



Professional packaging: Ecomaison and CITEO PRO, two experts at your service

The Ecomaison College



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Your contacts for Professional Packaging



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Contents



01

The partnership with Citeo

02

Actions to take

03

- EPR for Professional Packaging, the structuring principles
- The objectives of EPR for Professional Packaging and its key principles
- The scope of Professional Packaging
- Am I concerned as a producer placing packaging on the market?
- But I am also a holder of waste and an actor in the reuse of professional packaging?



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01

The partnership with Citeo



Two experts, zero worry

Professional packaging: Ecomaison and CITEO PRO, two experts at your service

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- Dedicated expertise in Professional packaging
- Mastery of 3R challenges (reduction, reuse, recycling)
- Ownership of the regulatory framework and accreditation




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- 15 years of operational EPR experience
- Management of 4 sectors (furniture, toys, DIY & garden, building)
- Field network, operators, collection, reuse and recycling solutions
- Sector-specific and multi-sector support



A joint response to the entry into force of EPR for Professional packaging

A shared objective: simplicity, practicality and consistency

A strategic choice: pooling expertise in service of the sectors

Why join the Ecomaison College

1.

Your sector (furniture, DIY and gardening, toys, construction) is represented on the board of directors and in the share capital of CITEO Pro.

Ecomaison, member of CITEO Pro's board, represents you and speaks on your behalf.



2.

A single point of contact for personalised support, including Professional Packaging.

We are here to support you and provide you with practical tools tailored to your Professional.



3.

Reduced costs for managing your commercial packaging waste

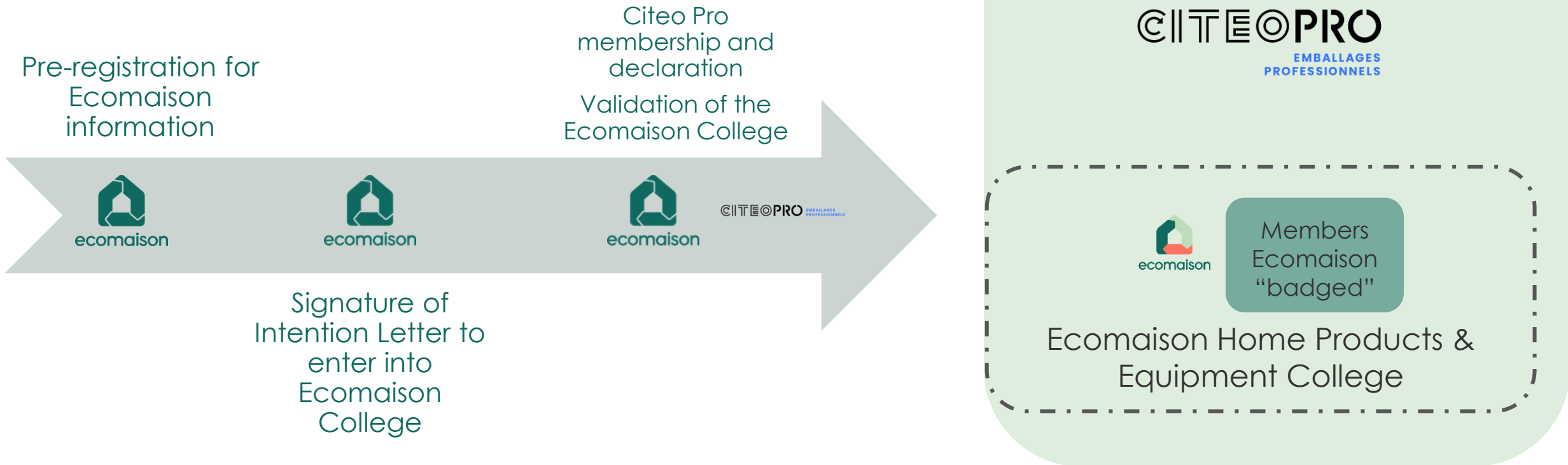
We help you manage your waste streams to reduce costs, make informed decisions and improve your operations.



Pre-register on the **dedicated page**



How to join the Ecomaison College



PRE REGISTRATION LINK

<https://ecomaison.com/professionnels/nos-filieres/emballages-professionnels/#pre-adhesion>



