



Eco- modulations guide

2026

Re_fashion

Version dated 27 January 2026

To encourage and reward the most virtuous eco-design initiatives and 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 and penalize those whose recycling represents a danger.

As part of the implementation of the specifications for the 2023/2028 CHF EPR sector of the Refashion eco-organization, the eco-modulation scale is changing for 2026:

- Optional eco-modulations:
 - Bonus for the durability;
 - Bonus for the certification by environmental labels;
 - Bonus for the incorporation of raw recycled materials.
- Mandatory eco-modulations:
 - Penalties for recyclability (**new eco-modulation from January 1st 2025**).

IMPORTANT: It should be noted that the following provisions are subject to any changes that may be imposed by the publication of new specifications for the CHF EPR sector or by any other decision by the public authorities to which Refashion would be subject in 2026 and whose provisions would be incompatible with those set out in this guide.

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

Updates 2026 _____

1_ How can you benefit from or pay for eco-modulations? _____

1st phase: declaration of references and transmission of supporting documents relating to bonuses _____

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

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

2_ Bonus for products durability _____

3_ Bonus for certification with environmental labels _____

4_ Bonus for the incorporation of raw recycled materials _____

5_ Penalties for recyclability _____

6_ Download resources _____

What is changing for products placed on the market in 2026

→ Pre-declarations

- New Excel pre-declaration form, containing the mandatory «lists».

→ «Durability» bonus

- Clarification of the rules for pooling tests across multiple references;
- Clarification regarding the pre-declaration of products placed on the market in batches (e.g. 3 pairs of socks);
- Update of operating conditions for fabric elasticity tests.

→ «Environmental Certifications» bonus

- Update of GOTS supporting documents.

→ «Recyclability» penalty

- Penalty rates increase proportionally to eco-fee rates.

For details on penalty rates for each type of product, please refer to the [2026 eco-modulation scales](#).

1 How can you benefit from or pay for eco-modulations ?

The eco-modulation procedure is composed of 3 phases:

- **Phase 1 : In 2026**
Pre-declaration of references for bonuses and penalties, and for bonuses, submission of the relevant supporting documentation;
- **Phase 2 : In 2027**
Declaration and control of quantities placed on the market for references pre-declared during phase n°1;
- **Phase 3 : In 2027**
Payment of bonuses or invoicing of penalties by Refashion, if applicable.

Phase 1

Pre-declaration of references for bonuses and penalties, and transmission of supporting documentation relating to bonuses

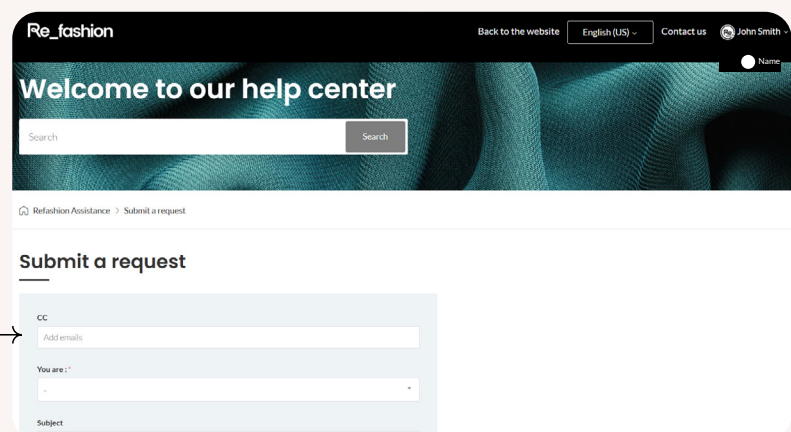
Supporting documentation must be submitted during 2026, as mentioned in the standard membership agreement, in order to enable Refashion to examine them and decide on eligibility for eco-modulations.

→ When and how to make a pre-declaration?

