



SUMMARY OF PREVENTION AND ECO- DESIGN PLANS

DIY AND THERMAL GARDEN PRODUCTS

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.

CONTENTS

INTRODUCTION	4
1. KEY FIGURES	6
1.1. ACTIONS PROPOSED BY	7
1.2. OVERVIEW OF MANDATORY THEMES	9
1.2.1 Reducing the use of non-renewable resources	9
1.2.2 Increasing the use of recycled materials	10
1.2.3 Increasing product recyclability	11
2. QUALITATIVE FINDINGS	12
2.1. PERCEIVED LIMITS	12
2.2. CORPORATE COMMITMENT	13
3. PROSPECTS	14
3.1. REGULATORY DEVELOPMENTS	14
3.2. AREAS FOR IMPROVEMENT IN PEP	14
3.3. TOOLS DEPLOYED BY ECOLOGIC	16
3.3.1 Repair	16
3.3.2 Reuse	16
3.3.3 Recycle	17
CONCLUSION	19
APPENDICES	20
APPENDIX N°1 - PEP online form	20
APPENDIX N°2 - PEP EXCEL TEMPLATE	21
APPENDIX N°3 - UPDATED Q&A	22
APPENDIX N°4 - Table of figures	23

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 make the process their own, and to express their commitments in 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. **Of the 64 company PEPs received for the ABJth**

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.

sector, 34 were submitted via this form, 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 and take ownership of these new regulations and turn them into an opportunity.

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 ABJth sector, analyze the various issues and identify the prospects for progress envisaged by Ecologic and the stakeholders in this still young sector.

The exercise is not intended to provide an exhaustive quantitative analysis of prevention and eco-design work in the thermal ABJ 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.
- 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

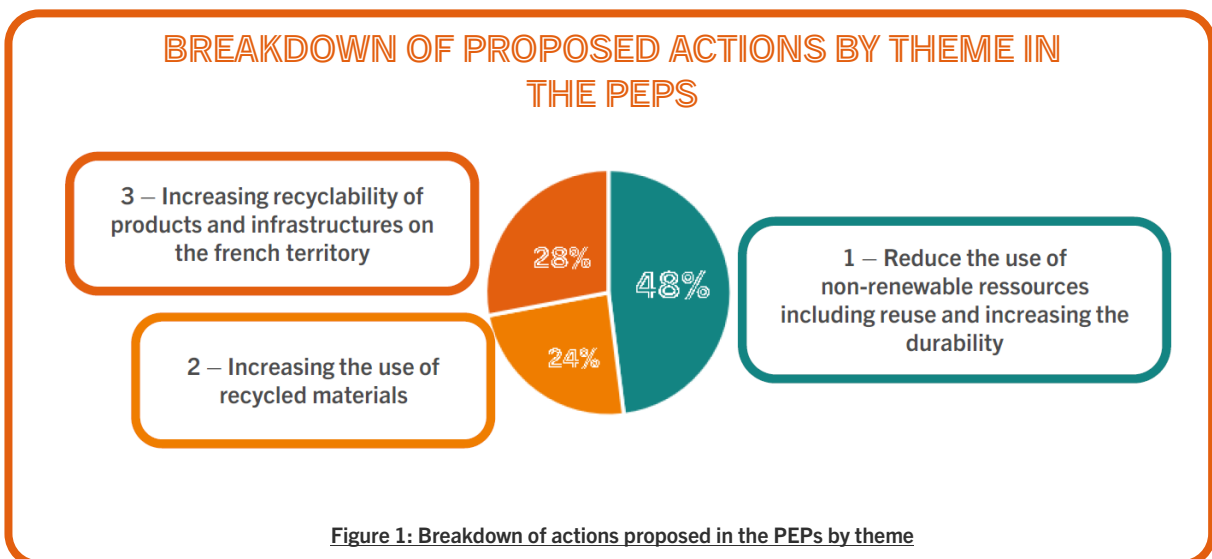
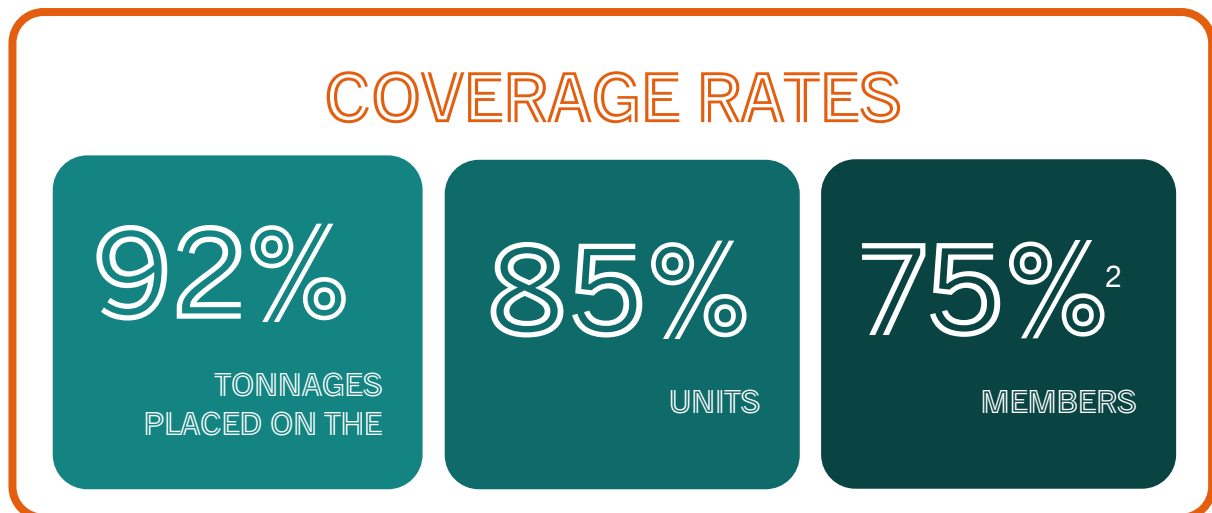
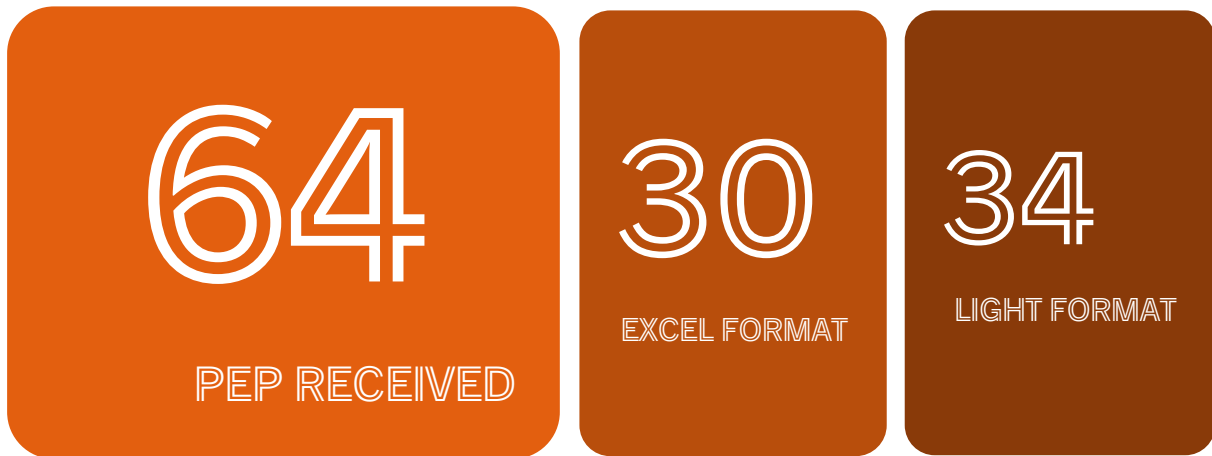


