



SUMMARY OF PREVENTION AND ECO- DESIGN PLANS

ELECTRICAL AND ELECTRONIC
EQUIPMENT

11/10/2024

WWW.ECOLOGIC-FRANCE.COM

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 re-use 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 make the process their own, and to 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 spreadsheet (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**, allowing greater accessibility and simplifying the exercise, well-suited to smaller structures. As a result, **of the 8013 company PEPs received for the EEE sector, 3789 were submitted via this**

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.

form, i.e. almost half, with an average completion time of around 20 minutes, and options to go further on each theme.²

Ecologic has run a number of **communication campaigns** in the form of emailings and webinars to help members understand the new regulations and turn them into an opportunity.

The extensive feedback received has 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 **all tools, materials and information in both French and English**. Similarly, this summary will be available in English from September 2024.

The aim of this document is to review the results of the EEE sector, summarize the various issues and **identify the prospects for progress** envisaged by Ecologic and its stakeholders.

The exercise is not intended to provide an exhaustive quantitative analysis of prevention and eco-design work in the EEE 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 proposed action performance indicators have not been filled in systematically, and are not all homogeneous.
- 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.

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>

1. KEY FIGURES

8013

PEP RECEIVED

4224

IN EXCEL FORMAT

3789

IN LIGHTER FORMAT

EEE MEN COVERAGE RATES

75%

TONNAGES MARKETED

60%

UNITS MARKETED

52%³

OF MEMBERS

EEE PRO COVERAGE RATES

65%

TONNAGES MARKETED

56%

UNITS MARKETED

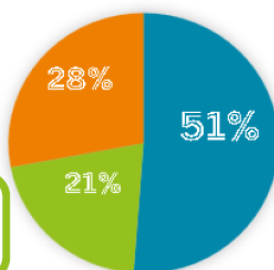
44%³

OF MEMBERS

BREAKDOWN OF PROPOSED ACTIONS BY THEME IN THE PEPS

3 – Increasing recyclability of products and infrastructures on the french territory

2 – Increasing the use of recycled materials



1 – Reduce the use of non-renewable resources including reuse and increasing the durability

Figure 1: Breakdown of actions proposed in the PEP by theme (Calculation based on a sample of 312 PEP, N=5646 actions)

3 Among those declaring a market launch in 2023, i.e. around 80% of total members

1.1. ACTIONS PROPOSED BY

Firstly, there is a small gap between the coverage of professional and household EEE. The reasons for this cannot, at this stage, be explained with any certainty. Differences by sector of activity or type of equipment are also visible but are not significant.

To determine which actions were highlighted by companies, an initial analysis was carried out on a sample of **312 PEP representative of Ecologic's members** (size, sector, typology, etc.) in the Electrical and Electronic Equipment sector, proposing 5,646 actions.

A predominance of actions to reduce the use of non-renewable resources was noted, accounting for 51% of proposed actions. In the short to medium term, these actions focus in particular on extending the useful life of products, supporting access to product repair and reuse. The use of recycled raw materials and improving product recyclability are secondary concerns.

However, **the incorporation of recycled plastics** is well identified with 21% of dedicated actions, and should be facilitated by steps taken to raise the awareness of purchasing departments and their suppliers. This is primarily reflected in the inclusion of specific clauses in tenders, and in the monitoring carried out to identify alternative materials that could be used in product manufacturing processes.

With regard to **increasing recyclability**, actions representing 28% of the total focus on improving knowledge of the recyclability of their products in order to determine the levers to be used to reduce environmental impact. They also involve providing consumers with better information on the environmental characteristics of their products, as anticipated by Article 13 of the AGECE law and the European "Digital Product Passport" (DPP).

Most of the proposed actions are based **on the definition of indicators that can be measured** over time. The PEPs could therefore become a means of steering and monitoring companies' commitments to prevention and eco-design, provided that :

- Guaranteeing the reliability of information provided
- Promoting these commitments within companies
- Harmonization of relevant indicators by type of action.

To complete the analysis of actions implemented within companies, the method adopted consisted in assessing which **levers were most frequently mentioned in the PEPs**, with concrete actions associated with them. **It should therefore be noted that the data presented in this summary is not weighted by the tonnage placed on the market.**

The levers of training, awareness-raising and communication stand out, as shown in Figure 2. The members who use it are mainly manufacturers of **Small Household Appliances (SHEs)**.

They propose actions such as :

- Training purchasing departments in responsible purchasing.
- Support for after-sales and customer repair training.
- Training in Life Cycle Assessment (LCA) for product designers.

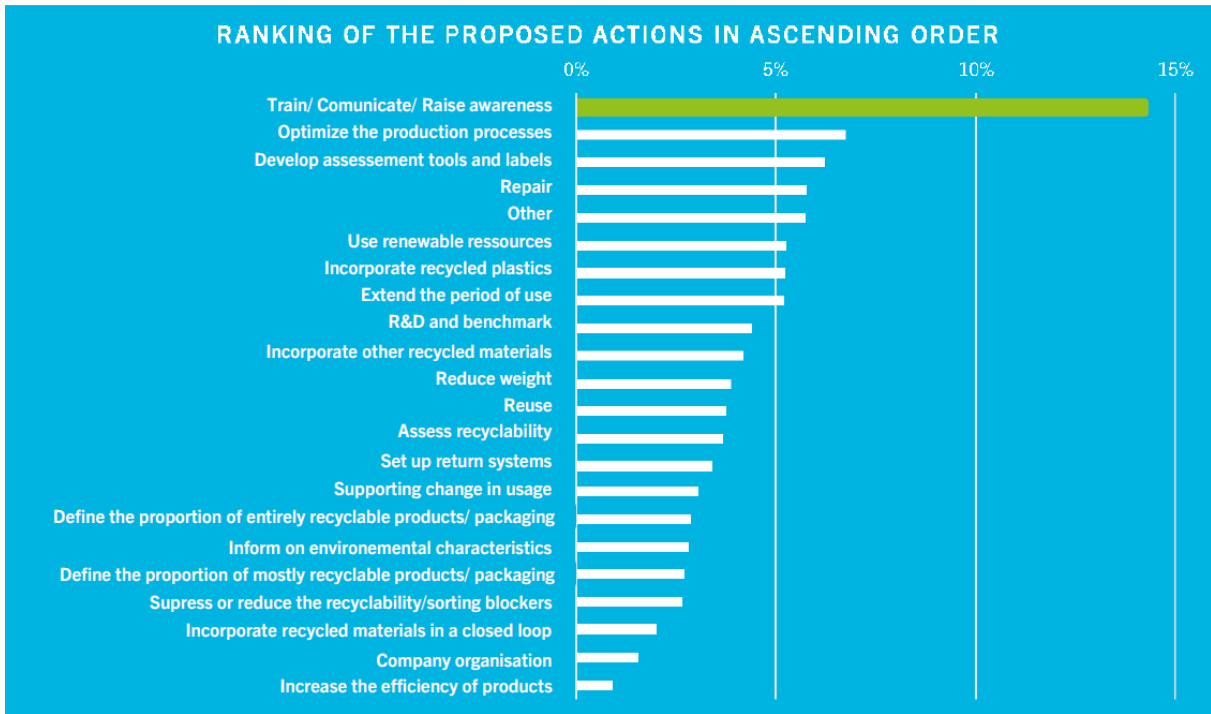


Figure 2: Ranking of the most frequently used levers in the PEPs for all themes (N = 5646 actions)