Pre-declaring is quick and easy! It is carried out in 2 phases:

1. Create an account through our contact form – here: [registration](#)
2. Send the pre-declaration file and (and any supporting documents) through the contact form: [pre-declaration form](#)

Area to copy your request to other people in your organization



The screenshot shows the 'Re_fashion' website's help center. The header includes 'Back to the website', 'English (US)', 'Contact us', and a user profile 'John Smith'. The main heading is 'Welcome to our help center' with a search bar. Below this is a breadcrumb trail: 'Refashion Assistance > Submit a request'. The 'Submit a request' form has a 'CC' section with an 'Add emails' input field. Below that is a 'You are:' dropdown menu, and at the bottom is a 'Subject' input field. A callout box from the left points to the 'Add emails' field.

The tutorial below shows you the steps to follow to make this request:

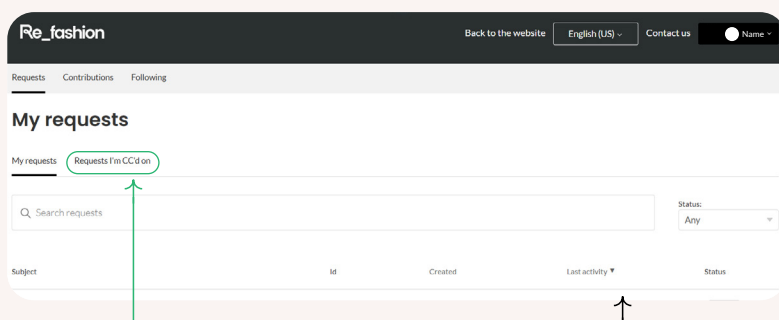
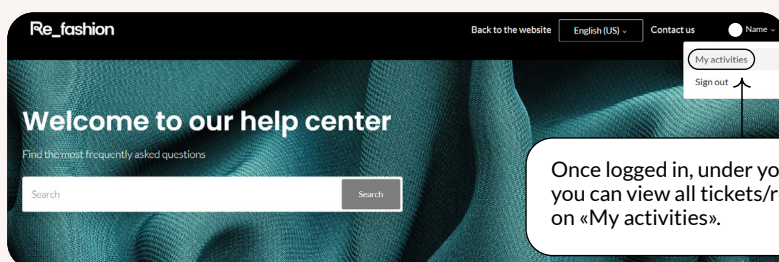
IMPORTANT: If you can't attach more than 5 supporting documents to your application, it means that you have not logged in correctly. You will need to log in again (step 1).

Upon receiving the supporting documentation, Refashion:

- Will validate the eligibility and compliance of the style in relation to the eco-modulation criteria.
For pre-declarations relating to penalties, references are automatically validated;
- 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:



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.

→ Can a pre-declaration be made for multiple references?

Yes For each pre-declaration, you can provide us the supporting documentation for multiple references. However, each pre-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. Otherwise, we will ask you to restart your pre-declaration.

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 pre-declaration for the «ABCDE» reference. You make the pre-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, Refashion's approval or rejection of this reference. 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 pre-declaration per type of eco-modulations?

Yes For organizational reasons and to facilitate the processing of your request, for each pre-declaration, you cannot provide supporting documentation for several types of eco-modulation. As mentioned above, you can, however, pre-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 pre-declaration = 1 type of eco-modulation = 1 or more references

→ When and how send the supporting documentation?

You must send supporting documentation throughout 2026.

All supporting documentation must be sent to Refashion by **November 30th, 2026**.

To submit supporting documents, simply add them to your preliminary declaration in the section of the form reserved for attachments. You must be logged in to your account to do this. This allows you to combine more than five attachments into a single submission. We invite you to remain vigilant about the correct uploading of your attachments to avoid partial transmission of documents, which could lead Refashion to invalidate your pre-declaration.

Therefore, if you are limited to five documents when sending your application, please check that you are logged in before finalising your request. It is essential for our teams that all supporting documents are grouped together in a single request.

In order to streamline operations, we recommend that you **submit your preliminary declarations** (with the required supporting documents) **every month, and at least once a quarter**.

Over the past two years, we have noticed that many marketers submit their pre-declarations between 23 and 30 November, even though their supporting documents were issued several months earlier. Unfortunately, this practice penalises our organisation and significantly lengthens our processing times.

→ 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 penalties for recyclability, no proof is required. Pre-declaration of the references concerned will be sufficient in 2026.

The declaration for quantities placed on the market in 2026, the pre-declared references for eco-modulations will take place in 2027.