Figure 1: Breakdown of actions proposed in the PEPs by theme

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

1.1. ACTIONS PROPOSED BY

An initial analysis was carried out on a sample of **30 PEPs** from the DIY and Thermal Garden products sector. 97% of the PEPs submitted and used proposed at least one action per mandatory theme, which is the minimum required in Ecologic's communications.

A total of **842 actions** are proposed in the ABJth sector's PEPs on mandatory themes³. 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 13 actions allocated to this theme, compared with 7 for increasing the use of recycled materials and 8 for increasing recyclability. This trend is confirmed indiscriminately for each of the major product families (lawnmowers, chain saws, etc.) on the market.

An initial explanation for this trend, which has also been observed in the Electrical and Electronic Equipment (EEE) and Sporting Goods and Leisure Equipment (ASL) 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.

More specifically, the actions detailed by members in their PEP show a **strong focus on training, awareness-raising and communication** around these themes linked to resources and their origins, as well as reflections on the development of assessment tools and labels.

Members who share a significant number of training, awareness and communication initiatives propose actions such as:

- Training sales teams and purchasing departments;
- Developing and sharing technical guides;
- Repair training for after-sales service and customers.

In terms of assessment tools and labels, the actions taken mainly concern the need to define roadmaps and use decision-making tools. This can be attributed to the fact that the industry is in the early stages of reflection, given its recent establishment.

Among the other avenues mentioned, the desire to extend the useful life of products and to optimize manufacturing processes by refining knowledge of inputs/outputs and by controlling consumption are notable.

What's unusual about the ABJth sector's PEPs is that they almost always include optional actions and/or objectives, although these are not predominant. At this stage, however, there is not enough material to provide a detailed picture of the concrete actions behind the stated intentions. A better understanding of the options raised could enable us to extend the scope of the items proposed, in order to better meet members' needs.

³ 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.

