OCAD3E

Approved Coordinating Body for Waste Electrical and Electronic Equipment

Frequently Asked Questions: Premiums and penalties applicable to EEE under the eco-modulation scheme

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Cancels and replaces all previous versions

Purpose of this document

This Frequently Asked Questions (FAQ) section supplements the Technical Note, produced jointly by the Producer Responsibility Organizations Ecologic and ecosystem, which presents the **premiums and penalties applicable to electrical and electronic equipment** ("EEE" in the rest of this document) under the eco-modulation scheme. The purpose of this FAQ is to provide details and explanations to facilitate the application of the rules and principles set out in the Technical Note.

This document is an official English translation of the original French document by Ecologic and Ecosystem. In the event of any ambiguity, misinterpretation, or discrepancy, the French version shall prevail and be considered the authoritative reference.

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1. Separability of the battery or accumulator

1.1. Why is it necessary for the battery to be separable by the user in the case of household EEE?

The aim of this criterion is to encourage the separation of the battery from the rest of the equipment as early as possible in the WEEE collection chain. To achieve this, it is necessary to make the separation process as easy as possible for the user, to limit the risk of fire during this operation. This also makes it possible to ensure the safe transport of WEEE throughout the logistics chain.

Article 11 of the 2023 European Battery Regulation addresses the same subject and specifies that a portable battery is considered to be easily removable by the end user when it can be removed from a product using commercially available tools, without the need for specialized tools, unless these are provided free of charge with the product, or proprietary tools, thermal energy, or solvents to dismantle the product.

According to studies carried out by Producer Responsibility Organizations and service providers responsible for the collection and treatment of WEEE, a significant proportion of fires and associated damage occurred before operators began dismantling equipment and extracting components such as batteries. All battery technologies and electrochemical pairs are covered by the criterion so as not to overly complicate user awareness and communication.

1.2. What is meant by a "commonly available" tool as required in the technical note on household EEE? Why does the list of accepted tools differ from the EN45554 standard?

The list of accepted tools is indeed different from that of standard EN45554, which addresses:

- **Another issue**: the battery separability criterion does not penalize the repairability of the product, but rather the ease of separating the battery for sorting at source when the user disposes of their product, thereby optimizing its recovery and reducing the risk of fire and associated collection/transport/storage issues.

- **In a different context**, repairing a device to "bring it back to life" does not require the same preparation and willingness to try on the part of the user as when they are simply looking to dispose of their device.

The EN45554 standard therefore serves as a basis and provides an initial list of tools officially considered to be commonly available on the market. This list has been restricted to tools that are commercially available and considered to be in sufficiently common use by private individuals, so as not to give users the impression that they are taking risks "just" to deposit their WEEE at a collection point.

The list of tools accepted under the premium and penalty system applicable to household equipment is therefore a closed list: only the tools listed in the technical note are accepted. The producer therefore does not need to look for further examples of tools commonly available on the market.

As a counterexample, a soldering iron is a tool commonly available on the market and is one of the tools listed in standard EN45554. However, in the context of the modulation criterion aimed at encouraging users to sort their WEEE and batteries separately as early as possible, the need for an

"average" user to equip themselves with and use a soldering iron to remove a battery before depositing their device at a collection point is not a sufficiently practical and attractive solution to be acceptable.

1.3. As the penalty is applied *de facto*, is it up to the producer to systematically provide proof that the battery can be separated?

Yes, the producer must be able to systematically provide proof that each product meets the criterion. The Producer Responsibility Organizations' reporting systems allow for simplified pre-reporting, based, for example, on a sworn statement to provide the necessary supporting documents later/separately, but checks may well be applied on a reference-by-reference basis.

1.4. Does the criterion apply to button batteries?

Button batteries are covered by the criterion, except for those soldered onto an electronic circuit board, as the user is unable to separate them using the tools listed in the technical note.

