



SUMMARY OF PREVENTION AND ECO- DESIGN PLANS SPORTS AND LEISURE ARTICLES

11/10/2024

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PRELIMINARY NOTE

Please note that a translation tool was used to help us produce the present document in a decent delay.

If any formulation or information seem inexact or incorrect, do not hesitate to contact us.

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INTRODUCTION

Prevention and eco-design are two levers aimed at reducing waste production and environmental impacts. The French **Anti-Waste and Circular Economy Act** therefore requires producers to draw up and manage a **five-year prevention and eco-design plan (PEP)**¹ to meet today's challenges.

This PEP aims to :

- **Reduce the use of non-renewable resources.**
- **Increase the use of recycled materials.**
- **Increase the recyclability of its products at processing facilities located in France.**

It is understood here that :

Prevention refers to "all measures taken before a substance, material or product becomes waste, when these measures contribute to the reduction of at least one of the following items:

- The quantity of waste generated, including through the reuse or extension of the useful life of substances, materials or products;
- The harmful effects of waste products on the environment and human health;
- The content of substances hazardous to the environment and human health in substances, materials or products" - definition taken from article L.541-1-1 of the French Environment Code.

Eco-design is a "methodical approach that takes into account the environmental aspects of the design and development process with the aim of reducing negative environmental impacts throughout a product's life cycle", according to ISO 14006.

To support its members in their first exercise in drawing up these PEPs, Ecologic has developed and deployed tools to help them take ownership of the approach and express their commitments to these three mandatory areas.

In association with the eco-organizations **Léko, Screlec and Valdelia**, a joint project was launched in early April 2023 to provide their members with an Excel template (see Appendix 2), designed to help them draw up their plans and facilitate the processing of the documents received.

Another means of completion was also offered to members, in the form of a **questionnaire**, making the exercise more accessible and simpler. As a result, **of the 304 company PEPs received for the SLA sector, 166 (over half) were submitted via this form**, with an average completion time of around 20 minutes, and options to go further on each theme. ²

¹ "Art. L. 541-10-12-Any producer mentioned in article L. 541-10-1 is required to draw up and implement a prevention and eco-design plan with the aim of reducing the use of non-renewable resources, increasing the use of recycled materials and increasing the recyclability of its products in processing facilities located on national territory.

"This plan is revised every five years. It may be individual or common to several producers. It includes an assessment of the previous plan and defines the prevention and eco-design objectives and actions to be implemented by the producer over the next five years. The eco-organization set up by the producers may draw up a joint plan for all its members.

"The individual and joint plans are forwarded to the eco-organization set up by the producers, which publishes a summary that is accessible to the public, after presentation to the body representing the sector's stakeholders.

² On sustainability, with Ethikis: https://longtime.ethikis.com/fr_FR/survey/start/diagnostic-maturite-durabilite-229
On the use of recycled materials: <https://forms.office.com/e/Xu1iDQWcYh>
On recyclability: <https://forms.office.com/e/qKz0xLxXj6>

Various communication campaigns were carried out by Ecologic in the form of emailings and webinars to help members understand the new obligation and make it their own. For the purposes of this initial summary, only companies already members in 2022 were taken into account, as they were the only ones able to benefit from the entire communication campaign and the time required to complete the document.

The extensive feedback we received enabled us to identify needs and examine the difficulties and questions raised by the variety of players involved. Some of these can be found in the Frequently Asked Questions (see Appendix 3).

We have also responded by offering **the full range of tools, materials and information in French and English**. Similarly, this summary is available in English.

The aim of this document is to review the results of the SLA sector, analyze the various issues and **identify the prospects for progress** envisaged by Ecologic and the stakeholders in this still young EPR sector.

The exercise is not intended to provide an exhaustive quantitative analysis of prevention and eco-design work in the SLA sector, for various reasons:

- Some of the strategic work carried out by marketers has not been included in the PEP for reasons of confidentiality.
- The performance indicators for the proposed actions have not been filled in systematically and are not all homogeneous.
- Many new members' PEPs were received after the set deadline, which is very restrictive for a new member.
- To present a more detailed analysis would risk compromising the confidentiality of the information transmitted.

However, while this summary is descriptive and introductory, inferential analyses can be developed at a later stage.

1. KEY FIGURES

304

PEP RECEIVED

138

IN EXCEL FORMAT

166

LIGHT FORMAT

COVERAGE RATES

84%

TONS – PUTS ON
THE MARKET

85%

UNITS LAUNCHED

58%²

MEMBERS

BREAKDOWN OF PROPOSED ACTIONS BY THEME IN THE PEPS

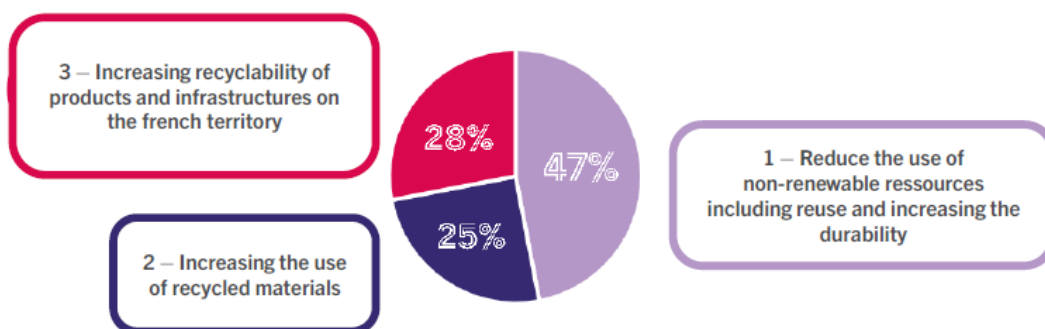


Figure 1: Breakdown of actions proposed in the PEP by theme (N = 3654 actions)

² Among those who are members and have declared a market launch in 2022

1.1. ACTIONS PROPOSED BY

In order to determine which actions had been highlighted by the companies, an initial analysis was carried out on a sample of **112 PEP** representing the Sporting Goods and Leisure Goods (SLA) sector. A minimum of one action per mandatory theme was requested.

A total of **3,654 actions** are proposed by the SLA sector's PEPs on mandatory themes. Most of these actions focus on reducing the use of non-renewable resources, with little disparity depending on the type of member. In the documents analyzed, this is illustrated by the average of 14 actions allocated to this theme, compared with 7 for increasing the use of recycled materials and 8 for increasing recyclability.

An initial explanation for this trend, which has also been observed in the Electrical and Electronic Equipment (EEE) and DIY and Thermal Garden Equipment (ABJth) sectors, is that this theme appears first in the PEP framework proposed to members to help them draw up their plans. It is therefore possible that this may have generated **a filling bias**.

At the same time, the decarbonization of the energies used is a key topic in the regulatory and technical news, and the levers put forward to reduce greenhouse gas emissions and achieve carbon neutrality by 2050 on the European continent.

Furthermore, in an initial attempt at consolidation, the results by major product family (as defined in Ecologic's ecocontribution scale) do not appear to vary significantly, suggesting that **eco-design actions relate more to structures and their organization than to the products designed**. Thus, the predominance of actions relating to the reduction of non-renewable resources persists.

More specifically, a look at the actions detailed by members in their PEPs in Figure 2 shows a predominance given to an item encompassing many different notions, the "Other leads" item.

Training, awareness-raising and communication take second place, which differs from the findings of the IAS and ABJth summaries.

In this way, members share a preponderance of actions relating to :

- The choice of recognized labels.
- Reviewing logistics chains.
- Relocation of certain products within Europe and first-tier suppliers.

With regard to training/awareness/communication levers, actions mainly concern training for purchasing departments, training in life-cycle analysis, training for after-sales departments and the sharing of CSR policies.