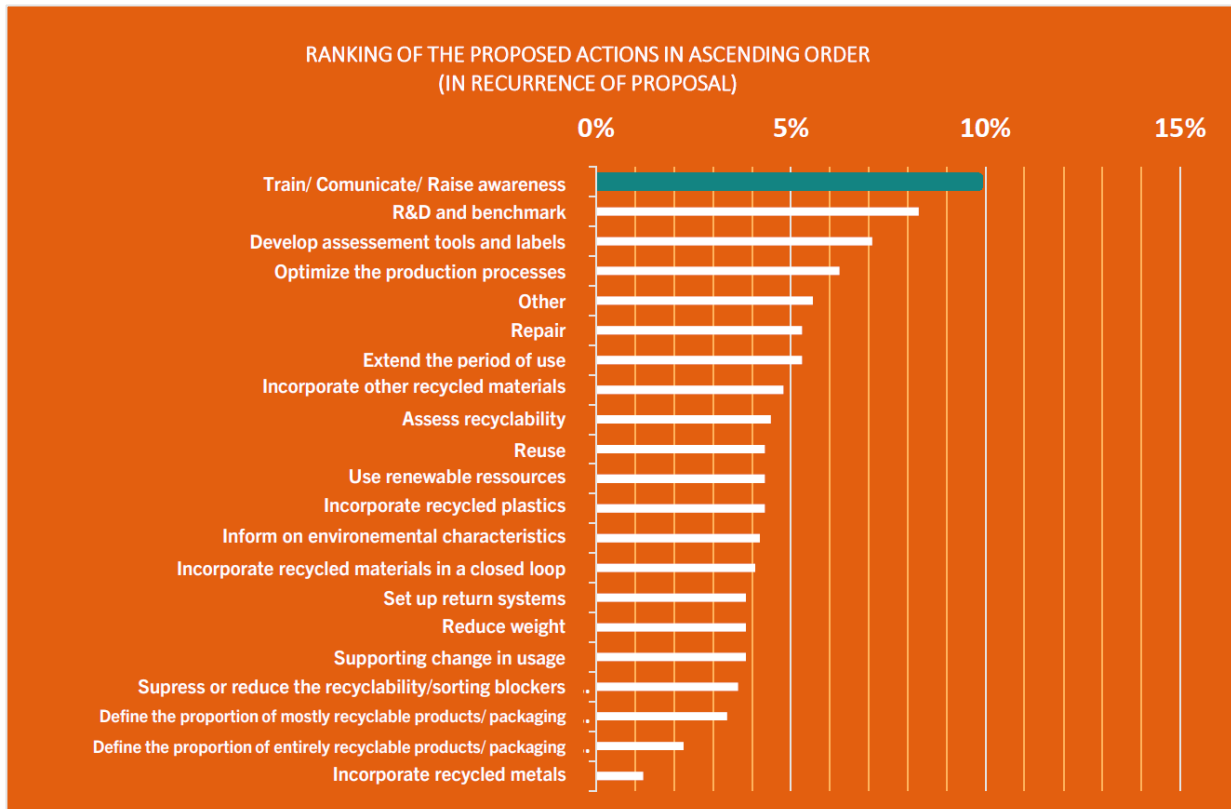


Figure 2: Ranking of levers most frequently used in PEPs, all themes combined (N=842)

