



To encourage and reward the most virtuous eco-design initiatives or penalize the least virtuous products, Refashion has implemented a bonuses and penalties system: **eco-modulations**. The purpose is to reward products that minimize their environmental impact or penalize those whose recycling represents a danger.

In compliance with the Refashion’s authority approval specifications, the following types of eco-modulations will be applied to products placed on the market from January 1st 2025:

- Bonus for the durability of products (new products/category),
- Bonus for obtaining certain environmental certifications,
- Bonus for the incorporation of raw recycled materials,
- Penalty for recyclability of textiles and footwear products (*new eco-modulation for 2025*).

In this guide, you will find all the information you need on the procedure to follow as well as on the supporting documentation to be provided to request eco-modulation eligibility for your products.

SUMMARY OF THIS GUIDE

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2025 UPDATES

BONUS FOR PRODUCT DURABILITY

- New products (jackets and coats; knitted pants; sweatshirts; ...) and a new product category (baby products) eligible;
- New thresholds to achieve for some products;
- Standards to be used for testing new types of eligible products;
- Clarification of the rules for declaring references placed into the market in several colors;
- Requirements clarification for multi-sourcing of the same reference;
- End of tests on raw materials: except in exceptional cases, all tests must be carried out on finished products;
- Clarification on the tests operating conditions and scoring scales;
- Information on the new tests required in the event of non-conformity / invalid references;

BONUS FOR THE INCORPORATION OF RAW RECYCLED MATERIALS

- Revision of the steps to be taken into account as part of the proximity criteria;

RECYCLABILITY PENALTY

Introduction of new eco-modulation in the form of penalties:

- Penalty for the presence of metalloplastic fibers in Textile, Household Linen and Footwear products;
- Penalty for the presence of electronic or electrical components in Textile, Household Linen and Footwear products.

1. HOW CAN YOU BENEFIT FROM OR PAY FOR ECO-MODULATIONS?

The eco-modulation procedure is composed of 3 phases:

- **1st phase** = During 2025, declaration of references for bonuses and penalties, and transmission of supporting documentation where applicable.
- **2nd phase** = In 2026, declaration and control of eco-modulated quantities placed into the market for references declared and validated during phase n°1.
- **3rd phase** = In 2026, payment of bonuses or invoicing of penalties by Refashion, if applicable.

1st phase: declaration of references and transmission of supporting documentation for bonuses (excluding penalties)

Supporting documentation must be submitted during 2025, as mentioned in the contract, in order to enable Refashion to examine them and decide on eligibility for eco-modulations.

WHEN AND HOW TO SEND THE SUPPORTING DOCUMENTATION?

You must send supporting documentation throughout 2025.

All supporting documentation must be sent to Refashion by **November 30th, 2025**.

Supporting documentation is not required for penalties. A declaration is sufficient.

To ensure free flowing operations we recommend that you make your styles declarations (with the required supporting documentation) each month, and at least once per quarter.

Declaration is carried out in 2 phases:

1. Create an account through our contact form – here: [registration](#)

Registration allows you to enclose more than 5 documents in a single mailing, with no size limit. If you are limited to 5 documents when sending your request, please check that you are well logged in before finalizing your request. **It is essential for our teams that all supporting documents are gathered in the same request.**

2. Send the declaration file and supporting documentation through the contact form: [declaration form](#)

- 1. Refashion.fr/pro/en
- 2. FAQs
- 3. Contact us

Re_fashion

Back to the website Contact us Refashion -

Welcome to our help center

Search

Refashion Assistance > Submit a request

Submit a request

CC
Add emails

You are:
A brand, retailer or producer

You contact us for:
Declare styles for eco-modulations

Type of eco-modulation:
-

Attention, remember to log in / create an account on this page to finalize your request (and only one type of eco-modulation per request). Please note that this account is different from your account on <https://adherent.refashion.fr/connexion>

Area to copy your request to other people in your organization

The tutorial below also shows you how to make this request:

[Video tutorial for declaring eco-modulation references.](#)

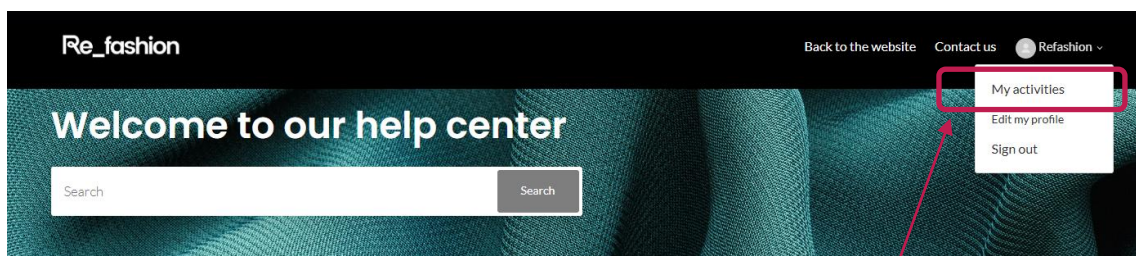
Upon receiving the supporting documentation, Refashion:

- Will validate the eligibility and compliance of the style in relation to the eco-modulation criteria.
- File away all requests in a SharePoint space shared with the company.
- Summarize the list of validated references in a tracking file.

