# Re\_fashion 2024 GUIDE TO ECO-MODULATION

For a number of years now Refashion has implemented a bonus system to encourage and reward virtuous ecodesign initiatives known as eco-modulation. The purpose of this system is to reward products whose environmental impacts have been minimised.

In compliance with Refashion's authority approval specifications, the following types of eco-modulation apply to products placed onto the markets since 1 January 2023:

- Bonus for the durability of products,
- Bonus for obtaining certain environmental certifications,
- Bonus for the incorporation of raw recycled materials.

In this guide you will find all the information you need on the procedure to be followed as well as on the supporting documentation to be provided in order to benefit from these bonuses.

#### **NEW IN 2024:**

#### For the eco-modulation «Durability»:

- Product categories concerned
- Multiplication factors per category
- Criteria summary file

#### For all 3 eco-modulations:

• Eligible references declaration form

### THE CONTENTS OF THIS GUIDE:

1. How can you benefit from eco-modulation?	<u>2</u>
1st phase: declaration of styles and transmission of supporting documentation	<u>2</u>
2nd phase: declaration and verification of eco-modulated quantities	<u>4</u>
3rd phase: payment of the bonus by Refashion	<u>5</u>
2. Bonus for product durability	<u>9</u>
3. Bonus for obtaining certain environmental certifications	<u>11</u>
4. Bonus for the incorporation of raw recycled materials	<u>13</u>

# RESSOURCES TO DOWNLOAD TO BENEFIT FROM ECO-MODULATIONS:

- 1. Eco-modulation form
- 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 2024

#### 1. HOW CAN YOU BENEFIT FROM ECO-MODULATION?

To benefit from eco-modulation, this procedure is comprised of 3 phases:

- 1st phase = During year 2024, declaration of styles and transmission of supporting documentation;
- 2nd phase = In year 2025, eco-modulated quantities are declared and verified;
- 3rd phase = In year 2025, the bonus is paid by Refashion.

#### 1st phase: declaration of styles and transmission of supporting documentation

Supporting documentation must be submitted during year 2024, 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 the supporting documentation throughout year 2024. All supporting documentation must be sent to Refashion by **30/11 of year 2024**.

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 steps:

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 supporting documentation through our contact form: Declaration form
  - 1. Refashion.fr/pro/en
  - 2. FAQs
  - 3. Contact us

The tutorial below shows the steps to follow in order to make this request.

#### Video tutorial on how to make a declaration

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.

#### WHAT SUPPORTING DOCUMENTATION SHOULD BE PROVIDED?

This depends on the type of eco-modulation and is described in the following sections (2, 3 and 4) of this guide. Generally, this is documentation showing that the eco-modulation criteria have been met. In order to facilitate auditing, the style's name for which you are requesting the bonus, must be cited in the supporting document's name. Otherwise, the request cannot be processed and will be systematically rejected.

In the case where a supporting document 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.

#### IS IT NECESSARY TO PROVIDE SUPPORTING DOCUMENTATION FOR EACH DECLARED STYLE?

Yes, to benefit from a bonus for the style in question, the related supporting documentation must be sent to Refashion.

<u>NB</u>: depending on the producer, the terminology associated with a product varies.

for Refashion, 1 style = 1 model = 1 trade name

The style can be declined in several colors (style- color / model -color) and several sizes (RCS / Reference Color Size).

#### **CAN A DECLARATION BE MADE FOR SEVERAL STYLE?**

Yes, for each declaration made you have the possibility of communicating supporting documentation for several styles. However, each declaration corresponds to a single type of eco-modulation.

An Excel form, available for download at the beginning of this guide, enables you to list all the references concerned. It includes a tab for each type of eco-modulation, and must be attached to your declaration. For each new declaration, please use a blank form (do not keep the lines from your previous request).

For a given type of eco-modulation, each reference (or color reference) must be declared only once.

For example, you make a "Durability" eco-modulation declaration for the "ABCDE" style. 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 ecomodulations. As mentioned above, you can, however, declare several styles per type of eco-modulation.

To declare both "durable" products and "certified" products it is necessary to make 2 separate declarations.