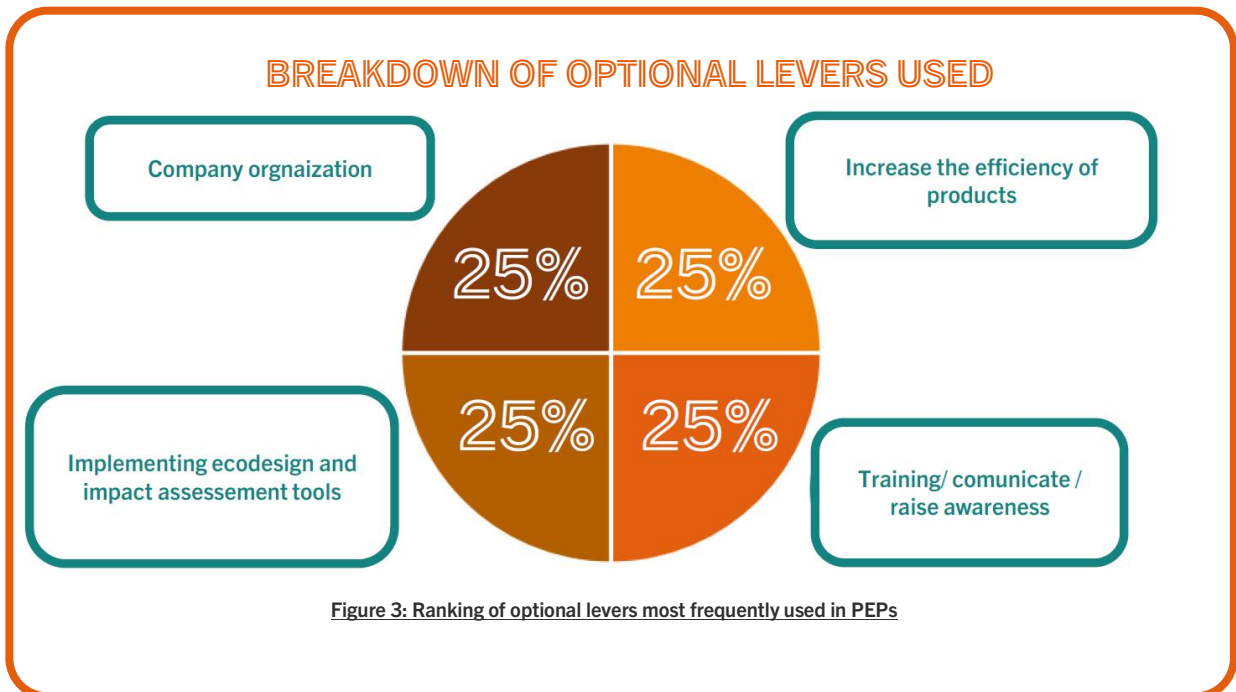


Figure 3: Ranking of optional levers most frequently used in PEPs

1.2. OVERVIEW OF MANDATORY THEMES

1.2.1 REDUCING THE USE OF NON-RENEWABLE RESOURCES

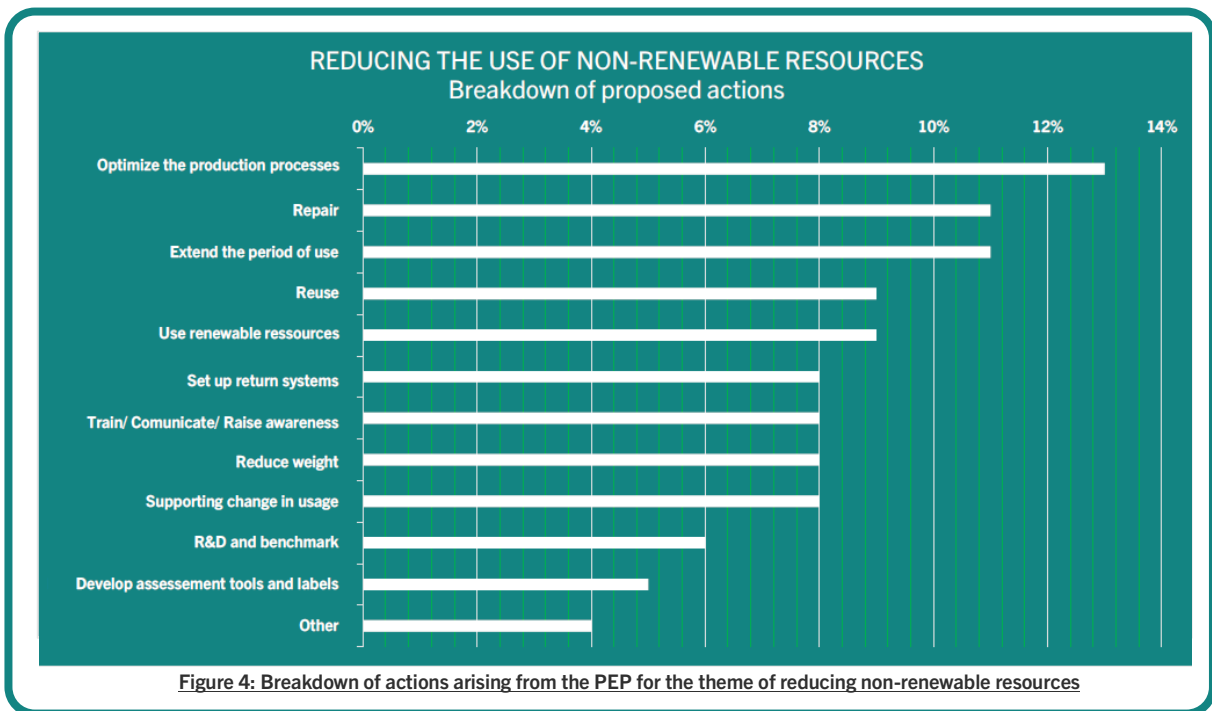


Figure 4: Breakdown of actions arising from the PEP for the theme of reducing non-renewable resources

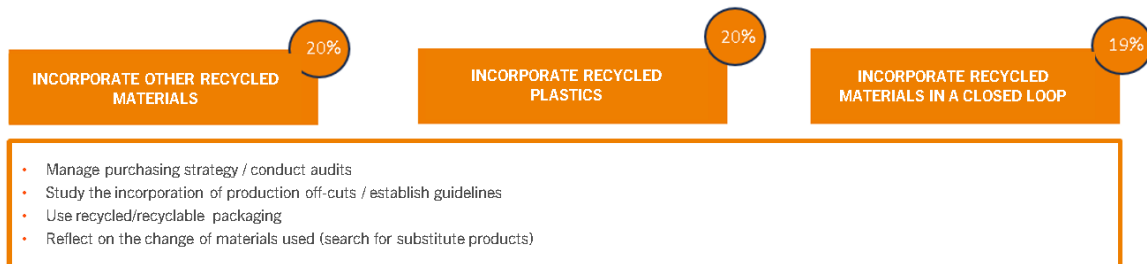
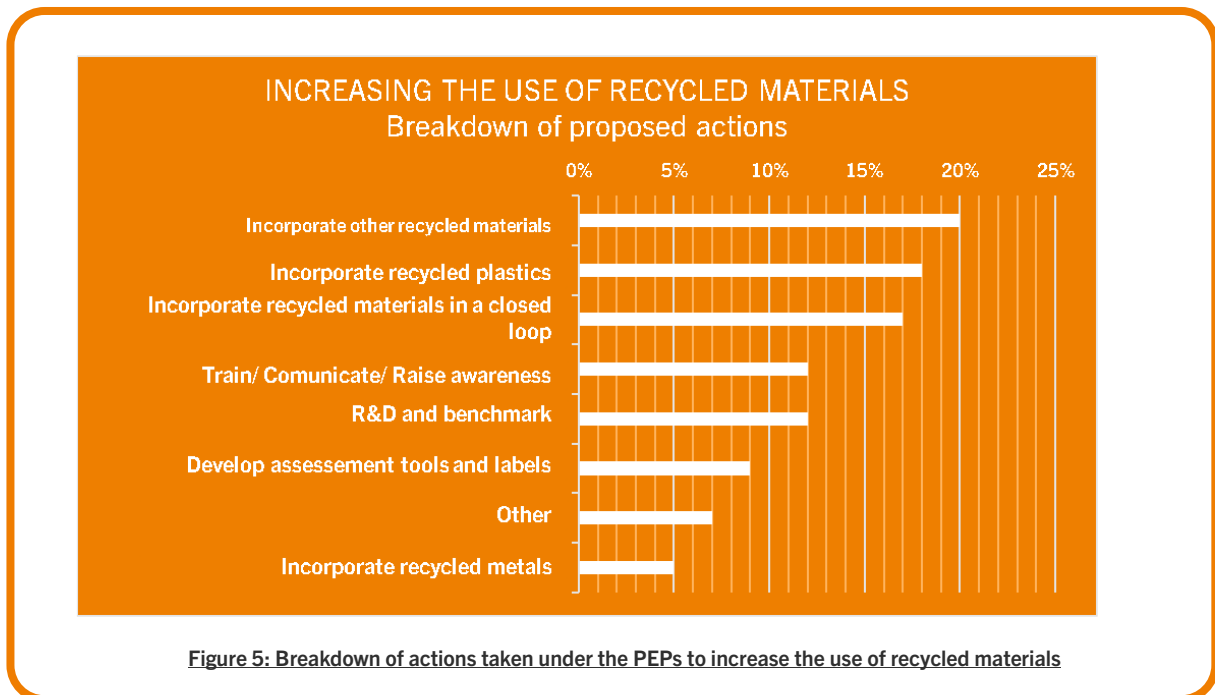


Most of the actions in this first theme focus on two main areas: the need to optimize and transform production processes, and the need to inform customers about their product's end-of-life.

The first axis is illustrated by the presence of actions all along the value chain referring to aspects of energy transition (notably in factories) and restructuring of logistics chains to ensure efficient transport with as little loss as possible. It is also illustrated at product level by a desire to make products more repairable at the design stage, and to gain a better understanding of the amount of waste produced by ABJth.

Customer information, the second priority, is illustrated by a desire to provide customers with more detailed information, to make spare parts available and to raise awareness. It is possible that these actions are partly due to the repair funds that are being set up in the sector, helping manufacturers to take these steps.