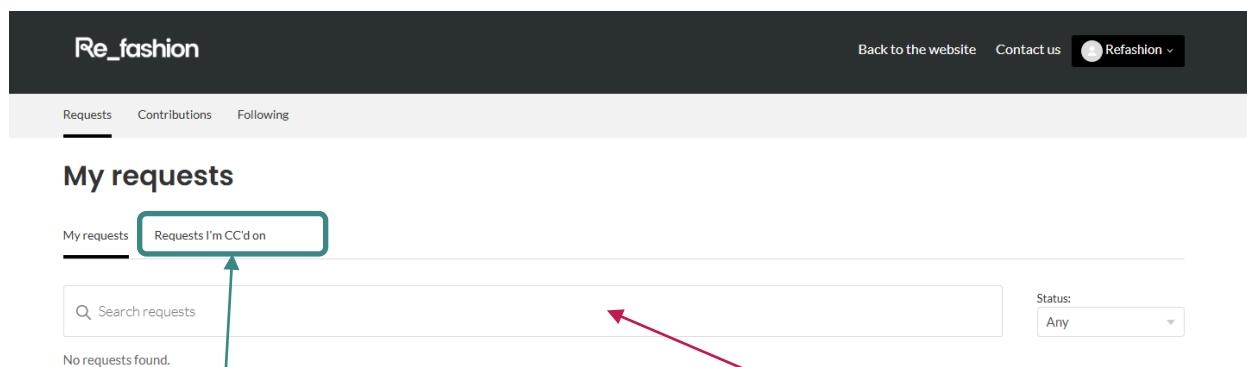
HOW TO TRACK THE PROGRESS OF REQUESTS?

By logging in when transmitting requests, they are automatically saved and associated with the "requester" profile.

To view requests and their status, simply follow the instructions below:



Once logged in, under your profile name, you can view all tickets/requests by clicking on "My activities".



If you have an account and are copied on a request, you will find the requests concerned in the "CC requests I receive" tab.

This is where you'll find your tickets/requests and their status. If you need to complete your initial application, you can also do so here.

WHAT SUPPORTING DOCUMENTATION SHOULD BE PROVIDED,

This depends on the type of eco-modulation and is described in the following sections of this guide. Generally, this is the supporting documentation showing that the eco-modulation criteria have been met. In order to facilitate auditing, **the style's name of the supporting document must begin with the code or wording of the reference for which you are requesting a bonus.** Otherwise, the request cannot be processed and will be systematically rejected.

In the case where a supporting documentation concerns several references (e.g. a GOTS transaction certificate), the name of the document may contain only one style's name. However, the comments field of the declaration form must specify the name of the document on each of the lines concerned.

In the case of eco-modulation based on recyclability, no proof is required. Pre-declaration of the references concerned will be sufficient in 2025. The quantities concerned will be declared in 2026.

DO SUPPORTING DOCUMENTATION NEED TO BE PROVIDED FOR EACH REFERENCE?

Yes, to benefit from a bonus on a reference, the associated supporting documentation(s) must be sent to Refashion.

Note: depending on the marketer, the terminology associated with a product may vary: for Refashion, **1 product reference = 1 style = 1 model = 1 commercial designation.**

A product reference can be available in multiple colors (reference-color / model-color) and sizes (RCS / Reference Color Size).

CAN A DECLARATION BE MADE FOR MULTIPLE REFERENCES?

Yes, for each declaration, you can provide us the supporting documentation for multiple references. However, each declaration must correspond to only one type of eco-modulation.

An Excel form, available for download at the end of the guide, enables you to list all the relevant references. It includes a tab for each type of eco-modulation, and must be attached to your declaration.

IMPORTANT: This form is updated annually. Please ensure you use the current version.

For each new declaration, please use a blank form (do not keep the rows from your previous request). For a given type of eco-modulation, each reference (or color reference) must only be declared once.

For example, you make a "Durability" eco-modulation declaration for the "ABCDE" reference. You make the declaration in March and send the related supporting documentation according to the described procedure (see above). In return, you will first get an acknowledgment of receipt of your declaration, and later, if need be, Refashion will validate this. It is not necessary to make the same declaration in April or in May even if you have not received a response from Refashion.

IS IT NECESSARY TO MAKE A DECLARATION PER TYPE OF ECO-MODULATION?

Yes, for each declaration, you cannot provide supporting documentation for several types of eco-modulation. As mentioned above, you can, however, declare several references per type of eco-modulation.

For example, to declare both "Durability" products and "Label" products, it is necessary to make 2 separate declarations.

IMPORTANT: 1 declaration = 1 type of eco-modulation = 1 or more references

IS IT POSSIBLE TO COMBINE MULTIPLE ECO-MODULATIONS FOR ONE REFERENCE?

Yes, this is possible in several cases:

- If, for the same reference, you have fulfilled the criteria for multiple **bonuses**, and you provide the associated supporting documentation as part of separate declarations;
- Penalties can also be combined. For example, if your product contains metalloplastic fibers and an electrical device, you will incur both penalties.

IMPORTANT: However, a product subject to a penalty will no longer be eligible for a bonus.

HOW ARE DECLARATIONS CHECKED?

Throughout 2025 and following the declaration received, Refashion will assess the eligibility of each reference based on the supporting documentations provided, and, if necessary, by consulting its network of experts.

Any declaration that has not been sent in accordance with the procedure described in this guide and without the appropriate supporting documents will be considered invalid

IF APPLICABLE, HOW TO DISPLAY THE ELIGIBILITY OF MY PRODUCTS FOR A BONUS OR PENALTY?