IMPORTANT: 1 declaration = 1 type of eco-modulation = 1 or several styles

#### IS IT POSSIBLE TO ACCUMULATE SEVERAL TYPES OF ECO-MODULATION FOR 1 STYLE?

Yes, you can if for a same style you have fulfilled the criteria for several types of eco-modulations and you have provided the related supporting documentation.

#### **HOW ARE THE DECLARATION CHECKED?**

During year 2024 and following the declarations received, Refashion evaluates the eligibility and compliance of each style based on the supporting documentation 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

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

At the beginning of 2025, you must declare the quantities placed onto the market for year 2024 corresponding to the validated styles in phase 1.

#### **HOW ARE QUANTITIES DECLARED?**

During the annual declaration for items placed onto 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-Modulation Declaration.»
- 3. Download your Excel file with the list of validated references for various eco-modulations.

You must send us the quantities placed onto the market per style.

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

#### **HOW ARE MY DECLARATIONS CHECKED?**

In year N+1, after you have reported the eco-modulated quantities and before the bonus is paid, we will 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 relate to the last five declarations, as mentioned in the contract.

#### 3rd phase: payment of the bonus by Refashion

The bonus will be paid by Refashion by the end of the 3rd quarter 2025 at the latest after control of the quantities declared for the eco-modulated styles.

#### HOW MUCH CAN I CLAIM WHEN MAKING DECLARATIONS?

The total amount of bonus a producer may receive depends:

- On the type of eco-modulation requested;
- On the volume placed onto the market;
- And for some types of eco-modulation, on the category into which the product falls and for which a multiplication factor may exist.

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

#### "DURABILITY" BONUS:

For "Durability", the bonus paid for each style corresponds to the multiplication of a reference amount (€0.07 or €0.70 depending on the volume placed onto the market) and a factor specific to each of the 10 product categories concerned.

The multiplication factors and categories have been revised for 2024 and result in the following

amounts per category:

ae per earegery.		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	Bath linen/towels	€ 1,05	€ 0,105
6	Bed linen	€ 0,70	€ 0,07
7	Table linen	€ 0,70	€ 0,07
8	Open footwear	€ 0,70	€ 0,07
9	Closed footwear	€ 0,70	€ 0,07
10	Trainer-type footwear	€ 0,70	€ 0,07

The link between the product (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 on the market. In 2024 you placed: 16 styles for a total of 800,000 products;
- During 2024, you provided "durability" supporting documentation for 5 styles: 4 were validated, 1 was refused.
- At the beginning of 2025, Refashion recalls the 4 validated styles so that you can send the quantities for each of these 4 styles.
- The following type of information is sent to us:

o Ref 1 : 60.000 o Ref 2 : 40.000 o Ref 3 : 50.000 o Ref 4 : 25.000

i.e. a total of 175,000 products benefiting from the "durability" bonus placed onto the market.

• The amount of your bonus is therefore: (100.000\*0.7)+(75.000\*0.07) = €75,250.

#### "ENVIRONMENTAL CERTIFICATIONS" BONUS:

As from 1 January 2023, finished products certified by the 8 certification labels presented in Section 3 of this guide, can benefit from 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 style.

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 on the market. In 2024 you placed: 16 styles for a total of 800,000 products;
- During 2024, you provided "certifications" supporting documentation and 4 styles have been validated.
- At the beginning of 2025, Refashion sends the list of the 4 validated styles so that you can send the quantities for each of these 4 styles.
- The following type of information is sent to us:

o Ref 1 : 60.000 o Ref 2 : 40.000 o Ref 3 : 50.000 o Ref 4 : 25.000

i.e. a total of 175,000 "certified" products placed onto the market.

• The amount of your bonus is therefore: (100.000\*0.3)+(75.000\*0.03) = € 32,250.