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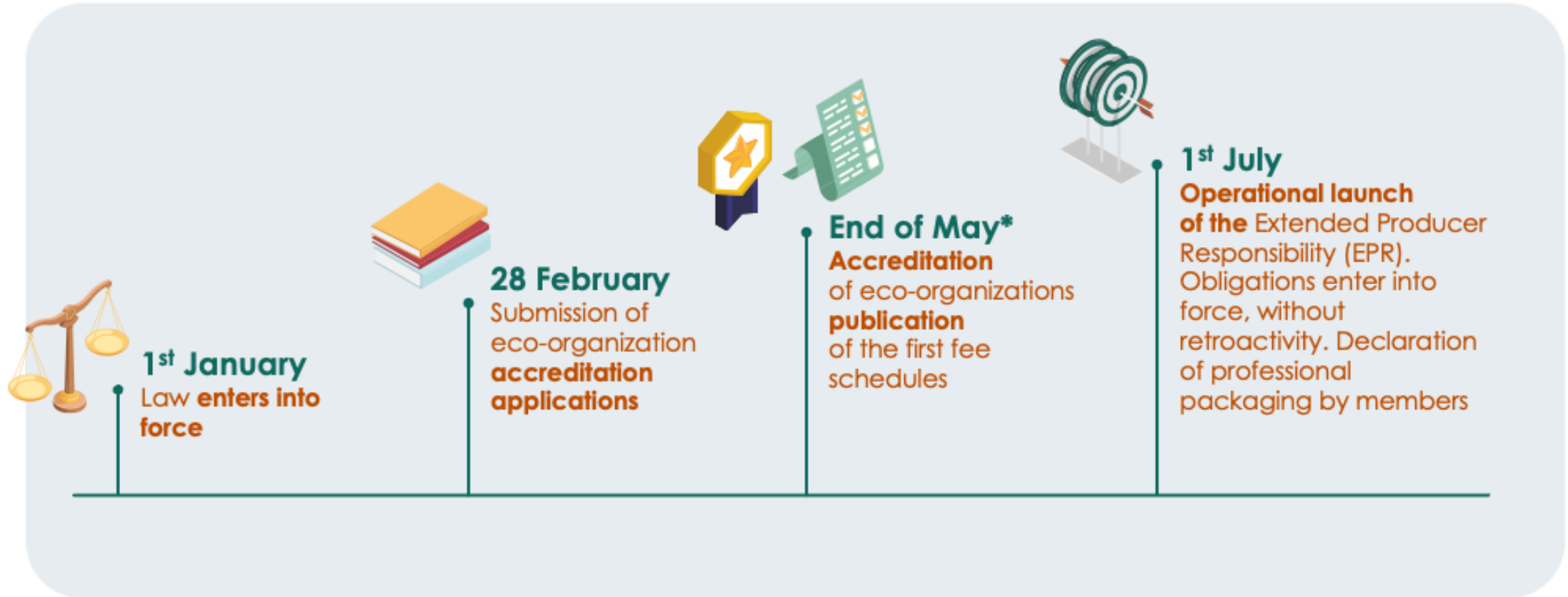
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02