1.2.2 INCREASING THE USE OF RECYCLED MATERIALS



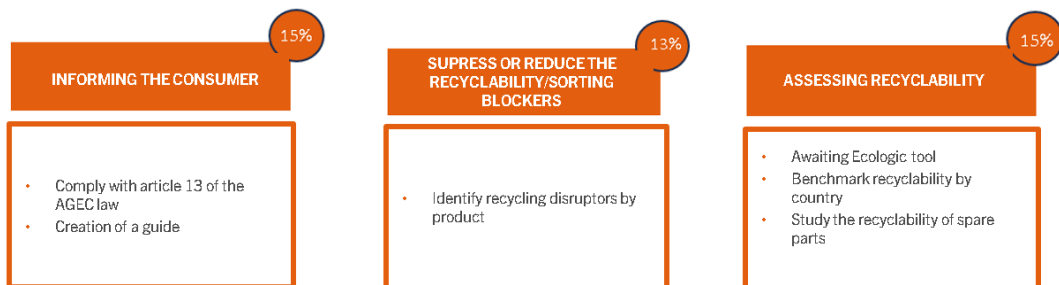
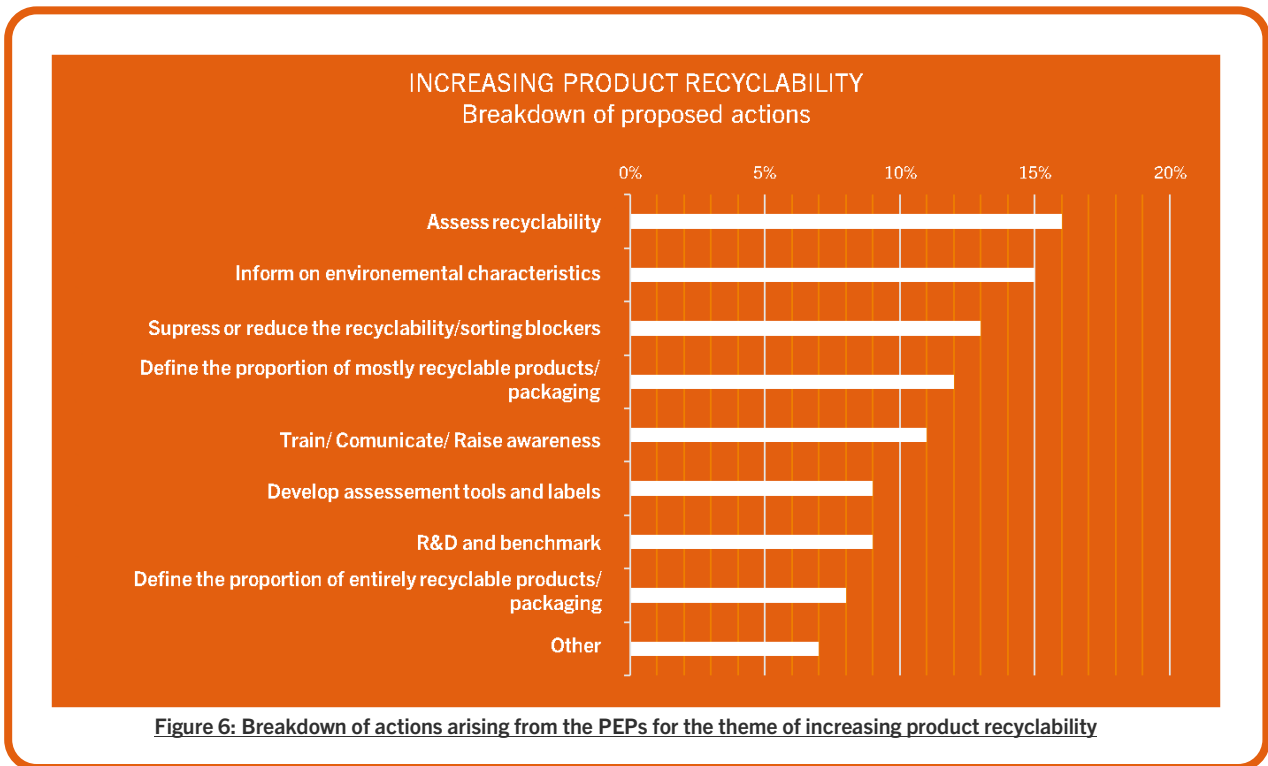
As in the case of the Electrical and Electronic Equipment (EEE) and Sport and Leisure Equipment (SLA) sectors, the levers for incorporating recycled materials have been clearly identified by the sector's players, who are keen to incorporate recycled plastics, but also to find substitute materials for plastic resins.

Companies want to review their purchasing strategies to meet the new challenges and revise their manufacturing processes to incorporate production offcuts more efficiently. This ties in with the need to reduce waste and control inputs/outputs.

Packaging is also highlighted, and work will be carried out to improve its recyclability or propose alternatives made from recycled materials. Several players are also looking at more durable packaging, which could be used to extend the product's lifespan by enabling it to be stored more efficiently and in a well-considered position to limit the risk of long-term malfunctioning.

The low proportion of recycled metals is unexpected but may be due to a bias when drawing up the plans. As metal recycling is already in place, it may be perceived as a low priority and therefore not mentioned in an action plan.

1.2.3 INCREASING PRODUCT RECYCLABILITY



Regulations have a particularly significant impact on the players in this sector, who focus their efforts on compliance and understanding the various laws and obligations.

Product evaluation and consumer information are the main thrusts of this last mandatory theme. In fact, assessing recyclability accounts for 16% of the proposed actions. Marketers are therefore looking for tools and are in the process of training their staff in concepts related to recyclability.