The optional levers activated seem to carry a great deal of weight for companies in this sector.

For example, the notion of choosing recognized labels appears in the optional levers under the notion of "Implementing tools linked to eco-design and impact assessment", which represents 24% of the proposed actions, as explained in Figure 3, but is almost entirely absent from the actions stemming from mandatory levers, as can be seen in Figure 2.

At this stage, it should be noted that the data proposed in this summary are not weighted by tonnage placed on the market, for reasons of confidentiality.

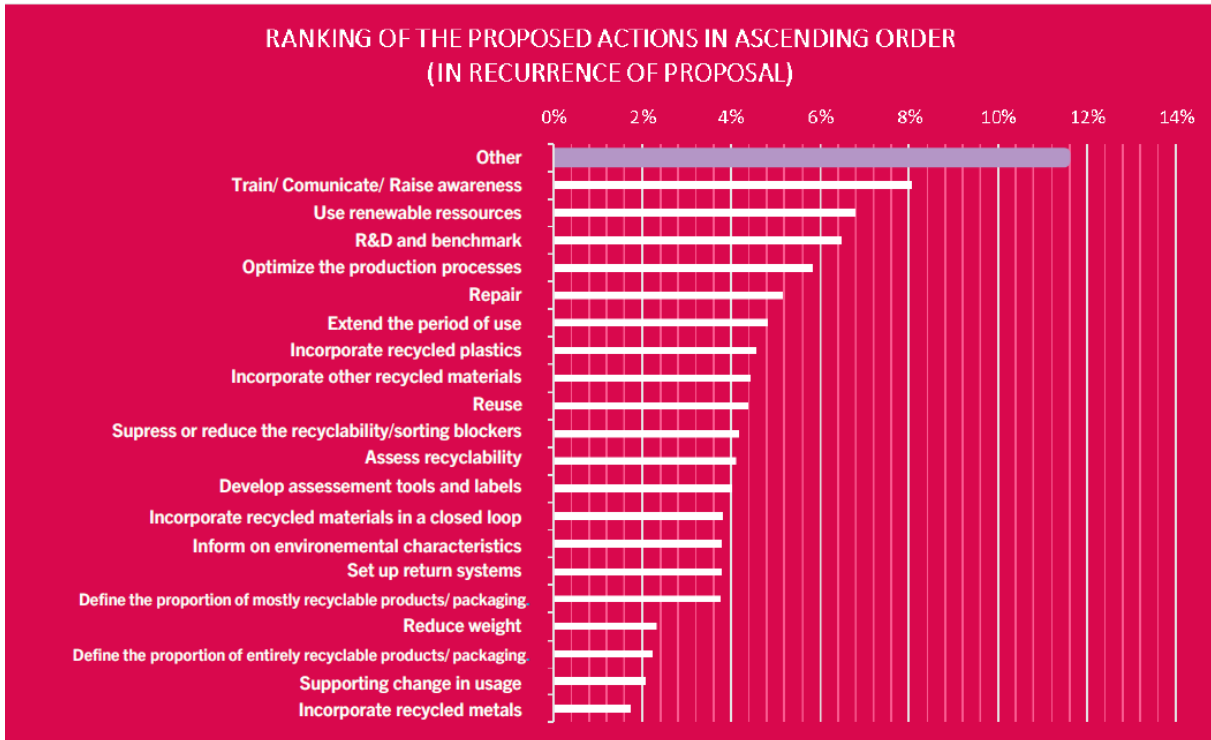


Figure 2: Ranking of the most frequently used levers in the PEPs for all themes (N = 3654 actions)

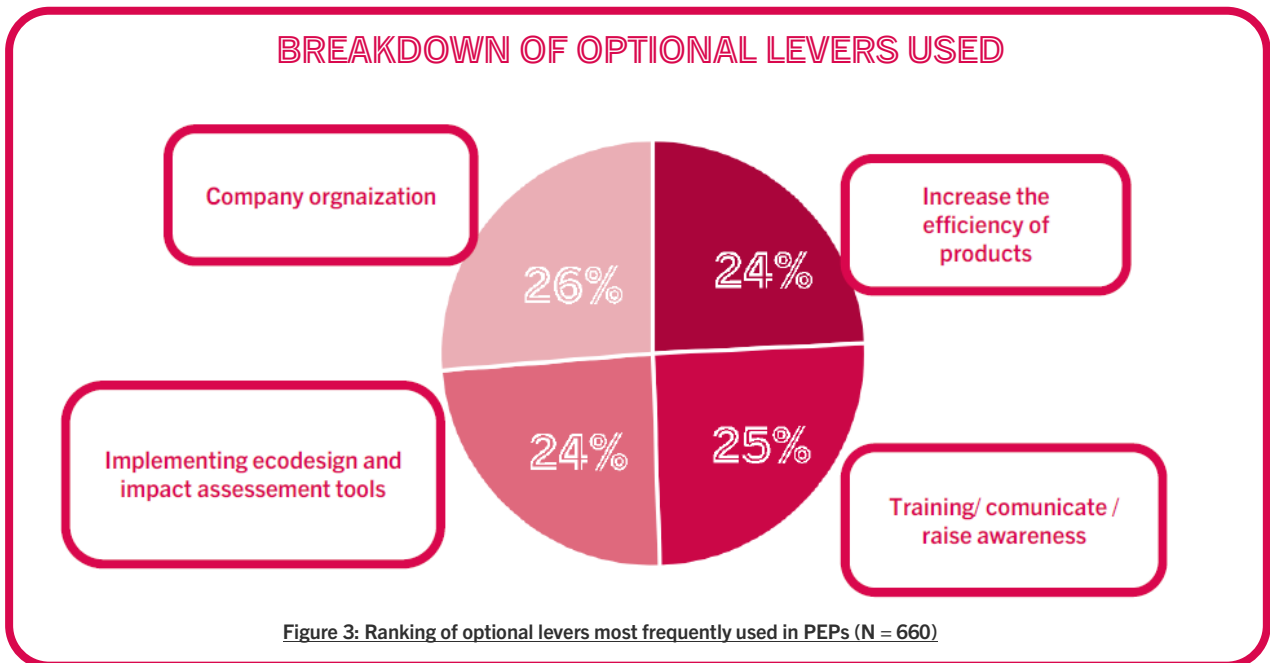
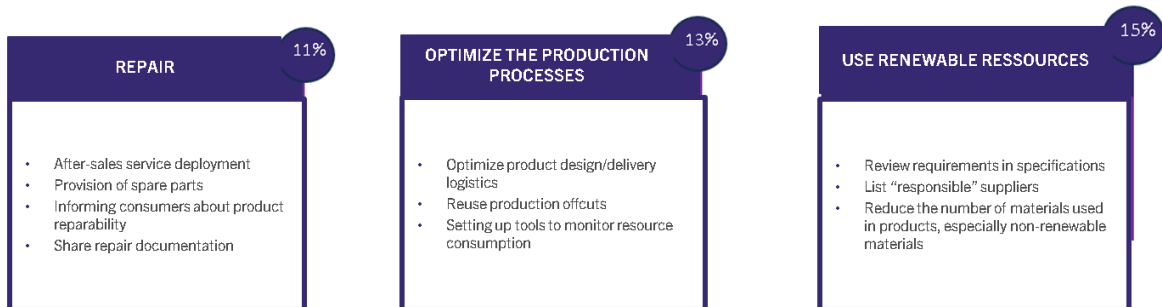
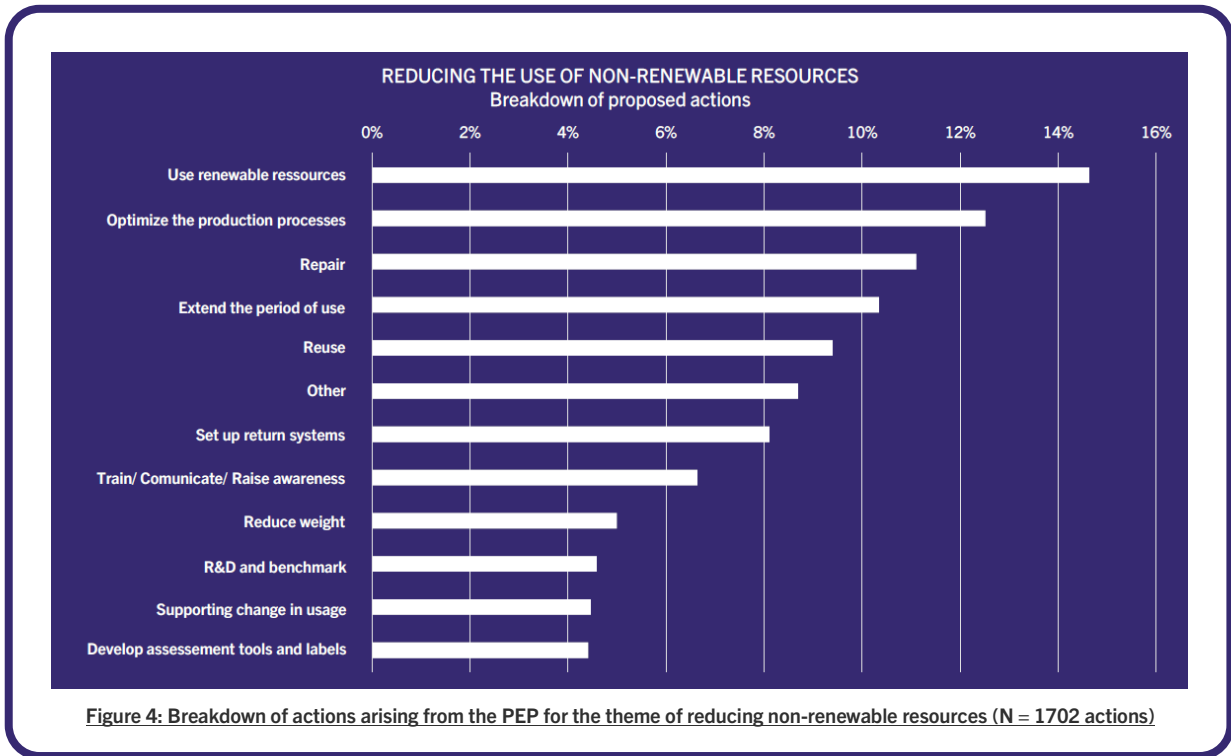