1.5. What exemptions are possible for reasons of safety or data integrity, for example?

Only products explicitly mentioned as exempt in the technical notes applicable to household and professional equipment respectively may benefit from an exemption from the modulation criteria. If producers and their representative organizations identify cases where compliance with the criterion is not possible for justified reasons under the terms of the European Batteries Regulation (Article 11), these cases may be subject to a joint study with Producer Responsibility Organizations to assess the possibility of exempting them.

1.6. How should a product be declared if the battery is separable, but the technical instructions advise the user not to separate it themselves?

As it stands, the rule only applies to the physical possibility of the user removing the battery themselves safely. In the case mentioned, the product in question would therefore not be penalized. However, if the criterion is met, there should be no contraindications related to user safety in the instructions. In addition, it is recommended that, as far as possible, the messages conveyed to consumers regarding the importance of properly managing their equipment and batteries at the end of their life be consistent.

1.7. Are rechargeable batteries subject to the criterion?

Rechargeable batteries present the same safety issues for logistics and processing operations as mentioned in section 1.1 (fire hazards) as non-rechargeable batteries. They are therefore subject to the same eco-modulation criterion on separability.

1.8. Does a product containing a non-separable battery that is not listed in the table of products subject to the penalty require an exemption in order to avoid a penalty?

The types of products covered by the battery separability criterion are listed in section 3.1 of the technical note applicable to household EEE and in the table in section 1.2 of the technical note applicable to professional EEE.

For household equipment, full details of the products concerned (e.g., the complete list of personal care equipment) are provided in Annex 4 of the corresponding note. If a product appears on this list,

it may be penalized for non-compliance with the criterion. For example: "*GPS and similar devices*" are part of the "*Small consumer electronics (EGP)*" category.

Certain products may, upon request by the relevant professional federations and subject to the explicit agreement of both Producer Responsibility Organizations, obtain an exemption if they comply with the rules set out in the technical note applicable to them (household EEE). Only products explicitly mentioned as exempt in the technical notes benefit from this exemption.

2. LED light source

Section currently empty, to be completed in the future based on questions received.

3. HFC gases

3.1. What is the purpose of this criterion in view of future regulatory bans?

The purpose of this criterion is to encourage anticipation of regulatory deadlines. The continuation of this criterion over time will be reviewed considering the entry into force of obligations and changes in practices observed in the field.

3.2. Can a generic manufacturer's certificate replace a supporting document by reference?

At the initial stage, when the declaration is made, a generic certificate may be accepted if it explicitly mentions the references covered and the gas used, so that they can be unequivocally identified during in-depth checks. During these checks, the company must be able to prove compliance with the criterion for each reference using the supporting documents specified in the technical note.

4. Brominated flame retardants

4.1. Can a generic certificate from the manufacturer replace supporting documentation by reference?

At the first level, during the declaration, a generic certificate may be accepted if it explicitly mentions the references covered, so that they can be unequivocally identified during in-depth checks. During these checks, the company must be able to prove compliance with the criterion for each reference with the supporting documents specified in the technical note. A specific certificate stating that none of the covered references contain brominated flame retardants may also be accepted, with Producer Responsibility Organizations reserving the right to request additional information.

4.2. Is there an exception for recycled plastics (as in the EPEAT label, for example)?

Some labels (particularly those developed and/or commonly used in areas not covered by the RoHS regulation) may allow exemptions on the bromine thresholds permitted in plastic parts when the materials come from recycling. For example, criterion 4.1.5.1 of the EPEAT label allows a maximum concentration of 5000 ppm (0.5%) of bromine for plastic parts containing at least 25% post-consumer recycled plastic.

In the European Union, the RoHS regulation sets a limit for certain brominated flame retardants at 0.1% (or 1000 ppm). As it stands, this regulation provides **for a single exemption for recycled materials**, which concerns the thresholds for **lead and cadmium in the specific case of recycled PVC** (tolerated at 1.5% and 0.1% respectively in recycled PVC, instead of 0.1% and 0.01% for primary

materials) and only for **category 11 equipment** (corresponding to products recently added to the scope of the regulation in 2019 with the transition to "open scope"). This **exemption is set to expire in 2028**.