As a reminder, eco-modulations (bonus or penalty) must be displayed on the **digital file** for the relevant references, where applicable (in accordance with article 13 of the AGECE law).

To assist you, after your request is validated by Refashion (by submitting the list of references and the appropriate supporting documentation according to the procedure outlined in this guide), **we will provide you with a standard phrase** that can be used for this purpose.

For any more specific questions, or those related to your communication activities, we encourage you to contact your legal department or your professional federation.

2nd phase: declaration and verification of eco-modulated quantities

At the beginning of 2026, you must declare the quantities placed into the market in 2025 corresponding to the validated references in phase 1.

HOW ARE QUANTITIES DECLARED?

During the annual declaration for volumes placed into the market on the Extranet, you will also have access to the declaration for eco-modulated quantities.

1. Go to the [Extranet](#)
2. In the "Your declarations" tab, click on "Eco-modulations declaration"
3. Download your Excel file with the list of validated references for various eco-modulations

You must send us of the quantities placed into the market per reference.

4. Upload your completed file to the Extranet
5. Access the summary of your eco-modulation declaration

HOW ARE MY DECLARATIONS CHECKED?

In 2026 (year+1), after you have reported the eco-modulated quantities and before the bonus is paid or the penalty invoiced, we will carry out targeted checks of the declarations or via an audit carried out by an independent third party.

It should be noted that these checks may related to the last five declarations, as mentioned in the membership contract.

3rd phase: payment of the bonus or invoicing for the penalty by Refashion

After check and validation or audit of the quantities placed into the market for eco-modulated references, Refashion will pay the corresponding bonuses or invoice the penalties due during the second half of 2026.

WHAT IS THE AMOUNT OF THE BONUS I CAN CLAIM WHEN I MAKE MY DECLARATION?

The total amount of bonuses a marketer can receive depends on:

- The type of eco-modulation requested;
- The volumes placed into the market ;
- And for certain types of eco-modulation, the category to which the product belongs, which may have a multiplication factor.

You will find below an example for each type of bonus:

"DURABILITY " BONUS

For "Durability", the bonus paid for each reference corresponds to the multiplication of a reference amount (€0.07 or €0.70 depending on the volume placed into the market), and a factor specific to each of the 11 product categories concerned.

The multiplication factors and categories have been revised for 2025 and result in the following amounts per category:

| | | Bonus (in €) per item per category | |
|----|--------------------------|------------------------------------|-------------------------------|
| | | Quantities ≤100,000 items | Quantities > 100,000 items |
| 1 | Tops | €0,70 | €0,07 |
| 2 | Bottoms | €0,70 | €0,07 |
| 3 | Intimate products | €1,05 | €0,105 |
| 4 | Socks & Hosiery | €0,35 | €0,035 |
| 5 | Outdoor clothing | €1,05 | €0,105 |
| 6 | Bath linen/towels | €1,05 | €0,105 |
| 7 | Bed linen | €0,70 | €0,07 |
| 8 | Table linen | €0,70 | €0,07 |
| 9 | Open footwear | €0,70 | €0,07 |
| 10 | Closed footwear | €0,70 | €0,07 |
| 11 | Indoor and baby footwear | €0,70 | €0,07 |

The link between product type (e.g. Women's T-Shirt) and the category (e.g. Tops) is specified in Refashion's [classification system](#).

Here's an example:

- You place women's tops into the market. You placed into the market in 2025: 16 references, for a total of 800,000 products;
- During 2025, you provided "Durability" supporting documentation for 5 references: 4 were validated, 1 was rejected.
- At the beginning of 2026, Refashion will recall the 4 validated references, so that you can send the quantities for each of these 4 references.

- The following type of information is sent to us:
 - Ref 1 : 90.000
 - Ref 2: 40,000
 - Ref 3: 50,000
 - Réf 4 : 35.000

i.e. a total of 215,000 products benefiting from the “Durability” bonus.

- **The amount of your bonus is therefore :**
 $(100,000 \times 0.7) + (115,000 \times 0.07) = \text{€ } 78.050$

“ENVIRONMENTAL CERTIFICATIONS” BONUS

Finished products certified by the 8 certification labels presented in section 3 of this guide, can benefit for the bonus.

In the case where a style has been certified by several eligible certification labels, the bonus is granted within the limit of a single certification. Thereby the “environmental certification” bonuses cannot be accumulated for the same reference.

For “Environmental certifications”, the following three categories are considered as “product categories”: Clothing, Household linen, Footwear.

The amounts per category are given below:

| | | Bonus (in €) per item per category | |
|---|-----------------|------------------------------------|-------------------------------|
| | | Quantities ≤100,000 items | Quantities > 100,000 items |
| 1 | Clothing | 0,30 € | 0,03 € |
| 2 | Household linen | 0,30 € | 0,03 € |
| 3 | Footwear | 0,30 € | 0,03 € |

Using the previous example,

- You place women's tops into the market. You placed into the market in 2025: 16 references, for a total of 800,000 products;
- During 2025, you provided “certifications” supporting documentation and 3 references have been validated.
- At the beginning of 2026, Refashion will send the list of the 3 validated references, so that you can send the quantities for each of these 3 references.
- The following type of information is sent to us:
 - Ref 1 : 90.000
 - Ref 2: 40,000
 - Ref 3: 50,000

i.e. a total of 180,000 « certified” products placed into the market.

