

## Responsibilities for Modint members under the French AGEC law (EPR and Triman logo)

In order to harmonize the separate collection systems within France, the French Decree No. 2014-1577 has made it mandatory from 1 January 2015 to print the Triman Logo on recyclable products and packaging sold to consumers in France. Products with the Triman Logo on them are meant to be collected in separate waste streams. The Triman logo is mandatory to use on products affected by an EPR system, which are:

- Furniture and furnishings
- Graphic papers
- Tyres
- **Clothing textiles**
- **Household linens**
- Shoes
- **Household packaging**
- Electrical and electronic equipment
- Batteries and accumulators
- Products that generate specific non-point waste

The Triman logo appears on the product, its packaging or, failing that, in the other documents supplied with the product, without prejudice to the symbols affixed in application of other provisions. Until January 2022, the logo can also be displayed on the website, either on the product page or on a separate page informing consumers about recyclability of products and packaging.

In 2020, the French Anti-Waste Law for a Circular Economy (AGEC law), was published. The law contains a part to make sorting more efficient and to better inform consumers. In practice this means stricter rules for labelling products under an EPR system:

The Triman logo will be mandatory and indicated on the product, its packaging, or on the documents supplied with the product (so no longer on a webpage), and **shall be accompanied by sorting information, specific to each EPR sector.**

The implementing decree (No. 2021-835) which sets the new requirement for accompanying the Triman logo with sorting instructions for products subject under an EPR system in France was published on June 29, 2021.

These instructions are developed by the eco-organisation or each EPR sector. For Modint members, relevant organizations are:

For household packaging: [CITEO](#).

French eco-organization for textile, household linen and footwear: [Re\\_fashion](#).

Entry into force:

According to the law, the text comes into force the day after its publication (June 30 2021) and will be a requirement by January 1st 2022. However, the decree also provides a more flexible timetable for more smooth implementation:

- 12 months to bring products into conformity and affix sorting info next to the Triman logo.
- 18 months for products that have been manufactured or imported before the validation date of the new symbols (further explained below).

Below we have specified the most important information from both [Re\\_fashion](#) and [CITEO](#).

### **CITEO:**

The regulations obligate every placer of packaging waste on the French market to enter into a return scheme.

Companies concerned are:

**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 (PLB).

**Introducers and importers** for packaged products purchased abroad – inside and outside the European Union – and resold on the French market.

**The party responsible for first putting the packaged product on the market**, in the absence of the producer's or the introducer/ importer's identification.

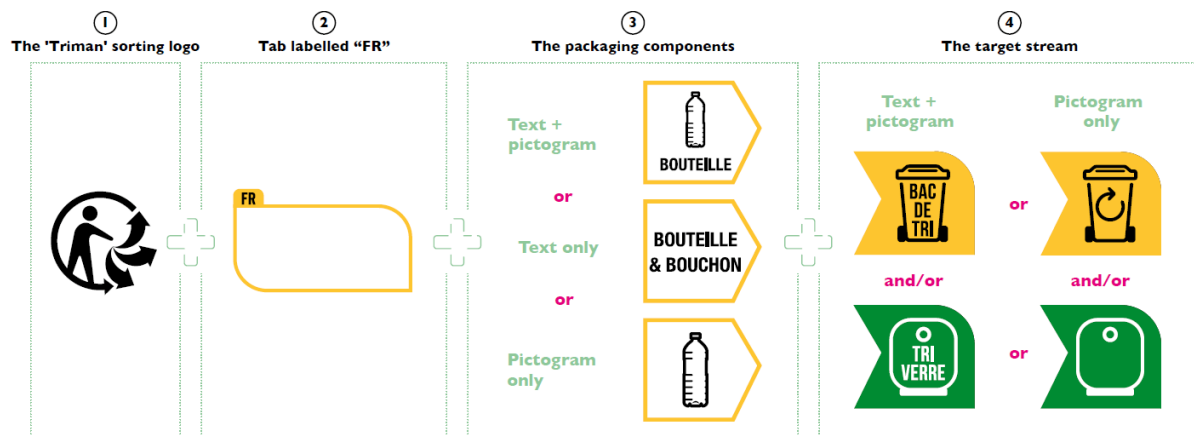
If you are not responsible according to above mentioned rules but you are the party that is labelling the products, your (French) partner/client should register with CITEO and be able to provide you with the correct artwork.

CITEO is the eco-organisation which assists companies with their EPR obligation to collect and recycle household packaging put on the French market. To comply with the law, companies have to become a member and pay an annual fee (based on packaging materials and volume) to CITEO.

The access to their information, such as the sorting info to accompany the Triman logo, is only accessible to CITEO members. Below are examples of the Triman logo accompanied by the sorting information for packaging.

