

DECLARATION OF REUSE OF INDUSTRIAL AND COMMERCIAL PACKAGING AND FOOD SERVICES PACKAGING

Declaration Support Guide

2025 Declaration
for 2024 marketing data

January 2025

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1.Preamble

Reuse targets for packaging in France have been set through the French Anti-Waste Act for a Circular Economy (*loi Anti-Gaspillage pour une Economie Circulaire*, referred to as the AGECE Act).

France thus adopts a national trajectory aimed at increasing the proportion of reused packaging placed on the market relative to single-use packaging, so as to attain a proportion of 10% of reused packaging placed on the market in France in 2027, expressed in sales units or sales unit equivalents.

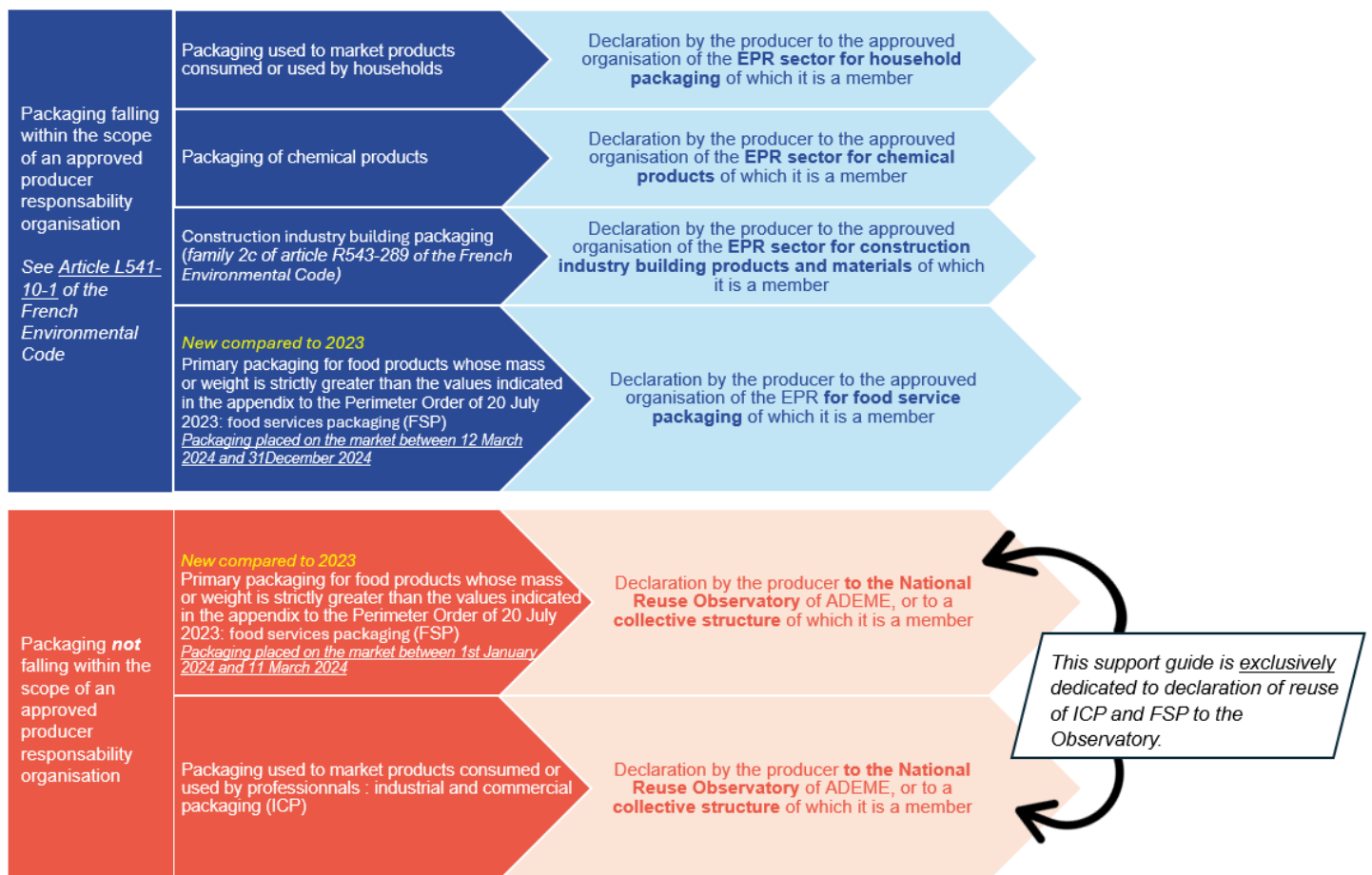
Obligations concerning the placing of reused packaging on the market are set for all producers placing at least 10,000 units of packaged products on the market per year. [Decree no. 2022-507 of 8 April 2022 on the minimum proportion of reused packaging to be placed on the market annually](#) specifies the terms of these obligations:

1. The types of packaging concerned,
2. The producers concerned,
3. The obligation for these producers to rely upon the support of their producer responsibility organisations (*éco-organismes*) or the possibility of grouping themselves together within a collective organisation in order to fulfil their obligations,
4. The minimum proportions of reused packaging to be placed on the market for producers, according to their annual turnover.

Declaration obligations and procedures

All producers placing at least 10,000 units of packaged products on the market per year have to report their packaging data annually, as from 2024.

The procedures for reporting packaging data differ according to the type of packaging placed on the market by the producer.



Declaration procedures for professional packaging

"Professional packaging" is packaging used or consumed by professionals. It is divided into two categories: industrial and commercial packaging (ICP) and food services packaging (FSP).

To date, the EPR sector for industrial and commercial packaging has not been put in place – it will be set up in 2025 – and there are therefore no approved producer responsibility organisations for this sector able to collect these members' packaging data.

The food services packaging EPR system was introduced on 12 March 2024. The CITEO PRO approved producer responsibility organisation is collecting the data from its producer members for FSP placed on the market during its approval period in 2024, i.e. the data for packaging placed on the market between 12 March 2024 and 31 December 2024.

The Reuse National Observatory (*Observatoire du réemploi et de la réutilisation*) managed by ADEME is putting a transitional solution in place in 2025 in order to collect professional packaging data from producers not covered by an approved producer responsibility organisation for packaging in 2024, i.e.:

- ICP placed on the market in 2024
- FSP placed on the market between 1st January 2024 and 11 March 2024

This guide is solely dedicated to producers' declaration of their **professional packaging data to the Reuse National Observatory in 2025 (2024 data)**.

Reference documents concerning the rules for counting the reuse of packaging in France

In 2023 the Reuse National Observatory published a study on methodologies for counting the reuse of packaging placed on the market in France, for professionals. **A new version of this study has been available since November 2024.** It provides additional information and details with regard to certain counting rules.

This study is available here at the [ADEME bookshop](#). In addition to the study, the National Observatory also places a [Frequently Asked Questions section](#) at your disposal.

We invite you to acquaint yourself with these elements which constitute the reference documents with regard to obligations concerning the counting of reuse of packaging.

This guide is a supplementary resource solely concerned with the declaration of data relating to industrial and commercial packaging and food services packaging placed on the market in France in 2024.

Details:

The information presented within the framework of this guide applies to data for 2023 and 2024, in accordance with current regulations (in particular articles R541-350 and R543-43 of the French Environmental Code (*Code de l'environnement*)).

This guide is without prejudice to any future changes in the regulatory framework that may affect data concerning 2025 and subsequent years.

2.Security, Confidentiality and Use of Data

Confidentiality and security of data:

Your declaration is made using the online questionnaire provided for this purpose.

This ADEME questionnaire makes it possible to **manage both data security and confidentiality**. Answers to the questionnaire will be visible solely to the ADEME and its service provider LE SPHINX from their administration area. By virtue of the contract signed between ADEME and LE SPHINX, the latter is subject to confidentiality obligations. Due to the contract signed between ADEME and LE SPHINX, the latter is subject to confidentiality obligations.



What use will be made of my declared data?

The data declared by producers as a whole will be **compiled and processed by ADEME** in order to assess the national proportion of reused packaging placed on the market in France in the year of observation. None of your data will be disclosed in an individualised manner.