#### "INCORPORATION OF RAW RECYCLED MATERIALS" BONUS:

In accordance with the specifications, products incorporating recycled materials may benefit from a bonus in accordance with 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 recycled raw material incorporated in the product placed onto the market.	€1,000/tonne	€500/tonne

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 2024 you placed: 16 styles for a total of 800,000 products;
- During the year 2024, you provided supporting documentation of «incorporation of raw recycled materials» with the % of incorporation in 2 of your styles and their weight.

o Ref 1: 0,15kg - 50% of materials from CHF waste

o Ref 2: 0,15kg - 30% of materials from non CHF waste

- At the beginning of 2025, Refashion sends the list of the 2 validated styles so that you can send the quantities for each of these 2 styles.
- The following type of information is sent to us:

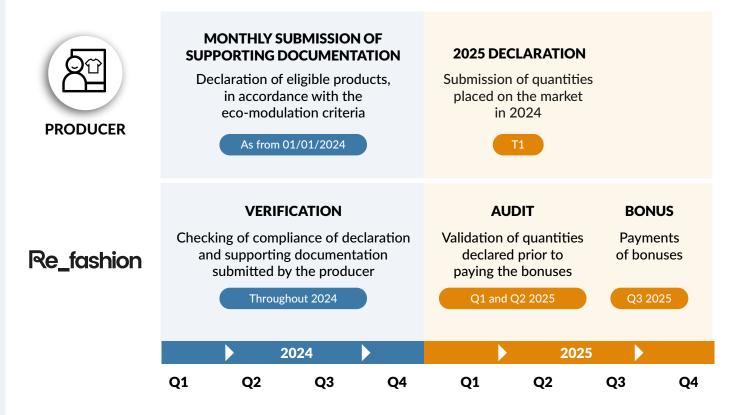
o Ref 1 : 60.000 o Ref 2 : 40.000

i.e. a total of 100,000 products benefiting from the "incorporation of raw recycled materials" bonus placed onto the market.

• The amount of your bonus is therefore :

(1.000\*(60.000\*(50%\*0,00015)))+(500\*(40.000\*(30%\*0,00015))) =€5.400

#### **SCHEDULE**



Above, you will find an example of the schedule for 2024 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 laboratory tests. A summary of the criteria is available for download at the beginning of the guide.

This 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 THE PRODUCT CATEGORIES ELIGIBLE FOR THIS BONUS?

No, for 2024, baby products remain excluded.

## IN ORDER TO OBTAIN THE BONUS FOR 1 PRODUCT, IS IT NECESSARY TO RESPECT THE CRITERIA OF ALL THE TESTS?

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

#### **HOW TO CARRY OUT THE TESTS?**

To justify product conformity, tests must be carried out by an ISO 17025 accredited laboratory, for the tests performed and the standard required.

#### WHAT SUPPORTING DOCUMENTATION NEEDS TO BE PROVIDED?

For each style, it is the **tests reports** enabling the achievement of thresholds or compliance with the limits stipulated in the requirements summary document available for download at the beginning of this guide.

It is possible to carry out certain tests on materials. In this case, it will also be compulsory to provide:

- The test reports for the material concerned;
- The traceability details between the material and the finished product via a written statement from the finished product's supplier stipulating the styles that are manufactured by incorporating the said material (a model certificate is available for download at the beginning of this guide).

## FOR STYLES WITH SEVERAL COLOURS, DOES SUPPORTING DOCUMENTATION HAVE TO BE PROVIDED FOR EACH COLOUR?

Not all tests depend on the colour. The tests to be carried out for each color are specified in the downloadable summary at the beginning of this guide. So for this style you can provide:

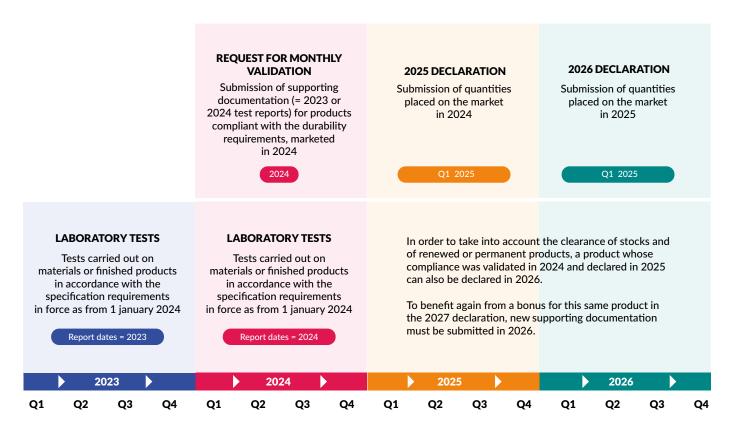
- A single result for the tests that do not depend on colour;
- A result per colour for the other tests (e.g. aspect following washing or dye bleeding).

