



France – packaging EPR

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THE SHORT VERSION

France did not wait for the PPWR. A French **mandataire** has been compulsory for every producer not established in France since **10 July 2026** — a month before the EU date, under a law that arrived with almost no warning. The good news is that the mandataire and your scheme do the registration for you, which is the opposite of Germany. The catch nobody sees coming is that France then makes you **publish your registration number on your own website**.

What changed in July

New obligation, live since 10 July 2026. Any producer not established in France — whether inside the EU or outside it — must appoint a written **mandataire** established in France to carry their extended-producer-responsibility obligations. There is **no transition period**. It applied from the day it came into force.

The legal basis is Art. L. 541-10-9-1 of the Code de l'environnement, created by **Law n° 2026-602 of 8 July 2026** and in force from 10 July. If you are reading a French compliance guide that does not mention that law, it predates the change — and most of them do, because the provision arrived inside a bill primarily about fast fashion and textiles rather than in anything labelled "packaging".

The timing matters for a second reason. France moved **a month before** Art. 45(3) PPWR made representatives compulsory across the Union on 12 August. So there was a window in July where France required something the rest of the EU did not, and a French obligation now sits alongside the

EU one rather than being derived from it. Where the two differ, the French text is broader — see below.

This desk covers EPR only. Everything below is the **producer** role — the mandataire, the scheme, the declarations, the fees. If your own name, logo or brand is on the packaging, PPWR also makes you the **manufacturer** of it: a separate set of EU-level conformity duties that took effect on 12 August 2026 and is not country-specific. See [manufacturer or producer?](#)

Does it apply to me?

French packaging EPR attaches from the **first household package** placed on the French market. There is no turnover floor, no weight floor and no general small-business exemption to fall under. If a French consumer orders from you and a parcel crosses the border, you are a producer in France.

You ship to French consumers, no French establishment

Yes. Appoint a mandataire, join an approved scheme, get an IDU, declare annually and apply the sorting marks.

You're established elsewhere in the EU

Caught. [Art. L. 541-10-9-1](#) says "not established in France", which includes producers established in another member state.

You're established outside the EU

Also caught, and expressly so. France did not wait to see whether it would exercise the third-country option in Art. 45(3) PPWR — its own law covers you either way.

You're established in France

No mandataire needed. You join a scheme and declare in the normal way.

You run a marketplace, and you're not French

You need one too. This is unusual and worth flagging: the French duty reaches non-established online marketplaces facilitating distance sales, not just the sellers on them.

You sell only B2B into France

Different stream. Household packaging and professional packaging have separate schemes and separate rules — see [B2B is a separate stream](#).

The mandataire

France's representative is a stronger creature than Germany's or Austria's. The statutory word is **subrogé**: the mandataire is subrogated to the producer's obligations, meaning the EPR liability transfers to them rather than merely being administered by them.

Legal basis

Art. L. 541-10-9-1 Code de l'environnement , created by Law n° 2026-602 of 8 July 2026.

In force since

10 July 2026. No transition period was provided.

Who can be one

A natural or legal person established in France, appointed by written mandate.

Which streams it covers

All of them. The article is not packaging-specific — it applies across every French EPR stream you happen to be caught by. If you also sell textiles, furniture, electricals or toys into France, the same appointment logic reaches those.

What they actually do

Sign the scheme membership contract, handle your registration and data in SYDEREP, make the declarations, pay the eco-contribution, and deal with ADEME. In practice the scheme membership is signed *by* the mandataire rather than by you.

Does it remove your exposure?

Legally the obligations are subrogated to the mandataire, which is a stronger transfer than the German or Austrian model. We would still not treat that as an indemnity — **we have not seen this tested**, the law is weeks old, and your contract with the provider is a separate question from the statute.

Why this matters for a buying group. France is the clearest case on the file for buying together. The mandataire is compulsory, it is compulsory for *everyone* foreign regardless of size, the market for it is six weeks old, and the same provider can cover several EPR streams at once. A hundred shops arriving with one mandate to negotiate is a completely different conversation from a hundred shops arriving separately.