3. About the Declaration

3.1 Who is concerned by this declaration?

The professionals concerned

The professionals concerned by this declaration are **producers**¹, that is to say:

1. Any professional that **packages products or has them packaged** for the purpose of placing them on the French market,
2. Any **importer/introducer** whose products are marketed in packaging in France or,
3. The person responsible for **the first placing of these products on the market** (in the absence of identification of the producer or importer).

Examples of professionals concerned by this declaration (non-exhaustive list):

- ✓ Manufacturers
- ✓ Distributors
- ✓ Marketplaces
- ✓ Food service providers and artisans

Details:

The above definition of producer applies to data concerning packaging placed on the market in 2023 and 2024 in accordance with current regulations (articles R541-350 and R543-43 of the French Environmental Code).

This guide is without prejudice to any future changes in the regulatory framework for this definition of producer that may affect data concerning 2025 and subsequent years.

Packaging managers (or poolers) are not responsible for monitoring data related to packaging reuse. However, they may be asked to provide certain data by their partner(s).

Packaging manufacturers do not count the packaging they produce since, under current regulations, packaging manufacturers are not the initial marketers of manufactured packaging. However, they do count all packaging they use to pack the packages they manufacture (delivery pallets, pallet film, etc.).

A **logistics platform** may be considered to be a producer if it packs products in packaging for the dispatch of its orders (parcel packaging) and if this is not an act of subcontracting. If no packing or reconditioning is undertaken (for example in the case of cross-docking), then no packaging is used again, and the company therefore does not monitor any data relating to the reuse of packaging.

Under article L.541-10-9, a **marketplace** is responsible for the declaration of products and packaging subject to the EPR principle placed on the market by third-party sellers, unless the marketplace can prove that the third-party seller has already fulfilled its obligation. Declaration of ICP follows the same rules.

Declarant entity

The declaration has to be made at the level of a **legal entity corresponding to a SIREN** (French legal entity business identification number). In the case of a group with several subsidiaries with different legal entities, you may choose to declare at the group level or for each of these subsidiaries. Either the declaration is made at group level (for all subsidiaries), or the declaration is made by each subsidiary. It is not possible to declare at the level of an establishment (SIRET, French business establishment identification number). If this concerns you, please consult your registered office and do not make your declaration via this questionnaire.

→ Are you part of a collective organisation?

In 2025, collective organisations may take care of collection of their members' professional packaging data (packaging not covered by measures for approval by a producer responsibility organisation). A collective

¹See [Article R541-350](#) of the French Environmental Code (*Code de l'environnement*).

organisation may be, for example, an Industry Federation, or a producer responsibility organisation without regard to its approval category.

If you have already made your declaration to a collective organisation, you should not declare your data again to the Reuse National Observatory.

At the end of the declaration period, these organisations are obliged to compile and pass on the data they have collected to the National Observatory.

Threshold for the declaration obligation

Producers are subject to the declaration obligation if they place **at least 10,000 units of packaged products per year** on the market. Producers that place less than 10,000 units of packaged products per year on the market may declare their packaging on a voluntary basis.



How to determine whether my company places at least 10,000 units of packaged products per year on the market?

All producers placing **at least 10,000 units of packaged products per year on the market** are subject to the reuse obligation and are required to monitor and count their packaging from 2023.

Producers calculate their **units of packaged products per year** on the basis of:

- Packaging placed on the French market
- All household and professional packaging
- All types of (sales, grouped and transport) packaging and packaging materials
- Single-use, new reusable and reused packaging

The following are excluded from this calculation:

- Exported packaging
- Packaging subject to prohibition of reuse (R.541-350, III of the Environmental Code)

By way of example, in order to illustrate the notion of a unit of packaged product (regarding the threshold of 10,000 units of packaged products):

- 1 small bottle of shampoo = 1 unit of packaged product
- A pack of 12 yoghurts = 12 units of packaged products
- A pack of 10 biscuits = 10 units of packaged products
- A box of 100 nails = 100 units of packaged products
- 6 bottles of wine in a wooden crate = 6 units of packaged products
- 1 telephone in a parcel = 1 unit of packaged product
- A pallet of 20 car parts (with boxes, pallet film, fillers, etc.) = 20 units of packaged products
- A pallet of 100 concrete blocks (sold in batches of 100) = 100 units of packaged products
- If the producer sells by the cubic metre or linear metre:
 - 1 m³ of stone blocks sold on a pallet = 1 unit of packaged product
 - 6 m³ of sand sold in 6 big bags = 6 units of packaged product
 - 1 reel of 3 metres of cable = 1 unit of packaged product
 - 1 reel of 6 metres of cable = 1 unit of packaged product
 - 2 reel of 6 metres of cable = 2 unit of packaged product

Example of calculation of a producer's units of packaged product for 2024:



3.2 When to declare data?

The declaration period is open from **20 January 2025** until **31 May 2025** with a secure online questionnaire.

3.3 What data to declare?

Declarants will be asked to provide the following types of data via the Observatory's secure online questionnaire:

- Declarant's contact information
- Declarant's SIREN (French legal entity business identification number) identity, in particular:
 - Country of residence
 - SIREN (or identification number for companies whose registered address is not in France)
 - Total annual turnover declared in 2024 (or failing that, if the financial year does not make this possible, the total annual turnover declared in 2023)
 - NAF code, indicating French classification of business activities (or principal sector of economic activity for companies whose registered address is not in France)
- Quantities of professional packaging placed on the market in 2024 in units of packaging:
 - Total quantity of professional packaging placed on the market in 2024;
 - Proportion of reused professional packaging placed on the market in 2024.
 - Please note: If you are declaring ICP and FSP data, the questionnaire will ask you to enter your packaging quantities, distinguishing between these two packaging sectors.

Declarant's identity

Here you should state whether you are declaring as a legal entity corresponding to a SIREN (French business identification number) or whether you have been appointed by an entity to make this declaration. If you have been appointed to make the declaration on behalf of an entity, you have to be in a position to prove this in case of inspection. As appointed representative you will be asked to enter your company name and your SIRET (French business establishment identification number) in the questionnaire.

The following information concerning the declarant entity will then be demanded:

- Company name
- Country of residence and postcode (for a company headquartered in France)
- SIREN number (for a company headquartered in France) or European Union value added tax number or registration number with the tax authorities in the country in which the company is headquartered

Turnover

In this section you should enter your **total annual turnover** corresponding to the declarant SIREN number. Enter your **turnover for 2024 or failing this**, if the financial year does not allow this, your **turnover for 2023**.

It should be noted that:

Declarant entity headquartered in France: The turnover is the declarant's overall public turnover, calculated for all business operations conducted at national level (including turnover connected with the export of packaged products).

Declarant entity outside of France: The turnover of a declarant not headquartered in France is the turnover of the declarant's business activities in France.

Specific questions relating to the definition of turnover are not dealt with in this guide. They are dealt with by the French Directorate General for Risk Prevention (*Direction Générale de la Prévention des Risques, DGPR*), attached to the French Ministry for an Ecological Transition and Territorial Cohesion (*Ministère de la transition écologique et de la cohésion des territoires*).

Business sector

If you are a French company, you should first enter the declarant SIREN entity's NAF code (French classification of business activities).

If your company is not headquartered in France, you will be asked to provide a principal sector of business activity similar to the French NAF code classification ([codification française NAF](#)). The sectors provided in this case are as follows:

- Service activities
- Agriculture, forestry and fishing
- Food industry - beverages
- Food industry - except beverages and tobacco
- Food industry - tobacco
- Arts, culture and recreation
- Motor vehicles & garages
- Other manufacturing
- Retail trade & department stores
- Wholesale trade
- Construction, civil engineering, public works
- Water, energy, waste
- Electrical and electronic equipment, optique
- Mass distribution
- Accommodation, food service and tourism activities
- Manufacture of chemicals
- Manufacture of pharmaceutical, veterinary and laboratory activities
- Manufacture of plastics
- Manufacture of transport equipment and mobility
- Manufacture of paper and wood
- Mining and quarrying
- Logistics, transportation
- Mechanical and manufacture of metals
- Furniture
- Health
- Textiles, clothing and footwear

Number of professional packages

Producers declare their quantities of industrial and commercial packages (ICP) and food services packages (FSP) placed on the market in 2024 to the Reuse National Observatory, in sales units or sales unit equivalents.