Figure 3: Ranking of optional levers most frequently used in PEPs (N = 660)

1.2. OVERVIEW OF MANDATORY THEMES

1.2.1 REDUCING THE USE OF NON-RENEWABLE RESOURCES

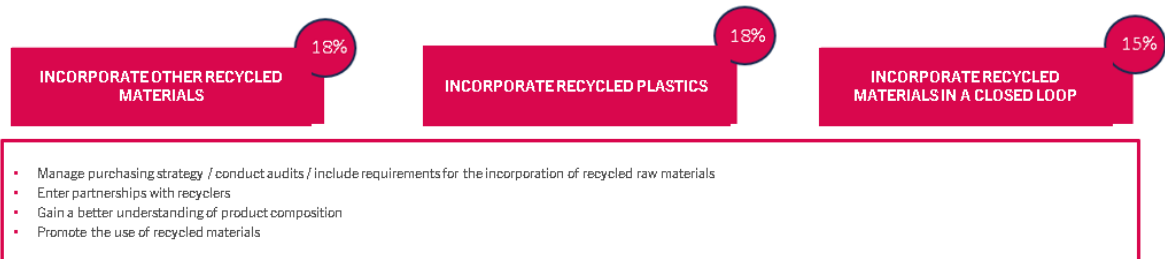
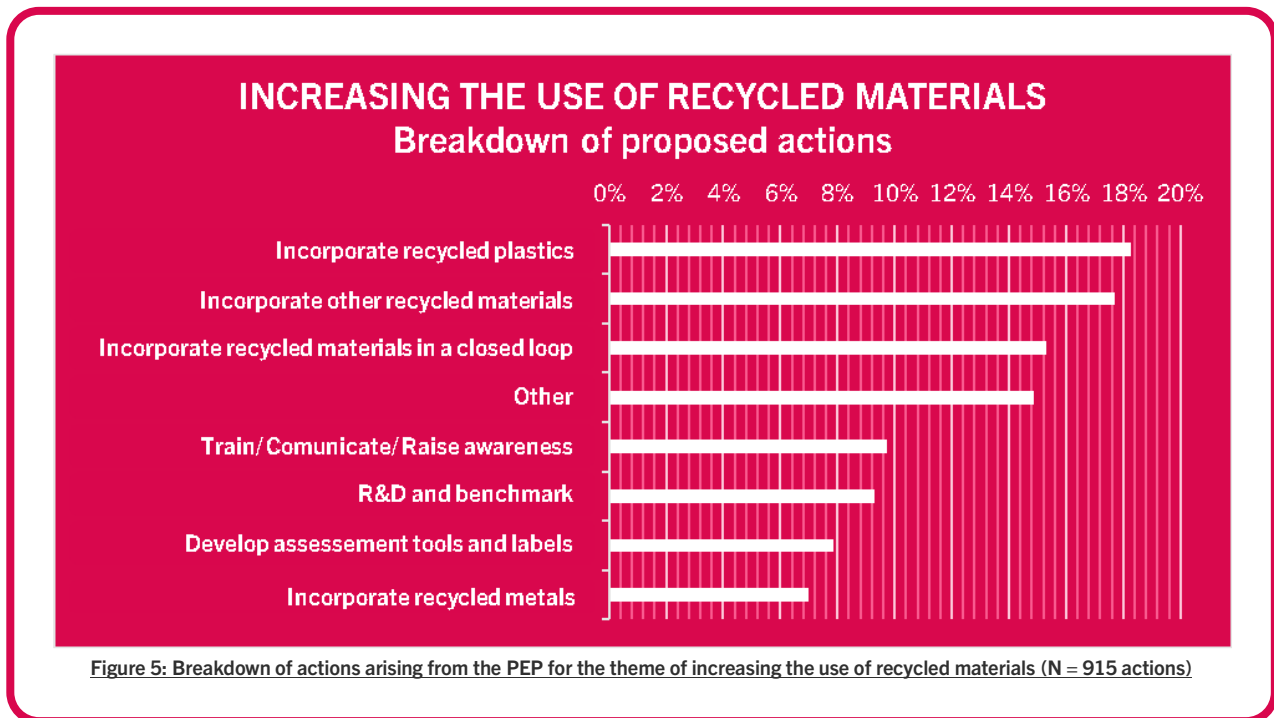


The use of renewable resources stands out with **15% of actions focused on this subject**.

We can see that players in the industry are determined to work on this aspect by reviewing their value chains from marketing to end-of-life, identifying the right partners and working on design. In this way, the reduction in the number of materials used is emphasized, which coincides with Ecologic's observations, and the various projects aimed at moving towards single-material products in particular.

The Sporting Goods industry is faced with the dual problem of having to **offer increasingly high-performance products for top-level sportsmen** and women, but also having a segment of its clientele looking for products for so-called leisure sports activities. This category of customer, who uses products less regularly or less intensively, can offer the possibility of simplifying them without compromising the desired performance. In the same way, products for younger customers, who naturally have a shorter lifespan, can be designed with end-of-life in mind.