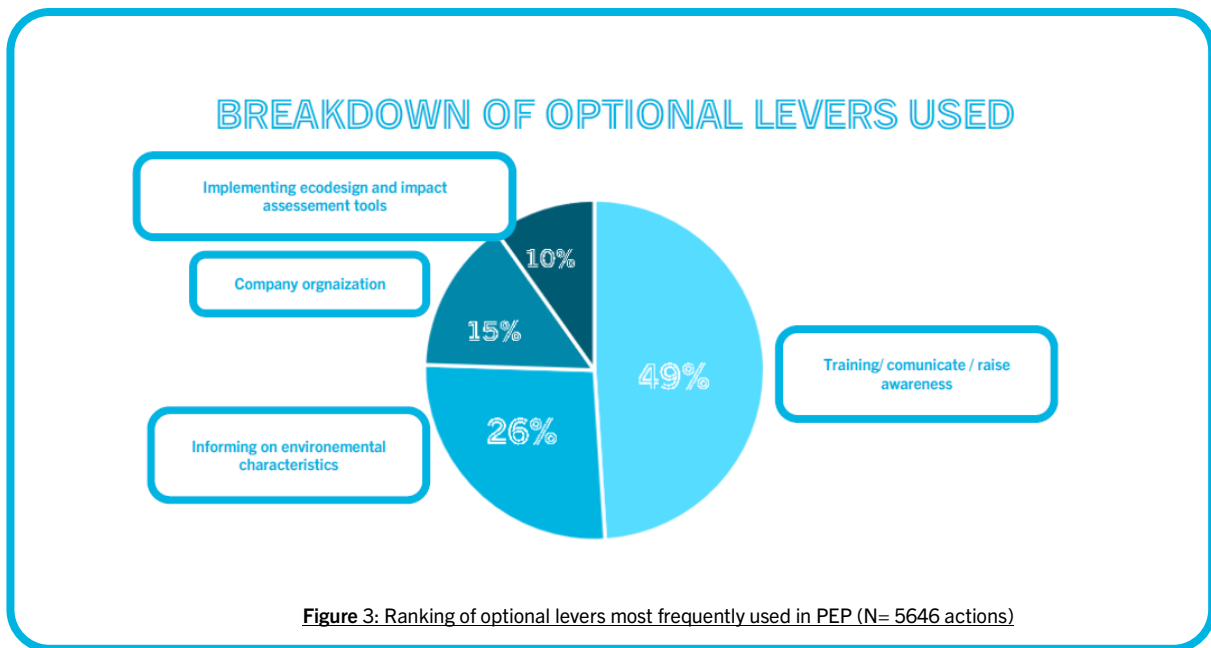


Figure 3: Ranking of optional levers most frequently used in PEP (N= 5646 actions)

The majority of members propose actions to optimize manufacturing processes, with a wide range of actions such as :

- Installing **photovoltaic panels**
- Improving the **performance of equipment motors** where appropriate
- Reducing **the production of waste from product manufacturing**, or even reincorporating it into the process or treating it.
- **Securing supplies.**

These actions are diverse and could in part be broken down into other proposed levers. Consistency in filling out the framework is therefore essential to promote its appropriation and subsequent consolidation.

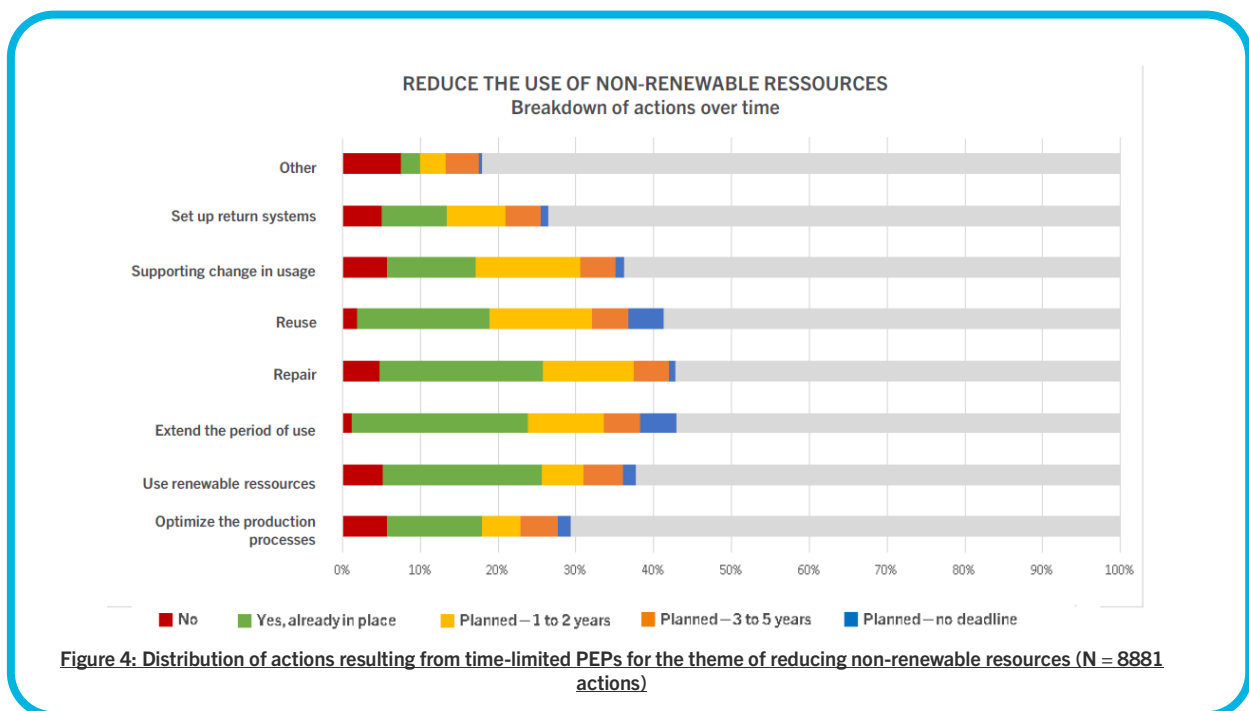
Other avenues mentioned include **conducting studies** to optimize product logistics, restructuring services to strengthen after-sales service and better **support customers in repairing** products, conducting exchanges with suppliers, and **strengthening commitment to the CSR policy** to be implemented.

What's more, an initial consolidation of results by major product family (as defined in Ecologic's ecocontribution scale) reveals few differences between members. **The predominance of actions focusing on the reduction of non-renewable resources persists.**

With the exception of **audiovisual equipment**, where the importance of product recyclability is greater than in other families, with over **45% of actions proposed on average** by members.