As the basis of eco-modulation is to encourage practices that go beyond strict regulatory compliance or anticipate future developments, this type of exemption on the presence of bromine in plastic parts containing recycled materials is not permitted for eco-modulation.

4.3. Which parts are exempt from the criterion?

As described in the technical note, plastic parts weighing less than 25 g, cables, and printed circuit boards (PCBs) are exempt from the criterion. For the sake of clarification and harmonization with existing standards (in particular the EPEAT label, criterion 4.1.5.1), it is specified that electronic cards are understood to mean the complete assembly (commonly referred to as "PCB assembly" in technical nomenclatures) including the card support and the components soldered directly onto the card. For example, a cooling fan for an electronic card that is soldered directly onto it is therefore excluded from the criterion.

4.4. What threshold is used to validate the absence of brominated flame retardants in a plastic part?

Compliance with a maximum threshold of 200 ppm of total bromine in the plastic material is accepted as proof of compliance with the criterion.

5. Single-use products

This section is currently empty but will be completed in the future based on questions received.

6. French Repairability Index

As a reminder, from January 1st, 2026, the premium linked to the French Repairability Index cannot be granted to a product that has been penalized (decree of September 5th, 2025).

6.1. Are reconditioned appliances eligible for the French Repairability Index criterion?

Refurbished devices, when imported from abroad, are subject to eco-contribution. However, they are not affected by the French Repairability Index criterion because the indices are calculated for new equipment.

Except from the decree of December 29th 2020, on the French Repairability Index for EEE: "*The French Repairability Index for [EEE] consists of a score out of ten that is to be brought to the attention of consumers* ***at the time of purchase of new equipment***."

6.2. Which equipment is not affected by the French Repairability Index criterion?

Furthermore, among the product categories covered by the repairability index, certain products are not eligible and are described in the following table.

Product categories with a French Repairability Index	Products not eligible for the French Repairability Index
Vacuum cleaners	Wet vacuum cleaners, carpet cleaners
Dishwashers	-
Laptop	-
Smartphone	Feature phone, landline phone, foldable phones
Lawn mower	-
High-pressure cleaner	-

7. French Durability Index

As a reminder, from January 1st, 2026, the French Durability Index premium cannot be granted to a product that has been penalized (decree of September 5th, 2025).

7.1. How will the switch to the French Durability index work for the products concerned?

The French Durability Index for televisions and washing machines came into force on January 8th, 2025, and April 8th, 2025, respectively. Thus, during 2025, Producer Responsibility Organizations were able to observe the distribution of ratings from the new French Durability Index according to product categories.

As declarations of these new indices are mandatory on the data.gouv.fr website, the data was sufficiently reliable to establish a threshold for triggering new premiums linked to the French Durability Index based on observations made during 2025.

Thus, televisions with a French Durability Index greater than or equal to 9.2 and washing machines with a French Durability Index greater than or equal to 9.4 are eligible for a premium as of January 1st, 2026.

7.2. Are reconditioned appliances eligible for the French Durability Index criterion?

Refurbished appliances, when imported from abroad, are subject to eco-contribution. However, they are not affected by the French Durability Index, as this index only applies to new EEE.

Excerpt from the decree of April 5th, 2024, on the durability index for EEE: "*This subsection applies to categories **of new electrical and electronic equipment***."

7.3. Which equipment is not affected by the French Durability Index?

Furthermore, among the product categories covered by the durability index, certain products are not eligible and are described in the following table.

Product categories with a French Durability Index	Products not eligible for the French Durability index
Front-loading washing machines	Washer-dryers
Top-loading washing machines	
Televisions	-

8. Incorporation of recycled plastics (IRP)

8.1. What level of evidence is required (self-declaration/supplier declaration/third-party certification)?

The evidence required is explained in the technical note and is based on third-party certification schemes to ensure that the premiums awarded correspond to actual practices and verifiable quantities of RPM.