- **The amount of your bonus is therefore :**
 $(100,000 \times 0.3) + (80,000 \times 0.03) = \text{€ } 32.400$

“INCORPORATION OF RAW RECYCLED MATERIALS” BONUS

In accordance with the specifications, products incorporating recycled materials may benefit from a bonus, according to the criteria and amounts given in the following table:

| Incorporation of Recycled Materials Bonus | Raw materials from the recycling of post-consumer CHF waste collected or funded by an approved producer responsibility organisation for CHF textile management. | Recycled raw materials coming from open loop recycling of waste collected or funded by an approved producer responsibility organisation excluding food-grade plastic resin. |
|---|---|---|
| Bonus per tonne of raw recycled material incorporated in the product placed into the market | €1,000 €/ton | €500/ton |

The bonus will be granted for each tonne of raw recycled material from waste collection supported by Refashion, or any other eco-organization approved by the French public authorities, that is included in its composition.

Using the previous example,

- You place women’s Tops on the market. In 2025 you placed: 16 styles for a total of 800,000 products;
- During 2025, you provided supporting documentation of “incorporation of raw recycled materials” with the % of incorporation in 2 of your styles and their weight.
 - Ref 1 : 0,15kg - 50% of materials from CHF waste
 - Ref 2 : 0,15kg - 30% of materials from non CHF waste
- At the beginning of 2026, Refashion sends the list of the 2 validated styles so that you can send the quantities for each of these 2 references.
- The following type of information is sent to us:
 - Ref 1 : 60.000
 - Ref 2 : 40.000i.e. a total of 100,000 products benefiting from the “incorporation of raw recycled materials” bonus placed into the market.
- **The amount of your bonus** is therefore :
 $(1.000*(60.000*(50\%*0,00015)))+(500*(40.000*(30\%*0,00015))) = €5.400$

WHAT IS THE AMOUNT OF THE PENALTY I CAN BE SUBJECT TO?

The total amount of penalties a marketer can incur depends on:

- The two criteria related to recyclability;
- The volumes placed into the market ;
- The initial eco-fee amount of the products concerned;

This penalty amount is specified per product line ([see classification system](#)).

"RECYCLABILITY " PENALTY

For penalties related to the recyclability of CHF products, since January 1st 2025, CHF products containing metalloplastic fibers and/or electrical or electronic equipment EEE (*excluding component(s) whose function is to provide information on product traceability and/or composition, and which do not contain a battery or accumulator*) may be subject to recycling-related penalties.

| | | Bonus (in €) per item per category |
|---|-----------------|--|
| 1 | Clothing | Details available by product line in the classification system |
| 2 | Household linen | |
| 3 | Footwear | |

Penalties are cumulative.

Additionally, if one of your products is subject to a penalty, it will not be eligible for a bonus.

Using the previous example,

- You place women's tops into the market. You placed into the market in 2025: 16 references, for a total of 800,000 products;
- During 2025, you declared that: 3 references have characteristics that penalize their recyclability (e.g. composition including metalloplastic fibers and/or EEE).
- At the beginning of 2026, Refashion sends the list of 3 declared references, so that you can send the quantities for each of these 3 references.
- The following type of information is sent to us:
 - Ref 1 - Shirt (metalloplastic fibers + EEE): 90,000
 - Ref 2 - Pullover (EEE): 40,000
 - Ref 3 - Pull (metalloplastic fibers): 50,000