→ Do supporting documentation need to be provided for each pre-declaration?

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).

→ How are declarations checked?

Throughout 2026 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 pre-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.

→ What will happen to my pre-declared references in 2025?

References validated in 2025 will be automatically duplicated in your 2026 annual summary. It is therefore not necessary to re-declare them in 2026 (summary available on the shared SharePoint space).

For bonuses (EM1, EM2 or EM3), the following will be excluded:

- References checked as 'valid' in 2025, whether they result from automatic duplication from 2024 or from the transmission of supporting documents identical to the 2024 declaration;
- References that were subject to an exemption in 2025;
- References checked as «invalid» in 2025;
- References that remained «pending» in the 2025 pre-declarations.

As a reminder, duplicate references (references - colours) do not allow new colours to be validated for 2026.

→ 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 pre-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.

→ 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 AGECL law). This obligation, which is the responsibility of the marketer, is an additional reason to make pre-declarations throughout 2026.

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 sentence** 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.

Phase 2

Declaration and verification of eco-modulated quantities

At the beginning of 2027, you must declare the quantities placed on the market in 2026 corresponding to the validated references in phase 1.

→ How are quantities declared?

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

1. Go to the **Extranet** and log in with your username and password;
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 on 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 2027 (year+1), after you have declared the references eligible for bonuses or penalties, placed on the market, 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 agreement.

Phase 3

Payment of bonuses or invoicing of penalties by Refashion

After check and validation or audit of the quantities placed on the market for eco-modulated references, Refashion will pay the corresponding bonuses or invoice the penalties due from the second quarter of 2027.

→ 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 on the market;
- And for certain types of eco-modulation, the category to which the product belongs, which may have a multiplication factor.

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 on the market), and a factor specific to each of the 11 product categories concerned.

The multiplication factors and categories have been revised for 2025, remain unchanged for the 2026 products placed on the market and result in the following amounts per category:

		Bonus (in €) per item per category	
		Quantities ≤100 000 items	Mises en marché >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.

Example

- You place women's tops on the market. You placed on the market in 2026: 16 references, for a total of 800,000 products;
- During 2026, you provided «Durability» supporting documentation for 5 references: 4 were validated, 1 was rejected;
- At the beginning of 2027, 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
 - Ref 4: 35,000
 i.e. a total of 215,000 products benefiting from the «Durability» bonus;
- **The amount of your bonus is therefore:** $(100,000 \times 0.7) + (115,000 \times 0.07) = €78,050$

«Environmental certification» bonus

Finished products certified by one or more of the 8 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 on the market. You placed on the market in 2026: 16 references, for a total of 800,000 products;
- During 2026, you provided «certifications» supporting documentation and 3 references have been validated;
- At the beginning of 2027, 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 on the market;
- **The amount of your bonus is therefore:** $(100,000 \times 0.3) + (80,000 \times 0.03) = €32,400$

«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 on 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 2026 you placed: 16 styles for a total of 800,000 products;
- During 2026, you provided supporting documentation of «incorporation of raw recycled materials» with the percentage of incorporation in 2 of your styles and their weight:
 - Ref 7: 0.15kg - 50% of materials from CHF waste
 - Ref 8: 0.15kg - 30% of materials from non CHF waste;
- At the beginning of 2027, 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 7: 60,000
 - Ref 8: 40,000
 i.e. a total of 100,000 products benefiting from the «incorporation of raw recycled materials» bonus placed on the market;
- **The amount of your bonus is therefore:**

$$(1,000 \times (60,000 \times (50\% \times 0.00015))) + (500 \times (40,000 \times (30\% \times 0.00015))) = €5,400$$

«Recyclability» penalty

For penalties related to the recyclability of CHF products, since January 1st 2025, products containing metalloplastic fibers or wires 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) are subject to recycling-related penalties. These are applied whenever a metal-plastic fibers acting as an internal disruptor or wires and/or an electronic or electrical device is present within the product, meaning that penalties are cumulative for the same product.

The total amount of penalties that a marketer may be subject to depends on:

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

This penalty amount is specified by product line.