1. *What is packaging?*

Packaging is defined in article R543-43 of the French Environmental Code as all products made of any materials of any nature to be used for the containment, protection, handling, delivery and presentation of goods, from the producer to the user or the consumer. All "disposable" items used for the same purposes should be considered as packaging.

Packaging consists solely of:

- **Sales packaging or primary packaging**, i.e. packaging conceived so as to constitute a sales unit to the final user or consumer at the point of purchase;
- **Grouped packaging or secondary packaging**, i.e. packaging conceived so as to constitute at the point of purchase a grouping of a certain number of sales units whether the latter is sold as such to the final user or consumer or whether it serves only as a means to replenish the shelves at the point of sale; it can be removed from the product without affecting its characteristics;
- **Transport packaging or tertiary packaging**, i.e. packaging conceived so as to facilitate handling and transport of a number of sales units or grouped packagings in order to prevent physical handling and transport damage. Transport packaging does not include road, rail, ship and air containers.

2. *What is professional packaging?*

A distinction is made between two different types of professional packaging:

- Industrial and commercial packaging (ICP) used or consumed by professionals - excluding food services professionals
- Food services packaging (FSP)

ICP is sales, grouped and transport packaging of products "used for the marketing of products consumed or used by professionals, which are not already covered by [EPR for Household Packaging and Graphic Papers], with the exception of those used or consumed by professionals in the food services business" ([Article L541-10-1](#) of the French Environmental Code). By way of example: pallets, drums, containers, crates, straps, strapping bands, pallet film, trays, canisters, casks, bottles, pots, etc. They are listed in a [Cartographie des couples produit / type et matériaux d'emballages \[Mapping of product / packaging type and material couples\]](#) published by ADEME (only available in French). It should be noted that, this scope will be refined if necessary in order to be consistent with the IPC EPR provided for in 2025.

FSP is **sales** packaging, used for the marketing of products consumed or used by professionals, **of food products** whose mass or weight is strictly greater than the values indicated in the annexe to [the order \(arrêté\) defining the characteristics of FSP of 20 July 2023](#).

3. What does “placing on the market” mean with regard to ICP and FSP?

The placing of industrial and commercial packaging (ICP) or food services packaging (FSP) on the market corresponds to the **transport** of one or more packaged products and an **act of purchase / transfer** (whether in return for payment or free of charge) of the packaged product or products **between two entities with different SIRET numbers**.

Containers dedicated to processes and handling within a site are not packaging placed on the market to be monitored by the producer.

4. Exclusions

→ Packaging for products whose reuse is prohibited by law

Decree no. 2022-507 of 08 April 2022 states that the provisions of the decree are not applicable to the following:

- Packaging of products for which a national or Community legislative or regulatory provision prohibits the reuse or recovery of such packaging due to health or safety requirements of the consumer;
- Packaging of products whose placing on the market requires an authorisation which prohibits their reuse or recovery or imposes an obligation to dispose of the used product with its container.

Packaging exempted by decree is excluded from the counting of the total number of packages for calculation of the packaging reuse rate.

All packaging whose reuse is not prohibited must be monitored by the producer. In particular, the packaging of hazardous products is not to be systematically excluded.

→ Packaging for exported products (which are not therefore placed on the market in France) **is excluded** from this declaration.

Reminder:

→ You are a member of an approved producer responsibility organisation for packaging?

Any packaging included within the remit of a currently approved producer responsibility organisation for packaging should not be declared to the Reuse National Observatory via this questionnaire.

The currently approved producer responsibility organisations for packaging are as follows:

- The EPR sector for Household packaging and graphic papers (HPGP);
- The EPR sector for chemical products (CHEMP);
- The EPR sector for construction industry building products and materials (family 2c of article R543-289 of the French Environmental Code (*Code de l'Environnement*)).
- The EPR sector for food services packaging (FSP) *between 12 March 2024 and 31 December 2024*.

Any packaging coming within the scope of approval by these four EPR sectors should not be directly declared via the National Observatory questionnaire. This data is to be passed on to your [producer responsibility organisation](#).

5. Calculation of the total quantity of ICP and FSP placed on the market

Each producer calculates the total quantity of industrial and commercial packaging (ICP) and food services packaging (FSP) that it placed on the market in France in 2024. How to calculate it?

Total quantity of FSP = Number of reused FSP + Number of new reusable FSP + Number of single use FSP (in units)

Total quantity of ICP = Number of reused ICP + Number of new reusable ICP + Number of single use ICP (in units)

Definition of reused packaging:

This means packaging subject to being used at least a second time according to three scenarios:

- Either the packaging is used for a second time for a use of the same nature as that for which it was designed and whose reuse is organised by or on behalf of the producer.
- Or by being filled at the point of sale as part of bulk sale.
- Or by being filled at home in the case of a recharge arrangement organised by the producer.

Definition of new reusable packaging:

Reusable packaging is packaging which has been conceived, designed and placed on the market to accomplish within its lifecycle multiple trips or rotations by being refilled or reused for the same purpose for which it was conceived.

New reusable packaging is reusable packaging that is placed on the market for the first time (moreover reused packaging is reusable packaging which has been placed on the market at least a second time).

Definition of single-use packaging:

Conversely, this means packaging which is not reusable packaging.

In order to obtain the numbers of **reused**, **new reusable** and **single-use** ICP and FSP packages, producers should apply the counting methodologies. Consult **Summary 7** of the ADEME study "Counting the Reuse of Packaging in France" [by clicking here](#).

6. Calculation of the proportion of reused ICP and FSP placed on the market

Each producer calculates the proportion of reused industrial and commercial packaging and food services packaging that it placed on the market in France in 2023. How to calculate it?

$$\text{Proportion of reused FSP} = \frac{\text{Number of reused FSP}}{\text{Total quantity of FSP}} (\%)$$

$$\text{Proportion of reused ICP} = \frac{\text{Number of reused ICP}}{\text{Total quantity of ICP}} (\%)$$

A proportion of reused packaging is the number of reused packages (in units) divided by the total quantity of packages placed on the market (in units).

Further details are provided in the annexe to this guide, in particular concerning the definition of a **sales unit (or sales unit equivalent)** to be used in the calculation (as well as examples of special cases of counting).

4. How to complete the online declaration questionnaire

The declaration questionnaire can be accessed [HERE](#) from the Reuse National Observatory's dedicated page.

4.1 Choice of language

Specify the language to complete the questionnaire: French / English.

4.2 Home page and confidentiality

On this page you will find the principal information concerning the Declaration of reuse of industrial and commercial packaging and food services packaging to the Reuse National Observatory.



Declaration of reuse of industrial and commercial packaging and food services packaging
2024 data

From 2023, any producer placing **at least 10,000 units of packaged products** on the market per year is concerned to a reuse obligation and must make an annual declaration of its packaging data.

You are covered by this declaration if you meet the following 4 conditions:

1. You are a producer within the meaning of the French Environment Code.
2. You place at least 10,000 units of packaged products on the market each year, or you wish to make a voluntary declaration.
3. You place on the market **packaging for products consumed or used by professionals**. This declaration to the National Reuse Observatory only concerns the professional packaging sector not yet covered by an EPR sector, i.e. :
 - Industrial and commercial packaging used or consumed by professionals (excluding catering professionals) placed on the market between January 1st 2024 and December 31st 2024;
 - Food service packaging placed on the market **between January 1st 2024 and March 11th 2024**.
4. You have not already declared your professional packaging to a collective structure.

To find out more about this declaration, a guide to help you make the 2025 declaration is available on [the Reuse Observatory's website](#).

Packaging of products not concerned:

- packaging falling within the scope of the [EPR for household packaging and graphic paper](#)
- packaging falling within the scope of [EPR for food service packaging](#) placed on the market between March 12th 2024 and December 31st 2024
- packaging falling within the scope of the [EPR for chemical products](#)
- packaging falling within the scope of family "2c" (Article R543-289 of the Environment Code) [Building EPR](#)
- professional packaging - food service and others - already declared to a collective structure

The packaging listed above should not be declared on this form. Contact your eco-organisation or collective structure.