Actions to be taken



Implementation timeline

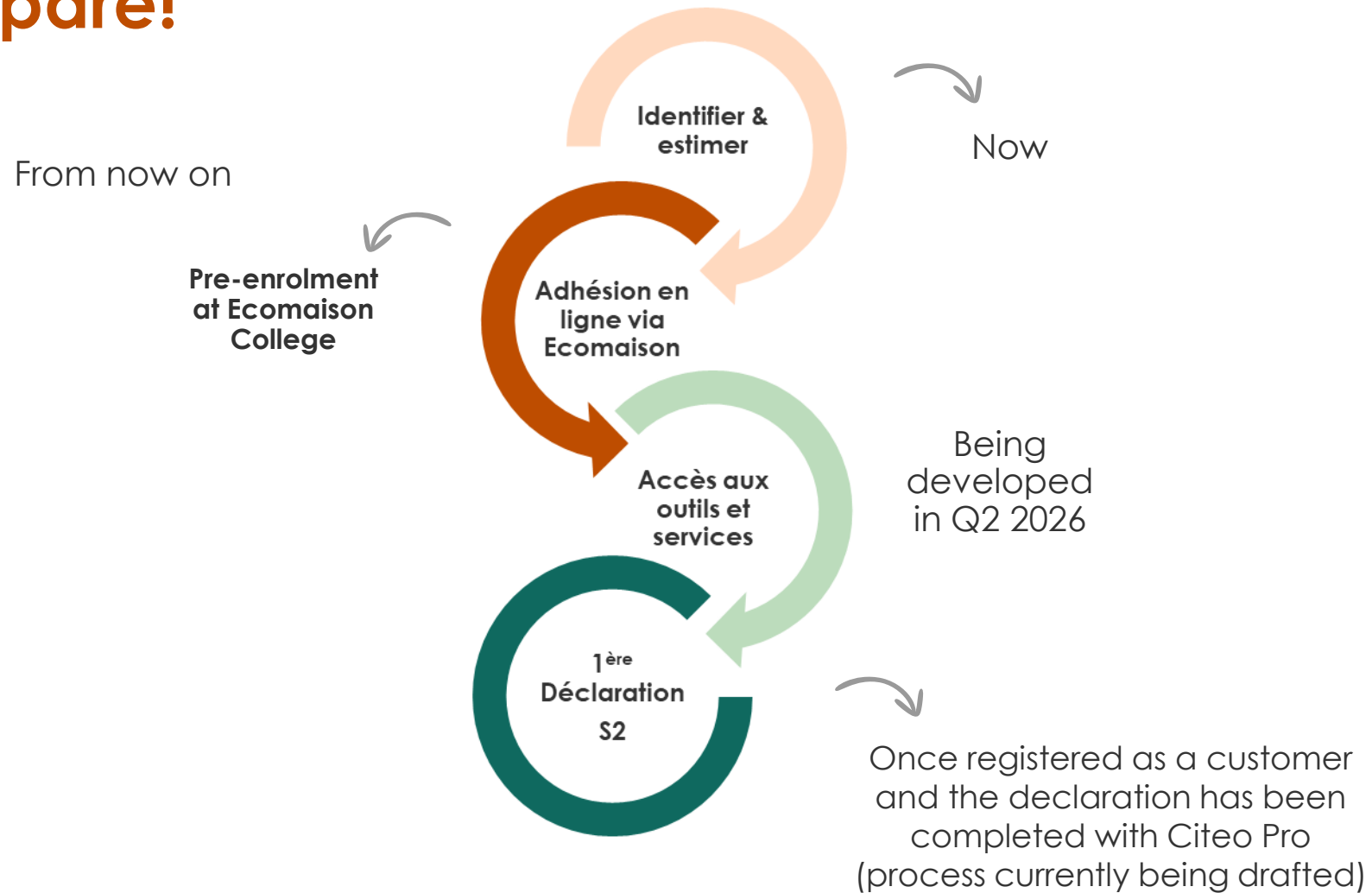


*The exact accreditation dates of the various candidate producer responsibility organizations, and the publication dates of the fee scales, have not yet been set.

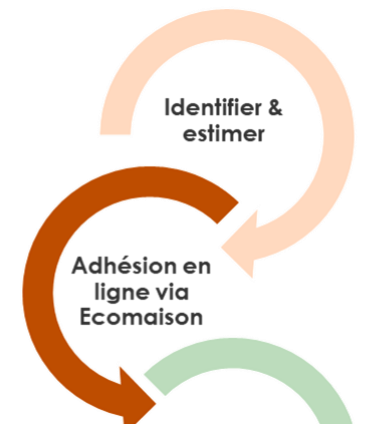
**EPR: Extended Producer Responsibility

Key stages

How to prepare!



Identify and estimate Professional packaging A responsibility that still needs to be clarified



OBJECTIVE -> Be as close as possible to the final assessment once the scope is finalized

WHO in my company may have the data?

→ My Purchasing Department:

- ⇒ Who buys consumables - packaging
- ⇒ Who imports finished packaged products from outside France
- ⇒ Who orders packaged private-label products

→ My Technical and Logistics Department

- ⇒ Who has custom-made or branded packaging designed

→ My Logistics Department

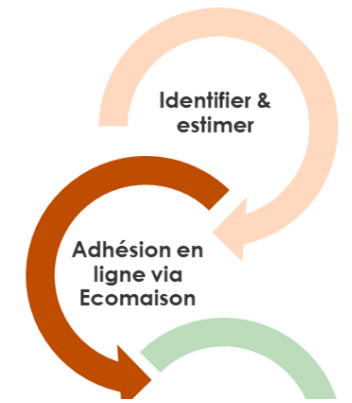
- ⇒ Who knows the origin of packaged products

→ My CSR Department

- ⇒ Who manages the data
- ⇒ Who declares household packaging in my company

Identify and estimate Professional packaging

A responsibility that still needs to be clarified



What? Identify the packaging that will fall under Professional packaging EPR

Questions to ask yourself?

- ✓ Is my packaging specifically intended for professional use?
- ✓ Is my packaging transport packaging?
- ✓ Is my packaging grouped packaging?
- ✓ Is my packaging sales packaging?
- ✓ Is my packaged finished product sold in sales packaging intended exclusively for professionals?
- ✓ Is my packaging glass packaging?