		Penalty (in €) per item per category
1	Clothing	Details available by product line in the classification system (available for download at the end of this guide).
2	Household linen	
3	Footwear	

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

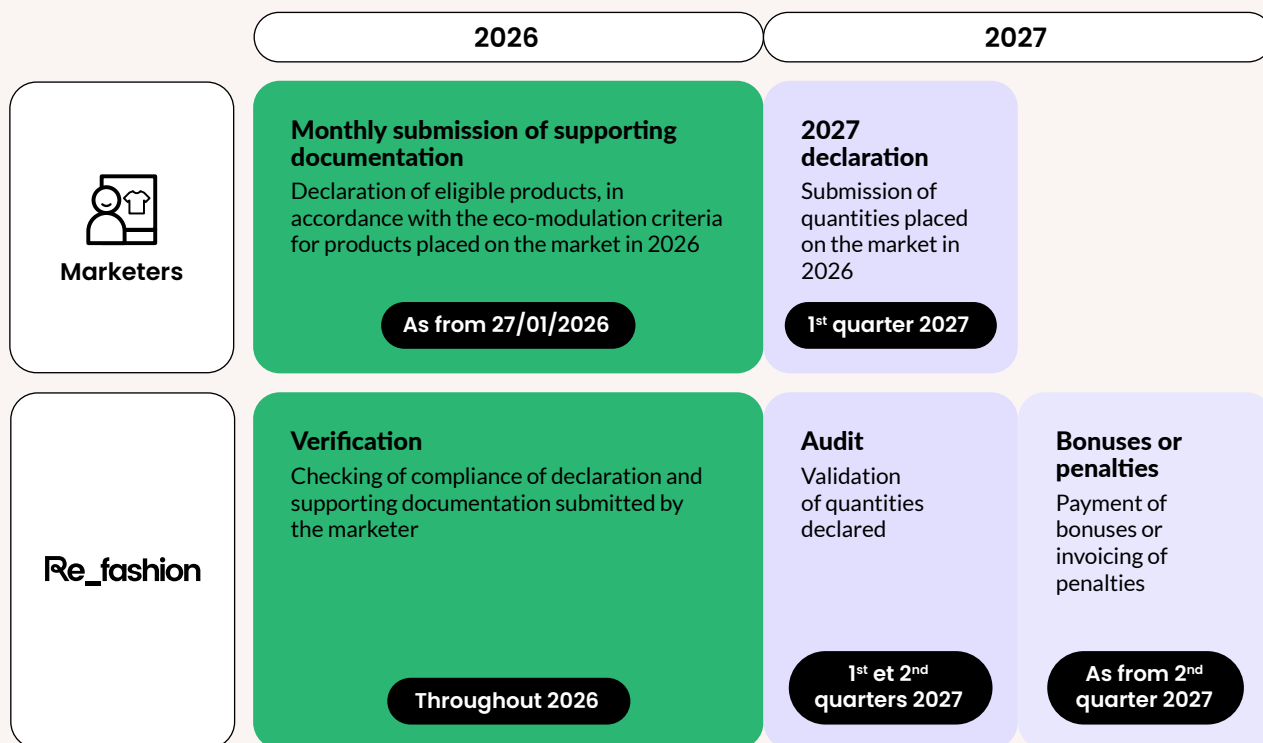
Using the previous example

- You place women's tops on the market. You placed on the market in 2025: 16 references, for a total of 800,000 products;
- During 2026, you declared that: 3 references have characteristics that penalize their recyclability (e.g. composition including metalloplastic fibers or wires and/or EEE);
- At the beginning of 2027, 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 10: Shirt (metalloplastic fibers + EEE) - 90,000 penalised according to two criteria
 - Ref 11: Pullover (EEE) - 40,000 penalised according to 1 criterion
 - Ref 12: Pull (metalloplastic fibers) - 50,000 penalised according to 1 criterioni.e. a total of 180,000 products placed on the market, will be penalized according to the published price list;
- **The amount of your penalty is therefore:**
 $(90,000 \times 0.0162 \times 2) + (40,000 \times 0.0307) + (50,000 \times 0.0307) = €5,679$

It is important to note that in these examples, the presence of a penalty on references 10, 11 and 12 would lead to the removal of any bonuses to be paid for these same references.