#### HOW LONG IS THE SUPPORTING DOCUMENTATION VALID FOR?

For styles placed onto the market in year 2024, the supporting documentation must date from the current year 2024 or from the previous year 2023.

For a reference product placed on the market during two consecutive years (2024 and 2025), the supporting documentation remains valid for year 2025. In year 2026 new supporting documentation must be provided.

In this way, styles validated in 2023 remain valid in 2024, and no supporting documents are required.



# 3. BONUS FOR OBTAINING CERTAIN ENVIRONMENTAL CERTIFICATIONS

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

- 1. Ecocert® Ecological & Recycled Textiles Standard (ERTS),
- 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 «labelling» and «certification», or «labeled products» and «certified products» will be considered as referring to the certification bonus by environmental labels.

#### ARE ALL THE PRODUCT CATEGORIES ELIGIBLE FOR THIS BONUS?

Yes, products for men, women, children or babies are all 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	<ul> <li>Certificate of Compliance (CC) mentioning the references concerned and the level reached</li> </ul>
Oeko-tex® Made in Green	<ul> <li>OEKOTEX product list certificate = extraction «labels» from the Oekotex system detailing: 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.</li> </ul>
Bluesign®	- BLUESIGN product list certificate
Fairtrade® Textile	- FAIRTRADE product list. The certificate must specify Fairtrade® Textile certification.
Ecolabel Européen	- Certificate by the certifying organisation with a product list
Demeter®	- DEMETER certificate
GOTS	<ul> <li>Scope Certificate (SC) covering the production period declared in the TC</li> <li>Transaction Certificate (TC) with precise mention to the concerned styles (particularly in box 10 of the TC «additional information»)</li> </ul>
Bioré®	- Documentation currently being defined by the BioRé licence holder

In all cases, the exact name of the styles concerned must clearly be given on the supporting documentation for these to be eligible. When a supporting documentation concerns several references (e.g. TC GOTS), the name of the supporting document must be mentioned in the «comments» column of the declaration form. Failure to do so may invalidate the declaration.

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

Yes, the following documents are required, particularly in the case of GOTS and Ecocert Textile certifications:

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

- The marketer's scope certificate (optional)
- The manufacturer's scope certification
- The fabric manufacturer's scope certificate + the Transaction certificate 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.

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

- The marketer's scope certificate
- The manufacturer's scope certification
- 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/knitting, and finished product

#### HOW LONG IS THE SUPPORTING DOCUMENTATION VALID FOR?

For each style, the supporting documents 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 product market placement declarations (for example for a style sold in years 2023 and 2024, and whose quantities are declared for year 2024 and 2025 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 proxmity 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 1 March 2023 on the subject. This criterion came into effect on July 1st, 2023.

Thus, from 01/07/2023, 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 kilometres from the sorting centre if it is located in France, or failing that, from the barycentre of the metropolitan France (46° 29′ 38″ N, 2° 36′ 10″ E).

This criterion applies in the same way for overseas territories.

#### WHAT ARE THE STEPS INCLUDED IN THE LOCAL PROXIMITY CRITERIA?

The geographical radius concerns all steps of:

- Sorting of waste, collected or supported by an approved co-organization (excluding food grade plastic resin)
- Preparation for recycling, such as: Unravelling, Garnetting, Grinding, Extrusion, Filament spinning...
- Recycling of waste by incorporating materials from it, such as: Spinning, Multi-filament assembly, Injection, Moulding...

#### This geographical radius therefore does NOT concern the following steps:

- Weaving / knitting
- Cutting / Tailoring
- Finishing...

As an example, here is a representation of the radius of 1000km from the barycenter of mainland France and the steps included in the local proximity criterion:



#### WHICH SUPPORTING DOCUMENTATION NEEDS TO BE PROVIDED?

The supporting documentation must include:

- The declaration form available for download at the beginning of the guide detailing each reference incorporating raw materials from recycling, with unit weight and % of incorporation.
- All the documents relating to the declaration of the quantities above, making it possible to verify 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 each year.