1.2. OVERVIEW OF MANDATORY THEMES

1.2.1 REDUCING THE USE OF NON-RENEWABLE RESOURCES



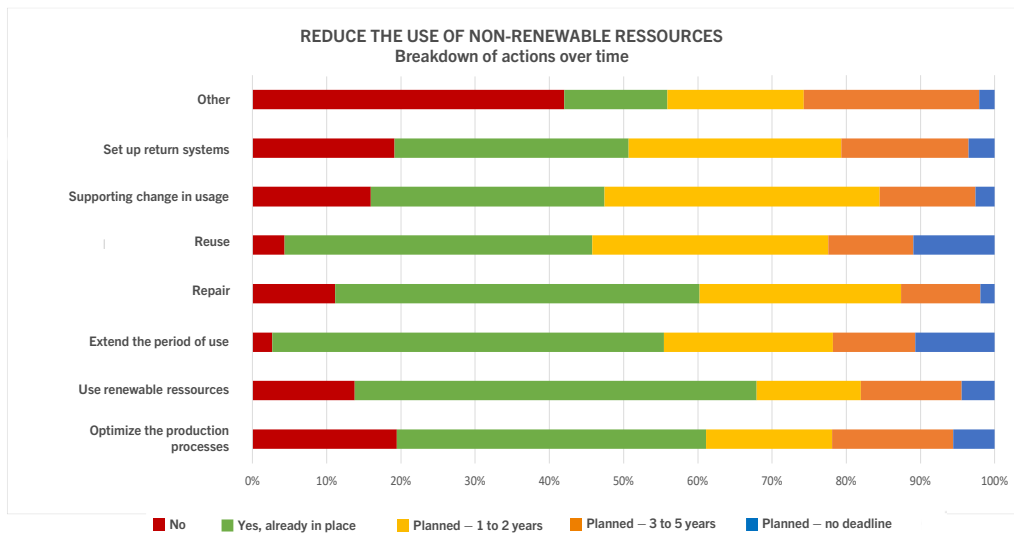


Figure 5: Standardized distribution of actions from time-limited PEPs for the theme of reducing non-renewable resources (N = 8881 actions).

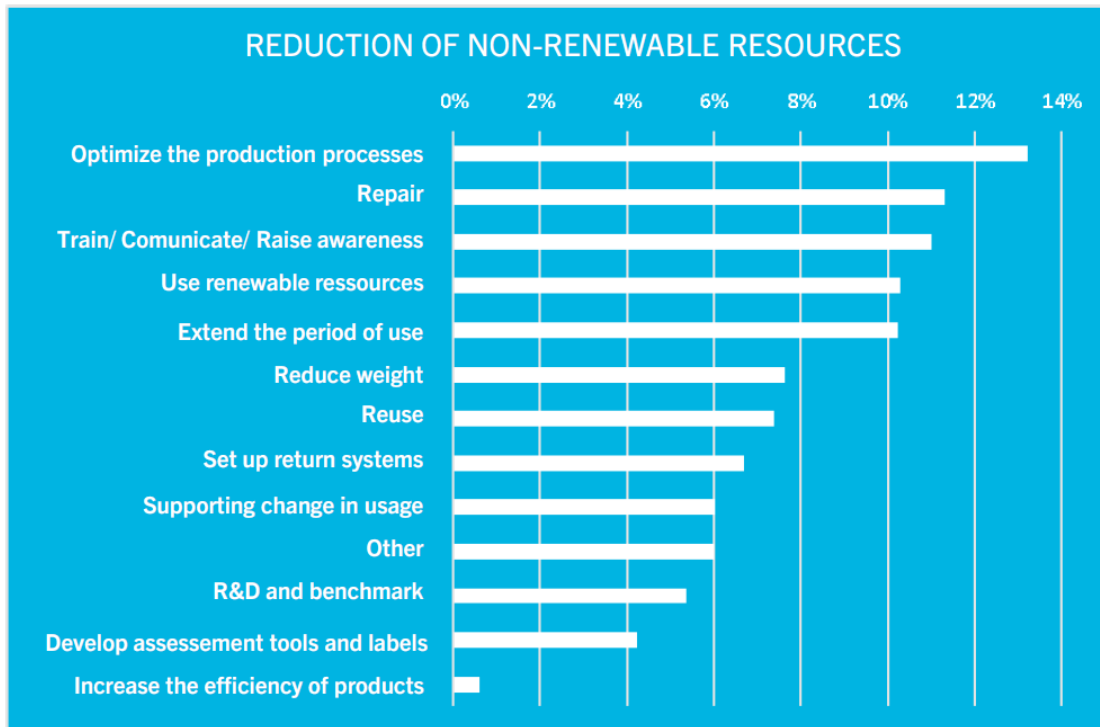
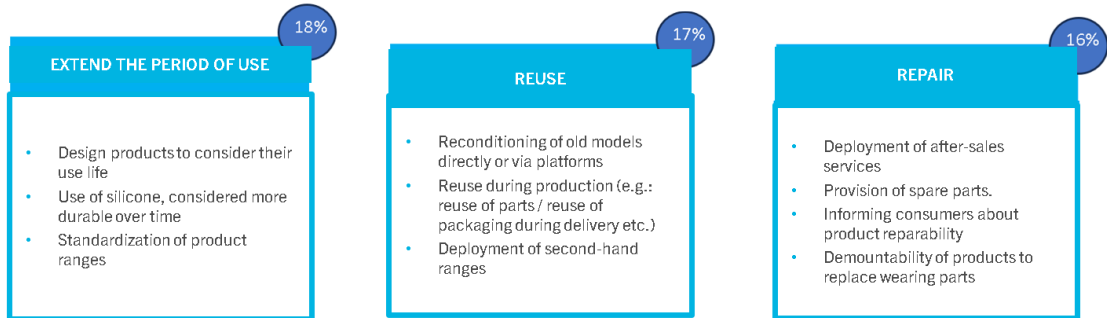


Figure 6: Breakdown of PEP Excel actions for the theme of reducing non-renewable resources (N = 2890 actions)

The main actions planned in the short or medium term in this area are aimed at **extending the useful life of products** placed on the market, with 18% of the actions in the light PEP and 11% of the actions in the Excel PEP respectively concerning this lever. This is also the lever that concentrates the most **actions without a specific deadline** (11%).

However, the optimization of manufacturing processes, which is predominant in the Excel documents, is rarely used as a lever in the Lean PEPs. This may be due to the tendency of smaller players, particularly importers and marketplaces, to fill in the questionnaires, thus creating a bias linked to **less control over the composition** of products marketed by these companies.

Work begins on the product right from the design stage, with **questions of structure and materials being considered to ensure greater resistance, as well as improved ease of repair through disassembly and accessibility of spare parts**. **Consumer support** is planned to ensure that a product nearing the end of its life can be properly collected and sent for repair as a matter of priority. This also involves **the development of second-hand ranges**, demonstrating a gradual change in corporate mentality towards a vision of refurbished products no longer as a threat, but as a new type of product aimed at a different clientele.

The strong presence of actions linked to **repair and reuse** can be correlated with legal obligations to take back products and the implementation of regulations such as **reparability and durability indices**. Companies are therefore transforming regulations into opportunities to offer customers an increasingly personalized service, while at the same time benefiting the environment.