Registration and the IDU – the mirror image of Germany

Germany makes registration a strictly personal duty that nobody may perform for you. France does the opposite: in the normal collective route **you never touch the register yourself**. This is the Art . 44 (3) PPWR option in action — member states may allow registration to be met under a written mandate, and France allows it.

1

You appoint the mandataire

Written mandate, to a person or company established in France.

2

They join an approved scheme on your behalf

Citeo, Adelphe or Léko for household packaging and graphic papers.

3

The scheme registers you in SYDEREP

SYDEREP is the national REP register, run by **ADEME**. The scheme you join registers you in it — you do not file the application yourself.

4

ADEME issues your IDU

The **identifiant unique** — your registration number, and the proof you are in the system. Note that each REP stream gets its *own* IDU, so packaging and, say, textiles are different numbers.

The register is public. ADEME publishes the list of registered producers and their IDUs as an open dataset. Anyone — a marketplace, a competitor, a customer — can check whether you are in it, which is worth knowing in both directions: it is how you get caught, and it is how you check that a provider actually registered you when they said they did.

Publishing your IDU – the bit that catches everyone

This has no German or Austrian equivalent and it is the single most missed French obligation. Having the number is not enough. You have to **display** it.

Legal basis

Art. R. 541-173 Code de l'environnement .

Where it goes

In your contractual information — general terms and conditions — **and on your website**.

Why people miss it

Because every other country's registration number is something you hold and quote on request. France's is something you publish. A shop can be perfectly registered, paid up and declared, and still be in breach because the number isn't on the site.

What it costs to get wrong

Failing to include the unique identifier where required is one of the things expressly sanctioned under [Art. L. 541-9-5](#) — up to **€30,000**. See [below](#).

The three schemes

Three producer responsibility organisations are approved for household packaging and graphic papers for the **2025–2029** accreditation period. You join one. They compete, and their minimum charges differ enough to matter at small volumes.

Citeo

The largest. Publishes the €80 flat-rate route for small producers.

Adelphe

Part of the Citeo group; historically wine and spirits, open more broadly.

Léko

The independent alternative, and the one that has published the clearest guidance for foreign producers on the mandataire rules.

What it costs

These are published 2026 list prices, not quotes we have negotiated, and not a recommendation. Mandataire fees are separate from all of them and are the line we expect to vary most.

Item	Indicative price	Note
Citeo flat rate, under 10,000 UVC	€80 / year	UVC = consumer sales units. Citeo describes the declaration as "validated in three clicks"
Léko minimum invoice	€95 / year	Excl. VAT
Adelphe minimum invoice	€110 / year	Excl. VAT
Mandataire	Not published	Commercial, quoted per provider. The number we most want from members
Volume-based contribution	By weight, material and unit	Applies above the flat-rate route. The 2026 Citeo scale mixes a per-tonne component with a per-unit component that varies by sector

The €80 is the cheapest headline number on this whole site — and it is also the clearest illustration of the association's argument. The *recycling* contribution for a small shop is eighty euros. The mandataire you are legally required to buy before you may pay that eighty euros is unpublished, uncapped and quoted per seller. The fee is proportionate. The paperwork around it isn't.

Have you been quoted for a French mandataire? Post it in **#quotes-and-costs** and it goes into the [Observatory](#) dataset, anonymised. France is the market where we currently have the least idea what the real rate is.

Reporting

You declare to your scheme, and the scheme reports onward to ADEME and SYDEREP. You do not file with the register directly.

Rhythm

Annual, for the preceding calendar year.

Deadline

Household packaging declarations are due to the scheme by **28 February**. Confirm the exact date and format with your own scheme — it is contractual, and it moves.

On the flat rate

The declaration is dramatically simplified, but it is not abolished. You still confirm annually that you are under the threshold, and you still keep the records that prove it.

Under 10 tonnes

Art. 44(8) PPWR gives producers under 10 tonnes a year a reduced EU reporting set. It sits alongside the French route rather than replacing it, and everyone reading this page is under it.

Triman and Info-tri – France really does make you print something

This is the other place France differs sharply from Germany and Austria. Neither of those requires a sorting mark on ordinary shipping packaging. France does, and has since **1 January 2022** — long before the PPWR.