And for each of these types of packaging, identify the material

Proposed mapping of your packaging

Definition of IN / OUT after confirmation of the scope

		Consumable			Import		
Materials	Types of packaging	Achat d'emballage à l'étranger (flux 1) (tonnes)	Purchases of packaging from abroad (flow 1) (tonnes)	Purchase of packaging in France in accordance with the client's specifications (specific design or logo) (stream 1) (tonnes)	Imported packaged finished products (flow 2) (tonnes)	Imported unfinished products (raw materials) in packaging (flow 3) (tonnes)	Retail packaging
E.g. : wood/ iron	E.g. : Cardboard box/ Pallet/ Film	Tonnes and units	Tonnes and units	Tonnes and units	Tonnes and units	Tonnes and units	Tonnes and units



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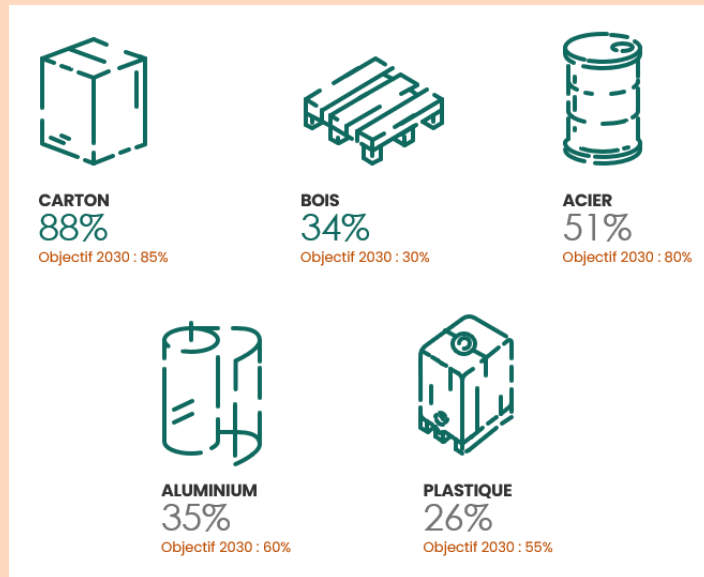
03

EPR for Professional Packaging, the key principles



Professional packaging: new obligations, new objectives

RECYCLING TARGETS BY MATERIAL (IN TONNES)



Reuse targets for Professional packaging

	2030	2040
Used transport and retail packaging for transport within the EU	40%	70%
Used transport and retail packaging for transport between sites within the EU	100%	100%
Used transport and retail packaging for transport between economic operations in France	100%	100%
Multi-packs in the form of boxes (excluding cardboard)	10%	25%

Priority issues:

Plastics

Reuse

Traceability

Source separation

Incorporation of recycled material

The key principles of the EPRO EPR scheme



A financial EPR scheme
(except for provision of wood at
public recycling centers)

&

competitive (likely accreditation
of several PROs, requiring
accreditation of an OCAEPRO)

An EPR scheme focused
on “plastics” for EPRO
waste, with ambitious
reuse targets

An EPR scheme that complements
existing EPR schemes or voluntary
agreements for packaging (EMPG,
PMCB, mineral oils, PCHIM,
ADIVALOR)

Implementation of a shared
traceability system for
transmitting data relating to
EPRO waste and packaging
collected for reuse

No fungibility between materials
EPRO waste management costs
are assessed by material and
borne by EPRO producers for
each targeted material

What to
remember



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04

What is Professional Packaging?



A distinctive EPR scheme

You may be considered as:

The producer placing packaging on the market



Manufacturer of packaged products or packaging manufacturer

- Responsible for packaging placed on the market

NEW PACKAGING CATEGORIZATION UNDER THE PPWR



Sales packaging
Grouped packaging
Transport packaging

CLEARLY DEFINED EXCLUSIONS



Some sectors already manage both containers and contents

A DECREE DEFINING THE SCOPE OF PROFESSIONAL PACKAGING



A new distinction between household and Professional packaging

A RESPONSIBILITY THAT STILL NEEDS TO BE CLARIFIED



A new definition of the producer placing packaging on the market that includes the packaging manufacturer

Definitions applicable in the draft decree on the scope of Professional packaging

Definition under the PPWR

AUTOMATICALLY CLASSIFIED AS HOUSEHOLD PACKAGING

1. Service packaging
2. Transport packaging used for
3. online e-commerce
4. Grouped packaging used to bundle and sell packaged products in packs that can also be split
5. Glass packaging, except that falling within the professional scope

AUTOMATICALLY CLASSIFIED IN THE CATEGORY OF PROFESSIONAL PACKAGING

1. List of specific packaging
- new* 2. Transport packaging excluding household e-commerce packaging
3. Grouped packaging excluding multipacks
4. Sales packaging where the products they contain are designed exclusively for professional use and are not marketed to households by all producers placing that product on the market
- new* 5. Glass packaging in the medical and veterinary fields specifically designed for use in hospitals, laboratories and professional livestock farming.

- RULES BASED EITHER ON:**
- **THE NATURE OF THE PACKAGED PRODUCT,**
 - **OR THRESHOLDS OF WEIGHT, VOLUME, QUANTITY OR POWER**

1st category: List of specific packaging

Packaging used between professionals in the context of an economic activity and that generally does not become household waste.