1.2.2 INCREASE THE USE OF RECYCLED MATERIALS

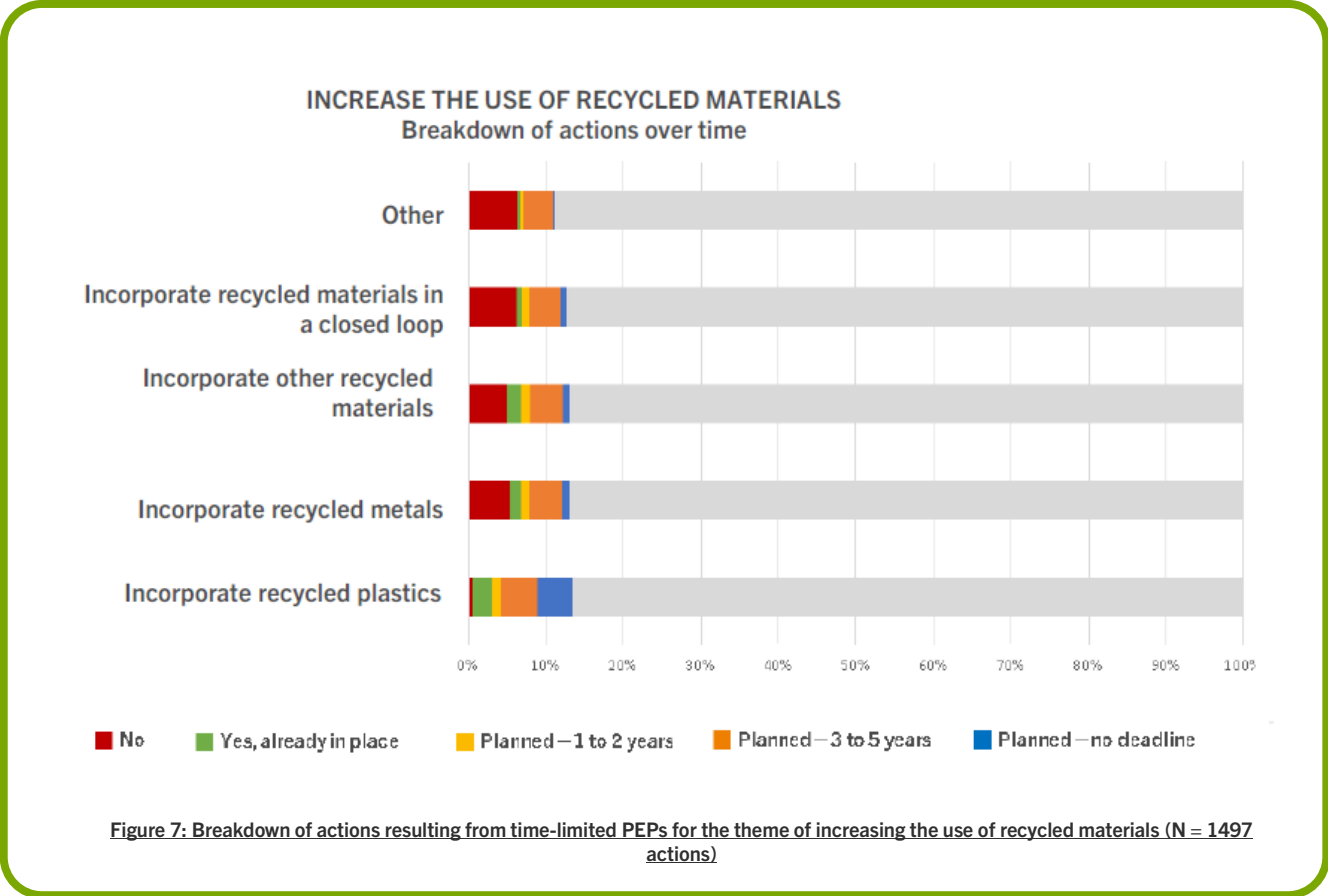


Figure 7: Breakdown of actions resulting from time-limited PEPs for the theme of increasing the use of recycled materials (N = 1497 actions)

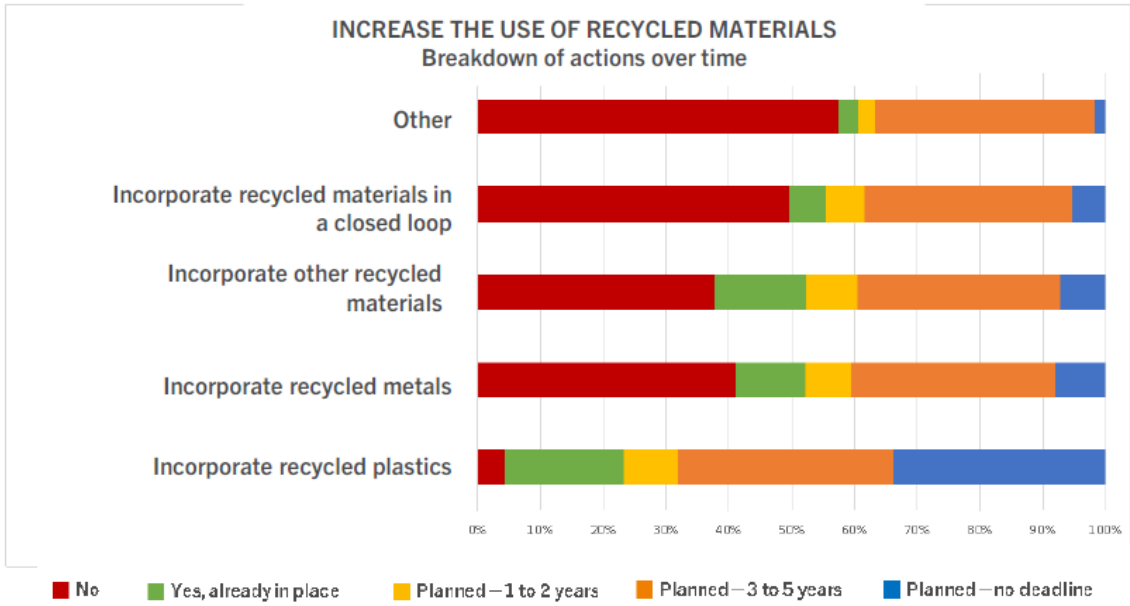


Figure 8: Standardized distribution of actions from time-limited PEPs for the theme of increasing the use of recycled materials (N = 1497 actions)

