-221 of the Environmental Code for the product model concerned, with the exception of information relating to the reparability index, the durability index and the use of renewable resources, for which specific provisions are made in application of the existing regulations.

Additional information or logos may also appear on or near the product, or in a separate section of the product sheet, as long as they are not contradictory and do not lead to confusion with the mandatory information.

Any addition to the product sheet of information or details on the environmental qualities and characteristics covered by the product sheet is the responsibility of the producer or importer as to the relevance, truthfulness and sincerity of such additions, this is in compliance with misleading commercial practices (art. L.121-2 to L.121-5 of the French Consumer Code).

1.2.5. Where should the product sheet appear? Does the fact that it is posted on a trading platform mean that the obligation is met?

The display obligations set out in Article R. 541-222 of the Environmental Code are the responsibility of the producer, importer or any other person placing the product on the market. Sellers or distributors are not subject to this obligation. The inclusion of this information on a retailer's website, or any other relevant medium, although not compulsory, is a practice that should be encouraged in order to enhance the information's availability.

1.2.6. Does the obligation apply to advertisements?

Article L.541-9-1 of the Environment Code does not require the display of the information on advertising media. However, if the information is displayed in advertisements, it must comply with the definitions set out in Article R.541-221 of the same code.

In addition, any voluntary display on a physical medium of a product and packaging must comply with the definitions of environmental qualities and characteristics as well as the mandatory information specified in Article R.541-221 of the same code.

1.2.7. Can we indicate that the information is not available?

It is compulsory to provide the information defined in Article R.541-221 of the Environmental Code, for the products mentioned in the same article. This obligation cannot be fulfilled by indicating that the information is not available.

1.2.8. How should the information on the presence of hazardous substances be displayed?

The answer is given in Part 2, under the heading "Hazardous Substances" in the Frequently Asked Questions.

1.2.9. How should EPR scheme bonuses or maluses be displayed?

The information concerning the bonuses or maluses for the products mentioned in Article R.541-221 of the Environmental Code consists of indicating the existence of a bonus or malus for the model concerned as well as the criteria that are the subject of this bonus or malus. Manufacturers have a period of 3 months from the date of approval or publication of ministerial ruling setting bonuses or

maluses to include in their "product sheets" the information relating to those bonuses or maluses that are applicable to their products.

1.2.10. What is the procedure for updating the mandatory information?

If the mandatory information provided for the product model concerned is no longer valid, the producer or importer must update it. In this case, the producer or importer shall indicate on the product sheet the date of the update.

1.2.11. How do the consumer information obligations under Article 13-I of the AGECE law relate to those under Article 13-II of the same law?

In accordance with decree n° 2021-1110 of 23 August 2021 relating to the availability of information allowing the identification of endocrine disruptors in a product taken in application of article 13-II of the AGECE law, when a product is subject to the information obligations provided for in articles 13-II and 13-I of the AGECE law, this information appears on the same medium ("product sheet" or Scan4Chem application if applicable).

1.3 Controls and sanctions

1.3.1. What is the applicable control and sanction regime?

Article L. 541-9-4-1 of the Environmental Code provides for a system of controls and sanctions in the event of non-compliance with the obligations defined in Article L. 541-9-1 of the Environmental Code. It specifies that any breach is subject to an administrative fine of up to €3,000 for a natural person and €15,000 for a legal person. This control and sanction regime is applicable as of 1 January 2023.

Pursuant to Article L. 511-7 of the Consumer Code, DGCCRF inspectors are empowered to investigate and record breaches of these provisions from 1 January 2023.

1.3.2. What is the relationship with sanctions for misleading commercial practices?

As with any other commercial practice, the penalty regime for misleading commercial practices, provided for in Article L. 132-2 of the Consumer Code, is applicable. Article 11 of Law No. 2021-1104 of 22 August 2021 on "Climate and resilience" strengthened the penalties applicable when misleading commercial practices are based on environmental claims. Indeed, the amount of the fine may be increased, in a manner proportionate to the benefits derived from the offence, to 10% of the average annual turnover, calculated on the last three annual turnovers known on the date of the offence, or to 80% of the expenses incurred in carrying out the practice constituting this offence.