Crate over 15L



Drum, jerrycan, bucket over 29 L



Plastic crate over 15L



Octobin



IBC liner / IBC bag (intermediate bulk container)



Fish crate

Gastronorm container



POS material with a packaging function



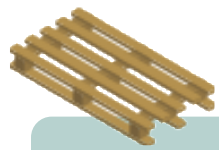
Pallet



Palletizing elements

2nd category: List of transport packaging

Packaging designed to facilitate the handling and transport of one or more sales units or a group of sales units, in order to prevent product damage linked to handling and transport, excluding road, rail, sea and air freight containers.



Transport packaging

Packaging used to prepare products for transport.

Does my packaging come from an e-commerce site aimed at households?



no

It is Professional packaging

yes

It is household packaging



3rd category: grouped packaging

Packaging designed to constitute, at the point of sale, a group of a certain number of sales units, whether this group is sold as such to the end user or serves to facilitate shelf restocking at the point of sale or to create a storage or distribution unit, and which can be removed without altering the characteristics of the product..



Grouped packaging

Packaging that groups products together before transport.

Is my packaging a multiple package**?

no

It is Professional packaging

yes

It is household packaging

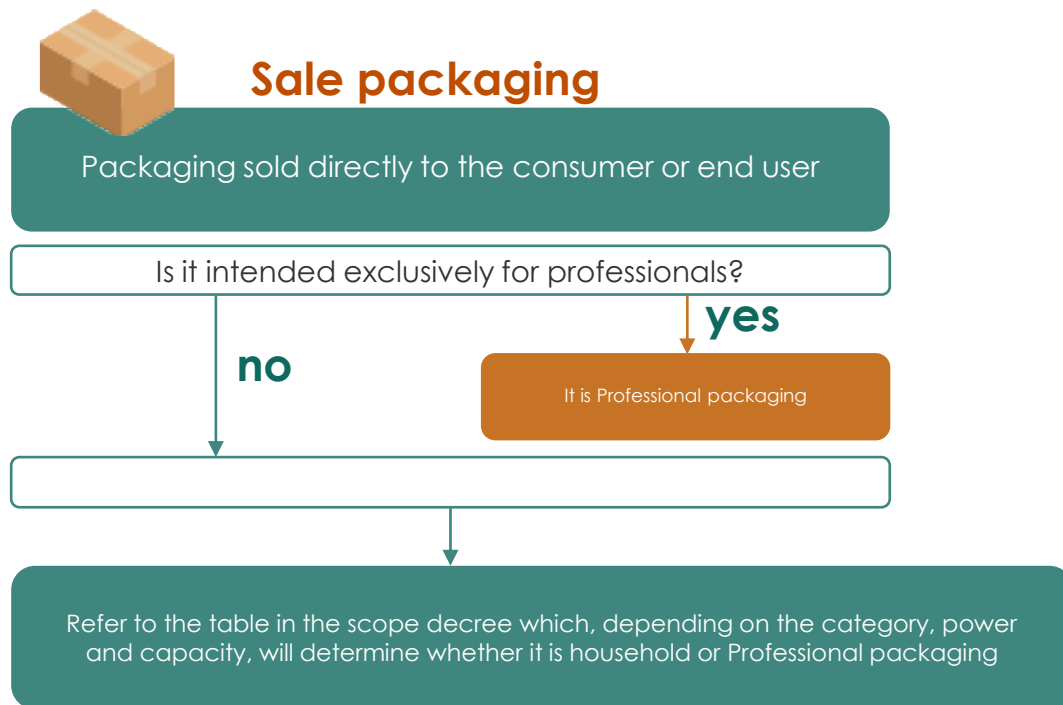


Definition of a multiple package: Ex Pack of bottle of water

4th category: sale packaging

Packaging designed to constitute, at the point of sale, a sales unit, itself made up of products and packaging, for the end user.

Designed exclusively for professional use and not marketed to households by all producers placing this product on the market



5th category: List of glass packaging

Glass packaging

in the medical and veterinary fields, specifically designed for use in hospitals, laboratories and professional livestock farming.



Packaging excluded from the Professional packaging scope

Packaging already declared to another producer responsibility organization is excluded from the Professional packaging scope:

- Packaging and packaging waste for mortars, plasters, paints, varnishes, resins and preparation/application products (PMCB EPR)
- Packaging and packaging waste from the agricultural inputs sector (ADIVALOR)
- Packaging and packaging waste for chemical products that may present a significant risk to health and the environment (DDS)
- Packaging and packaging waste for mineral or synthetic oils, lubricants or industrial oils
- Household packaging

› Refillable gas cylinders for non-professional use



To sum up

- 1 The scheme covers all types of packaging: materials, capacity, size



- 2 The entire value chain is taken into account



*Packaging
manufacturers*



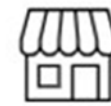
*Manufacturers of raw
materials /
components*



*Product manufacturers
(industrial)*



Logistics platforms



*Distributors / retail
outlets*



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05

Am I a producer placing professional
packaging on the market?
Scope to be clarified



A new reading of the texts



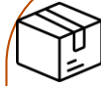
Draft legal notice
= PPWR implementing text

This text gives us elements to better understand the parts of the text that were still unresolved. This document is still a draft and has not been published in its final version.