These logo's must be applied to all household packaging:

- Before 9 September 2022 (to all products produced after September 9<sup>th</sup> 2021)
- No later than March 9, 2023. (For products produced before September 9<sup>th</sup> 2021)



Here is the process to register with CITEO and receive the correct artwork:

1. CITEO website, Triman information page (in French, you can use the translate button) – (<https://www.citeo.com/info-tri>)
2. Sign up to become a member – information in English - <https://clients-emballages.citeo.com/en/public/login/espace-adhesion>
3. Three types of declarations based on Unit Sold to Consumers on the market. Each level will have an annual fee to pay for the use of the logo + sorting information for packaging – It is a kind of eco-tax.
  - a. Flat fee of 80€ if the company sell less than 10 000 Units Sold to Consumers on the market
  - b. Sectorial declaration if the company sell between 10 000 and 500 000 Units Sold to Consumers on the market

- c. Declaration per Unit sold to Consumer over 10 000 Units Sold to Consumers on the market.
4. Choose the Triman logo corresponding to your packaging. A few propositions available.
5. When being registered, the company has access to all supporting documents.
6. Each year the company brand has to declare / to pay the eco-tax based on the number of units sold to consumers in France.

You can write to [clients.emballages@citeo.com](mailto:clients.emballages@citeo.com) to get response to more questions.

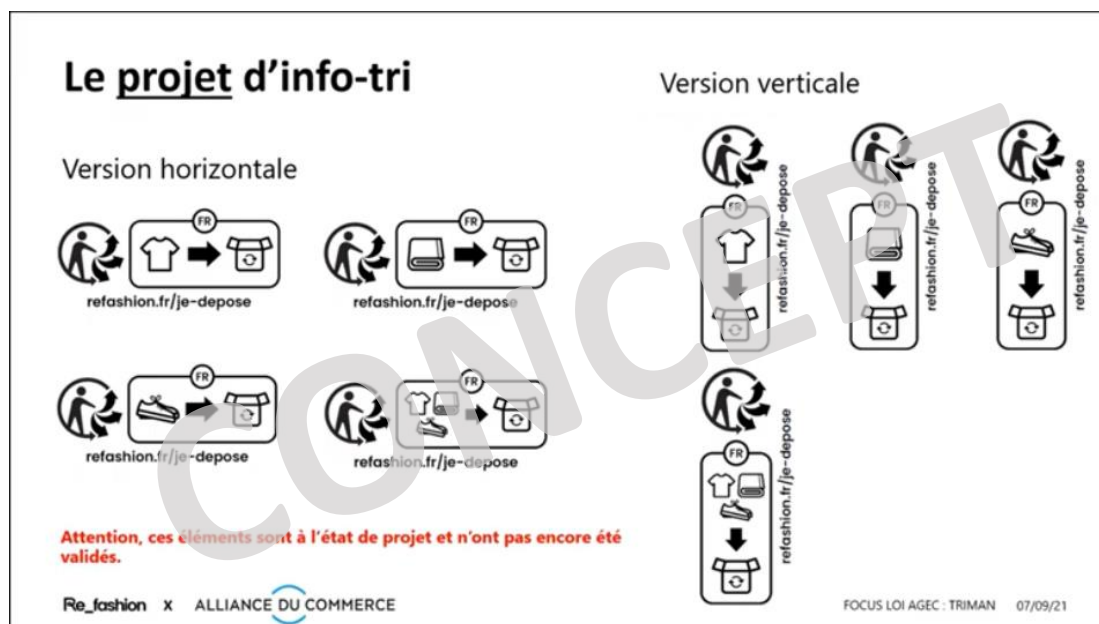
## Re\_fashion

Re\_fashion, on behalf of companies that place textile and footwear products on the market, ensures the prevention and management of the end of life of these items.

Subject companies:

You are liable if you are a manufacturer or ordering party, Importer (including in the European Union), distributor. The marketer is the one who brings the goods into French territory if they are produced abroad, whether as a principal or an importer. For manufacturers, whoever affixes his mark is responsible, whether it is made in France or abroad. If you buy from a French representative, but your purchase invoices come from abroad, you are also liable.

More about fees and becoming a member of Re\_fashion can be found [here](#).



The official sorting information for textile products has not been published yet. Above is a concept that has been shared. Refashion is awaiting validation of its Triman and sorting information by the Ministry. From the date of validation by the ministry, the clothing, household linen and footwear marketers will have a period of 12 months to bring their products into conformity and affix the info sorting with the signage (the period extends at 18 months if the products placed on the market were manufactured before the validation date of the ministry). Refashion will provide its members with TRIMAN signage and sorting info once validated, these elements will be accompanied by a user guide with recommendations on the size of the sorting info.

Modint is in contact with several organizations in France and will update you as soon as more information is available.

Whenever you have questions in the meantime, do not hesitate to contact us.

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