→ Global application schedule

Below is an example of a timeline, listing the main events.



→ Where can I find more information?

The **downloadable resources on the last page** contain essential information for your eco-modulation declarations.

The **FAQ** is also a source of additional information. It notably lists questions received by marketers, laboratories and other stakeholders, with the aim of providing everyone with the same level of information.

2 Bonus for product durability

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

It **must be consulted** and it specifies:

- Conditions for conducting product tests;
- 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 departments 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 (available for download at the end of this guide) and eco-modulation scale).

→ To obtain the bonus on one 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 or raw materials. Please note that to be admissible, **tests on raw materials must be carried out at the same time as those on finished products**. In other words, raw material samples and finished products must be sent to the same laboratory at the same time. The laboratory must issue a single report. The list of tests that can be performed on raw materials is specified in the summary document in Excel format.

IMPORTANT: In the event of non-conformity, only re-tests on the finished product will be accepted.

→ 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 2026, a minimum accredited test coverage rate of $\geq 60\%$ will be accepted. This rate is calculated based on the total number of tests required per product family (Clothing, Linen, Footwear).

→ What supporting documentation are required?

For each reference, **test reports that must include the information listed in the Excel summary document (on the «Testing Conditions» tab), and in particular the name or code of the reference tested**, 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 and to **show photos of all the declared colours**.

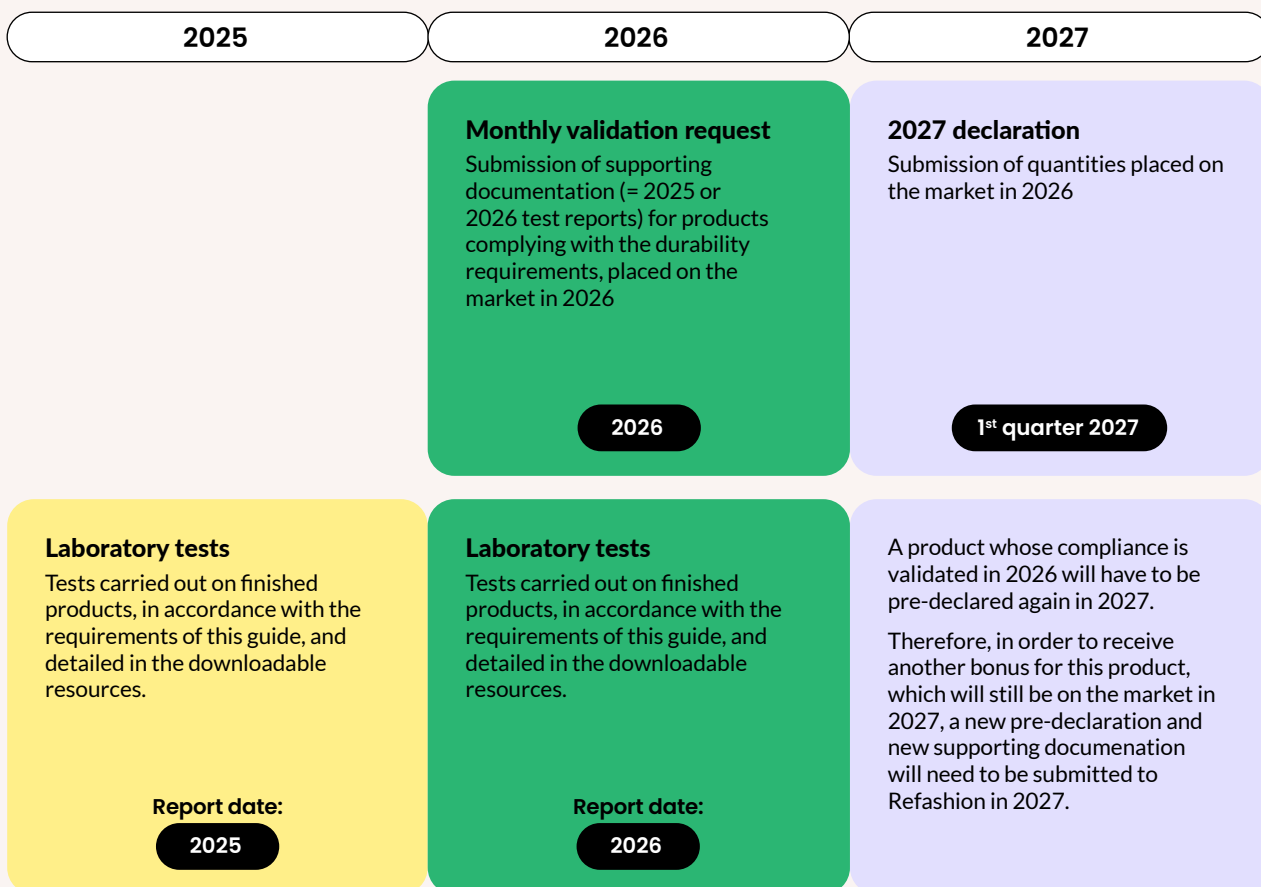
Therefore, **for a multi-colour reference, one or more test reports and photos of all colours must be submitted simultaneously**.