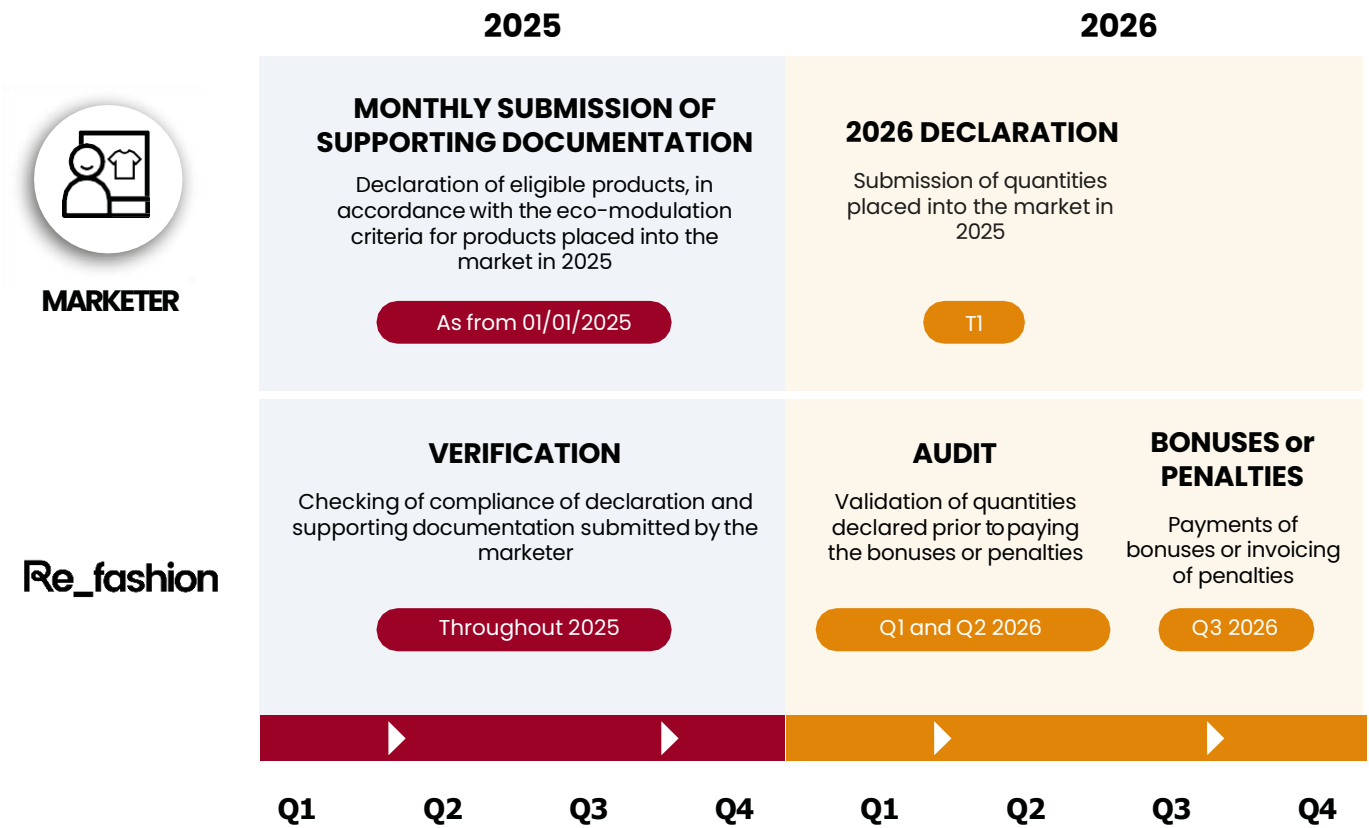
i.e. a total of 180,000 products placed into the market, will be penalized by 50% of the amount of their respective eco-fee.

- **The amount of your penalty** is therefore :

$$(90,000 \times 0.0147 \times 2) + [(40,000 + 50,000) \times 0.0279] = \text{€ } 5,157$$

It is important to note that in these examples, the presence of a penalty on references 1, 2 and 3 would lead to the removal of any bonuses to be paid for these same references.

GLOBAL APPLICATION SCHEDULE



Above, you will find an example of the schedule, which lists the main stages of an eco-modulation validation request.

2. BONUS FOR PRODUCT DURABILITY

This bonus awards the physical durability of products evaluated through by laboratory tests. A summary of the criteria is available for download at the end of the guide.

The summary specifies:

- The list of eligible and non-eligible products ;
- The tests to be carried out (and the standard to be used exclusively for each test) ;
- The thresholds to be achieved or limits not to be exceeded.

ARE ALL PRODUCT CATEGORIES ELIGIBLE FOR THIS BONUS?

Yes, because from January 1st 2025, baby products will be included in the "Durability" eco-modulation scheme:

- Baby footwear
- Baby clothes (except for specific exclusions listed in the [classification system](#) and eco-modulation scale)

In addition, other types of products are also eligible on all categories (baby, children, women, men):

- Jackets and coats
- Mesh pants
- Sweatshirts
- Work clothing
- Indoor footwear

TO OBTAIN THE BONUS ON 1 PRODUCT, IS IT NECESSARY TO RESPECT THE CRITERIA ALL THE TESTS?

Yes, to be declared as "compliant", the product tested must reach the thresholds or not to exceed the limits set for all the criteria given for the type of product concerned.

In addition, all tests must have been carried out on the finished product, at the same time.

HOW TO CARRY OUT THE TESTS?

To justify product conformity, tests must be carried out by an ISO 17025 accredited laboratory. The scope of accreditation (i.e. its perimeter) should ideally cover all tests carried out by the laboratory, according to the standard required to validate eco-modulations.

By exception to this rule, in 2025, a minimum accredited test coverage rate of $\geq 60\%$ will be accepted. This rate is calculated by product family (Clothing, Linen, Footwear).

WHAT SUPPORTING DOCUMENTATION ARE REQUIRED?

For each reference, **test reports** are required to confirm that the thresholds have been reached or that the limits specified in the summary document of the requirements (available for download at the end of this guide) have been respected.

FOR REFERENCES WITH MULTIPLE COLORS, DOES SUPPORTING DOCUMENTATION HAVE TO BE PROVIDED FOR EACH COLOR?

No, in order to limit the financial impact of supporting documentation, Refashion has established rules for providing supporting documentation in the case of « multi-color" references, i.e. a reference available in multiple colors (reference-color / model-color).

However, it is still necessary and mandatory to declare all the reference-colors concerned.

These rules are detailed in the "notice" tab of the requirements' summary document (*available for download at the end of this guide*).

HOW LONG IS THE SUPPORTING DOCUMENTATION VALID FOR?

There are two possible cases:

- **Case n°1: Your product is part of the newly products/category in the "Durability" eco-modulation:** The supporting documentation are valid for 2 years.