You are preparing to declare the reuse of your professional packaging placed on the market in 2024 to ADEME. Before answering:

1. Please ensure that your declaration corresponds to that of a legal entity corresponding to a SIREN code (French national identification number). In the case of a group with several subsidiaries with different legal entities, you can choose to declare at group level or for each of these subsidiaries. It is not possible to declare at the level of an establishment (corresponding to a SIRET).
2. Make sure you have read the [2025 declaration support guide](#) of the Reuse Observatory. Ensure that you are able to answer all the information requested before starting to fill in the following questionnaire. Any incomplete declaration cannot be saved for later validation.


How will the data reported be used?


The data declared by all producers will be compiled and processed by ADEME. None of your data will be disclosed on an individual basis.




Click on "Next" to begin the questionnaire.

4.3 Information on the processing of personal data

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Observatoire national**

**Declaration of reuse of industrial and commercial packaging and food services packaging
2024 data**

Information on the processing of personal data

This questionnaire is provided by ADEME's National Reuse Observatory.

ADEME undertakes to use the personal information communicated in this questionnaire only for the processing necessary for its operation and to carry out occasional user surveys, enabling us to improve the relevance and quality of the information processed and disseminated.

[To find out more](#)

How to reach us

ADEME - French Ecological Transition Agency
Data protection delegate
20, avenue du Grésillé - 49100 ANGERS
Tél. 02 41 20 41 20

Please click here if you want [more information on the treatment of your personal data](#).

I accept the processing of my personal data in accordance with the information provided
You must accept to continue.

[← Previous](#)

On this page, you will find information on the processing of your personal data (GDPR).

Tick the box “I accept the processing of my personal data in accordance with the information provided here”.

Click “Next”.

4.4 Information about you




Please enter your contact details:

- Your surname
- Your first name
- Your e-mail address (compulsory)
- Your telephone number

It is compulsory to enter your e-mail address in order to be sent a **declaration certificate**.

If you have consented to the use of your personal data and wish to withdraw your consent, send all of the necessary information (your contact details, etc.) by e-mail to ADEME, specifying that your question concerns the declaration of reuse of packaging questionnaire: rgpd@ademe.fr.

For further information, consult the [ADEME Personal data protection policy](#).




Declaration of reuse of industrial and commercial packaging and food services packaging 2024 data

Information on the declarant

Before starting your declaration, please provide your contact information.

Surname:
First name:

E-mail address:*
The answer is compulsory. You must enter your e-mail address in order to be sent a declaration certificate.

Phone number:

4.5 Start your declaration

Choose one of the two answers according to your situation.




Declaration of reuse of industrial and commercial packaging and food services packaging 2024 data

Start your declaration

Which situation applies to you? *

* The answer is compulsory.

I declare as a legal entity corresponding to a SIREN number
 I have been appointed by an entity to make the declaration on its behalf

a. If you are declaring as a legal entity corresponding to a SIREN number


Click "Next" and go directly to part [4.6 Information on the declarant](#).

b. If you have been appointed by an entity to make the declaration on its behalf


Please answer the following question:

If your answer is "No". You will not be able to continue your declaration and will need to provide the documentary proof requested. Please contact the entity that appointed you to make its declaration in order for it to provide you with this documentary proof.


If you answer "Yes", you will be able to enter your appointed representative's company name and SIRET number.



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**Declaration of reuse of industrial and commercial
packaging and food services packaging**
2024 data

Start your declaration

Which situation applies to you? *
** The answer is compulsory.*

I declare as a legal entity corresponding to a SIREN number
 I have been appointed by an entity to make the declaration on its behalf

In the event of an audit, are you able to provide proof that you have been appointed by a legal entity corresponding to a SIREN to make its declaration? *

Yes
 No

Authorized representative's company name: *

Authorized representative's SIRET: *

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Next →

! Rule: The SIRET number cell lights up red?

Check that the number of figures entered is equal to 14 and that the cell only contains figures.

Click “Next” and go directly to part [4.6 Information on the declarant](#).

4.6 Information on the declarant


Declare the information relating to your entity (legal entity corresponding to a SIREN number). If you have been appointed by an entity to make the declaration on its behalf, complete this and the following pages with the information concerning the entity that has appointed you.

Enter your declarant entity’s company name and the country in which it is headquartered.


- a. The country in which the company is headquartered is France (metropolitan and overseas departments and territories)*

If the country in which it is headquartered is France (metropolitan France and French overseas departments and territories), enter the information concerning your declarant entity:


- Its postcode;
- Its SIREN number;
- Its annual turnover declared in 2024 by the declarant (failing this, that of 2023);
- Its NAF code (5 figures).



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Declaration of reuse of industrial and commercial
packaging and food services packaging
2024 data

The information requested on the following pages is that of the producer whose declaration you have been instructed to make.

Information on the declarant entity

As a reminder, declaration is made by a legal entity corresponding to a SIREN number.

Declarant entity's company name: *

Declarant entity's country of residence: *

France (metropolitan France and French overseas departments and territories)
 Another country

Declarant entity's postcode: *

Declarant entity's SIREN number : *

Declarant entity's annual turnover declared in 2024 (if not known, 2023 turnover) : *

Turnover is the declarant's total public turnover, calculated on the basis of all activities at national level (including turnover from the export of packaged products).

€

Declarant entity's NAF code: *

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Next →

 **Rule: The NAF code cell lights up red?**

Check that the number of figures entered is equal to 4 figures followed by a letter.

 **Rule: The SIREN number cell lights up red?**

Check that the number of figures entered is equal to 9 characters.

b. The country in which the company is headquartered is not France

If the country in which it is headquartered is not France (metropolitan France and French overseas departments and territories), select your entity's country from the drop-down list. Find the country more easily by writing its first letters in the selection. Countries are listed in alphabetical order. You will then be able to enter the declarant's European Union value added tax number if it is headquartered in a country inside the European Union, or its registration number with the tax authorities if the country is outside of the European Union.

Then select your principal sector of economic activity from the following drop-down list. Sectors are listed in alphabetical order.

Lastly, enter your annual turnover declared in 2024 (failing this, that of 2023). The turnover of a declarant not headquartered in France is the turnover of the declarant's business activities in France.

Click "Next".



Declaration of reuse of industrial and commercial packaging and food services packaging
2024 data

The information requested on the following pages is that of the producer whose declaration you have been instructed to make.

Information on the declarant entity

As a reminder, declaration is made by a legal entity corresponding to a SIREN number.

Declarant entity's company name: *

Declarant entity's country of residence: *

- France (metropolitan France and French overseas departments and territories) Another country

Specify your country: *

What is your main business sector? *

Declarant entity's annual turnover declared in 2024 (if not known, 2023 turnover): *

The turnover of a declarant not resident in France is the turnover of the declarant's activities in France.

€

[← Previous](#)

[Next →](#)

4.7 Quantities of professional packaging placed on the market

Please answer the following question: do you place at least 10,000 units of packaged products per year on the market? To calculate your number of units of packaged products in 2024, refer to section 3.1 of this guide.

Then enter the category(-ies) of packaging you wish to declare.

The screenshot shows a web form titled "Declaration of reuse of industrial and commercial packaging and food services packaging 2024 data". It features logos for the République Française, ADEME, and Observatoire national. The main question is "Do you put at least 10,000 units of packaged products on the market per year? *". Below this, there is explanatory text and two radio button options: "Yes, I placed at least 10,000 units of packaged products on the market in 2024" (selected) and "No, I placed less than 10,000 units of packaged products on the market in 2024 but I want to declare voluntarily." A reminder section asks "Which declaration concerns you (several selections possible)?" with two checkbox options: "Declaration of your primary packaging for food products used by food service professionals placed on the market between January 1st 2024 and March 11th 2024" and "Declaration of your packaging used by professionals - excluding catering professionals - placed on the market between January 1st 2024 and December 31th 2024". At the bottom, there are navigation buttons: "Previous", "Next", and "Finish later".

If you clicked the: "Declaration of your primary packaging of foodstuffs by food services professionals placed on the market between 1 January 2024 and 11 March 2024" option, go to the following part 4.8.

If you only clicked the: "Declaration of your packaging used by professionals – excluding food service professionals - placed on the market between 1 January 2024 and 31 December 2024" option, go straight to part 4.9.

From this stage, you can tick the "Finish later" box in order to save your answers and be able to return to your declaration when you wish.

Click "Next" to continue your declaration.