2. Environmental qualities and characteristics

I. Repairability index and durability index

2.1.1. What is the scope of the information obligation?

The reparability index is compulsory for all electrical and electronic equipment covered by a joint ruling of the Minister for the Environment and the Minister for the Economy. The list of categories concerned and useful information can be found on the official page of the scheme: <https://www.ecologie.gouv.fr/indice-reparabilite>

However, it is not forbidden to include the reparability/durability index in the product sheet on a voluntary basis.

2.1.2. Are the display methods provided for by Decree No. 2022-748 of 29 April 2022 on consumer information on the environmental qualities and characteristics of waste-generating products and those of the reparability index cumulative?

No, specific display methods are defined for the reparability index. Useful information can be found on the official page of the scheme: <https://www.ecologie.gouv.fr/indice-reparabilite>

II. Compostability

2.2.1. What is the scope of the "compostable packaging" information requirement?

Only collection bags (paper/cardboard or domestic compostable plastics) that are eligible for joint collection and recovery with source-separated biowaste are "compostable", cf. order of 15 March 2022 listing compostable, methanisable and biodegradable packaging and waste that can be collected jointly with source-separated biowaste.

2.2.2. Is the obligation to use the words "Do not throw away" for plastic products and packaging applicable?

The answer is specified in the frequently asked questions in part 3 on "prohibited terms".

2.2.2. Is the ban on the use of the word "Compostable" for plastic products and packaging that can only be composted in an industrial unit applicable?

The answer is specified in the frequently asked questions in part 3 on "prohibited terms".

III. Incorporation of recycled materials

2.3.1. What is the scope of the information obligation?

The products subject to EPR mentioned in 3° (printed paper), 5°(Electrical and electronic equipment), 6°(Batteries and accumulators), 7°(Containers of chemical products), 10°(Furnishing items), 11° (Textile products for clothing, linen, footwear with the exception of leather articles), 13°(Sport and leisure articles), 14°(DIY and garden articles) and 15°(car, van, 2, 3 and 4-wheeled vehicle) of Article L. 541-10-1 of the Environmental Code.

2.3.2. Can we indicate % ranges such as "our packaging contains between 30% and 80% recycled material"?

The mandatory statement is "at least X%".

2.3.3. What to do when information is unavailable? Can we put "not available" or should we make a negative communication?

The answer is given in the Frequently Asked Questions in Part 1 on "General Questions".

2.3.4. What if the product does not contain any recycled material?

Negative statements are not required in the product sheet. They may be included voluntarily by the producer or marketer, only in the form "product does not contain recycled material". Otherwise, the producer or importer does not have to include anything in the product sheet.

2.3.5. What is the definition of a leather article?

A "leather article" is understood to be an article for which the leather pictogram is present for the upper ("tige") as provided for by Decree No. 96-477 of 30 May 1996 on the labelling of materials used in the main components of footwear offered for sale to the consumer. As stipulated in Article 5 of the said decree, the leather material is therefore in the majority when it "represents at least 80% of the surface of the upper". Such an article can therefore be described as a "leather article".

2.3.6 Can the incorporation of recycled material from chemical recycling and mass balance be included in this percentage?

It is not excluded at this stage to take into account chemical recycling but it will be necessary to refer to the calculation methods validated at EU level as soon as these are defined.

2.3.7 For products subject to EPR mentioned in 11° (Textile products for clothing, linen, footwear with the exception of leather articles) of article L. 541-10-1 of the Environment Code, must the calculation of the percentage of recycled material be based on a reference size?

The total mass of the product and the mass of recycled materials contained in it are determined according to the same reference size for the model concerned.