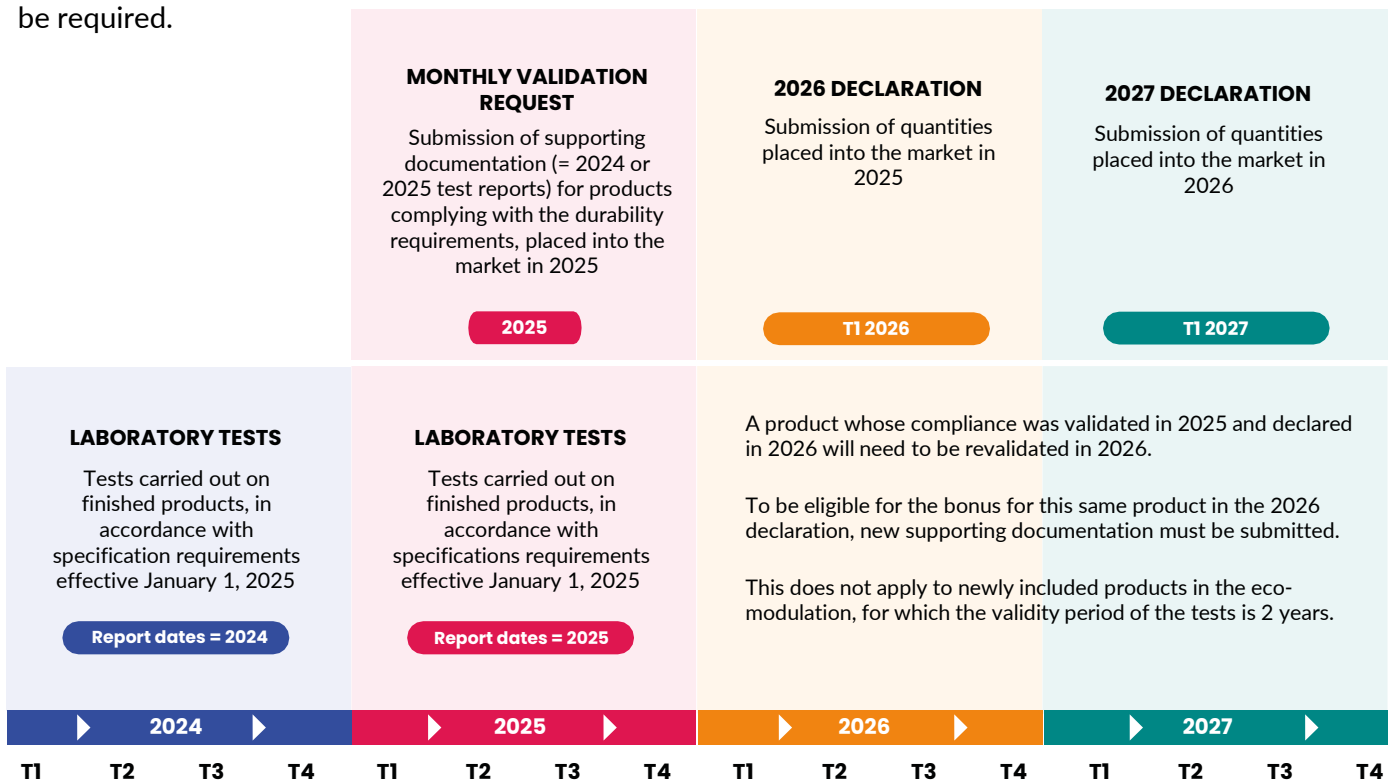
Thus, for references placed into the market in 2025, the supporting documentation must be dated from 2024 or 2025. For a reference placed into the market for two consecutive years (2025 and 2026), the supporting documentation will also be valid for 2026. Therefore, references validated in 2025 remain valid in 2026, and no new supporting documentation will be required.

- **Case n°2: Your product was part of the "Durability" eco-modulation system in 2024:** The supporting documentation are valid for 1 year.

For references placed into the market in 2025, the supporting documentation must be dated from 2024 or 2025.

For a reference placed into the market for two consecutive years (2025 and 2026), the supporting documentation will no longer be valid in 2026. Starting in 2026, new supporting documentation must be provided.

Thus, references newly validated in 2024 remain valid in 2025, and no new supporting documentation will be required.



3. BONUS RELATED TO CERTIFICATION BY ENVIRONMENTAL LABELS

Finished products certified according to one or several of the following 8 labels, as indicated in the approval specifications, can benefit from the "Certification" bonus:

1. Ecocert® Ecological & Recycled Textiles Standard (ERTS) - Level 2,
2. Oeko-tex® Made in Green,
3. Bluesign®,
4. Fairtrade® Textile,
5. Ecolabel Européen,
6. Demeter®,
7. GOTS,
8. Bioré®.

It is specified that the use of different terms such as "labeling" and "certification", or even "labeled products" and "certified product" will be considered as referring to the certification bonus by environmental labels.

ARE ALL PRODUCT CATEGORIES ELIGIBLE FOR THIS BONUS?

Yes, whether the products are for men, women, children or babies, they are eligible.

ARE CERTIFICATIONS FOR RAW MATERIALS VALID?

No, it is the finished product that must be certified.

WHAT SUPPORTING DOCUMENTATION NEEDS TO BE PROVIDED?