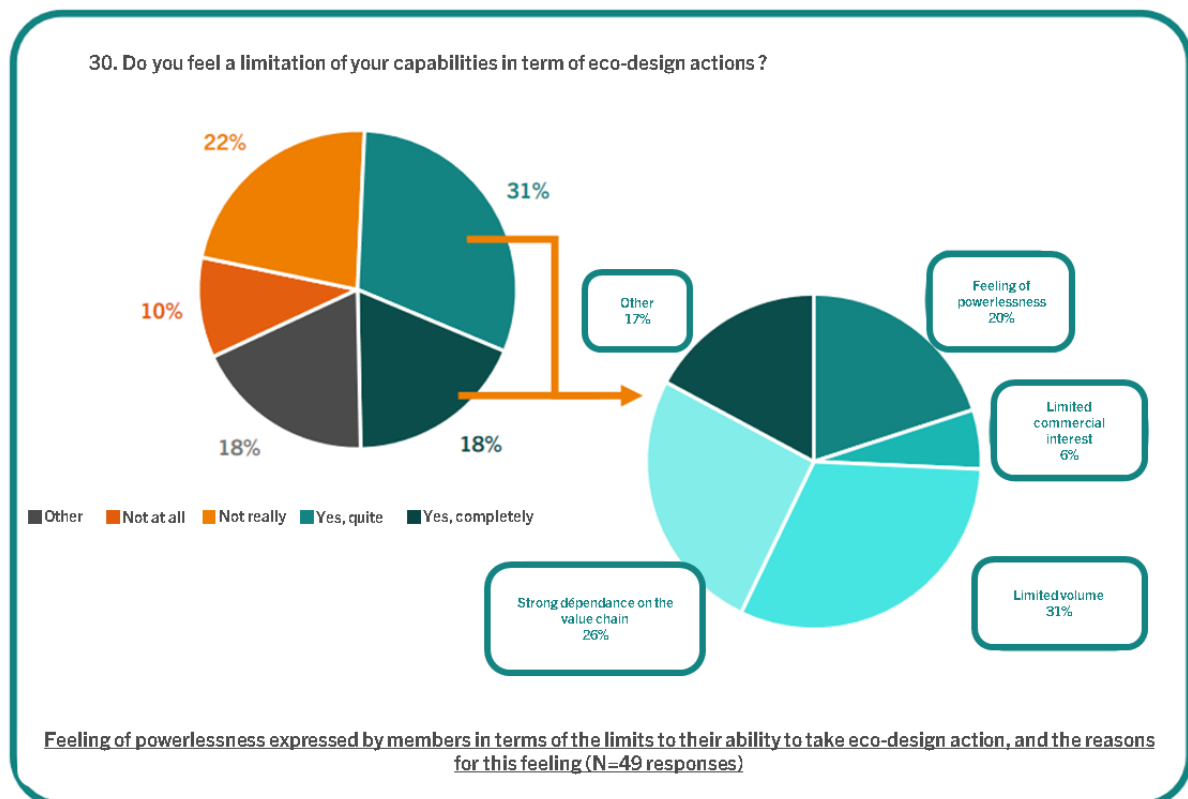
Ecologic will therefore have to support companies by providing the necessary tools, as well as relevant documentation on the various end-of-life scenarios and issues raised, and the opportunities generated.

2. QUALITATIVE FINDINGS

2.1. PERCEIVED 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** didn't see what their areas 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 consider concrete action plans that will have an impact across the entire value chain.



According to feedback, 49% 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

Despite the novelty of the sector, companies are showing a clear commitment and willingness to learn and improve. As in the ASL and EEE sectors, there is a clear desire to make the transition to green energy in factories and stores.

Controlling the supply chain, sharing information and recommendations, and even raising demands on suppliers is a key issue.

A consumer awareness campaign is underway and should help to ensure that products are repaired more systematically, even outside their legal warranty period.

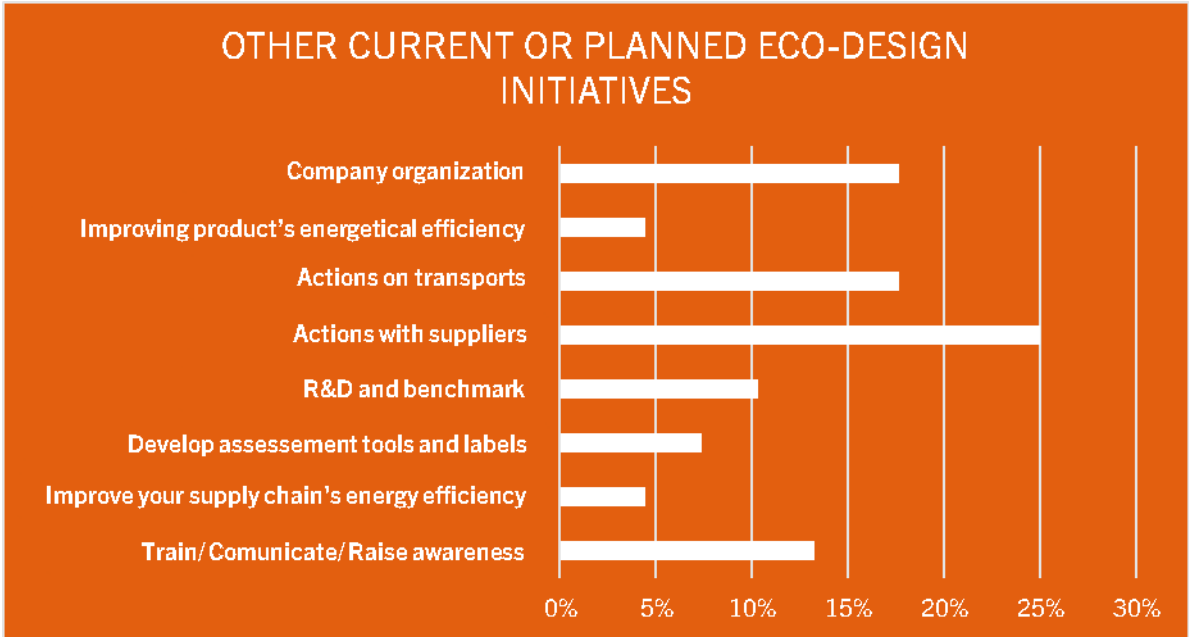


Figure 8: Other actions underway or planned in light PEPs (N = 68 actions)

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. This will set new eco-design requirements for a wide range of products to make them "more durable, reliable, reusable, upgradable, repairable and easier to maintain, refurbish and recycle, as well as to make more efficient use of energy and resources." ⁴ In particular, it includes a "Digital Product Passport" (DPP) by 2027, designed 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 IN 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.