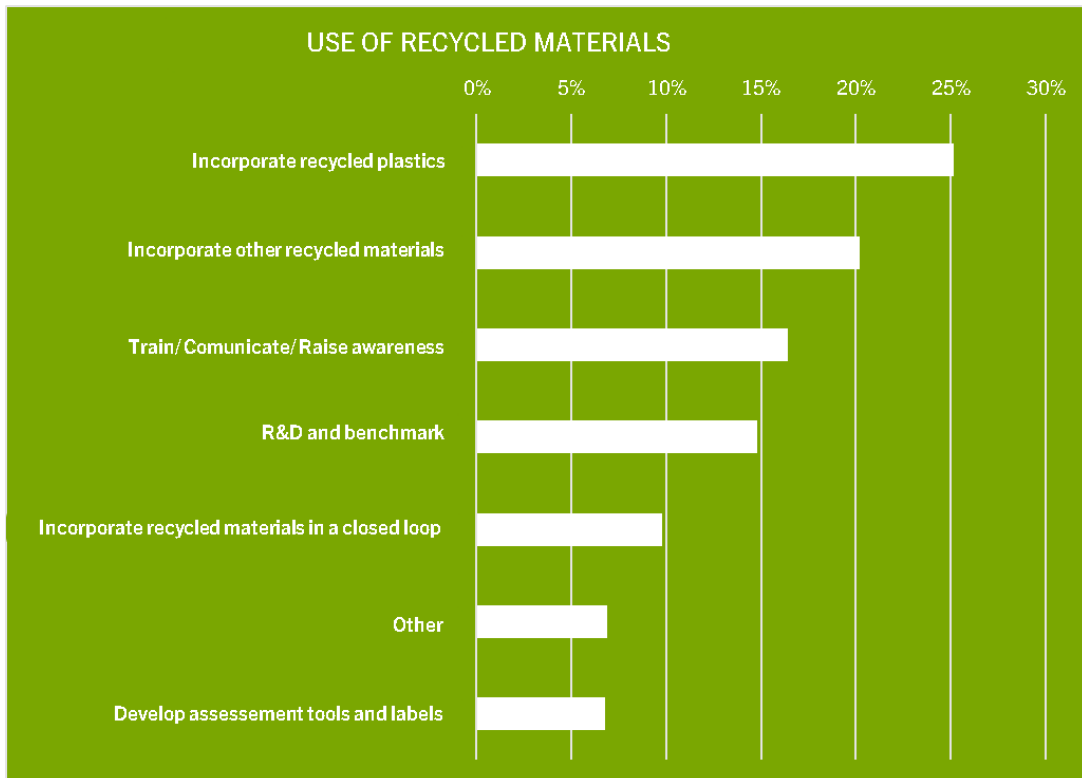


Figure 9: Breakdown of PEP Excel actions by material use theme (N = 1177 actions)

Most actions planned in the short or medium term for the **use of recycled materials** mainly concern **the use of recycled plastic resins** on products or packaging, with a recurrence rate of 32% in lightweight PEP and 25% in Excel PEP.

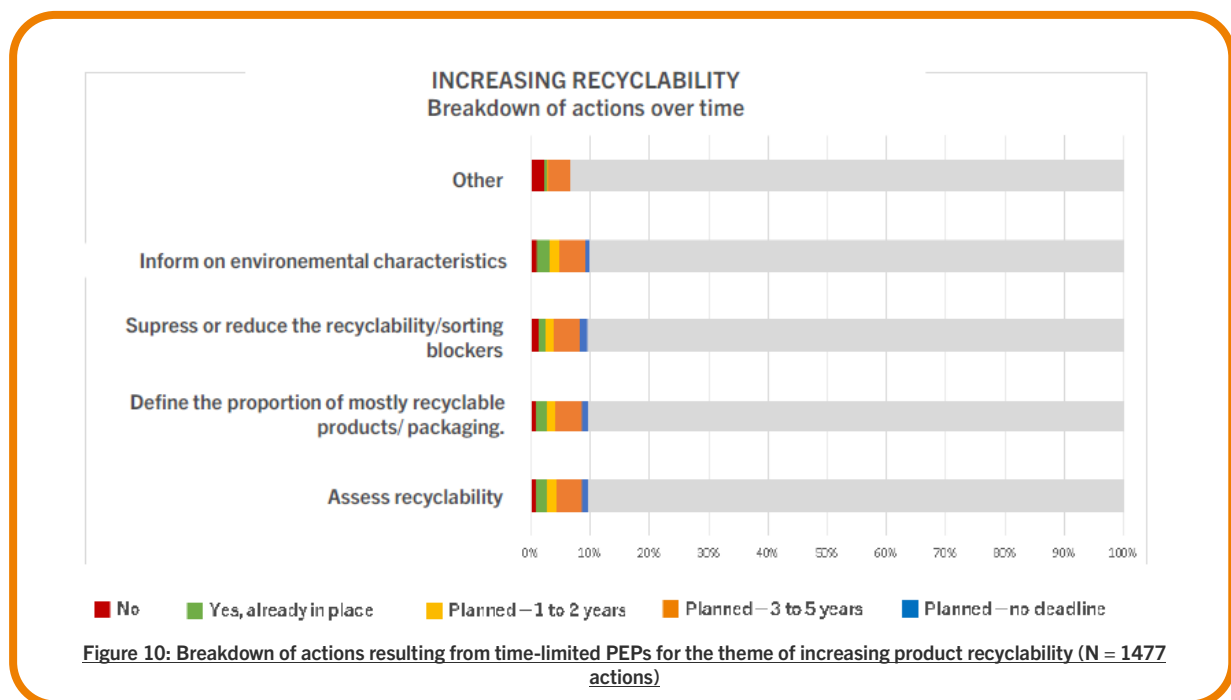
Incorporating recycled materials other than plastics comes second, with many companies wishing to **incorporate recycled metals** or already indicating that they do so. An in-depth study of this lever will have to be carried out to define which materials of interest other than metals and plastics are of particular interest to the sector.

There is an emphasis on actions concerning **buyer training**, which is consistent with the data presented in Figure 2. The benefits of incorporating recycled materials lie not only in **an environmental approach**, but also in **the optimization of manufacturing processes**, with the reintegration of production offcuts and the implementation of processes enabling **the incorporation of materials in a closed loop**.

It is also possible to make the link between companies' actions and advances in recycling technologies, as well as the multiplication of research projects associated with these subjects. Sourcing and integrating high-quality recycled materials is becoming **an economic issue**, and this is driving companies to get involved.

Changing only virgin raw materials into recycled ones also means that manufacturing processes are not significantly impacted and is therefore seen as **one of the most financially and technically accessible options** in the short term.