The supporting documentation are those attesting the certification for the concerned label. The table below provides further details:

| Eligible certification | Expected supporting documentation |
|-------------------------|---|
| Ecocert® ERTS - Level 2 | <ul style="list-style-type: none"> • Certificate of Compliance (CC) with references concerned and level reached |
| Oeko-tex® Made in Green | <ul style="list-style-type: none"> • OEKOTEX certification of the product list = extraction of "labels" from the Oekotex system, including details of: product ID, article name, article code, validity period, status, etc. For the Made In Green label, the "product ID" must be indicated in the comments column of the declaration form. |
| Bluesign® | <ul style="list-style-type: none"> • BLUESIGN product list certificate |
| Fairtrade® Textile | <ul style="list-style-type: none"> • FAIRTRADE product list. The certificate must specify that the product has been awarded the "Fairtrade® Textile" certification. |
| Ecolabel Européen | <ul style="list-style-type: none"> • Certificate from certification body with list of products |
| Demeter® | <ul style="list-style-type: none"> • DEMETER certificate |
| GOTS | <ul style="list-style-type: none"> • Scope Certificate (SC) covering the production period declared in the TC • Transaction Certificate (TC) with precise mention to the concerned styles (particularly in box 10 of the TC «additional information») |
| Bioré® | <ul style="list-style-type: none"> • Document certifying the BioRé certification on the finished product |

In all cases, the exact name of the references concerned must clearly be given on the supporting documentation for these to be eligible.

Case of the GOTS certification:

- The Scope Certificate may be issued with the name of the concerned entity.
- When the Transaction Certificate (TC) concerns multiple references, the TC number must be explicitly mentioned on the declaration form: in the "comments" column, on each of the relevant product lines.

Failure to do so may invalidate the declaration.

IN THE CASE OF "CUSTOM-MADE" PRODUCTS, IS IT NECESSARY TO PROVIDE ADDITIONAL SUPPORTING DOCUMENTATION?

Yes, in this case, particularly in the case of the GOTS certification, the following documents are required:

Case n°1: the marketer does not carry out any production operations in-house:

- The marketer's Scope Certificate (optional) ;
- The Scope Certificate ;
- Certificate transaction between the manufacturer and the marketer;
- Written proof from the manufacturer enabling the link between the fabric and the "finished product" reference to be established, according to the model attached to this guide;
- Summary table showing traceability between yarns, fabric/knitwear and finished product.

Case n°2: the marketer carries out material storage, weaving or knitting in-house

- The marketer's Scope Certificate ;
- The Scope Certificate ;
- Written proof from the manufacturer enabling the link between the material (fabric or knit) and the "finished product" reference to be established, according to the model attached to this guide;
- Summary table showing traceability between yarns, fabric/knitwear and finished product.

HOW LONG IS THE SUPPORTING DOCUMENTATION VALID FOR?

For each reference, **the supporting documentation are valid:**

- Up to the end of the date of validity (if this information is given on the certificate);
- For a maximum of 2 successive declarations of products placed into the market (e.g. for a reference placed into the market in 2024 and 2025, whose quantities would be declared in 2025 and 2026 respectively).

4. BONUS FOR THE INCORPORATION OF RAW RECYCLED MATERIALS

Products integrating raw recycled materials in their composition, in accordance with the specifications, will be rewarded.

The bonus for incorporating recycled materials will be granted:

- if the CHF waste has been collected or funded by Refashion or if another type of waste (excluding food resin) has been collected or supported by another eco-organisation approved by the French public authorities (open-loop recycling)
- and if the recycled material from this waste has been produced according to the local proximity criteria and carried out in facilities adhering to measures that are equivalent to those for ICPE classified facilities (French facilities classified for environmental protection).

CAN ALL RAW RECYCLED MATERIALS RECEIVE A BONUS?

No, the bonus for incorporating recycled materials from the recycling of waste will be not be granted:

- If the recycled material incorporated comes from production off-cuts
- If the recycled material incorporated comes from unsold items.

WHAT IS THE DEFINITION OF THE "LOCAL PROXIMITY" CRITERION?

This criterion is defined by the Specifications, as amended by [the decree of March 1st 2023](#) on the subject. This criterion came into effect on July 1st, 2023.

Thus, to be eligible for this bonus, it is necessary to set up traceability for all stages of sorting, preparation for recycling and recycling of waste by incorporation of materials from it, so as to be able to demonstrate :

- That all these steps are carried out within a geographical radius of no more than 1500 kilometers from the point of collection of this waste ;
- Or, when traceability is not possible from the collection point: That all these steps be carried out within a geographical radius of not more than 1000 kilometers from the sorting center if it is located in France, or failing that, from the barycenter of the metropolitan France (46° 29' 38" N, 2° 36' 10" E).

This criterion applies in the same way for overseas territories.

WHAT EXACTLY ARE THE STEPS THAT MUST OCCUR WITHIN THE 1,000 OR 1,500KM RADIUS?

This geographical radius covers all the following steps:

- Sorting of waste collected or supported by an approved eco-organization (*excluding food-grade plastic resin*).
- Preparation for recycling, such as: defibration, shredding, grinding, etc.
- Recycling of waste by incorporating materials derived from it, such as: spinning, extrusion, filament spinning, multi-filament assembly, compounding, or formulation, etc.

This geographical radius therefore does NOT cover the following steps:

- Weaving / knitting,
- Cutting / tailoring,
- Injection,
- Molding,
- Finishing, etc.

As an example, here is a representation of the 1,000km radius from the barycenter of mainland France and the steps included in the local proximity criterion:



WHICH SUPPORTING DOCUMENTATION NEEDS TO BE PROVIDED?