4.8 Quantities of food services packaging placed on the market

This page only concerns food services packaging placed on the market between 1 January and 11 March 2024 (in packaging units).

Depending on the details of your data, you may complete the questionnaire in a detailed or simplified manner by selecting the box of your choice.

a. In the case of detailed data:

You will have 3 boxes to complete with the following information in units of packaging:

- The quantity of **single-use** food services packaging placed on the market between 1 January 2024 and 11 March 2024 (in units of packaging).


- The quantity of **new reusable** food services packaging placed on the market between 1 January 2024 and 11 March 2024 (in units of packaging).
- The quantity of **reused** food services packaging placed on the market between 1 January 2024 and 11 March 2024 (in units of packaging).

It should be recalled that the definitions of these categories of packaging and the associated counting methodologies are set out in the Annexe to this guide and in still greater detail in [the ADEME study “Counting the reuse of packaging in France”](#).


Please note that your proportion of reused food service packaging is automatically calculated by the tool on the basis of the declared data, according to the formula described in the [“What data to declare?”](#) chapter of this guide.



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Declaration of reuse of industrial and commercial
packaging and food services packaging
2024 data

Quantities of FOOD SERVICE packaging placed on the market between January 1st 2024 and March 11th 2024 (in packaging units)

For further information on the determination of packaging quantities to be declared (in packaging units), please refer to the [2025 declaration support guide](#).

Note: *If you have already made your declaration of your primary food packaging used or consumed by food service professionals placed on the market between January 1st 2024 and March 11th 2024 to a collective structure, you must not declare again these packaging to the Observatory*

You are able to enter the quantities of primary food packaging used or consumed by catering professionals: *

in a detailed manner by indicating quantity of reused packaging, quantity of new reusable packaging and quantity of single-use packaging
 in a simplified manner by indicating the total quantity of packaging and the proportion of reused packaging

Hereafter, primary food packaging used or consumed by food service professionals is abbreviated to 'food service packaging'.

Important note : Declare your food service packaging to the Observatory placed on the market only between January 1st and March 11th 2024. Between March 12th 2024 and December 31th 2024, declare your packaging to the approved EPR eco-organisation for food service packaging.

Quantity of **single-use food service** packaging placed on the market between January 1st 2024 and March 11th 2024 (units): *

_____ packaging

Quantity of **new reusable food service** packaging placed on the market between January 1st 2024 and March 11th 2024 (units): *

_____ packaging

Quantity of **reused food service** packaging placed on the market between January 1st 2024 and March 11th 2024 (units): *

_____ packaging

b. In the case of simplified data:

You will have 2 boxes to complete with the following information:

- The **total** quantity of food services packaging placed on the market between 1 January 2024 and 11 March 2024 (in packaging units),
- The **proportion** of reused food services packaging placed on the market between 1 January 2024 and 11 March 2024 (in %).

It should be recalled that the methodology for calculation of the proportion of reused packaging is set out in the [“What data to declare?”](#) chapter of this guide.




Declaration of reuse of industrial and commercial packaging and food services packaging
 2024 data

Quantities of FOOD SERVICE packaging placed on the market between January 1st 2024 and March 11th 2024 (in packaging units)

For further information on the determination of packaging quantities to be declared (in packaging units), please refer to the [2025 declaration support guide](#).
Note: If you have already made your declaration of your primary food packaging used or consumed by food service professionals placed on the market between January 1st 2024 and March 11th 2024 to a collective structure, you must not declare again these packaging to the Observatory

You are able to enter the quantities of primary food packaging used or consumed by catering professionals: *

in a detailed manner by indicating quantity of reused packaging, quantity of new reusable packaging and quantity of single-use packaging
 in a simplified manner by indicating the total quantity of packaging and the proportion of reused packaging

Hereafter, primary food packaging used or consumed by food service professionals is abbreviated to 'food service packaging'.
Important note : Declare your food service packaging to the Observatory placed on the market only between January 1st and March 11th 2024. Between March 12th 2024 and December 31th 2024, declare your packaging to the approved EPR eco-organisation for food service packaging.

Total quantity of food service packaging placed on the market between January 1st 2024 and March 11th 2024 (units): *
 _____ packaging

Proportion of reused food service packaging placed on the market between January 1st 2024 and March 11th 2024 (%): *
 _____ %

c. Qualification of your data

Select the level of qualification of your declared data from the three options:

- Level 1: You have exhaustive monitoring of your data and the declared data is sound.
- Level 2: Part of the declared data, but a non-significant proportion, is estimated.
- Level 3: There are significant uncertainties in the declared data.

If you select level 3, a “Comments” field is available, in which you may set out any information you consider useful with regard to the uncertainties in your declared data.

Select the level of qualification of your declared data: *

You have exhaustive monitoring of your data and the declared data is sound.
 Part of the declared data, but a non-significant proportion, is estimated.
 There are significant uncertainties in the reported data.

Comments:
Specify any information you consider useful concerning the uncertainties of the data you are declaring.

Enter your text here _____

Click “Next”.

4.9 Quantities of industrial and commercial packaging placed on the market in 2024

This page only concerns industrial and commercial packaging placed on the market in 2024 (in packaging units).

Depending on the details of your data, you may complete the questionnaire in a detailed or simplified manner by selecting the box of your choice.

a. *In the case of detailed data:*

You will have 3 boxes to complete with the following information in units of packaging:

- The quantity of **single-use** industrial and commercial packaging placed on the market in 2024 (in packaging units)
- Quantities of **new reusable** industrial and commercial packaging placed on the market in 2024 (in units of packaging)
- Quantities of **reused** industrial and commercial packaging placed on the market in 2024 (in units of packaging)

It should be recalled that the definitions of these categories of packaging and the associated counting methodologies are set out in the Annexe to this guide and in still greater detail in [the ADEME study Counting the reuse of packaging in France](#)".

Please note that if you have chosen to declare detailed data for your packaging, the proportion of reused industrial and commercial packaging is automatically calculated by the tool on the basis of the declared data, according to the formula described in the ["What data to declare?"](#) chapter of this guide.



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Declaration of reuse of industrial and commercial
packaging and food services packaging
2024 data

Quantities of INDUSTRIAL AND COMMERCIAL packaging placed on the market in 2024 (in packaging units)

For further information on the determination of packaging quantities to be declared (in packaging units), please refer to the [2025 declaration support guide](#).

You are able to enter the **quantities of professional packaging - excluding catering professionals - placed on the market in 2024 (units): ***

in a detailed manner by indicating quantity of reused packaging, quantity of new reusable packaging and quantity of single-use packaging

in a simplified manner by indicating the total quantity of packaging and the proportion of reused packaging

Hereafter, packaging used or consumed by professionals - excluding catering professionals - is abbreviated to 'industrial and commercial packaging'. **Important note : Declare your industrial and commercial packaging to the Observatory placed on the market between January 1st and December 31th 2024.**

Quantity of **single-use industrial and commercial** packaging placed on the market in 2024 (units): *

_____ packaging

Quantity of **new reusable industrial and commercial** packaging placed on the market in 2024 (units): *

_____ packaging

Quantity of **reused industrial and commercial** packaging placed on the market in 2024 (units): *

_____ packaging

b. *In the case of simplified data:*

You will have 2 boxes to complete with the following information:

- **Total** quantity of industrial and commercial packaging placed on the market in 2024 (in units of packaging),
- The **proportion** of industrial and commercial packaging placed on the market in 2024.

It should be recalled that the methodology for calculation of the proportion of reused packaging is set out in the ["What data to declare?"](#) chapter of this guide.



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Declaration of reuse of industrial and commercial packaging and food services packaging
2024 data

Quantities of INDUSTRIAL AND COMMERCIAL packaging placed on the market in 2024 (in packaging units)

For further information on the determination of packaging quantities to be declared (in packaging units), please refer [to the 2025 declaration support guide](#).