8.2. How does the premium apply when different types of plastics are used (e.g., virgin/recycled; open-loop recycled/closed-loop recycled)?

The premium amount must then be calculated by determining the ratios and total quantities of recycled plastics from the different sources. The ratios used in the calculations must comply with those established in the context of the required certifications on the origin and incorporation of materials in products placed on the market. By default, when the distinction between RPM from open loop or closed loop is not known, the premium amount applicable to RPM from open loop applies.

8.3. What is meant by "recycled material" and "incorporated material"?

The plastic material contained in end-of-life products is recycled—i.e., collected, sorted, regenerated, and possibly supplemented with additives—before being incorporated by the plastic parts manufacturer.

A material can be considered recycled when it meets the criteria for end-of-waste status (EWS), as provided for in Article L541-4-3 of the Environmental Code. When the material is not covered by an explicit SSD procedure as provided for in I bis of the same article, it must meet the four general conditions set out in Article I and the equivalence criterion established in Article I ter (see below).

Article L541-4-3 of the Environmental Code

I. - Waste ceases to be waste after being treated and undergoing a recovery operation, in particular recycling or preparation for reuse, if it meets all of the following conditions:

- *the substance or object is used for specific purposes.*
- *there is a demand for such a substance or object, or it meets a market need;*
- *the substance or object meets the technical requirements for the specific purposes and complies with the legislation and standards applicable to products;*
- *its use will not have any overall harmful effects on the environment or human health.*

I bis. - The competent administrative authority shall define criteria for meeting the conditions referred to in I. These shall include, where appropriate, limit values for pollutant content and shall be set taking into account the harmful effects of the substances or objects on the environment.

In order to ensure compliance with the above conditions, the criteria may provide for third-party monitoring, where appropriate, by an accredited body, in certain types of facilities or for certain waste streams. Such monitoring shall be implemented for hazardous waste, excavated soil, or sediments that cease to be waste.

I ter. - A substance or object produced in a production facility that uses waste as all or part of its raw material does not have the status of waste if that substance or object is similar to the substance or object that would have been produced without the use of waste, provided that the operator of the production facility complies with the conditions mentioned in I.

8.4. Are recycled plastics derived from waste collected, sorted, recycled, or incorporated in countries other than France eligible?

Obtaining the premium is subject to compliance with the principle of proximity, in accordance with Article 8 of the Decree of September 5, 2025. All stages of collection, sorting, recycling, and incorporation of recycled plastics must therefore be carried out cumulatively:

- Within a maximum radius of 1,500 km around the geographical center of mainland France *(46° 29' 38" N, 2° 36' 10" E, coordinates established by the IGN);*
- In a member state of the European Union or, where applicable, in a third country, provided that the latter applies standards equivalent to the Waste Framework Directive, the Industrial Emissions Directive, and all European regulations and directives applicable to the products covered by the decree of September 5, 2025.

Where full traceability of operations from initial collection cannot be ensured, only the sorting, recycling, and incorporation of recycled plastics must be carried out within the radius and in a country meeting the same regulatory requirements.

Figure 2. 1,500 km radius around the center of gravity of France for reference

OCAD3E has drawn up a list of countries whose territory is located within a maximum radius of 1,500 kilometers around the barycenter of mainland France (46° 29' 38" N, 2° 36' 10" E) and belonging to the European Union: Austria, Belgium, Croatia, Denmark, France, Hungary, Ireland, Italy, Luxembourg, Malta, the Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden, and the Czech Republic.

EU countries not included within the 1,500 km radius are: Bulgaria, Finland, Estonia, Lithuania, Latvia, Greece, and Cyprus.