What it is

The **Triman** logo together with **Info-tri** sorting instructions, telling the customer how to separate each component of the packaging.

Who it applies to

All household packaging and graphic papers placed on the French market. It follows the destination, not your establishment — a foreign distance seller is caught.

Very small surfaces

Derogations exist by size. Where the largest face is under **10 cm²** the signage may be provided digitally instead. Between **10 and 20 cm²** the Triman must appear but the sorting instructions may be dematerialised.

Where to get the artwork

From your scheme. Do not redraw it — the layout, wording and language are prescribed, and the schemes publish approved files.

Don't confuse this with the EU sorting label

Triman is a **French national** requirement, in force since 2022. The harmonised EU sorting label under Art . 12 (1) PPWR is a different mark and does not apply until **12 August 2028** at the earliest. Doing the EU one is not an answer to France, and Triman is not early compliance with the EU one.

B2B is a separate stream, and it is moving

Everything above is **emballages ménagers** — household packaging, which is what a distance seller shipping to consumers produces. France runs **professional packaging** as its own REP stream with its own scheme arrangements and its own scale, and that stream has been coming into full application through 2026.

If you sell B2B into France as well as B2C, treat it as a second question with a second answer. This desk does not cover it, and we would rather say so than imply the household answer travels.

What happens if you don't

The core sanction is administrative, imposed by the environment minister with ADEME operating the register side.

Basis	Maximum	Covers
L. 541-9-5	€30,000	Administrative fine. Includes failing to register in SYDEREP, failing to fill in the required information correctly, and failing to state your IDU where it is required
L. 541-9-5	€20,000 / day	Daily penalty (<i>astreinte</i>), running from a date set in the decision until you comply

You get a mise en demeure first. The procedure runs through a formal notice setting out the alleged breaches and the sanctions faced, with **ten days** to submit observations before a decision. Ten days is not long if the letter arrives in French at an address you don't monitor — which is one practical argument for a mandataire who reads their post.

Secondary, and not confirmed against the statute

We have seen a separate free-rider sanction described for producers who are subject to a stream and do not contribute to it — reported as up to **€7,500 per unit or per tonne** of the product concerned. We have **not** pinned that to an article and the sources we found disagree on the detail, so treat the figure as indicative only. The €30,000 and the €20,000-a-day above are the ones we are confident in.

The PPWR grace period does not help you here

The Commission's August FAQ says enforcement of the new EU rules should start with a request to correct rather than a prohibition. That rests on **Art. 62**, headed **Formal non-compliance**, whose list is conformity-side only — declarations of conformity, technical documentation, Art. 15 and Art. 18 administrative failures. **None of the French obligations on this page are in it.** They are national, they predate the PPWR, and L. 541-9-5 has been live for years.

GPSR is a separate problem

Packaging EPR and product safety are different regimes with different representatives. The General Product Safety Regulation requires an EU-based **Responsible Person** for consumer products, with no exemption for small sellers. Your French mandataire is *not* automatically your GPSR Responsible Person, and your scheme certainly isn't. France is the country where this confusion is most likely, because the same providers often sell both — check what is actually in the mandate you sign.

"It's been suspended"

You will be told this, usually by someone selling you something, and it is worth answering once.

It is a proposal, and it is not in force. The Commission published it on **10 December 2025** as part of the Environmental Omnibus (COM(2025) 983): a suspension of the EPR authorised-representative obligation for EU-established producers until 2035. The Council **dropped the EPR provisions from its Environmental Omnibus mandate on 24 June 2026**, so there is no Council position for Parliament to negotiate against. Parliament's own draft reports of May 2026 would in any case narrow the suspension to micro and small enterprises and to packaging and textiles only.

Until something is adopted and enters into force, Art. 45(3) applies as written, and it has applied since 12 August 2026. We think the proposal is worth watching and worth arguing about — see our [note on it](#) — and we do not think it is worth planning around.

Known traps

Guides written before 10 July 2026

Almost everything published about France says a mandataire is optional, or only required of non-EU sellers. Law n° 2026-602 changed that for everyone not established in France. Check the date on anything you read, including this page.