You are able to enter the quantities of professional packaging - excluding catering professionals - placed on the market in 2024 (units): *

in a detailed manner by indicating quantity of reused packaging, quantity of new reusable packaging and quantity of single-use packaging
 in a simplified manner by indicating the total quantity of packaging and the proportion of reused packaging

Hereafter, packaging used or consumed by professionals - excluding catering professionals - is abbreviated to 'industrial and commercial packaging'. **Important note : Declare your industrial and commercial packaging to the Observatory placed on the market between January 1st and December 31th 2024.**

Total quantity of industrial and commercial packaging placed on the market in 2024 (units): *

_____ packaging

Proportion of reused industrial and commercial packaging placed on the market in 2024 (%): *

_____ %

c. Qualification of your data

Select the level of qualification of your declared data from the three options:

- Level 1: You have exhaustive monitoring of your data and the declared data is sound.
- Level 2: Part of the declared data, but a non-significant proportion, is estimated.
- Level 3: There are significant uncertainties in the declared data.

If you select level 3, a "Comments" field is available, in which you may set out any information you consider useful with regard to the uncertainties in your declared data.

Select the level of qualification of your declared data: *

You have exhaustive monitoring of your data and the declared data is sound.
 Part of the declared data, but a non-significant proportion, is estimated.
 There are significant uncertainties in the reported data.

Comments:
Specify any information you consider useful concerning the uncertainties of the data you are declaring.

Enter your text here

← Previous

Next →


✓ Finish later


Click "Next".

4.10 Before saving

You are about to save your declaration. A confirmation e-mail will be sent to you after you have clicked on "Save", giving you access to a summary of your declaration and a certificate that you may download online.

Click "Save" to validate and send your declaration.




Declaration of reuse of industrial and commercial packaging and food services packaging
 2024 data

To finish, please click on **Save**.

By clicking on **Save**, you confirm that your declaration is correct and it will be automatically forwarded to the Reuse Observatory. A declaration certificate will be sent to your e-mail adresse and you will have the possibility to access again to your declaration if you wish to correct any data.

4.11 Conclusion of the Declaration




The **confirmation e-mail** sent to you at the e-mail address previously provided in the declaration gives you access to your declaration certificate. It is automatically generated by @sphinxonline.net.

Do not forget to **verify your declaration** and **download your declaration certificate** in PDF format.

Please note: the declaration certificate will not be sent to you directly by e-mail. To obtain it, follow the instructions in the confirmation e-mail received at the e-mail address you previously provided in the declaration.

This certificate will be available until 30 July 2025.

Please check your spam if you have not received your confirmation e-mail.




Declaration of reuse of industrial and commercial packaging and food services packaging
 2024 data

Your declaration has been successfully recorded and will be sent to the Reuse Observatory.

A **confirmation email** has been sent to the e-mail address previously entered in the declaration. It is automatically generated by @sphinxonline.net. **Don't forget to check your declaration.** If you detect an error and wish to make a change, you will have the possibility to make a correction to your declaration.

Important note : the declaration certificate is not sent to you directly by email. To obtain it, follow the instructions in the confirmation email received at the email address previously entered in the declaration.

5. Contact details

For any further information or questions concerning the declaration questionnaire, you may contact our declaration support unit:

E-mail address: assistance-declaration-reemploi@ademe.fr

Annexes

Annexe 1: Details on the definition of a “sales unit”

What is the sales unit (or sales unit equivalent) to be used?

The reuse targets set out in the Environmental Code (*Code de l'environnement*) are expressed in terms of sales units or sales unit equivalents. Each producer has to monitor their quantities of packaging in compliance with this unit of measure, which is different according the type of packaging placed on the market.

For full details, consult **summary 1** of the ADEME study [“Counting the Reuse of Packaging in France”](#) by clicking on this link.

Sales ICP and FSP

Industrial and commercial and food services sales packaging is counted **per sales unit**.
Sales unit: product corresponding to a volume of product contained in a reference list, which is the subject of a transaction between two actors)

For products referenced listed by unit, the packaging (which may comprise several components) connected with each product unit is counted as one package.
 For products reference listed by quantity (weight, volume, dimensions), each corresponding package (which may comprise several components) is counted as one package.



1 bottle sold in food services (CHR) with a stopper
 = 1 package counted



1 gastronorm container with cover
 = 1 package counted



1 IBC with stopper
 = 1 package counted



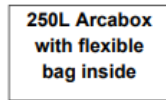
1 drum with cover
 = 1 package counted



1 crate containing fruit and vegetables = 1 package counted



1 plastic sachet with label
 = 1 package counted



250L Arcabox with flexible bag inside

1 rigid box
 1 flexible bag
 = 1 package counted



1 tray containing 2 meal portions, with two lids
 = 1 package counted

Examples of counting from the ADEME study “Counting the reuse of packaging in France”

Grouped and transport ICP and FSP

Grouped and transport industrial and commercial and food services packaging is counted **per package**.

1 package counted = a packaging component with any associated ancillary component(s).

A packaging component is considered as being an ancillary component in the following cases:

- The packaging component is a sealing component (lid, etc.)
- It is an element that is mechanically connected (screwed, glued, welded, etc.) to the packaging (label, tape, staple, etc.)



1 pallet with a label
 = 1 package counted



1 rolling cart
 = 1 package counted



1 pallet crate with cover and straps
 = 1 package counted



1 box with tape and label
 = 1 package counted

Examples of counting from the ADEME study “Counting the reuse of packaging in France”

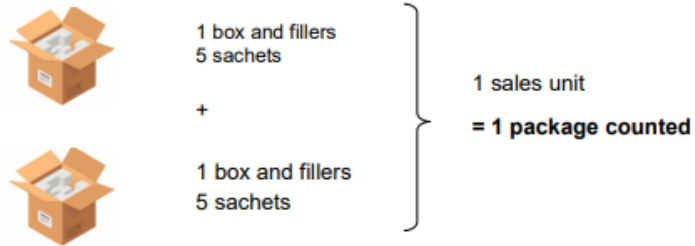
Special cases

Special cases: Sales ICP and FSP

Special cases

Case of one sales unit divided between several packages

If a sales unit is divided into several packages, all of the packages used are counted as **one sales unit**.
Two examples of counting are shown below:



2 items of joinery with hardware
making up the sales unit,
wrapped in film + corner fillers +
labels

1 sales unit
= 1 package counted

Examples of counting from the ADEME study "Counting the reuse of packaging in France"

Special cases: Grouped and transport ICP and FSP (1/2)



Special cases

⇒ **Packaged sales units grouped in grouped or transport package**

In the case where one or several units of packaged products, each packaged in professional sales packaging, are grouped together in the same professional grouped or transport package, then:

- Sales packaging is counted per sales unit,
- Grouped and transport packaging is counted per package.

1 grid containing 21 sales units packaged in plastic bags and boxes, with the different layers separated by dividers

1 grid > 1 package counted
2 dividers (see the special case of dividers) > 2 packages counted
21 sales units (21 boxes and 21 plastic sachets specific to each sales unit*) > 21 packages counted
= 24 packages counted

12 glasses individually packaged in protective foam. The whole is packed in a box

1 group box > 1 package counted
12 sales units (12 fillers specific to a sales unit) > 12 packages counted
= 13 packages counted

*See the rule for fillers below.

Special cases: Grouped and transport ICP and FSP (2/2)

DETAILS

Case of fillers

Fillers are not counted, except when the sales unit is without packaging and the filler is specific to each sales unit. In this case they are counted per sales unit.