Other non-EU countries located wholly or partly within the 1,500 km radius: Albania, Andorra, Bosnia and Herzegovina, Liechtenstein, Monaco, Montenegro, Norway, United Kingdom, Serbia, Switzerland, Vatican City, Algeria, Morocco, Tunisia.

For operations carried out in a country only partially included in this perimeter or in a third country, it is the responsibility of the marketer to provide proof that all the operations concerned took place within the 1,500 km limit and in a country that meets the appropriate regulatory requirements. This evidence may be provided in the form of valid certifications or attestations, such as the appendix for Producer Responsibility Organizations Recycles Recycled Content Traceability or any equivalent method.

Case study 1**: **Asian supplier of recycled plastic, compounding in Asia, injection molding in Vietnam, manufacturer in France

An Asian supplier of recycled plastic purchases flakes from France and carries out compounding. The material is then sold to a plastics manufacturer in Vietnam who injects parts, which are subsequently purchased by a manufacturer based in France. Is this eligible?

In this case, the place of recycling is considered to be located in Asia at the compounding site, more than 1,500 km from the French center of gravity, so the material is not eligible. In the form of flakes, in the case described above, the material still requires compounding before it meets the technical specifications required for the intended application.

Case study 2**: **Sorting, recycling, or incorporation takes place in a country outside the European Union

In this situation, several requirements must be met cumulatively:

- *If this country is partially included in the 1,500 km circle around the center of gravity, it must be demonstrated that all stages carried out outside the EU are actually located less than 1,500 km from the French center of gravity.*
- *It is essential to provide evidence that the third country applies standards equivalent to those of the European Union (Waste Framework Directive, Industrial Emissions Directive, etc.).*
- *The nature and rigor of the evidence expected (certificates, independent audits, complete traceability such as Recyclass, etc.) must enable Producer Responsibility Organizations to verify and certify compliance unequivocally.*

If all these conditions are not met, the incorporated material will not be considered eligible for the premium.

Case study 3: Collection in France, sorting in France, recycling and injection in France

All stages of the chain—collection, sorting, recycling, and effective incorporation of the material—are carried out in the European Union and entirely within a radius of 1,500 km around the center of gravity of mainland France. The marketer is eligible for the premium.

8.5. What evidence is required to ensure the traceability of the volumes of RPM purchased and incorporated into the products placed on the market?

Traceability of volumes is an integral part of the control points verified by auditors in order to issue the certifications required to qualify for the premium (see Technical Note). The certification standard specifications and audit grid will specify the up-to-date list of required documents.

8.6. Are RPMs from chemical recycling eligible for premium?

In the case of plastics from chemical recycling, the recycled content of the material incorporated in manufacturing can only be guaranteed by the "mass balance" method. The "mass balance" chain of custody models is currently mainly governed by private standards set up by certification bodies whose methodological practices may differ. Standardization work has begun and should lead to harmonization in the coming years. The ISO 22095:2020 standard already defines two variants of the mass balance method:

- the "rolling average" method;
- the "Credit" method.

In the rolling average method, since the proportion of inputs with specified characteristics is not constant and may vary over time (and therefore over the period over which the claims are calculated), the resulting proportion in the final products is established as an average for all outputs.

The Credit method is based on the quantification of credits linked to the "recycled" characteristic, followed by the free allocation of these credits to certain products obtained at the end of the process (theoretical allocation, independent of the actual recycled content of the products), and then the transfer of these credits downstream in the value chain.

The traceability of the origin of materials (pre- and post-consumer, household or industrial, geographical origin, packaging waste, WEEE, automotive waste, etc.) is not currently possible in a robust and harmonized manner between standards. This traceability throughout the value chain is mandatory in order to validate compliance with the criteria established for the premium.

Under the current regulatory framework, these materials are therefore not eligible for the premium. Special cases may be referred to by OCAD3E for review if the situation requires it, provided that the other eligibility conditions are met, in particular the yield of more than 50% and the proximity criterion.