1.2.3 INCREASING PRODUCT RECYCLABILITY



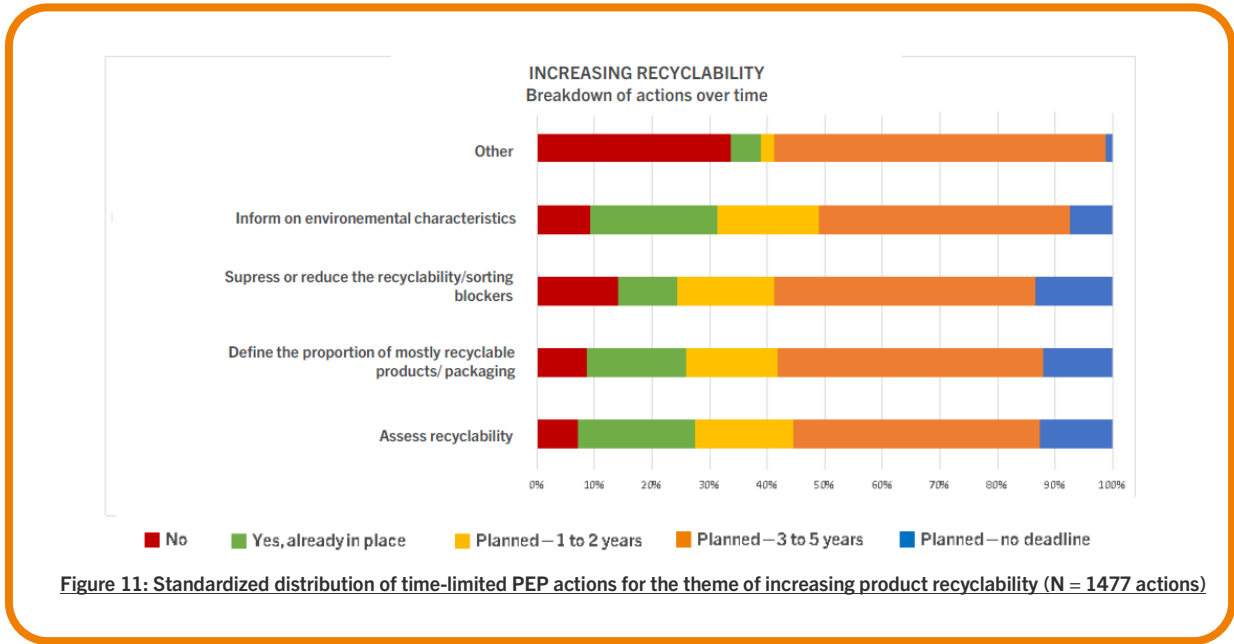


Figure 11: Standardized distribution of time-limited PEP actions for the theme of increasing product recyclability (N = 1477 actions)

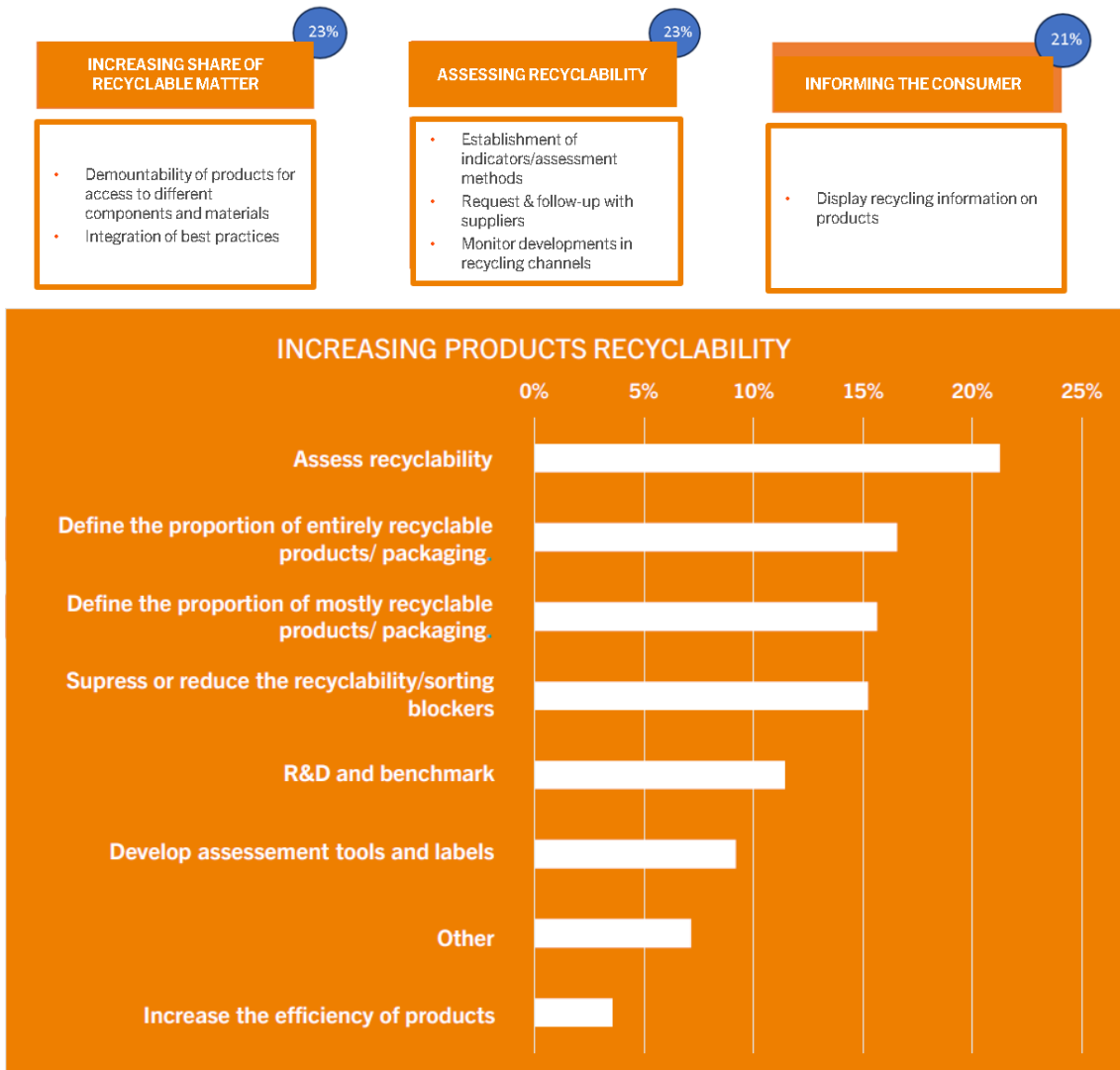


Figure 12: Breakdown of actions from the Excel PEPs for the theme of increasing recyclability (N = 1579 actions)

Most actions planned in the short or medium term in this area concern **better knowledge of products and their environmental impact**, in particular by **assessing recyclability**. This lever represents 23% of actions in the light PEP and 22% of actions in the PEP in Excel format.

This is in line with the observation that there is a **lack of detailed information**, even from manufacturers who know their products inside out, on certain components such as **electronic boards, cables and motors**, which are purchased in large quantities from third-party companies, often non-European, who specialize in the production of these common parts in electrical and electronic equipment.

Environmental quality and performance indicators are also in full development, and companies are in the process of adapting, appropriating and understanding them. Information on performance criteria is found at 21% in the light PEPs and represents 26% of the optional actions in the Excel PEPs, as shown in Figure 3.

Putting employee and supplier training at the forefront, and asking them to commit to labels, life-cycle analyses (LCAs) and end-of-life issues right from the design stage, is becoming more common practice than ever before, and a marketing argument in its own right.

These changes have been accompanied by the emergence of qualified personnel, with the proliferation of eco-design consultancies and design offices, active recruitment of these profiles within companies, and an increase in eco-design modules in higher education.