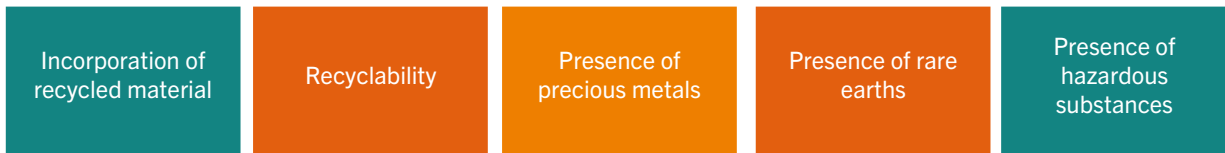
Discussions are currently underway **along five** main lines:

- 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 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.
- 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.

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

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, 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

Deployment of the [repair fund](#) and repairer labeling campaigns are underway to support the industry's efforts in this area. At the same time, a regulatory study will provide further information on the repair of ABJth.

Another study on extending the life of ABJths will also be carried out, addressing product design aspects to improve equipment reparability.

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

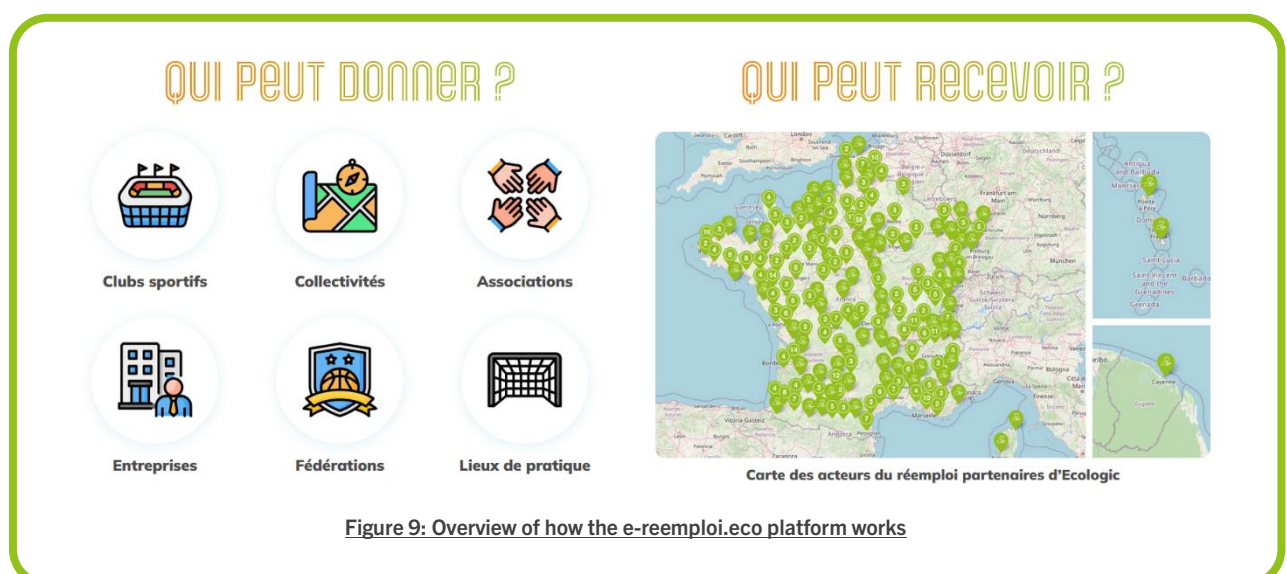


Figure 9: Overview of how the e-reemploi.eco platform works

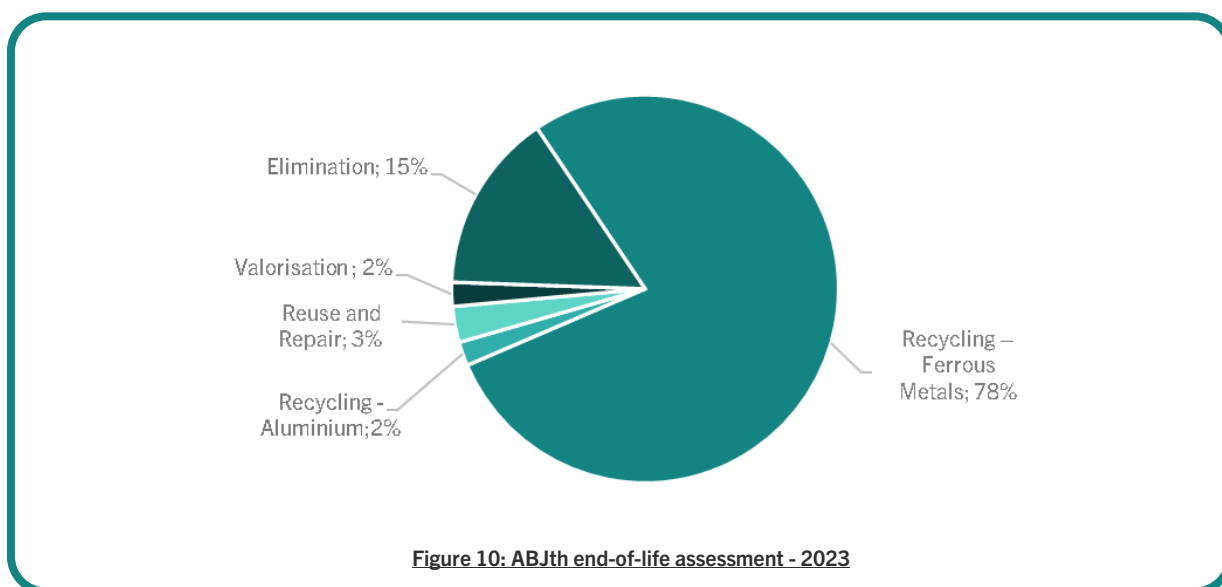
This web service, **entirely free of charge**, is offered exclusively to all companies, especially Ecologic members... to encourage donations between professional organizations. It relies on a network of over 400 Social and Solidarity Economy (SSE) structures.