Supporting documentation must include :

- The declaration form, available for download at the end of the guide, details each reference incorporating raw recycled material, including the unit weight and the percentage of incorporation.
- All documents related to the declaration of quantities above, which allow for verifying the accuracy of the declaration of tonnages and traceability of the "local proximity" criterion.

HOW LONG IS THE SUPPORTING DOCUMENTATION VALID FOR?

Supporting documentation must be renewed every year.

5. PENALTY FOR RECYCLABILITY

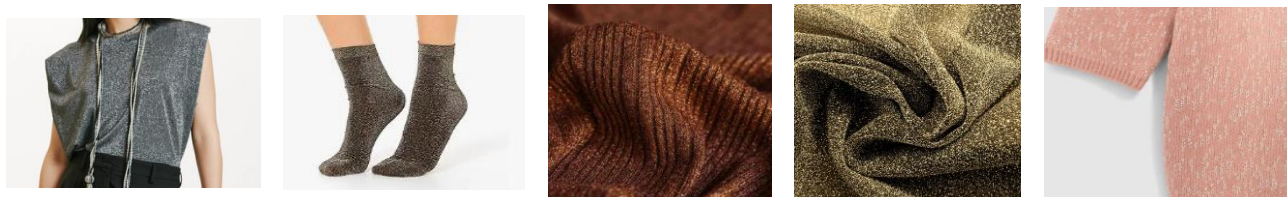
As of January 1st 2025, a new eco-modulation will be introduced in the form of penalties for danger in the recycling chain due to the presence of certain components.

This will include two penalties related to the recyclability of CHF products:

- **Penalty for the presence of metalloplastic fibers**

A metal-plastic fiber (also known as metallized fiber) is a synthetic fiber with a metallic appearance. It may consist of one or more metallic filaments (e.g., aluminum) coated with a layer of plastic film (e.g., polyester) and reinforced with other fibers (e.g., polyamide). It is often used in fabrics to create shiny or textured effects.

Examples (non-exhaustive): Lurex®.



There is no minimum percentage threshold to be affected by the penalty. If the product contains metal-plastic or metallized fibers, it is subject to the penalty, even if not specified in the product's composition. Only internal disruptors to recycling are concerned, while **external disruptors** are not.

Examples:

- For Clothing & Household Linen: The penalty applies only to fabrics (including main material, secondary materials, and linings) and non-removable components (internal disruptors). It does not apply to accessories or supplies (external disruptors).

All-over embroidery and knitting threads are subject to penalties (internal disruptors), while placed embroidery is not (external disruptors).

Brand tags or logos are not subject to penalties (external disruptors). Strass and sequins are not subject to penalties (external disruptors).

- For Footwear: Textile uppers, elastic bands, etc., are subject to penalties (internal disruptors). Shoelaces containing Lurex are not subject to penalties (as they can be removed).

- **Penalty for the presence of electronic or electrical components EEE** (excluding component(s) whose function is to inform about product traceability and/or composition, and which do not contain batteries or accumulators)

Non-exhaustive examples: LED light, heating device, pedometer, etc.

Exclusion example: RFID chip.

The penalty is specified by product line in the corresponding [classification system](#) and is applied whenever a metalloplastic fiber or electronic or electrical device is present in the product.

To identify your products subject to penalties, we recommend consulting your product managers, who can provide precise details on the composition of your marketed items.

5. PENALTY FOR RECYCLABILITY

ARE ALL PRODUCT CATEGORIES AFFECTED BY THESE PENALTIES?

Yes, whether the products are for men, women, children or babies, they are eligible.

WHAT SUPPORTING DOCUMENTATION MUST BE PROVIDED?

- No supporting documentation are required in 2025, pre-declaration of the concerned references is sufficient. It is your responsibility to declare the products affected by the penalties;
- In 2026, you will need to declare the quantities placed into the market for products subject to penalties;
- A sworn statement will be required to confirm the accuracy of the penalty's declaration;
- An audit may be conducted by Refashion to verify the accuracy of the declarations, if necessary.

ARE THE TWO PENALTIES CUMULATIVE?

Yes, the penalties can be accumulated for the same reference.

CAN A BONUS AND A PENALTY BE COMBINED FOR THE SAME REFERENCE?

No, a product subject to a penalty cannot be eligible for a bonus.

ARE CHRISTMAS SWEATERS WITH LEDS SUBJECT TO EEE?

Indeed, LEDs usually fall under the scope of the EEE (Electrical and Electronic Equipment) EPR, just like heating devices. However, the authorities have ruled that it is the final destination of the product that takes precedence over its composition. A Christmas sweater or shoes with integrated LEDs are intended to be worn as clothing/shoes by the consumer. At the end of their life, they will therefore be dropped off in a collection bin along with other textiles (clothing textiles, household linen and shoes) and then sent to a sorting facility.

WHAT ARE THE EXTERNAL OR INTERNAL DISRUPTORS IN RECYCLING?

To learn more, find our best practice guides for designing [textiles](#) and [shoes](#) for recycling (the documents are in French).

6. RESOURCES TO DOWNLOAD

You will find below the resources available to you in order to benefit from eco-modulations:

1. Declaration form for eco-modulations references
2. List of tests to be carried out and criteria to respect in order to receive a “Durability” bonus
3. Manufacturer statement template
4. Templates for supporting documents to be provided for the “Environmental certification” bonus
5. Refashion classification system 2025

Download resources by clicking [here](#).