Awaiting the final texts

Who is concerned?

All companies that place packaging on the market within the meaning of the European regulation (PPWR)



Those who manufacture and place packaging on the market in France in its finished form



Those who import finished packaged products into France



The party that has packaging manufactured in France (including private label)



The party that gives the packaging its final form



The definition of the Producer is still being worked on within OCAPRO



Specific case:

Micro-enterprises with fewer than 10 employees and a turnover of €2 million will not be regarded as placing products on the market. The obligation will be passed on to their suppliers.

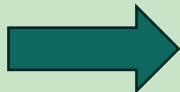
For a transport packaging, Producer us the company who imports or makes it in its Final Form

Final Form → Packaging Maker



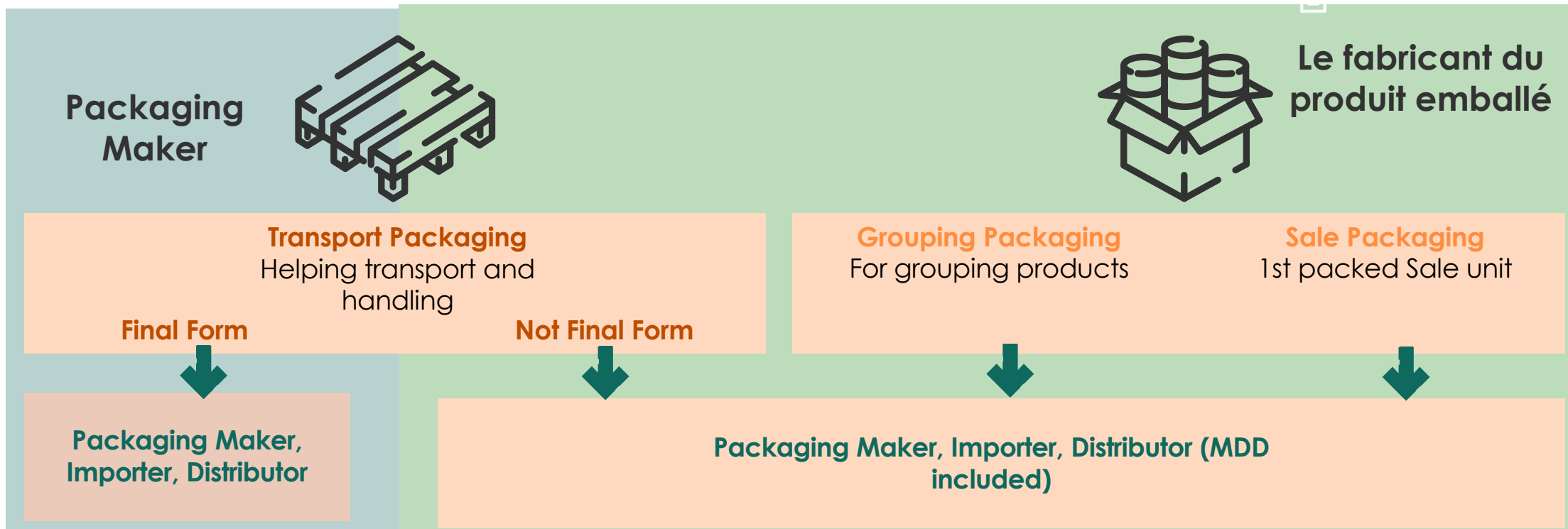
*Working in progress
(Regulation)*

No Final Form → Packed Product Maker



The Producer Définition as Legal Notice

Producer is the one who settle the packaging for the 1st time into the French Territory





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06

But I am also a holder of waste and an actor in the reuse of professional packaging?