Having the IDU but not publishing it

The most common French failure and the most avoidable. Art. R. 541-173 wants the number in your contractual information **and on your website**. Being registered is not the same as complying.

Assuming your German setup travels

It doesn't, and the systems are built on opposite principles. In Germany you must register personally and may not delegate it; in France the scheme registers you and you generally can't do it yourself. A LUCID number means nothing to ADEME, and an IDU means nothing to the ZSVR.

One IDU for everything

Each REP stream issues its own identifiant unique. If you sell packaged textiles into France you are potentially in two streams with two numbers, and quoting the packaging one against the textile obligation doesn't work.

Treating Triman as optional for a foreign seller

It follows the destination market, not where you're based. Shipping from Vienna or Cardiff does not exempt the box from French sorting-information rules.

Forgetting the shipping box

The outer carton, the tape and the filler are household packaging you placed on the French market, and they count towards your declaration and your UVC count. We keep a concrete list: [what counts as packaging](#).

Sources

Primary law first, then the official register and ministry, then the schemes, then secondary summaries. Where a claim on this page rests only on a secondary source, we have said so in the body text rather than leaving it to a footnote.

- 1 **Art. L. 541-10-9-1 Code de l'environnement — Légifrance** (https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000054403121/2026-07-10)

The mandataire obligation, as in force from 10 July 2026. Created by Law n° 2026-602 of 8 July 2026, published in the Journal officiel on 9 July

- 2 **Art. L. 541-9-5 Code de l'environnement — Légifrance** (https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000043979280)

Source for the €30,000 administrative fine, the €20,000-a-day astreinte, the mise en demeure procedure and the ten-day window for observations

- 3 **ADEME — the identifiant unique (IDU)** (<https://filieres-rep.ademe.fr/en/identifiant-unique>)

Official. What the IDU is, that it is issued through SYDEREP, and that each REP stream generates its own separate identifier

- 4** **ADEME — public list of producers registered in SYDEREP** (<https://data.ademe.fr/datasets/rep-producteurs-idu>)
The open dataset of registered producers and their IDUs. Where you check that a provider actually registered you

- 5** **Citeo — declaring your packaging** (<https://www.citeo.com/declarer/>)
Scheme source for the annual declaration route and the 28 February deadline

- 6** **Citeo — the simplified declaration** (<https://www.citeo.com/le-mag/une-declaration-simplifiee-pour-faire-gagner-du-temps-vos-equipes/>)
Scheme source for the €80 flat rate below 10,000 UVC and the simplified declaration route for small producers

- 7** **Citeo — Info-tri** (<https://www.citeo.com/communication-responsable/info-tri/>)
Scheme source for the Triman and Info-tri signage requirements and the approved artwork

- 8** **Léko — the obligation to designate a mandataire** (<https://www.leko-organisme.fr/en/lobligation-de-designer-un-mandataire-pour-tous-les-producteurs-etablis-en-dehors-du-territoire-francais-ue-hors-ue/>)
Scheme source, and the clearest published explanation of the July 2026 change. Source for the absence of a transition period, the coverage of non-established marketplaces, and the subrogation of obligations to the mandataire. Léko is one of the three approved schemes — useful, but not a neutral source

- 9** **Regulation (EU) 2025/40 (PPWR) — EUR-Lex** (https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ%3AL_202500040)
Read in full, 14 August 2026. Source for Art. 44(3) on delegated registration, Art. 44(8) on the 10-tonne reporting threshold, Art. 45(3) on the EU representative duty, Art. 12(1) on the 2028 harmonised label and Art. 62 on formal non-compliance

- 10** **European Commission — PPWR Frequently Asked Questions, 2nd edition** (https://environment.ec.europa.eu/publications/faq-packaging-and-packaging-waste-regulation-ppwr_en)
DG ENV Unit B01, August 2026 (KH-01-26-068-EN-N). Read in full. Source for the enforcement approach from 12 August

- 11** **European Commission — PPWR guidance (Commission Notice), 30 March 2026** (https://environment.ec.europa.eu/topics/waste-and-recycling/packaging-waste_en)
The guidance document, distinct from the FAQ above. **Not read in full by us**

An association in formation, Vienna. Everything here is shared experience with a date attached — not legal advice.