To do this, the producer or importer can refer in particular to the official methods published by the Agence de la Transition Ecologique, the Association Française de Normalisation or established as part of the "Product Environmental Footprint (PEF) and PEF Category Rules (PEFCR) for Apparel and Footwear" work.

It is possible to voluntarily indicate the reference size according to which the calculation was carried out for the model concerned.

IV. Use of renewable resources

2.4.1 What is the scope of the "renewable resources" disclosure requirement?

This obligation applies only to products subject to EPR mentioned in 4° (construction materials) of Article L. 541-10-1 of the Environmental Code.

2.4.2 Do the display requirements of Decree 13-I and those of the FDES regulations apply concurrently?

These terms are not cumulative.

V. Possibilities of re-use

2.5.1. What is the scope of the "re-usability" information requirement?

This obligation applies only to packaging subject to EPR mentioned in 1° of Article L. 541-10-1 of the Environmental Code.

2.5.2. Is it possible to specify additional information to the mandatory statement?

The mandatory statement is "reusable packaging" or "refillable packaging". In addition, it is possible to voluntarily indicate additional information on the product or in the product sheet, provided that this does not cause confusion for the consumer.

2.5.3. How do we define the fact that a package is indeed reusable?

With reference to Decree No. 2022-507 of 8 April 2022 on the minimum proportion of reused packaging to be placed on the market annually, reusable packaging is packaging designed for at least one second use, in a non-cumulative manner:

- for a use of the same nature as that for which it was designed, and whose reuse is organised by or on behalf of the producer;
- or by being refilled at the point of sale in the context of bulk sales, or at home if it is a refill device organised by the producer, is deemed to be reused.

VI. Recyclability

Update as of 29.12.22: A tolerance period in the controls will be applied, until 1 July 2023, for the transmission by the EPR eco-organisations of the calculation methods for recyclability. Manufacturers will have a maximum of 3 months from the date of transmission of the calculation methodology to implement this information in their "product sheets".

2.6.1. What is the scope of the "recyclability" information obligation?

The products subject to EPR mentioned in 1° (household packaging), 3° (printed paper), 4° (construction products and materials), 5° (electrical and electronic equipment), 6° (Batteries and accumulators), 7° (Containers of chemical products) 10° (Furnishings), 11° (Textile products for clothing, linen and footwear), 13° (Sports and leisure items), 14° (DIY and garden items) and 15° (cars, vans, 2, 3 and 4-wheeled vehicles) of Article L. 541-10-1 of the Environmental Code.

2.6.2. What is the calculation methodology?

Recyclability is characterised for these waste-generating products by compliance with the following criteria:

- 1) The capacity to be efficiently collected on a territorial scale, via the population's access to local collection points;
- 2) The capacity to be sorted, i.e. directed towards the recycling channels in order to be recycled;
- 3) The absence of elements or substances that interfere with sorting, recycling or limit the use of the recycled material;
- 4) The ability of the recycled material produced by the recycling processes implemented to represent more than 50% by mass of the waste collected;
- 5) The capacity to be recycled on an industrial scale and in practice, in particular by guaranteeing that the quality of the recycled material obtained is sufficient to ensure the sustainability of the outlets, and that the recycling sector can justify a good capacity to take on products that can be integrated into it.

The EPR eco-organisations are obliged to provide their members with the information needed to check whether the criteria are being met.

As regards producers in individual systems, this information is provided under their own responsibility.

2.6.3. When can the words "product can be recycled into a product of the same nature" or "packaging can be recycled into a packaging of the same nature" be used?

When the capacity to be recycled of a product or packaging corresponds to a recycling of materials reincorporated up to at least 50% in other products within the same EPR channel, the producer can complete the information on recyclability by the mention "product recyclable into a product of the same nature" or "packaging recyclable into a packaging of the same nature".

2.6.4. What if the product is not recyclable according to the methodology described above?

Negative statements are not required. In this case, the producer or importer does not have to include anything in the product sheet.