2. QUALITATIVE FINDINGS

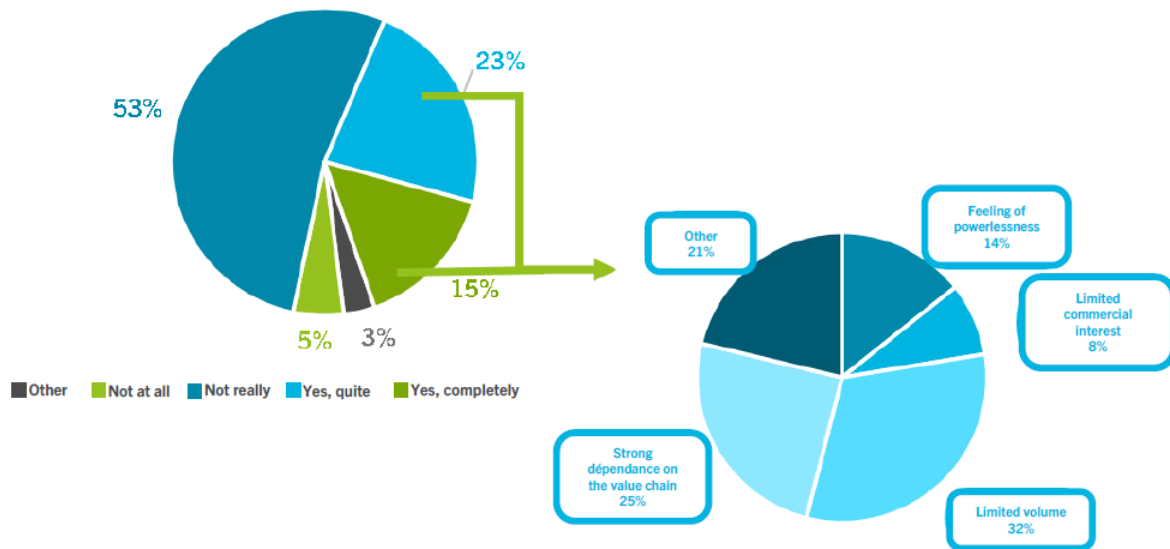
2.1. FELT LIMITS

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 had little experience of the methods of analysis, presentation and use of the information collected.

Some of our members also shared **their feeling of powerlessness when it came to these issues, as they were** unable to visualize 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 will have an impact across the entire value chain.

According to feedback, 70% of respondents feel this limitation. More communication and information work is needed to overcome this, as well as the lack of commitment in terms of the volumes involved and the commercial interest.

30. Do you feel a limitation of your capabilities in term of eco-design actions ?



Feeling of powerlessness expressed by members in terms of the limits to their ability to take eco-design action, and the reasons for this feeling (N=884 responses)

2.2. CORPORATE COMMITMENT

The questionnaires and exchanges with marketers reveal a very encouraging groundwork.

Alongside the actions highlighted in the previous sections, additional commitments have been noted, such as **reducing energy consumption** across the entire value chain. This is achieved not only by **optimizing processes**, but also by **consciously choosing green energy suppliers** and installing solar panels near production sites or directly on buildings.

Ecologic's members have also been working on **transport and its impact**, choosing to use freight trains rather than planes whenever possible, on logistics to keep the number of trucks to a minimum, and on product sourcing to encourage the shortest possible circuits.

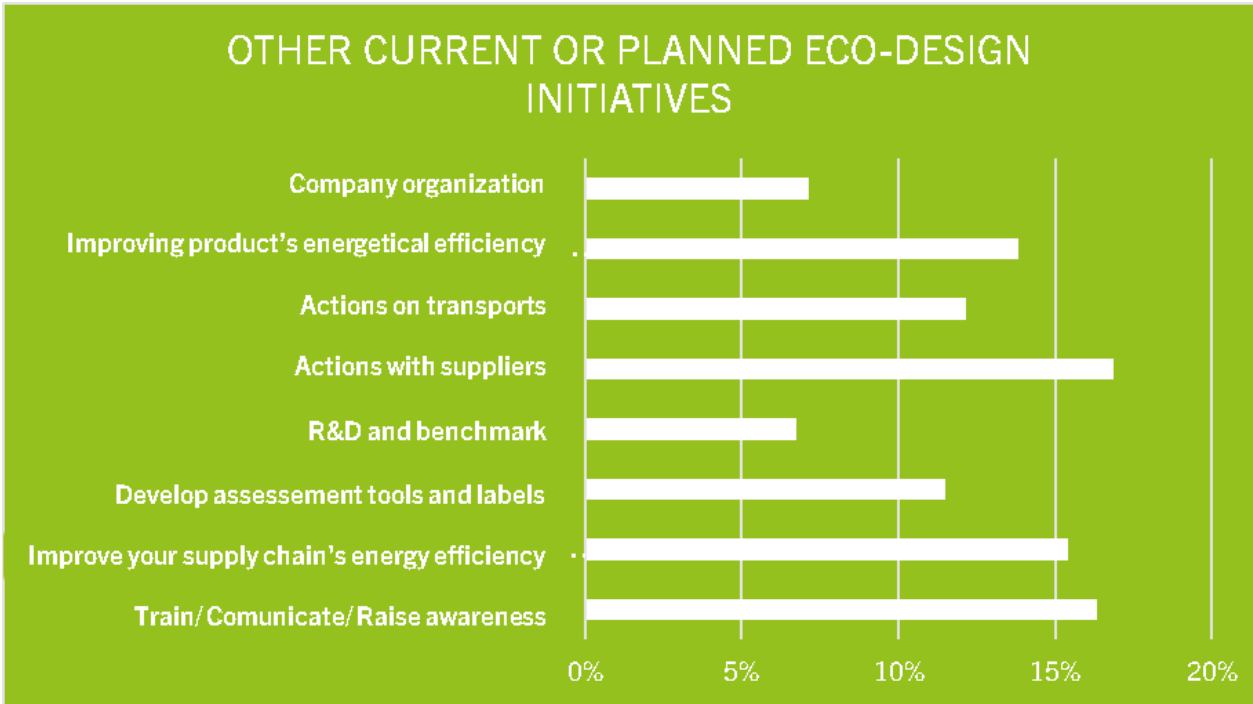


Figure 14: Other actions underway or planned in light PEPs (N = 3049 actions)

Some companies with little capacity to take action on their own indicated, via the light PEP questionnaire, that they would like to work with Ecologic and would be interested in some of the work underway on the three central themes of the PEP (Figure 15).

With this in mind, and in order to ensure that its members have a better grasp of these issues, Ecologic is working on various documents and practical sheets, based on the main actions expressed by members in their PEPs.

764 companies in the EEE sector are also interested in this summary.

ACTIONS PROPOSED BY ECOLOGIC

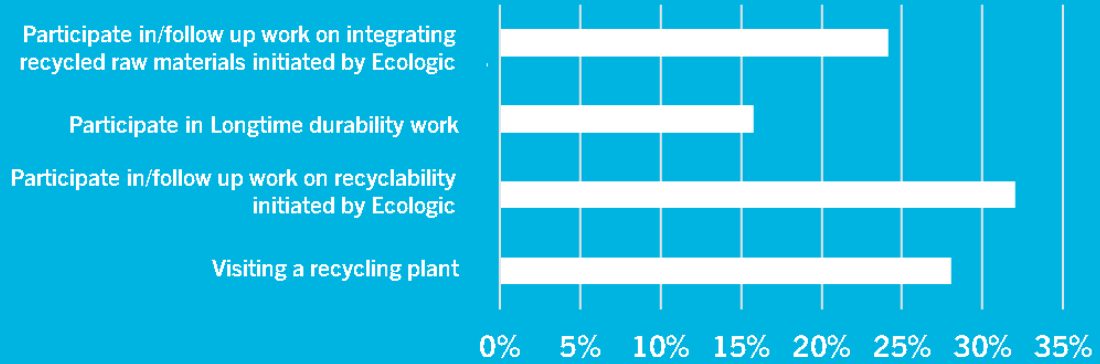


Figure 15: Interest in actions proposed by Ecologic (N = 223 actions)

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. The latter will set new eco-design requirements applicable to a wide range of products, with the aim of making 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 It includes a "Digital Product Passport" (DPP) by 2027, designed to enable finer traceability of products and better knowledge of their 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 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). However, this harmonization was necessary in order to be able to consolidate all the PEP and produce a summary as required by the AGEC law and its article 72. However, the format of the forms is likely to evolve to better meet members' expectations.