1.2.2 INCREASING THE USE OF RECYCLED MATERIALS



Most of these actions concern **the incorporation of recycled plastics or alternative materials, particularly in closed-loop processes.**

This is consistent with the stakes and **commitments of companies** in the sporting goods sector. For several years now, we've been seeing **more recycled materials being used**, particularly on objects containing plastic and on textile sports equipment.

Recycled metal seems to be a secondary issue but is seen as a **lower priority** because it is already in place in many sectors or is easy to access.

Here, there seems to be a need for a **better understanding of products** and **greater control over their design**. In particular, companies are embarking on development projects with recyclers and producers of alternative materials to make a profound transition from the existing to the future.

Promoting consumer awareness is also a challenge to which many players are committed to providing an appropriate response in order to develop a gesture of sorting and returning products for subsequent reintegration into developed processes.

1.2.3 INCREASING PRODUCT RECYCLABILITY

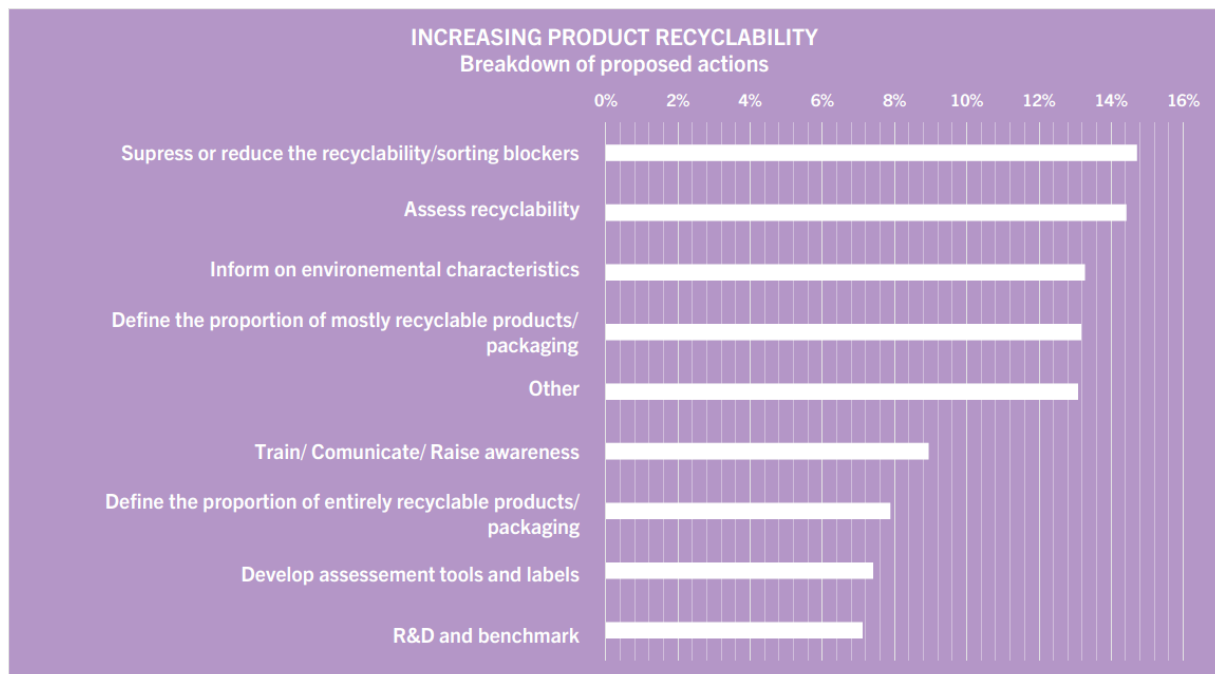
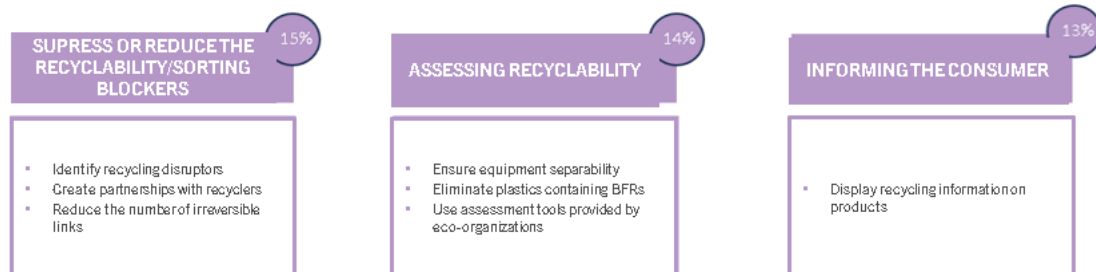


Figure 6: Breakdown of actions resulting from the lightweight PEP for the theme of increasing product recyclability (N = 1040 actions)



In line with the previous leverage point, the majority of actions focus on **improving product design**.

With the support of eco-organizations, players are looking to **identify the elements that disrupt the recycling of their products**. This involves taking into account and progressively eliminating substances such as **brominated flame retardants (BFRs)**, **reducing irreversible bonds** and working on **material separability**.

Ecologic and its members must work together to document and inform each other about end-of-life channels, to ensure that information is passed on smoothly and to identify industrially mature end-of-life channels that are currently being developed or implemented.

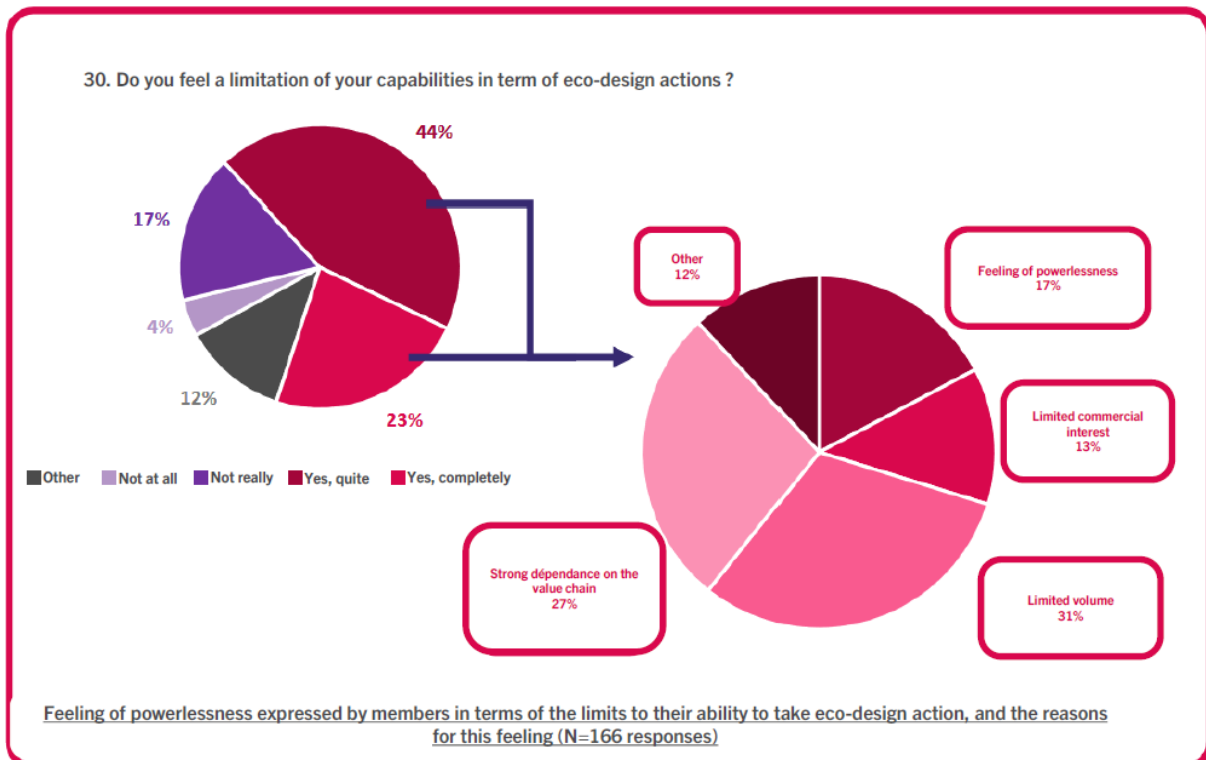
Companies in this sector have also adopted the environmental labelling required by the AGEC law, and some have even gone beyond their obligations by communicating their recycling methods to consumers.