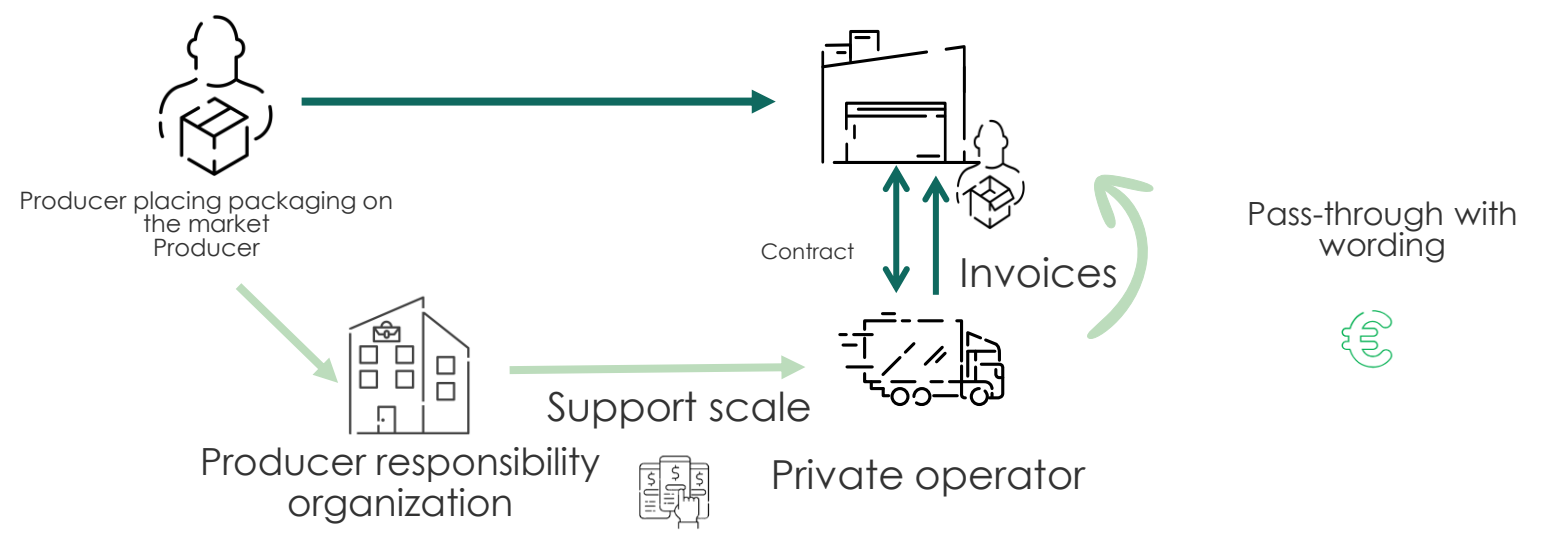
A distinctive EPR scheme

You may be considered as:



RECYCLING

- IMPROVE THE RECYCLABILITY OF PACKAGING** → Improve recyclability performance
- RAISE AWARENESS OF SORTING PRACTICES** → Remove barriers, promote best practices and share them widely
- SET UP FINANCIAL INCENTIVES** → Financial support mechanism (regulatory mechanism)



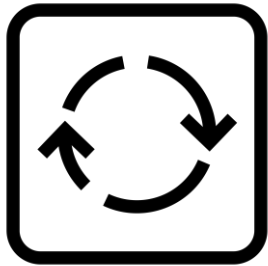
Example of support provided to collection operators

Mode de Collecte – Collecte dédié mono détenteur	Soutien Tonnage collecté séparément en vu du recyclage
Movi benne multi résine	128/T
Movi benne mono résine	192€/T
Semi-remorque hors PSE en vrac	6€/T
Semi-remorque PSE en vrac	150€/T

Soutien à la traçabilité	Soutien tonnage collecté séparément en vue du recyclage
Soutien à la traçabilité (de l'utilisateur final à la réception en installation de recyclage) Plastique	5€/T
Soutien à la traçabilité (de l'utilisateur final à la réception en installation de recyclage) Autres matériaux	2€/T

You may be considered as:

The reuse actor



Pooling company, logistics provider, distributor, industrial company

Deploy reuse solutions

Consolidation and monitoring of existing reuse flows

CLEARLY DEFINED EXCLUSIONS
PAYMENT OF SUPPORT FOR REUSE
TRACEABILITY OPERATIONS
DEFINED

STANDARDIZATION
OF REUSABLE PACKAGING

Financial support for reuse projects



REDUCTION AND REUSE

QUESTIONS / ANSWERS



FAQ

When does EPR for Professional Packaging come into force?

The EPR scheme for Professional packaging will become operational on July 1, 2026. From that date, the companies concerned will have to join an accredited producer responsibility organization and declare the Professional packaging they place on the market.

Which companies are concerned?

The companies concerned by EPR for Professional packaging are:

Companies that place Professional packaging on the French market for the first time, whether they are manufacturers, importers or distributors

And/or companies that place already packaged products on the French market for the first time

However, the scope of who is considered to be placing Professional packaging on the market is still under discussion within OCAPRO.

I am an importer: pallets go from the production site (e.g. Poland) to a French logistics warehouse belonging to one of our clients. Are we concerned? If so, how?

Yes, because you are the first party placing these pallets on the French market. Specific webinars on scope issues will be sent to you. Do not hesitate to register via the pre-registration page on the Ecomaison website.

However, some questions regarding who is considered to be placing packaging on the market are still being handled within OCAPRO.

FAQ

We are members of CITEO and ECOMAISON; if I understand correctly, it is preferable for me to choose ECOMAISON?