VII/VIII. Precious metals and rare earths

2.7.1. What is the scope of the information obligation on precious metals and rare earths?

This obligation applies only to the products subject to EPR mentioned in 5° (electrical and electronic equipment) and 15° (car, van, 2, 3 and 4-wheeled vehicle) of Article L. 541-10-1 of the Environmental Code.

IX. Presence of hazardous substances

Update 29.12.22: A period of tolerance in the controls will be applied until 1 April 2023 for the controls on the information obligation on hazardous substances.

2.8.1. What is the scope of the information obligation on hazardous substances?

Articles, substances, mixtures within the meaning of Decree No. 2021-1285 of 1 October 2021 on the identification of hazardous substances in products that generate waste.

2.8.2. How is the information on the presence of hazardous substances displayed?

Article R. 541-222 of the Environmental Code provides for two possibilities for making available information on the presence of hazardous substances referred to in IX of Article R. 541-221 of the Environmental Code:

- Either via the "product sheet" made available on a dedicated website or page,
- Or by means of the Scan4Chem application if possible (application allowing consumers to obtain information on the possible presence of substances of very high concern (SVHC) backed up by a centralised European database developed under the LIFE AskREACH programme). The use of the Scan4Chem application will soon be determined by a ruling of the Minister for the Environment.

In this case, if a "product sheet" is to be drawn up and made available on a dedicated website or page for at least one other environmental quality or characteristic, it must mention that the information on the presence of hazardous substances is provided by means of the Scan4Chem application and include a direct internet link to it.

It should be noted that it is not intended to designate any other application than the Scan4Chem application to comply with the obligation to inform consumers about the presence of hazardous substances in products.

The database of information on substances of concern in articles ("products") established under the Waste Framework Directive 2008/98/EC, known as "SCIP" (Substances of Concern In articles as such or in complex objects (Products)), does not currently meet the obligation to provide information on the presence of hazardous substances in products set out in Article 13-I of the AGEC Act. The information in the SCIP database is based on the criteria of Article 33 of the REACH Regulation, which are different from those provided for in the AGEC law.

[2.8.3. What are the hazardous substances referred to in IX of Article R. 541-221 of the Environmental Code? What is the deadline for providing information on the presence of a hazardous substance following its identification as a hazardous substance?](#)

Decree No. 2021-1285 of 1 October 2021 lists the hazardous substances within the meaning of Article L.541-9-1 of the Environmental Code whose presence in waste-generating products must be the subject of consumer information.

The information shall be made available no later than six months after the identification of the substance as a hazardous substance in accordance with Article R. 541-221 of the Environmental Code.

[2.8.4. How does this decree relate to the decree on endocrine disruptors \(decree no. 2021-1110 of 23 August 2021 on the provision of information to identify endocrine disruptors in a product\)?](#)

When a product is concerned by 13-II and 13-I, it should use the same medium ("product sheet" or "Scan4Chem application" if applicable).

[2.8.5. How to take into account the different layers of packaging?](#)

The obligation to display information on the presence of a hazardous substance applies as soon as it is present in a concentration of more than 0.1% by mass in a substance, mixture or article, within the meaning of points 1, 2 and 3 of Article 3 of Regulation (EC) No. 1907/2006, known as "REACH", with the exception of medicines.

For products placed on the market with primary packaging or sales packaging within the meaning of Article R. 543-43 of the Environmental Code, the packaging is covered by this obligation.

The provision of this information applies as soon as the concentration of a hazardous substance is greater than 0.1% by mass in either the product concerned or in its primary packaging or sales packaging.

The environmental qualities and characteristics of the packaging must be indicated separately from those of the product, within the same product sheet.

The packaging of a batch of products in film or cardboard, corresponding to "grouped packaging or secondary packaging" within the meaning of article R.543-43 of the Environment Code, does not fall within the scope of the obligation.