2. QUALITATIVE FINDINGS

2.1. FELT LIMITS

Following the discovery of this obligation, Ecologic's members quickly raised a number of questions and doubts. The novelty of the exercise meant that companies did not have the benefit of hindsight when it came to methods of analysis, presentation and use of the information collected.

Some of our members also shared **their feeling of powerlessness in the face of these issues, as they** did not see what their fields of action and possible levels of intervention might be. Ecologic will need to provide support, explanations and skills upgrading in order to reduce this feeling and help the various companies in the three sectors to envisage concrete action plans that have an impact across the entire value chain.



According to feedback, 67% of respondents feel this limitation. More communication and information is needed to overcome this, as well as the lack of commitment in terms of the volumes involved and dependence on the value chain.

2.2. CORPORATE COMMITMENT

The SLA sector has **been committed to ecological issues even before it was set up**. In fact, what sets this sector apart from that of Electrical and Electronic Equipment (EEE) and Do-It-Yourself and Thermal Garden Equipment (ABJth) is the particular sensitivity of its consumers to environmental issues.

Although still a secondary argument impacting the act of purchase behind price and product performance, sportsmen and women are naturally led to be more informed, more committed and closer to natural spaces. This is reflected in the fact that PEP communication is more focused on the repair and collection areas deployed in stores. Raising awareness of global issues is a task that has already been partly carried out and has been highlighted for years.

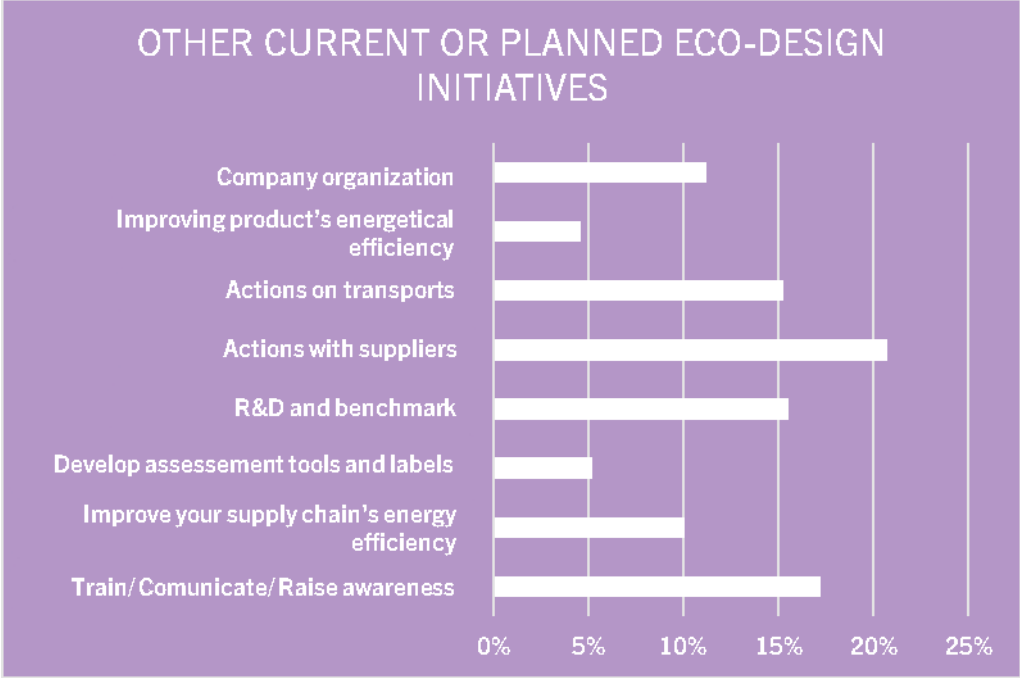


Figure 8: Other actions underway or planned in light PEPs (N = 367 actions)

Companies are also committed to reducing their impact in order to achieve the various carbon neutrality targets set. This involves reducing the impact of transport by avoiding air travel and promoting short distances, as well as choosing green energy sources through specific suppliers or the installation of solar panels.

3. PROSPECTS

3.1. REGULATORY DEVELOPMENTS

European regulations are in the process of evolving, as the 2009/125/EC eco-design directive will be repealed and replaced by a European regulation ([ESPR: Ecodesign for Sustainable Products Regulation](#)), currently under discussion. This will set out new eco-design requirements for a wide range of products to make them "**more durable, reliable, reusable, upgradeable, repairable and easier to maintain, refurbish and recycle, as well as more efficient in their use of energy and resources.**"⁴ «. In particular, it includes a "Digital Product Passport" (DPP) by 2027, which is intended to enable finer product traceability and better knowledge of the value chain, an expected tool for more accurate assessment of the environmental impact of complex products.

The final text was adopted by the European Parliament and the Council in spring 2024. It then entered into force, and will apply after the latter, in spring 2026.

It will be crucial to inform and support players in the industry as they apply the directive, as well as the [Corporate Sustainability Reporting Directive](#) (CSRD) for companies concerned from 2025 onwards.

3.2. AREAS FOR IMPROVEMENT ON THE PEP

Following the various problems identified during this first PEP reception and consolidation exercise, Ecologic has defined an action plan to continuously improve the services offered to members.

Discussions are currently underway in five main areas:

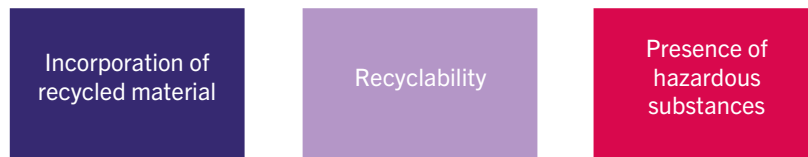
- 1. Improve the framework** for receiving future PEPs for new members, as well as for members who have already submitted their PEPs but wish to update them. Changes could concern both the content of the PEPs and the tools used to submit them to Ecologic (e.g.: submission via an extranet directly to a space dedicated to the member).
Indeed, members have encountered difficulties in completing a harmonized grid for all, in a context where the problems and realities of each can vary drastically. However, this harmonization was necessary in order to be able to consolidate all the PEP and produce a synthesis as required by the AGECE law and its article 72. However, the format of the forms is likely to evolve to better meet the expectations of our members.

⁴ Extract from the proposal for a Regulation of the European Parliament and of the Council establishing a framework for the setting of eco-design requirements for durable products and repealing Directive 2009/125/EC

- 2. Identify the right contact** upstream, to ensure that information is properly disseminated, provide support to members at the right level, and manage the PEP over time, so that it can evolve in line with regulatory and technical developments.

In addition, in order to consolidate all PEPs and enable cross-analyses between different databases, Ecologic must ensure that members completing their PEPs are easily identifiable in these databases, and that their names are identical. Identifying the right contact is also crucial for efficient sharing of information and documentation.