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?**

For references placed on the market in 2026, the supporting documentation must be dated 2025 or 2026. In 2026, newly submitted supporting documentation will only be valid for products placed on the market in that same year.

Indeed, given the current period of reopening our specifications and the uncertainty surrounding future requirements for eco-modulation «durability», it is not currently possible to guarantee that references will remain valid beyond 2026.



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 the 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	Certificate of Compliance (CC) with references concerned and level reached
Oeko-tex® Made in Green	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®	BLUESIGN product list certificate
Fairtrade® Textile	FAIRTRADE product list. The certificate must specify that the product has been awarded the «Fairtrade® Textile» certification
Ecolabel Européen	Certificate from certification body with list of products
Demeter®	DEMETER certificate
GOTS	<ul style="list-style-type: none"> • Photo of the finished product, GOTS labeled • Scope Certificate (SC) of the entity whose license number appears on the GOTS label covering the production period declared in the TC • Transaction Certificate (TC) between the marketer and the previous supplier with precise mention to the concerned styles (particularly in box 10 of the TC «additional information»)
Bioré®	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 Particularly in the case of the GOTS certification, the following documents are required:

Case n°1 The marketer buys the thread or fabric but does not carry out any internal production operation:

- The marketer's Scope Certificate (if the marketer is itself certified and its license number appears on the GOTS labels affixed to the finished product);
- 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 on the market (e.g. for a reference placed on the market in 2025 and 2026, whose quantities would be declared in 2026 and 2027 respectively), and **provided that eco-modulation remains unchanged in the future specifications.**

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 not be granted:

- If the recycled material incorporated comes from production off-cuts;
- If the recycled material incorporated comes from unsold items;
- When the recycled material used comes from the recycling of food-grade resin.

→ 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: sorting, delamination (removal of hard spots), cutting;
- Recycling : 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?

For products that have been newly manufactured, supporting documents must be renewed each year.

For «residual» products still in stock, already validated the previous year and no longer subject to new production, a simple stock statement for the product as at 1st January will suffice to extend the validity of the reference at the time of renewal.

5 Penalties 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 or wires**

A metal-plastic fiber or wires (also known as metallized fiber or thread) is a synthetic fiber or wires 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 or wires (e.g., polyamide). It is often used in fabrics to create shiny or textured effects.

→ Example (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).

→ Logos on labels or brand tags are not subject to penalties (external disruptors). Strass and sequins are not subject to penalties (external disruptors).

→ Glitter and sequins are not subject to penalties (these are not metal-plastic wires/fibers).

→ 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, they are therefore external disruptors).

- **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.

→ What are the external and internal disruptors to recycling?

To find out more, see our guides to best practices in designing for the recycling of **Textiles** and **Footwear** (the documents are in French).

→ Are all the 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 2026, pre-declaration of the concerned references is sufficient. It is your responsibility to pre-declare the products affected by the penalties.

In 2027, you will need to declare the quantities placed on the market for products subject to penalties. A sworn statement may 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 Waste (Electrical and Electronic Equipment Waste) 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.

6 Download resources

You will find below the resources available to you in order to pre-declare your eco-modulations:

1. Pre-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 2026.

Re_fashion