Examples of sales units without packaging with filler:



1 group box with a common filler for the sales units as a whole. The 4 sales units are sold without packaging.
= **1 package counted**



3 sales units, each packaged in a specific filler per sales unit > 3 packages counted
1 group box > 1 package counted
= **4 packages counted**

DETAILS

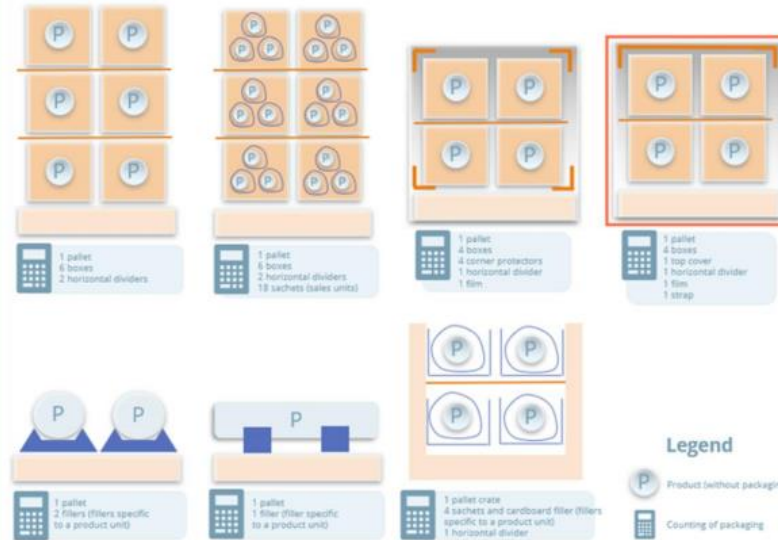
Case of dividers, pallet film, straps, corner protectors and top covers

The following packaging is counted **per unit**:

- Horizontal dividers used in making up a pallet load. Dividers that are non-horizontal or used as fillers are to be counted in accordance with the above rule for fillers.
- Pallet film (1 film per film-wrapped pallet) or cover
- Straps or strapping or banding
- Corner protectors (a small box with the same function as a corner protector is also to be counted per unit)
- Top cover



1 pallet
1 film
12 boxes
= **14 packages counted**



Examples of counting from the ADEME study "Counting the reuse of packaging in France"

What to do when my sales unit or packaging unit contains both reused and single-use packaging components?

Grouped and transport ICP and FSP is considered as being reused packaging if:

- The total weight of the single-use packaging components is **less than 20% of the total weight*** of the packaging concerned

Sales ICP and FSP constituting a sales unit is considered as being reused if the following two conditions are met:

- The single-use packaging component(s) is (are) used for at least one of the following functions:
 - Seal of sales packaging (lid, cap, stopper, cover, sprayer, etc.)
 - Labelling
 - Reinforcement of the protection of the product (barrier properties, integrity of product, dangerous product, sanitary protection, filler, absorbent sheet, food divider, etc.)
- The total weight of the single-use packaging components is:
 - **In the case of FSP: less than 20 % of the total weight*** of the package concerned
 - **In the case of ICP: less than 40 % of the total weight*** of the package concerned

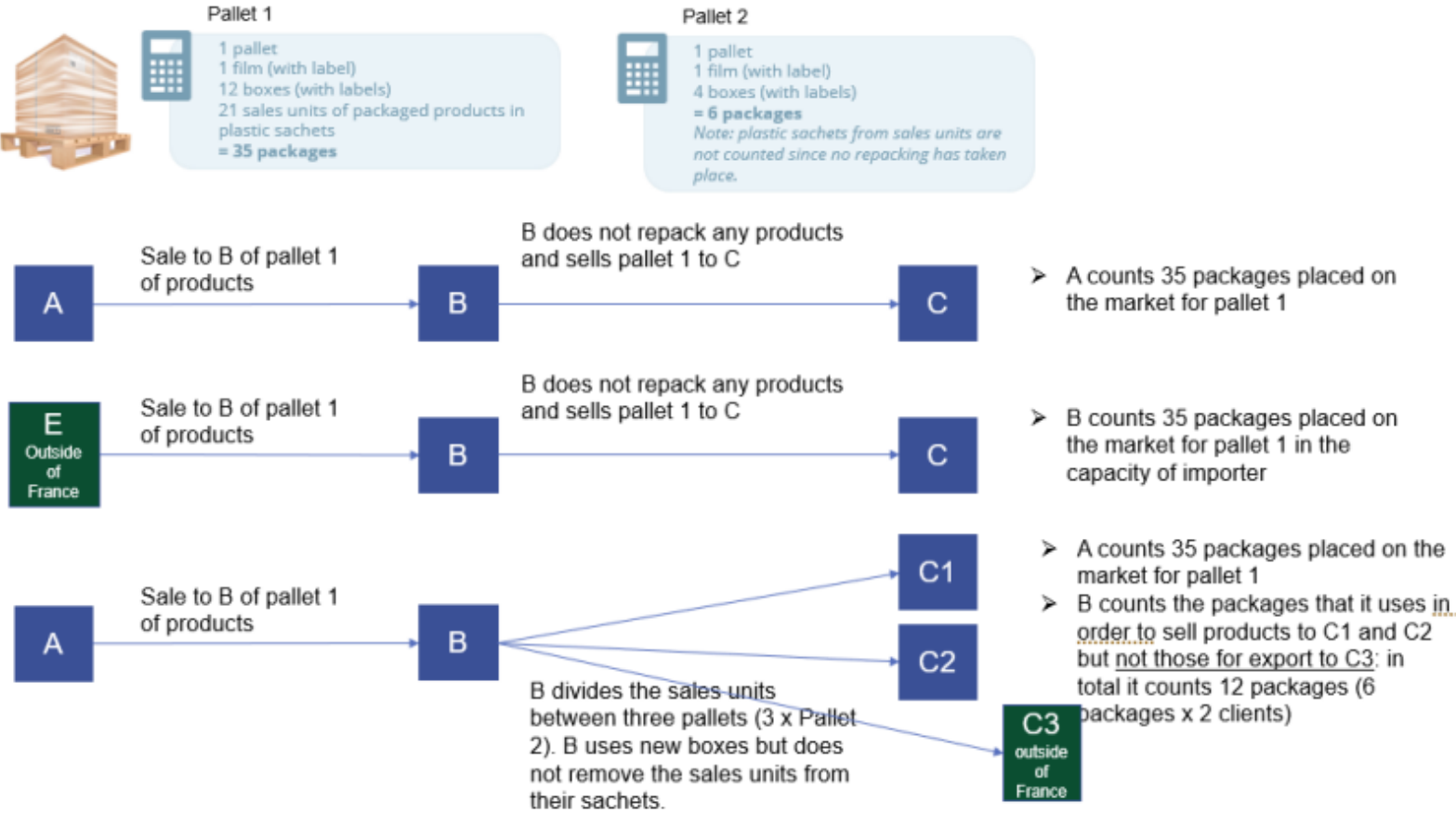
If a condition is not met, the sales unit or package is considered as being single-use.

* Total weight of the package = weight of single-use components + weight of reused components

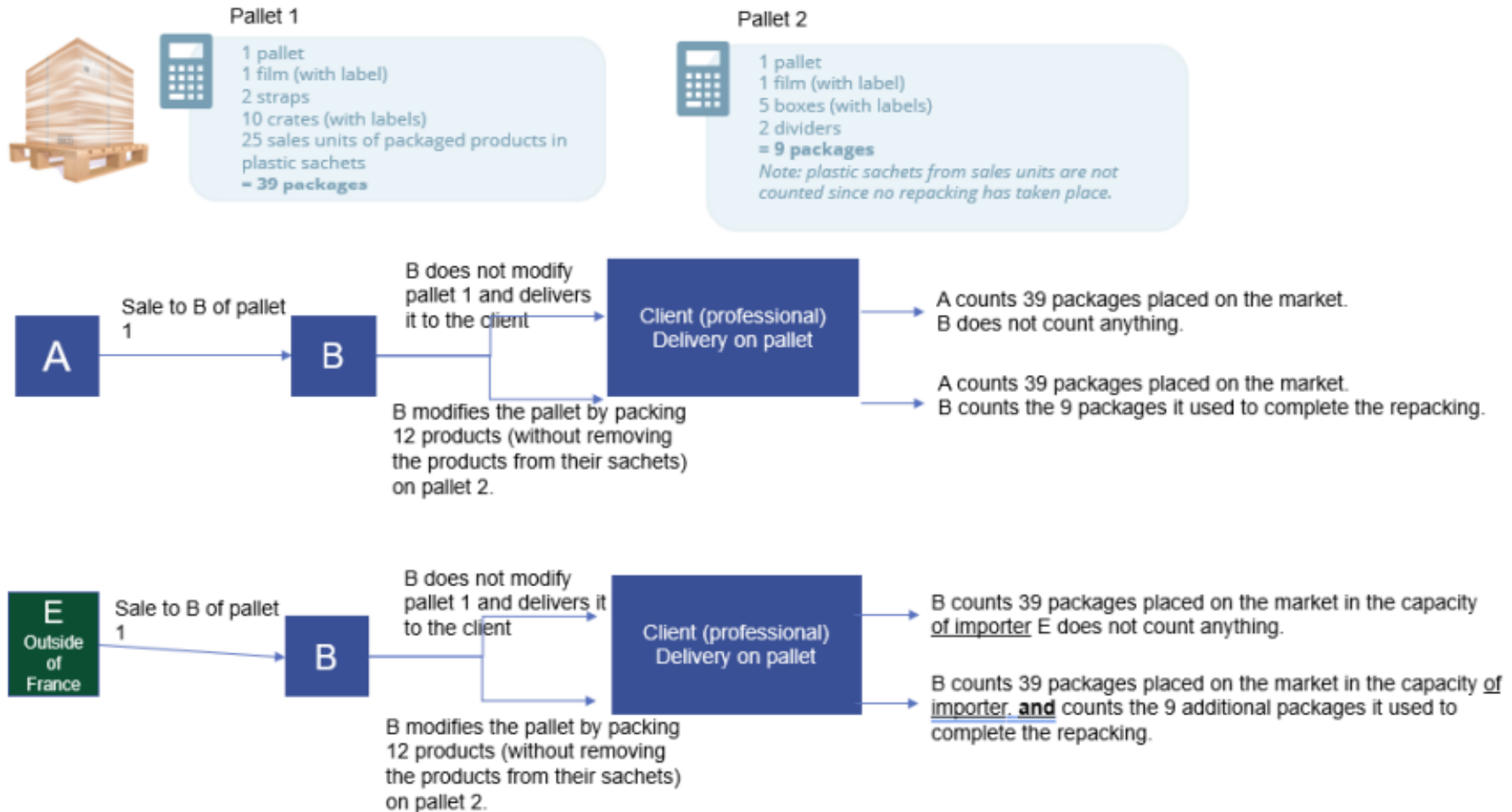
Annexe 2: Examples of shared responsibility for counting of professional packaging