- 3. Orient the content of the PEPs** to develop actions that specifically address :
 - Production or use of raw materials: **What? What? When? When?**
 - Use of spare parts and repair-related services
 - The study of the characteristics mentioned in article 13 of the AGEC law



One way of facilitating this orientation is to **propose** more precise **sector plans**. These could be semi-directive, with drop-down lists of levers, actions, objectives and indicators to choose from, along the lines of the online form.

- 4. Refine the automatic consolidation of** databases and support the translation of these tools, so that we speak a single language and do not reinforce the language barrier.
- 5. Clarify the intentions declared** in the PEPs, so that we know in detail the actions planned by members according to their nature, the products they market and the developments they would like to implement. Indeed, the PEPs are indicative at this stage. This factor, as well as concerns about the confidentiality of the data provided, has reduced the willingness of some members to share strategic information of a sensitive nature.

3.3. TOOLS DEPLOYED BY ECOLOGIC

The services offered by Ecologic are based on the 3R strategy: Repair - Reuse - Recycle: Repair - Reuse and Recycle. To these 3Rs must be added "Reduce", directly linked to the notion of waste prevention.

3.3.1 REPAIR

The work carried out on various emblematic products as part of the creation of the sector, and the deployment of the [repair fund](#) on 23 emblematic products in the SLA sector, demonstrate the importance of repair in extending product life.

For consumers, Ecologic's [e-reparation.eco website](#) offers diagnostic aids and support in finding a "BonusRepar" approved repairer nearby.

Repair will be facilitated by products designed to be more repairable, due to their structure, and by the availability of spare parts and repair services for this purpose. Ecologic is currently supporting a number of R&D projects on spare parts as part of [calls for R&D projects](#) in the SLA sector, in which members are invited to participate.

3.3.2 REUSE

E-reemploi.eco, a new Ecologic service to facilitate reuse and give more meaning to donation. It's also Ecologic's concrete commitment to fulfilling its missions on reuse, established by the AGECE law aimed at :

- Put organizations (businesses, local authorities, public institutions, clubs, sports federations, etc.) in touch with those specializing in reuse in your area.
- Facilitating the collection and transport of donations to local reuse organizations
- Ensure that the donation benefits a local structure listed by Ecologic, which has a reuse activity.
- And to track and trace donations (transfer certificates).

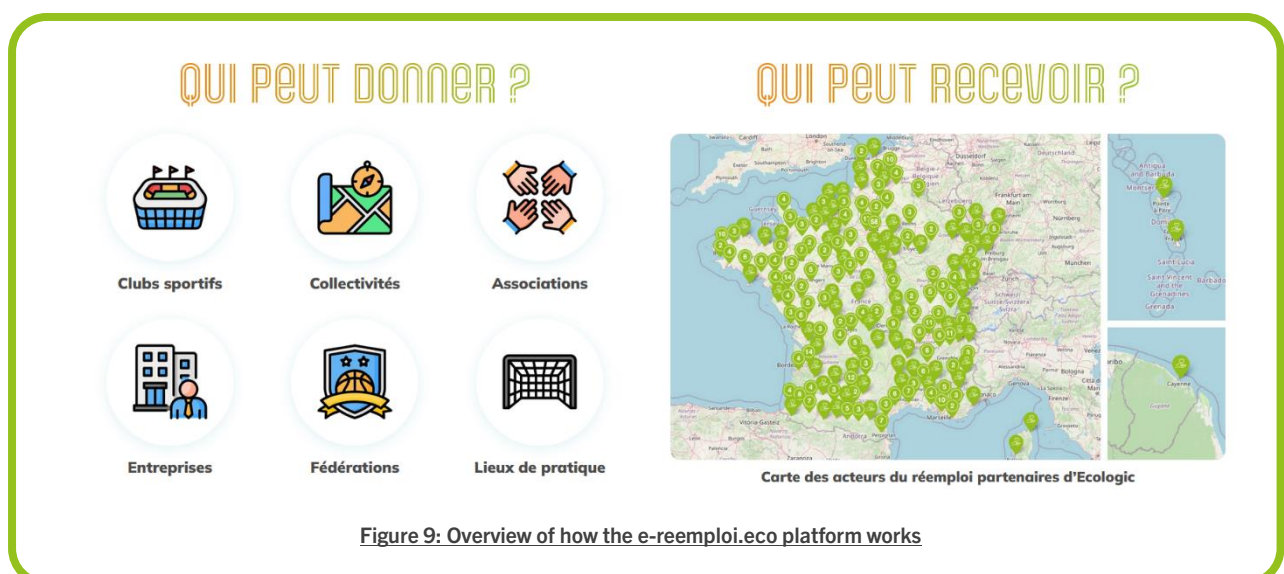


Figure 9: Overview of how the e-reemploi.eco platform works

This entirely free web service is available exclusively to all companies, local authorities, public establishments, clubs, sports federations, etc., to encourage donations between professional organizations. It relies on a network of over 400 Social and Solidarity Economy (SSE) structures.

Members wishing to work on the reuse of their LSAs can donate products to the platform. They can also benefit from financial support for reuse within their structure, by signing up to the "producer-actor" scheme.

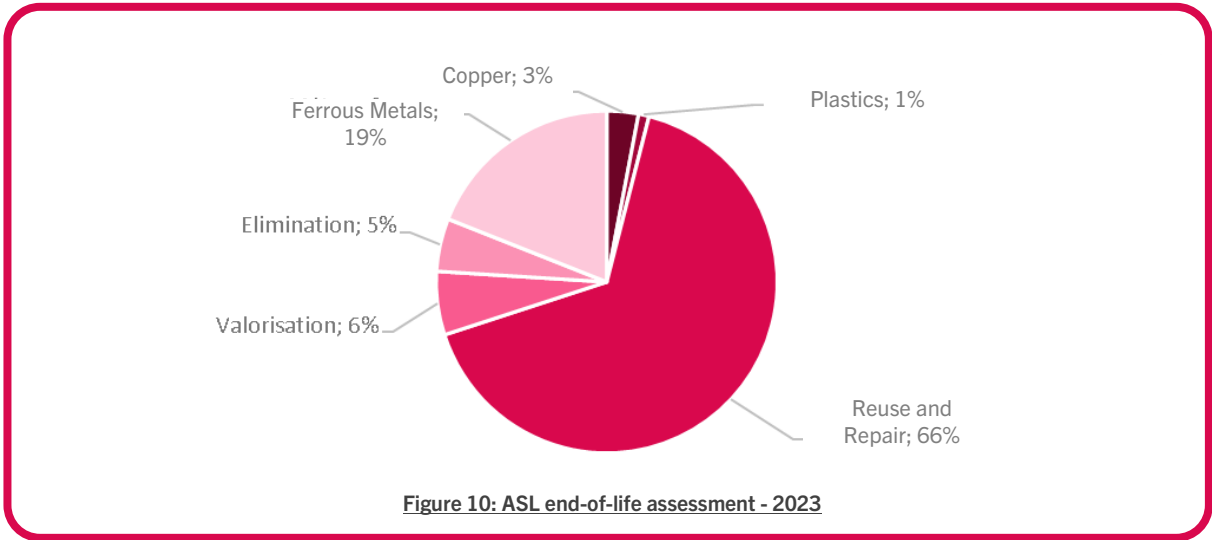
3.3.3 RECYCLE

Ecologic is working on the recycling of SLAs, via calls for R&D projects (see above) in which members are invited to participate. A [tool for assessing the recyclability of SLAs](#) placed on the market is also available.

A study on the brakes and levers on recyclability was carried out in 2023. It determined that the brakes are based on four levers:

- Organizational challenges linked to the diversity of products and the distribution of tonnages across the country.
- The economic stakes involved in competing for access to adapted industrial processes.
- Regulatory issues concerning the need for tools to be present on French territory and the control of hazardous substances.
- The various technical challenges relate to materials, manufacturing processes and the need to develop new structures.