Ecomaison will specifically support its PMCB / DEA / JJ and ABJ sector members in CITEO PRO governance, if the member so wishes.

What are the legal/contractual consequences of pre-registration?

Pre-registration allows you to stay informed about the regulations and the tools that Ecomaison makes available to support you in this new compliance process. Afterwards, a letter of intent will be sent to you so that you can join the Ecomaison college within Citeo Pro. However, this is only a letter of intent, so your company may decide not to join the Ecomaison college if it does not wish to subsequently join Citeo Pro once the fee scales are published.

Will membership be done via Citeo Pro or via Ecomaison? Or can it be both?

This will be done through a letter of intent with Ecomaison, in order to be part of the Ecomaison college: Building & Home, which will then lead you to declare on the Citeo website. Once the letter of intent is signed, both the contract and the membership will be with CITEO PRO. Then, Ecomaison teams will again handle the management and monitoring of your customer account through a multi-sector approach for our sectors.

FAQ

I am a member of Citeo for graphic paper and packaging, and of Ecomaison (toys). Should I declare my Professional packaging with Ecomaison or Citeo Pro?

You will be invited to join Citeo Pro via Ecomaison: in practice, you will be a member of Citeo Pro and you will submit your placing-on-the-market declarations to Citeo Pro; at the same time, you will mandate Ecomaison to represent you, defend your interests, and provide support through Ecomaison teams.

When will the first declarations need to be made?

The first declaration will have to be made after joining a producer responsibility organization, starting from 07/01/2026.

Will declarations cover packaging placed on the market before July 2026?

No. The first obligations should concern packaging placed on the market from July 1, 2026 onward.

You will need to estimate your volumes placed on the market for H2 2026, for example by taking an average of your 2025 volumes.

Then an actual declaration will be requested in Q1 2027.

This new declaration will allow the producer responsibility organization to make an upward or downward adjustment based on the estimate.

When will the eco-contribution fee scales be published?

The fee scales will be published after the official accreditation of producer responsibility organizations by the public authorities.

Probably between mid- and late May

FAQ

Will the fee scales be identical for all producer responsibility organizations?

The regulatory framework will be common, but the fee scales will be specific to each producer responsibility organization.

Can there be several producer responsibility organizations?

Yes, 3 producer responsibility organizations are candidates: CITEO PRO, LEKO PRO and TWICE.

How can duplicate declarations be avoided?

Responsibility lies with the first party placing packaging on the market in France. Stakeholders must clarify this point contractually within their supply chain.

Do SMEs or small volumes benefit from simplified rules?

Simplified or flat-rate arrangements may be provided for companies placing low volumes of packaging on the market. In addition, micro-enterprises with fewer than 10 employees and turnover \leq €2M will not be considered producers placing packaging on the market; the obligation would be shifted to their suppliers. The final texts have not yet been published.

Must pallets be declared?

Yes. If you are the first party placing the pallet on the market, it must be declared.

However, it is important to know and track pallet reuse where applicable, because there will be reductions in the eco-contribution for reused packaging.

FAQ

How will packaging collection be organized? Will we have to set up specific containers?

This will be a financial EPR scheme; no operational system will be set up for private actors.

No containers will be provided by the producer responsibility organization for sorting packaging waste. However, the holder of packaging waste may benefit from financial support, particularly for plastics, through their operator / collector.

What about packaging already covered by other EPR schemes (e.g. PMCB)?

Packaging covered by another scheme remains declared within that scheme according to the regulatory scope.

Could the Ecomaison Pro Card be used to drop off Professional packaging at recycling centers from July onward?

No, the ECOMAISON Pro Card will not allow Professional packaging to be dropped off.

I import toys from China. They are packed in boxes bearing our name as the importer. I then distribute them to our customers (hypermarkets and other distributors).

Am I concerned by Professional packaging EPR in this case?

Yes, you are the producer placing the Professional packaging of these packaged products on the market.

What about POS material?

Yes, POS material should be considered Professional packaging.

Are 12 x h10 cm cardboard labels affixed to products for sale covered by Professional Packaging EPR?

Yes

FAQ

If we do not have a plant in France but several plants in Europe that ship to our customers' warehouses in France, do we need to declare all transport packaging placed on the French market from our plants, is that correct?

Yes. Since this is a European EPR scheme, you will indeed be responsible for declaring the packaging going from your production sites to your customers in France.

For finished private-label products, is responsibility borne by the manufacturer or by the party requesting the manufacturing?

Packaging for private-label products depends on the party requesting the manufacturing (the "principal" notion).

How can we estimate the packaging subject to this EPR when we buy from our suppliers? We are large distributors and it is very complicated to assess. Will there be a fee scale by family, such as using a flat-rate ratio method by family?

Hello, I recommend contacting your Ecomaison representative or contact@ecomaison.com; we can support you with tools and help you understand the texts for this assessment.



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