X. Traçability

[2.9.1. What is the scope of the traceability information obligation?](#)

This obligation applies only to products subject to EPR mentioned in 11° (Textile products for clothing, linen and footwear) of Article L. 541-10-1 of the Environmental Code.

For products subject to EPR mentioned in 11° (Clothing textile products, household linen/textile, footwear) of Article L. 541-10-1 of the Environment Code, the traceability information obligation applies for each of the operations mentioned in X of Article R. 541-221 of the Environment Code, to each part

of the product subject to the labelling obligation under the European Regulation of 27 September 2011 on composition labelling or marking.

2.9.2 Specify the methodology to be used: How do you transmit information when the model is made up of several parts and/or is manufactured in several countries?

The producer or importer of the products mentioned in 11° of Article L. 541-10-1 of the Environment Code must indicate the geographical origin of the manufacturing stages where the product model is mainly produced.

Where, for a model, the geographical origin of the stages is different according to the textile sub-parts, the producer or importer shall indicate the country where the greatest proportion by mass of the textile fibres in the model is produced.

Where, for a model, the geographical origin of the stages is different according to the product units, the producer or importer indicates the country where the greatest number of units are produced.

2.9.3 What is meant by "weaving"?

Weaving refers to the operations of weaving, knitting or non-woven fabrics.

2.9.4 What is meant by "stitching"?

Stitching refers to the operations of assembling the different materials making up the upper of a shoe by sewing and/or gluing.

2.9.5 What is meant by "assembly"?

The term "lasting" refers to the assembly of the open upper with the insole, and the attachment of the outsole to this assembly. If the operation of assembling the open shank with the mounting base is carried out in a different country to that of fixing the base, then the geographical indication relates to the place of assembly of the open shank with the mounting base.

2.9.6 What is meant by "finishing"?

Finishing refers to the operations carried out after assembly to complete the manufacture of a shoe (deburring, waxing, lacing, boxing, etc.) and to give it a presentation suitable for sale.

XI. Plastic microfibres

2.10.1 What is the scope of the information requirement for plastic microfibres?

This obligation applies only to products subject to EPR mentioned in 11° (Textile products for clothing, linen and footwear) of Article L. 541-10-1 of the Environmental Code.

Partie 2 - Les mentions interdites

3.1. What is the applicable deadline for entry into force? What is the scope of the measure?

The ban on labelling or displaying on a product or packaging placed on the French market with the terms "biodegradable", "environmentally friendly" and their equivalents came into force on 1 May 2022.

For products and packaging manufactured or imported before 30 April 2022, the ban applies from 1 January 2023.

3.2. What are the equivalent terms?

The new version of the official guide on environmental claims, currently being drawn up by a working group of the Conseil National de la Consommation and to be published by the DGCCRF, may provide elements concerning the terms considered equivalent to "environmentally friendly" and "biodegradable".

3.3. How does the prohibition in Articles L.541-9-1 and R.541-223 of the Environmental Code on the use of the term "environmentally friendly" fit in with the authorisation provided for by the European Ecolabel to use the same term on products?

Regulation 66/2010 of the European Parliament and of the Council of 25 November 2009, authorises holders of the European ecolabel to display optional logos, determined for each standard, including statements such as "better for the environment", "limited impact on the aquatic environment" or "minimum content of hazardous substances". The authorised claims are defined in each standard and according to the 3 main environmental criteria of each product category. This directly applicable provision prevails over any other national regulation.

3.4. Is the obligation to use the words "Do not throw away" for plastic products and packaging applicable?

Stemming from Article L.541-9-1 of the Environmental Code, this provision is directly applicable. All plastic products and packaging that can be composted at home or in an industrial composting facility must be labelled "do not throw into the environment".

3.5. Is the ban on the use of the word "Compostable" for plastic products and packaging that can only be composted in an industrial unit applicable?

Stemming from Article L.541-9-1 of the Environmental Code, this provision is directly applicable and concerns plastic products and packaging whose compostability can only be obtained in an industrial unit.