The results and detailed conclusions should be shared and serve as a basis for improving the end-of-life of SLAs as a whole. Various research projects have been launched, and regulatory studies on the possibilities of reincorporating recycled material and extending the lifespan of SLAs will provide answers to the various issues raised.



Lastly, it should be remembered that **recycling is first and foremost conditioned by collection in good conditions**, as recalled by the [decree implementing Article 13 of the AGEC law](#), which characterizes recyclability in five factors:

1. **The ability to be efficiently collected on a regional scale, through access to local collection points.**
2. **The ability to be sorted, i.e. directed towards recycling channels for recycling.**
3. The absence of elements or substances that interfere with sorting and recycling, or limit the use of recycled materials.
4. The ability to ensure that the recycled material produced by the recycling processes implemented represents more than 50% by mass of the waste collected.
5. The ability 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 long-term outlets, and that the recycling chain can demonstrate a good capacity to handle products that can be integrated into it.

To guarantee this, in addition to a dense territorial network of collection points, Ecologic has for over ten years been offering professionals, and in particular its members, a customized EEE collection service, free under certain conditions, via the e-dechet.com service. This service has now been extended to SLAs and ABJThs.

CONCLUSION

This **first exercise in consolidating** prevention and eco-design plans shared by members of the Sporting Goods and Leisure Goods (SLA) sector ends on an encouraging note. Member participation has been high, and concrete support actions have been identified.

The predominance of interest in reducing the use of non-renewable resources in PEPs, whatever the nature of the members or the products marketed, is notable, particularly in commitments to extend their useful life.

The integration of recycled raw materials and the improvement of product recyclability are also highlighted through various actions demonstrating the commitment to work on materials, processes and product structures. Ecologic will thus be able to support its members in developing concrete actions on these eco-design levers directly linked to EPR channels.

A feeling of powerlessness and lack of interest was expressed by some members, who did not understand what their scope of action and possible level of intervention could be, for an exercise that is primarily seen as a regulatory constraint. These obstacles also need to be overcome.

That said, a feeling of powerlessness and lack of interest was expressed by some members, particularly distributors and importers. It can indeed be difficult to visualize what their scope of action and possible level of intervention might be, for **an exercise that is primarily seen as a regulatory constraint**.

Indeed, the PEPs are intended to reflect their commitment to reducing their environmental impact, and to deploy and then follow their own roadmap adapted to the regulations, but above all to their context and needs, which are highly variable by nature.

Based on these lessons, Ecologic is now looking at ways of offering its members appropriate solutions. We are encouraging **recyclers to make information available to producers, and vice versa**, on the basis of normative documents,⁴ existing tools⁵ as well as webinars, on-site visits, and various projects and projects (Operational Technical Committee with recycling operators, working groups with members). Analyses of PEP by sector are also planned.

PEPs are to be updated every 5 years, and the present summary updated in 3 years' time. The integration of new members into this process, as well as an annual data update, will be proposed to guarantee **dynamic monitoring of the plans**. Ecologic is therefore already anticipating the need to structure itself to ensure regulatory compliance for itself and its members on these points, while exchanging with stakeholders in the SLA sector and eco-organizations in other sectors to **develop, harmonize and even standardize tools and best practices**.

4 Such as IEC 62635: Guidelines for end-of-life information provided by manufacturers and recyclers

5 Like the i4rplatform: <https://i4r-platform.eu/>

APPENDICES

APPENDIX N°1 - PEP ONLINE FORM

IDENTIFICATION

- General information - Company identification
- Information on EPR channels and the main products marketed by the company

ACTIONS UNDERWAY OR PLANNED TO REDUCE NON-RENEWABLE RESOURCES

- Optimizing manufacturing processes
- Use of renewable resources
- Longer service life
- Product repair
- Product re-use
- Supporting changes in usage
- Setting up return systems
- Other tracks
- Comments

ACTIONS UNDERWAY OR PLANNED TO INCREASE THE USE OF RECYCLED RAW MATERIALS (RRM)

- Incorporation of recycled plastics
- Incorporation of recycled metals
- Incorporation of other recycled materials
- Closed-loop incorporation of recycled materials
- Other tracks
- Comments

ACTIONS PLANNED TO INCREASE PRODUCT RECYCLABILITY

- Assessing product recyclability
- Increase the proportion of products that can be recycled
- Eliminate/reduce disruptors to sorting and/or recycling
- Other tracks
- Comments

OTHER ONGOING OR PLANNED ECO-DESIGN INITIATIVES

- R&D and monitoring
- Training/ Awareness/ Communication
- Improving the energy efficiency of your products
- Improve the energy efficiency of your value chain
- Development of tools and evaluation labels
- Actions on transport
- Actions with suppliers
- Company organization
- Details and comments

COMPLEMENT

- How companies feel
 - Evaluation of the perceived limits of eco-design actions
 - Reasons for this limit
 - Actions proposed by Ecologic
- Eco-design strategy
- Wish to receive the summary
- Remarks and comments
- Related forms and download answers

The time horizon was requested in the evaluation of actions on the various levers. Respondents could choose between the following options:

- Yes, it is set up
- Expected within 1 to 2 years
- Expected in 3 to 5 years
- Planned without precise deadline
- No

APPENDIX N°2 - PEP EXCEL TEMPLATE



partner partnership s.r.l.



WASTE PREVENTION AND ECODSIGN PLAN

to be transmitted to the eco-organizations within the framework of the application of article L. 541-10-12 of the environmental code (bench regulation)

PEP sector:

IDENTIFICATION OF THE ORGANIZATION (Member or group of members)

Name of the company or subsidiary or parent:

Unique identifier number(s):

If relevant, I.e. one-line reference pack member concerned:

CE code:

IDENTIFICATION REFERENT

Reference (SIRENE) of the parent:

Site:

Company:

City:

Phone number:

CALENDAR

Customer publication date:

Start of application period:

Themes	Levers	Objectives	Scope of the objectives (Type of the product)	Actions initiated or to initiate	At the scale of an indicator related to an action or objective										Comments (context, strategy, interpretation, geographical area, ...)										
					Indicators (unit, reference, period)	Definition of the indicator (unit and data collection frequency)	Unit (reference)	Current value	Target values					Other deadlines											
									2024	2025	2026	2027	2028												
Reduce the use of non-renewable resources - including reuse and lifespan extension	Optimize manufacturing processes																								
	Use of renewable resources																								
	Reduce weight																								
	Extend the period of use																								
	Reuse																								
	Reuse																								
	Support usage evolution																								
	Set up return systems																								
	Train/Raise awareness/ Communicate																								
	Conduct R&D and monitoring																								
	Develop assessment tools and labels																								
	Other tracks																								
Increase the use of recycled materials	Incorporate recycled plastics																								
	Incorporate other recycled materials																								
	Incorporate recycled materials in a closed loop																								
	Train/Raise awareness/ Communicate																								
	Conduct R&D and monitoring																								
	Develop assessment tools and labels																								
Other tracks																									
Increase the recyclability of products in processing facilities located on the national territory	Assessing recyclability																								
	Increase the share of fully recyclable products/packaging																								
	Increase the share of products/packaging that are environmentally recyclable																								
	Remove/reduce disruptors of sorting and/or recycling																								
	Improve environmental characteristics																								
	Train/Raise awareness/ Communicate																								
	Conduct R&D and monitoring																								
	Develop assessment tools and labels																								
Other tracks																									
OPTIONAL	Implementing tools related to eco-design and impact assessment																								
	Improve product efficiency																								
	Train/Raise awareness/ Communicate																								
	Company organization																								

APPENDIX N°3 – UPDATED Q&A

Extract from questions 1 to 22 out of 80. These questions are divided into **nine** themes: assistance with filling in, timetable, eligibility, scope, penalties, structuring of PEPs, transmission of PEPs, type of levers and validity of plans.