The examples below are taken from annexe 5 of the new version of the study [“Counting the Reuse of Packaging in France”](#). Other examples can be found in the same study. The companies considered in the examples below have different SIRET registration nos. "C" may be a professional or a household.

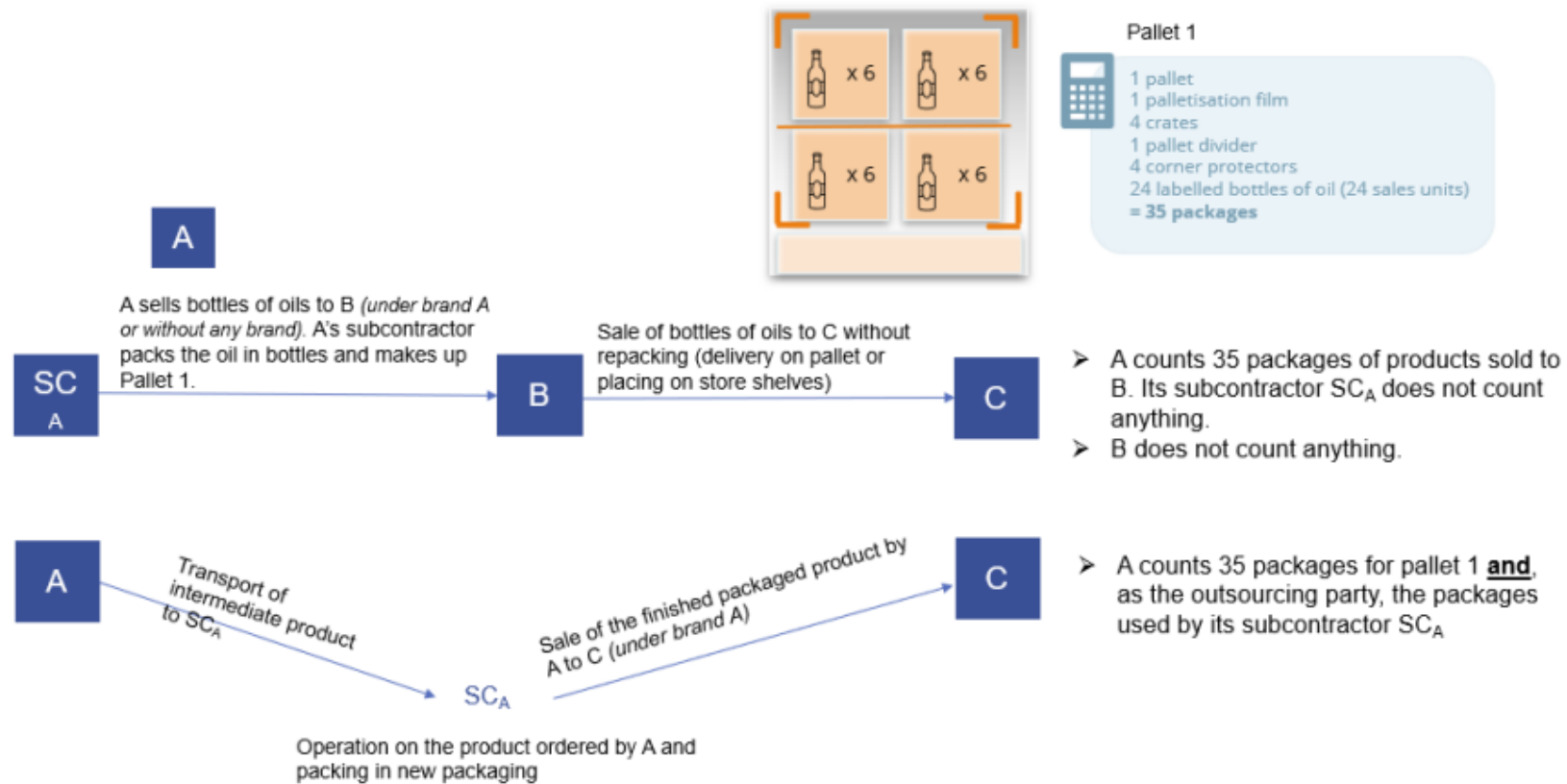
Case of counting, including the import/export of products



Case of counting with an intermediary (retailer, wholesaler, logistics platform, etc.), including the import of products



Case of counting with subcontracting



ADEME AT A GLANCE

At ADEME - the Agency for Ecological Transition - we are firmly committed to fighting climate change and the depletion of resources.

On all fronts, we mobilise citizens, economic actors, and local and regional authorities, giving them the tools they need to move towards a more resource-efficient, low-carbon economy that is fairer and more harmonious.

In every field - energy, circular economy, food, mobility, air quality, climate change adaptation, soil, etc. - we advise, facilitate, and help to fund numerous projects, from the research stage through to sharing solutions.

At every level, we put our expertise and forward-looking capabilities at the service of public policies.

ADEME is a public body under the supervision of the Ministry for an Ecological Transition and Territorial Cohesion, Ministry for the Energy Transition and the Ministry for Higher Education and Research.

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FACTS AND FIGURES

ADEME is a reference: It provides objective analysis on the basis of regularly updated statistical indicators.



KEYS FOR ACTION

ADEME is a facilitator: It draws up practical guides to help stakeholders implement their projects in a methodical manner and/or in compliance with regulations.



THEY'VE DONE IT

ADEME is a catalyst: Stakeholders talk about their experiences and share their know-how.



EXPERTISE

ADEME provides expertise: It reports on the results of research, studies and collective work conducted under its supervision.



HORIZONS

ADEME looks to the future: It proposes a prospective and realistic vision of the challenges of the energy and ecological transition, for a desirable future to be built together.

DECLARATION OF REUSE OF INDUSTRIAL AND COMMERCIAL PACKAGING AND FOOD SERVICES PACKAGING

2025 Declaration for 2024 marketing data

Reuse targets for packaging in France have been set through the French Anti-Waste Act for a Circular Economy (*loi Anti-Gaspillage pour une Economie Circulaire*, referred to as the AGECC Act). France thus adopts a national trajectory aimed at increasing the proportion of reused packaging placed on the market relative to single-use packaging.

Since 2023, all producers placing at least 10,000 units of packaged products on the market per year have been required to report their packaging data on an annual basis.

The Reuse National Observatory (*Observatoire du réemploi et de la reutilisation*) managed by ADEME is putting a transitional solution in place in order to collect producers' professional packaging data pending the setting up of EPR systems.



This guide is solely dedicated to producers' 2025 declaration of their data on professional packaging placed on the market in 2024 to the Reuse National Observatory.