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

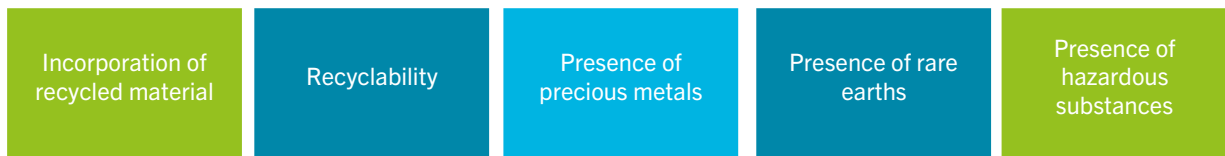
- 2. Identify the right contact** upstream, to ensure that information is properly disseminated, provide support to members at the right level, and manage the PEP over time, so that it can evolve in line with regulatory and technical developments.

In addition, in order to consolidate all the PEPs and enable cross-analyses between different databases, Ecologic must ensure that the members completing their PEPs are easily identifiable in these databases, and that their names are identical. As a result, a small minority of PEP could not be identified with certainty.

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
- 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**, as requested by some members. 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 to facilitate inferential analyses and dynamic monitoring of plans by members in relation to their marketing, and support the translation of these tools so as to speak a single language and not reinforce the language barrier.

- 5. Clarify the intentions declared** in the PEPs, so as to know in detail the actions planned by members according to their nature, the products they market and the developments they would like to deploy. 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 as part of the reparability index on 9 products, as well as the deployment of the [repair fund](#) on 73 emblematic products in the EEE sector, demonstrates the importance of repair in extending product life.

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 several R&D projects on spare parts as part of [calls for R&D projects](#) in the EEE sector, in which members are invited to participate.

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

3.3.2 REUSE

For functional equipment held by companies, Ecologic offers a new service to facilitate reuse and give more meaning to donation: [e-reemploi.eco](#).

This platform, which members are invited to visit, reflects our commitment to :

- Put organizations (businesses, local authorities, public institutions, 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).

This web service, **entirely free of charge**, is offered exclusively to all companies, especially Ecologic members... 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 reusing their EEE 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 works to promote the recycling of EEEs, through calls for R&D projects (see above), in which members are invited to participate. A [tool for assessing the recyclability of EEEs](#) placed on the market is also available.

At the same time, Ecologic is working with the operational players in the WEEE recycling sector to enable the generation of recycling raw materials that will feed the circular economy loop. Projects to sort and separate lithium batteries are currently underway.

From 2024, recycling targets in the EEE approval specifications will rise to a minimum of 70% (category 2), and up to 80% (categories 1, 4 and 8). The recycling and recyclability of metals, plastics and electronic components is the subject of ongoing research.

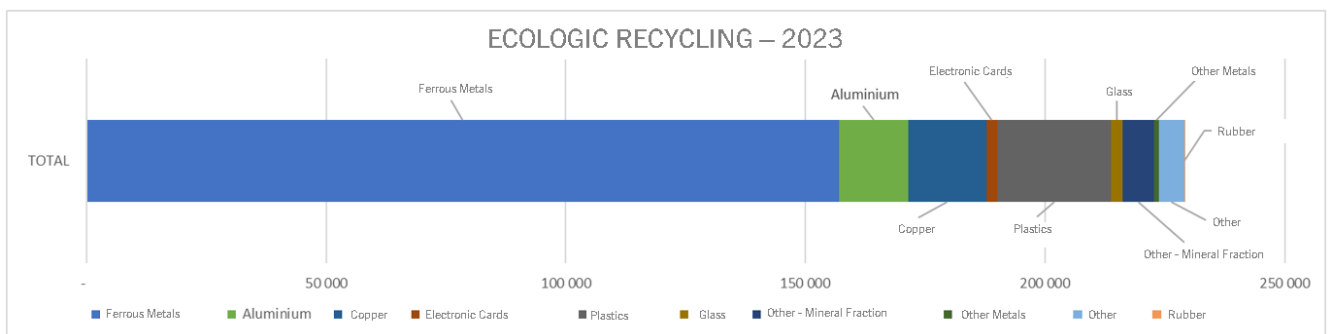


Figure 16: WEEE recycling in tons by material - 2023

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 Electrical and Electronic Equipment (EEE) sector ends on an encouraging note. **Marketers have participated fully**, and concrete actions have been identified.

The predominance of interest in reducing the use of non-renewable resources in PEP, whatever the nature of the members or the products marketed, is notable. Among these, actions aimed at extending useful life are particularly prominent, in particular through improved access to product repair and re-use. **The integration of recycled raw materials and the improvement of product recyclability take second place.** Ecologic will support its members in developing concrete actions on these two eco-design themes directly linked to EPR channels.

That said, a feeling of powerlessness and lack of interest was expressed by some members, particularly distributors and importers. It may 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.** These obstacles also need to be overcome.

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.

On the basis of these lessons, Ecologic is now looking at ways of offering its members appropriate solutions. In particular, we are encouraging **recyclers to make information available to producers, and vice versa**, on the basis of standards documents⁵ and existing tools⁶, 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, prior to the development of sector plans.

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 planning to structure itself to ensure regulatory compliance for itself and its members on these points, while exchanging with stakeholders in the EEE sector and eco-organizations in other sectors to **develop, harmonize and even standardize tools and best practices.**

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

6 Like the i4r platform: <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 with



WASTE PREVENTION AND ECODESIGN 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)

EPE sector:

IDENTIFICATION OF THE MEMBER ORGANIZATION (One column for each entity)

Name of the company or holding or group	
IF number (number of the company)	
IF number of the company (for each EPE code)	

IDENTIFICATION REFERENT

Director of EPE or the member	
Company	
Chair	
Phone number	

CALENDAR

Validation/publication date	
Date of update (max 3 years)	

Themes	Levers	Objectives	Scope of the objectives (Type of the product)	Actions initiated or to be initiated	Indicators (only reference to products)	Definition of the indicator (unit, frequency, numerical range, etc.)	Unit (if present)	Current value	Target value					Other deadlines	Comments (context, strategy, interpretation, geographical area, ...)
									2024	2025	2026	2027	2028		
REDUCED	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													
		Repair													
		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 professionally recyclable														
	Remove/reduce disruptors of sorting and/or recycling														
	Inform on 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 fil 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://entreprendre.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 I 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 (1,2,3 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 fill it in?	9	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, PP, 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?	10	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 structure the PPE?	11	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 columns 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 C) per theme (column B) and one objective (column D) per lever and one action (column F) per objective (for example, the lever "Train/Awareness/Communicate" 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?	
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 quarantainededechets 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 AEL 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 EPP 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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