

GUIDE FOR WRITING WASTE PREVENTION AND ECO-DESIGN PLANS

What is a waste prevention and eco-design plan?

This concept comes from Article 72, paragraph II of the French Anti-waste and the Circular Economy Law of 10 February 2020 (known as the AGECL Law in France) which created an obligation to establish and implement a waste prevention and eco-design plan:

“Art. L. 541-10-12 (of the French Environment Code). – All producers cited in article L 541-10-1 are obliged to establish and implement a waste prevention and eco-design plan with the aim of reducing the use of non-renewable resources, of increasing the use of recycled materials and increasing the recyclability of products in treatment facilities located in France.”

“This plan is reviewed every five years. It may be an individual plan or one common to several producers. It shall include a review of the previous plan and define the objectives and actions to be implemented in waste prevention and eco-design by the producer over the next five years. The eco-organisation established by the producers may create a plan common to all its members.”

“Individual and common plans are sent to the eco-organisation established by the producers, which publishes a publicly available summary after having presented it to a body that is representative of the industry’s stakeholders.”

In order to assist its members to comply with the law, Refashion has worked, in conjunction with other eco-organisations, to build **a streamlined template to help write waste prevention and eco-design plans**. This template is at the disposal of all Refashion members who wish to write their own waste prevention and eco-design plan.

Definitions:

Waste prevention:

According to the [French Environment Code - Article L541-1-1](#)

“All measures taken before a substance, a material or a product become waste, and that contribute to the reduction of at least one of the following:

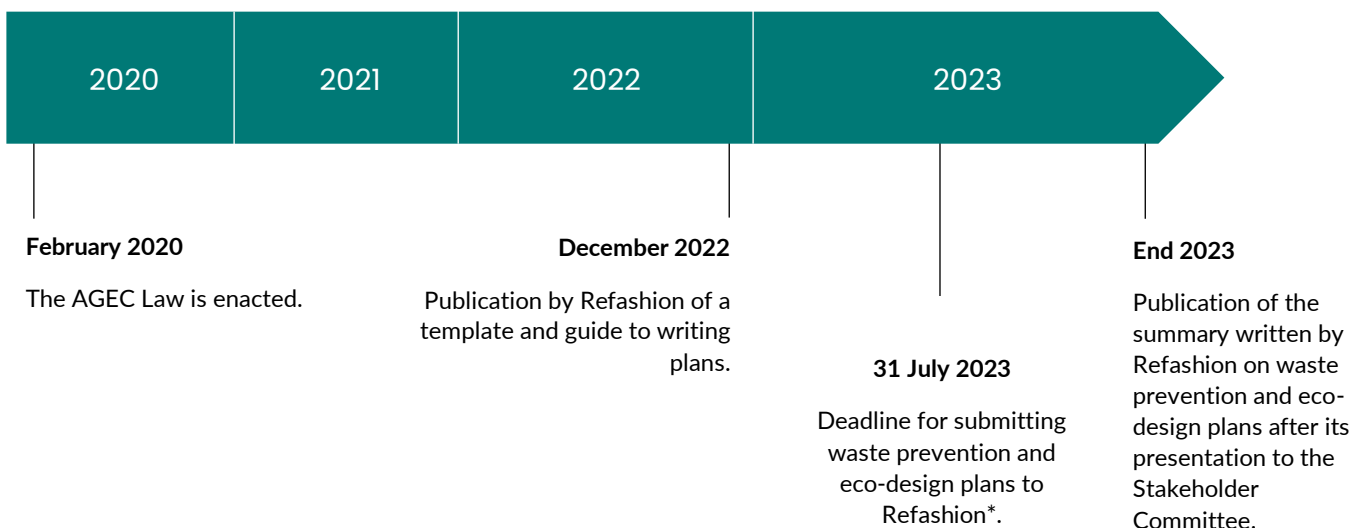
- the quantity of waste generated, including via reuse or the extension of service life of substances, materials or products;
- the harmful effects of waste produced on the environment and human health;
- the substances contained within these substances, materials or products that are hazardous to the environment and human health.”

Eco-design:

According to [Directive 2009/125/EC of the European Parliament and Council](#)

“The integration of environmental characteristics into product design with a view to improving the product’s environmental performance throughout its life cycle.”

Calendar



*waste prevention and eco-design plans must be reviewed every five years.

Who is concerned?

In compliance with Article 72 of the AGEC Law, this obligation concerns all those placing products onto the market, all sectors combined (see article [L.541-10-1](#) of the French Environment Code).

For the Textile industry, “marketers” are considered as all persons or companies that manufacture in France, sell, import or introduce goods for the first time into France (including the following authorities: Guadeloupe, Reunion, French Guiana, Martinique, Mayotte, Saint-Martin, Saint-Pierre-et-Miquelon), new clothing, household linen or footwear (CHF) intended for private individuals, at a cost or cost-free. Marketers can therefore be industrials, manufacturers, wholesalers, importers or retailers of CHF products.

NB: companies that are concerned are those subject to Clothing, Household linen and Footwear Extended Producer Responsibility requirements (CHF EPR). To find out more:

<https://refashion.fr/pro/en/liable-companies-and-products>

What are the objectives?

If you are starting out, writing your own waste prevention and eco-design plan allows you to initiate a waste prevention and eco-design system or, if you are already very much ahead, to integrate it into a continual improvement system. In both cases this plan will allow you to set specific, quantified, and dated objectives.