Members wishing to work on reusing their ABJTh can donate products to the platform.

3.3.3 RECYCLE

Ecologic is working on the recycling of ABJth, with a recycling rate of 78% to date (figure 9). Ongoing work with operational players in the ABJth end-of-life channels should enable the generation of recycling raw materials that will feed the circular economy loop, mainly metals and plastics.

A [tool for assessing the recyclability of ABJThs](#) on the market is also available.



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 to 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, 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](https://www.e-dechet.com) service. This service has now been extended to ASLs and ABJThs.

CONCLUSION

This **first exercise in consolidating** the prevention and eco-design plans shared by members of the thermal DIY and garden products sector (ABJth) ends on an encouraging note. Member participation has been high, and concrete 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. This is particularly true of short- and medium-term initiatives aimed at extending useful life, improving access to product repair and reuse. **The integration of recycled raw materials and the improvement of product recyclability are nevertheless well identified.**

The industry, which is still new, is in the process of being organized, and its players are focusing in part on regulatory aspects, translating them into action in their PEPs.

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.

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**, based on normative documents,⁵ 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.

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 ABJ 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 i4rplatform: <https://i4r-platform.eu/>

APPENDICES


APPENDIX N°1 - PEP ONLINE FORM

The image shows a screenshot of the PEP Online Form, which is a structured questionnaire. The form is divided into several sections, each with a specific focus. The sections are: 1. IDENTIFICATION: This section includes fields for general information, company identification, and information on EPR channels and main products. 2. ACTIONS UNDERWAY OR PLANNED TO REDUCE NON-RENEWABLE RESOURCES: This section lists various actions such as optimizing manufacturing processes, using renewable resources, longer service life, product repair, product re-use, supporting changes in usage, setting up return systems, other tracks, and comments. 3. ACTIONS UNDERWAY OR PLANNED TO INCREASE THE USE OF RECYCLED RAW MATERIALS (RRM): This section lists actions like incorporation of recycled plastics, recycled metals, other recycled materials, closed-loop incorporation of recycled materials, other tracks, and comments. 4. ACTIONS PLANNED TO INCREASE PRODUCT RECYCLABILITY: This section lists actions such as assessing product recyclability, increasing the proportion of products that can be recycled, eliminating/reducing disruptors to sorting and/or recycling, other tracks, and comments. 5. OTHER ONGOING OR PLANNED ECO-DESIGN INITIATIVES: This section lists various initiatives like R&D and monitoring, training/awareness/communication, improving energy efficiency of products and value chain, development of tools and evaluation labels, actions on transport, actions with suppliers, company organization, and details and comments. 6. COMPLEMENT: This section includes fields for how companies feel, evaluation of 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, and 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



prepared in partnership with

WASTE PREVENTION AND ECODSIGN PLAN
to be transcribed to the eco-organizations within the framework of the application of article L. 541-10-12 of the environmental code (French regulation)

RFR sector: Activities of DIY and Thermal Gardening

IDENTIFICATION OF THE ORGANIZATION (Member or group of members)

Name of the company or subsidiary or group	
IFRAE number (number)	
PE (Article D. 541-10-12 of the environmental code)	
IFRAE code	

IDENTIFICATION REFERENCE

PE (Article D. 541-10-12 of the environmental code)	
Company	
Product	
Reference number	

CALENDAR

Validation publication date	
Date of update (every 3 years)	

Themes	Levers	Objectives	Scope of the objectives (Type of the product)	Actions initiated or to initiate	Indicators (Input or measure if possible)	Definition of the indicator (and calculation method if relevant)	Unit (if present)	Current value	Target value					Other deadlines	Comments (context, strategy, interpretation, group specific area...)					
									2024	2025	2026	2027	2028							
REQUIRE	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																		
REQUIRE	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																		
		REQUIRE	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 easily and/or automatically recyclable																
				Removes/reduce disintegrators of sorting and/or recycling																
				Inform on environmental characteristics																
Train/ Raise awareness/ Communicate																				
Conduct R&D and monitoring																				
Develop assessment tools and labels																				
OPTIONAL	Implementing tools related to ecology and impact assessment	Implementing tools related to ecology 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 25, 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.		
How to fill it in?	5	What is the "APE" code and what information does it provide about Italian companies?	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 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?	If you are not a French company, it's not compulsory to look for your APE code. 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, ironers, 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 (L2,3 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, 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.		
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)?	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?	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 quarantinedmeshnets 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 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).		

APPENDIX N°4 - TABLE OF FIGURES

Figure 1: Breakdown of actions proposed in the PEP by theme	5
Figure 2: Ranking of the levers most frequently used in PEPs, all themes combined	7
Figure 3: Ranking of optional levers most frequently used in PEP	7
Figure 4: Breakdown of actions arising from the PEP for the theme of reducing non-renewable resources	8
Figure 5: Breakdown of actions taken under the PEPs to increase the use of recycled materials	9
Figure 6: Breakdown of actions arising from the PEPs for the theme of increasing product recyclability	10
Figure 7: Feeling of powerlessness expressed by members regarding the limits to their eco-design capabilities, and the reasons for this feeling (N = 49 responses)	11
Figure 8: Other actions underway or planned in light PEPs (N = 68 actions)	12
Figure 9: Overview of how the e-reemploi.eco platform works	15
Figure 10: ABJth end-of-life assessment - 2023	16