8.7. What are the recycling disruptors that do not qualify for the premium?

Article 4 of the decree of September 5th, 2025, states that Producer Responsibility Organizations may identify recycling disruptors that would exclude the disruptive material from the premium. In the EEE sector, the presence of brominated flame retardants in parts where recycled plastic has been

incorporated does not qualify for the premium because their presence reduces the recyclability of these parts.

In order to ensure that recycled plastic is properly incorporated into products/parts >25 g free of BFRs (brominated flame retardants), the following rules apply:

- **Products subject to penalty**: If no BFR penalty has been declared for the product, no additional verification is required.
- **Products not subject to penalty**: Proof must be provided that the part or product in question does not contain bromine.

Other recycling disruptors are likely to be defined by Producer Responsibility Organizations in the future.

8.8. Which recycling processes guarantee a mass yield of over 50%?

In the case of an open loop, where applicable, the recycling efficiency must be indicated in an appendix to the certification documents.

In the case of a closed loop, any WEEE recycling operator certified by Weeelabex is deemed to have an efficiency of over 50%. If the operator is not Weeelabex certified, the procedure defined for the open loop applies.

8.9. Is this IRP premium valid for all EEE?

This premium is valid for all household and professional EEE with the exception of reconditioned appliances. Indeed, Article 1 of the decree of September 5th, 2025, defines "recycled plastic" as "plastic derived from post-consumer waste that has undergone a recycling process within the meaning of Article L. 541-1-1 of the Environmental Code." However, reconditioning is not included in this definition of recycling.

8.10. Are accessories included in the weight calculation for the incorporation of recycled plastics?

For the mass-based calculation of incorporated recycled plastic, the “total quantity of plastic” in a product must be assessed against the total declared weight of the product used as the basis for the eco-contribution, including non-electrical and non-electronic accessories.

For example, televisions are declared together with their stand, and vacuum cleaners together with their brushes. The eco-contribution therefore includes these non-EEE accessories, and the premium is applied to the EEE product together with those accessories.

However, where a non-electrical or non-electronic accessory is sold separately, it is not subject to the eco-contribution and is therefore excluded from the weight calculation used to determine eligibility for the premium. For example, a blender bowl sold separately is not included in that calculation.

9. Display in accordance with Article 13 of the AGEC law

9.1. What are the main rules for displaying eco-modulation?

A suggested wording is provided in the technical note. More generally, the public authorities have published an FAQ on this article of the law.

Excerpts:

- A single product sheet for each product model. The information must be provided at the model level.
- Information concerning premiums and penalties consists of indicating the existence of a premium or penalty for the model concerned, as well as the criteria for this premium or penalty
- If the mandatory information provided for the product model concerned is no longer valid, the producer or importer must update it. In this case, the producer or importer shall indicate the date of the update on the product sheet

10. Versions

Date of update	Modification
December 16th, 2024	- Change to the title of question 1.1 - Addition of version tracking table (§8) - Addition of question 7.6 (proof of traceability on volumes) - Addition of question 7.7 (chemical recycling) - Addition of question 4.2 (exemptions for bromine in RPMs – EPEAT example) - Addition of question 4.3 (exempt parts – example EPEAT) - Addition of question 1.7 (case of rechargeable batteries)
December 25th, 2024	- Addition of question 1.8 (products concerned and exemptions to the battery separability criterion) - Addition of question 4.4 (threshold for proving the absence of BRF) - Modification of questions 1.1, 1.2, 1.5 (applicability to household or professional EEE)
December 12th, 2025	- Update to parts 6 and 7: repairability and durability indices - Update to part 8 following the decree of September 5, 2025, on recycled plastics (RPM) - Paragraphs previously written in the technical note moved to the FAQ
January 6th, 2026	- Update of countries not included in the proximity criterion - Modification of parts 6 & 7
March 30th, 2026	- Update on accessories & premium calculation for the incorporation of recycled plastics (8.10)
June 26th, 2026	- Precision on foldable phones for the repair score