Also, waste prevention and eco-design plans for different producers will be the subject of an overall and anonymous summary that is made public, in accordance with obligations imposed by the AGEC Law on eco-organisations. This will reflect the industry’s maturity and progress in terms of waste prevention and eco-design. Information provided in the waste prevention and eco-design plans will only be processed by the eco-organisation Refashion and will remain confidential.

How is an waste prevention and eco-design plan written?

To write your waste prevention and eco-design plan, Refashion provides you with two tools:

- The **developed template**
Cf. excel file [“Developed template – Waste Prevention and Eco-design Plan”](#)
This template has been pre-filled by Refashion, it provides examples of indicators and objectives. You have the possibility to adapt, add or delete some recommendations. The content of this template can be used exactly as it is or adapted to the needs and objectives of your organization.
- The **blank template**
Cf. excel file [“Blank template – Waste Prevention and Eco-design Plan”](#)
This template allows you to elaborate the entire content of your plan (objectives, indicators, deadlines...).

Do not forget that, in both cases, you engage yourself to achieve the objectives fixed in the waste prevention and eco-design plan that you will have returned to Refashion.

The waste prevention and eco-design plan is established in **7 steps**:

1

Company name: Indicate the name of the company OR the name used when undertaking your annual declaration for your eco-organisation.

Unique identification number: The unique identification number is issued by the eco-organisation to its members. It proves that your company is up to date with its eco-fees. You can obtain this from the person responsible within your company for completing annual declarations for the eco-organisation.

2

Filler's information: Indicate the professional information (Name/First name, position, email, phone number) of the person in charge of completing the waste prevention and eco-design plan template.

3

Date of enforcement: Indicate the date at which your waste prevention and eco-design plan will be enforced.

Deadline for updating: The waste prevention and eco-design plan must be revised at the latest 5 years after its establishment.

4

The company's waste prevention and eco-design strategy: This is the impetus given by management, and describes the general missions, the values and convictions upheld by the company on waste prevention and eco-design.

5

Organisation of the resources to be mobilised: Here, the needs and actions to be taken are entered in terms of organisation and necessary resources. Indeed, before starting a waste prevention and eco-design system at product level, it is important to implement it from an internal organisational point or view in order to ensure that it is successful and effective.

You must enter your needs to be able to implement the strategy and not what has been implemented.

6

This template enables you to set waste prevention and eco-design objectives in 6 areas:

- Product design for optimising the use of materials;
- Product design for limiting the impacts of use;
- Product design for extending service life;
- Manufacturing and retail processes;
- Product packaging optimisation;

- Services for extending service life.

These areas are divided into several approaches. Amongst these only three are compulsory, because they are cited in Article 72 of the AGEC Law (in sky blue in the excel tables "[Developed template - Waste Prevention and Eco-design Plan](#)" and "[Blank template - Waste Prevention and Eco-design Plan](#)", i.e.:

- Reduce the use of non-renewable materials;
- Maximise the integration of recycled materials;
- Increase the product's recyclability.

It is therefore not compulsory to fill in all the approaches given in the template. What is important is to select the most relevant ones for your internal waste prevention and eco-design system and those for which your company is ready to deploy the necessary work to implement them.

In regards to the area of "product packaging optimisation", it is indeed relevant to also consider the problem of packaging in a waste prevention and eco-design system. To do this, you can refer to the template provided by your eco-organisation in charge of the packaging industry.

7

Other initiatives: If you did not find an area or approach corresponding to the system that you have implemented or are considering within your waste prevention and eco-design system, use this box to enter the initiatives that you have taken.

How do I submit my prevention and eco-design plan to Refashion?

To enable Refashion to draw up the summary required by Article 72 of the AGEC law, you are asked to submit your prevention and eco-design plan to your eco-organization by **July 31, 2023 at the latest**.

To do so, go to your [Refashion extranet](#)

NB: only one person per company is authorized to have access to the extranet. We invite you to contact the internal person in charge of declaring volumes marketed and paying eco-contributions, so that he or she can file your plan for you (usually the finance, legal or CSR department).

In the "**Your company and contracts**" tab, we invite you to submit your prevention and eco-design plan(s) in the dedicated space of each "company file". If you belong to a group and have drawn up a common plan for all your companies, you will need to submit the same plan in each of the existing company files.

Once you are in your "**company file**" area, at the very bottom of the page you will find the area dedicated to filing plans, divided into three parts:

- 1. Identification of the person responsible for the plan within your company :**

This information will enable us to know who is in charge of drawing up the plan within your company, and who to contact on this subject if necessary.

2. Import your prevention and eco-design plan:

Import your plan from your computer, then enter the date on which your plan is to be implemented. The validity period will be calculated automatically from this date (i.e. after 5 years). Click on "Save" and your plan is officially submitted to Refashion!

3. History of your prevention and eco-design plans :

Here you will find all the plans you have previously submitted. Refashion will consider the most recently imported plan when compiling the summary.

For detailed explanations, visit our [FAQs](#).

What happens then?

Once all the plans have been collected, Refashion will draw up the summary required by the article in the AGECE law. The summary published by Refashion will not specifically identify a company, and the information will be anonymized.

Indeed, as from 2023 and every **3 years** thereafter, Refashion will summarise all the individual and common plans adopted by its members. This overall summary will be presented to the textile industry's Stakeholder Committee and will then be made public. The initial summary of waste prevention and eco-design plans for the textile industry will be published at the end of 2023.

Your plan should be reviewed **5 years** at the latest following the establishment of your first plan. It shall include a review of the previous plan, the objectives and actions to be taken in waste prevention and eco-design that will be implemented over the next five years.