EcoLogic			
Questions fréquemment posées			
Plan de prévention et d'éco-conception			
Last update : August 29, 2023			
Find below all the answers to the frequently asked questions			
Questions and answers are classified in 9 categories, you can use them as filters to sort them.			
Categories	N°	QUESTIONS about the Waste prevention and eco-design plan (PPE)	ANSWERS
Eligibility	1	If a customer is still registered but no longer places products on the market, is he required to complete a prevention plan?	If the entity did not declare any placing on the market at the time of the last declaration, then it may be exempted from PPE (provided that no placing on the market takes place during the year on-going).
How to fill it in?	2	Is it compulsory to use the Excel form or can the same information be used on a Word document?	It's compulsory to use a Excel file and not a Word document. You can adapt the Excel frame that suits you, as long as it corresponds to your context and the products you place on the market.
How to fill it in?	3	Can the PPE be drawn up in English?	The PPE can be submitted in French and/or English as you wish.
Lever types	4	Do you have a template to guide us in preparing the dossier?	We have produced a guide to help you draw up your EPP, as well as a number of suggestions within the format we have the APE code (principal activity carried out) identifies the main branch of activity of the self-employed person or company - https://entreprise.service-public.fr/vosdroits/F33050
How to fill it in?	5	What is the "APE" code and what information does it provide about Italian companies?	If you are not a French company, it's not compulsory to look for your APE code.
How to send the PPE?	6	In your FAQ, you say that "quantitative indicators are not compulsory". Does this mean that the "indicator" field is compulsory in all cases (if measurement is possible)? Or can we choose not to compile it even if a measurement is possible?	It is possible to write down only the objectives and associated actions. However, we encourage you to identify a few indicators that will enable you to make a factual assessment of the progress made. As a reminder: those indicators are not considered as a commitment, and can not be used against you
Perimeter	7	Does the prevention plan have to cover all the types of products/ranges we usually sell (sewing machines, hoovers, irons, fans, etc.), or can it focus on some of them (for example, only sewing machines)?	An PPE is expected for each member entity, it is not necessary to produce an PPE for each product range. On the other hand, you can detail in the MPE the product scope to which the defined action or indicator relates.
How to structure the PPE?	8	In other words, can we choose to state our actions, for the time being, by focusing only on certain categories of products that unit- what are the accepted values other than "%"? Numbers? Finally, if I have to use a unit-value (0,2,3 etc.) instead of a %, how should I indicate this? "Numbers", "Unit-value"?	Yes, this is possible Yes, the other options are valid. You can therefore indicate the unit that best characterises your indicator.
How to structure the PPE?	10	Given that we are sellers/distributors of third-party products, can we take action against our suppliers in the following way? - ask our main suppliers if they have taken or will take steps to use ABS, PS, PE plastics with a density < 1.1 that do not contain BFRs in the future manufacture of the products they supply to us" - "ask our suppliers to provide the documentation required for the repair of products by an approved repair service".	Yes, this type of action is totally in the scope. It is advisable to translate these actions into an indicator in order to have an initial reference value against which to measure progress.
How to structure the PPE?	11	In your Q&A, you say that "quantitative indicators are not mandatory". Does this mean that all these fields (indicators, definition of the indicator, unit, current value and annual target value included) are not mandatory or that only the unit and current value are not mandatory?	It is understood that your PPE may include qualitative actions and/or quantitative indicators. However, there is no obligation to use one or the other. The aim is for your PPE to reflect the efforts made by your company in terms of prevention and eco-design.
How to fill it in?	12	You have provided the EEE framework to help you complete the eco-design plan. Should we complete the downloaded framework showing both, the first PPE- EN- EEE sheet that needs to be completed or should we delete the example sheet shown in the framework before downloading it to you again?	You can send us the file as it stands, including any tabs that have not been filled in or the tab with possible courses of action.
How to fill it in?	13	Is the Indicator field (column G) mandatory?	It all depends on the nature of your objective and whether you want to translate it into qualitative actions or quantitative
How to fill it in?	14	Are the fields after column F, starting with Indicators, mandatory?	If you choose to include quantitative indicators, it is advisable to fill in all the columns from H to P. In order for the PPE to comply with the regulations, we believe that at least one action or indicator should be completed for each major theme, i.e. : - Reduce the use of non-renewable resources - Increase the use of recycled materials - Increase the recyclability of its products at processing facilities located in France.
How to structure the PPE?	15	Is it sufficient to complete one lever (column G) per theme (column B) and one objective (column D) per lever and one action (column F) per objective (for example, the lever "Train/Awareness/Communication" and the corresponding columns ticked in red, as shown in the screenshot of the box below)?	No supplementary document to the PPE is expected. The PPE must be self-supporting.
How to structure the PPE?	16	Is it sufficient to complete the box as indicated in the example sheet (short sentences/headings) or is an additional document with a detailed descriptive text concerning the objectives/actions requested? If so, who should receive this document?	No supplementary document to the PPE is expected. The PPE must be self-supporting.
How to fill it in?	17	Is column E Scope of objective (Type of product) compulsory? If so, as we have many types of product, what should be filled in? Can we choose a product type/product range?	It is good to describe the product as well as possible, but an exact list of all the products concerned is not necessary. For example, for any product in the same category such as "bathroom products", write "bathroom products", unless the action relates to a specific product, in which case it is useful to describe the product in as much detail as possible.
Lever types	18	Concerning the prevention and eco-design plan, for the "Increase the use of recycled materials" theme, the "Training/Awareness/Communication" lever, all our product packaging has the attached label specifying, among other things, that our product can be recycled and there is the "what to do with my waste" internet link. There is also a "crossed-out bin" logo on each of our products. Are these indications part of the compulsory lever?	You can indeed indicate them. However, these display elements fall within the scope of regulatory obligations. The purpose of the prevention and eco-design plan (PPE) is not to remind you that you are fulfilling your obligations, but to specify what your company can do over and above them. Furthermore, the lever "Increase the use of recycled materials" concerns the recycled materials that your products incorporate or could incorporate in the future. So it's not linked to the quaraienedesdechets or the crossed-out bin logo.
Lever types	19	For the theme "Increase the recyclability of products and packaging in processing facilities located in France", the "Training/Awareness/Communication" lever, we share the information received by you (approved eco-organisation) with the manufacturing plant in Asia to indicate the instructions required in France. Does this fall within the scope of the mandatory lever?	You can specify what type of information you share with the factory beyond that which relates to regulatory compliance.
Eligibility	20	I make/produce/market limited edition products, do I have to take them into account when I fill in the EPP?	Products manufactured in limited editions do not prevent us from asking questions about their environmental impact and the preventive measures that can be taken. The drafting of an EPP, even if it limits the action plan, seems to us to be a feasible option.
Agenda	21	If we don't have enough elements for the 2020 - 2025 plan, can you envisage submitting a plan for 2025 - 2030 at a later date?	We expect the PPEs to cover the period 2023-2028. However, in the PPE framework there is a column for 'other deadlines', which can be used to note long-term actions, for example. Only items from the AIL sector are applicable to the EcoLogic PPE. As textiles are excluded, only helmets and snowboards will be concerned.
Perimeter	22	What items fall under the "You are a producer of sports and leisure goods" section, we produce sportswear/clothing and winter sports equipment such as snowboards and helmets if this would be applicable.	Clothing must be included in the PPE of the Refashion eco-organisation, which is responsible for the Textiles and Footwear EPR chain. If the entity did not declare any placing on the market during the last declaration then it can be exempted from PPE (provided that no placing on the market takes place during the year).

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