

# DECLARATION OF REUSE OF INDUSTRIAL AND COMMERCIAL PACKAGING

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Declaration Support Guide

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**2026 Declaration**  
for 2025 marketing data

January 2026

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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 AGEC Law).

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.

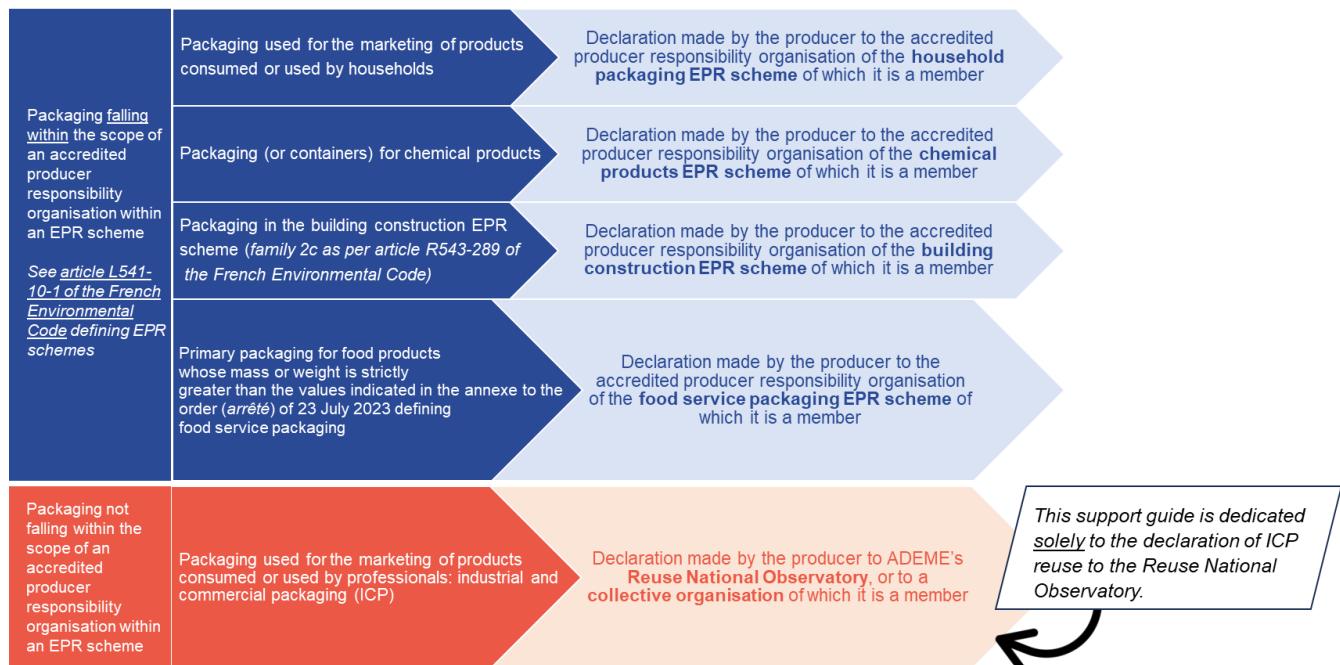
Obligations concerning the placing of reused packaging on the market are set for all producers placing at least 10,000 units of packaged products on the market per year. [Decree no. 2022-507 of 8 April 2022 on the minimum proportion of reused packaging to be placed on the market annually](#) specifies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

The food services packaging EPR scheme was introduced on 12 March 2024. The CITEO PRO accredited producer responsibility organisation collects the data from its producer members for FSP placed on the market. As the year 2025 is completely covered by the accreditation period for this scheme, **no food services packaging is to be declared via the Reuse National Observatory (*Observatoire du reemploi et de la réutilisation*) in 2026.**

The EPR scheme for industrial and commercial packaging has not been introduced to date, though implemented is scheduled for 2026. There are no accredited producer responsibility organisations in this scheme in a position to collect the packaging data from these members.

**The Reuse National Observatory, managed by ADEME, is putting a transitional solution in place in 2026 in order to collect professional packaging data from producers not covered by an accredited producer responsibility organisation for packaging in 2025, i.e.:**

- ICP placed on the market in 2025

This guide is solely dedicated to producers' declaration of their **industrial and commercial packaging data to the Reuse National Observatory in 2026 (2025 data).**

## **Reference documents for declaring and 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 2025.** It provides additional information and details with regard to certain counting rules. This study is available here from the [ADEME bookshop](#).

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.

In addition, the Observatory also provides:

- A list of Frequently-Asked Questions
- 3 webinars held during the declaration period
- A video tutorial to help you understand how packaging is counted

All of these resources can be found on the [ADEME portal on the Reuse National Observatory website](#).

This guide is a supplementary resource solely concerned with the declaration of data relating to industrial and commercial packaging placed on the market in France in 2025.

### **Details:**

The information presented within the framework of this guide applies to data for 2025, 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 2026 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. ADEME and LE SPHINX undertake to keep the data declared within the framework of this declaration confidential. By virtue of 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. No individual data will be disclosed.

### 3. About the Declaration

#### 3.1 Who is concerned by this declaration?

##### The professionals concerned

The professionals concerned by this declaration are **producers**<sup>1</sup>, 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).

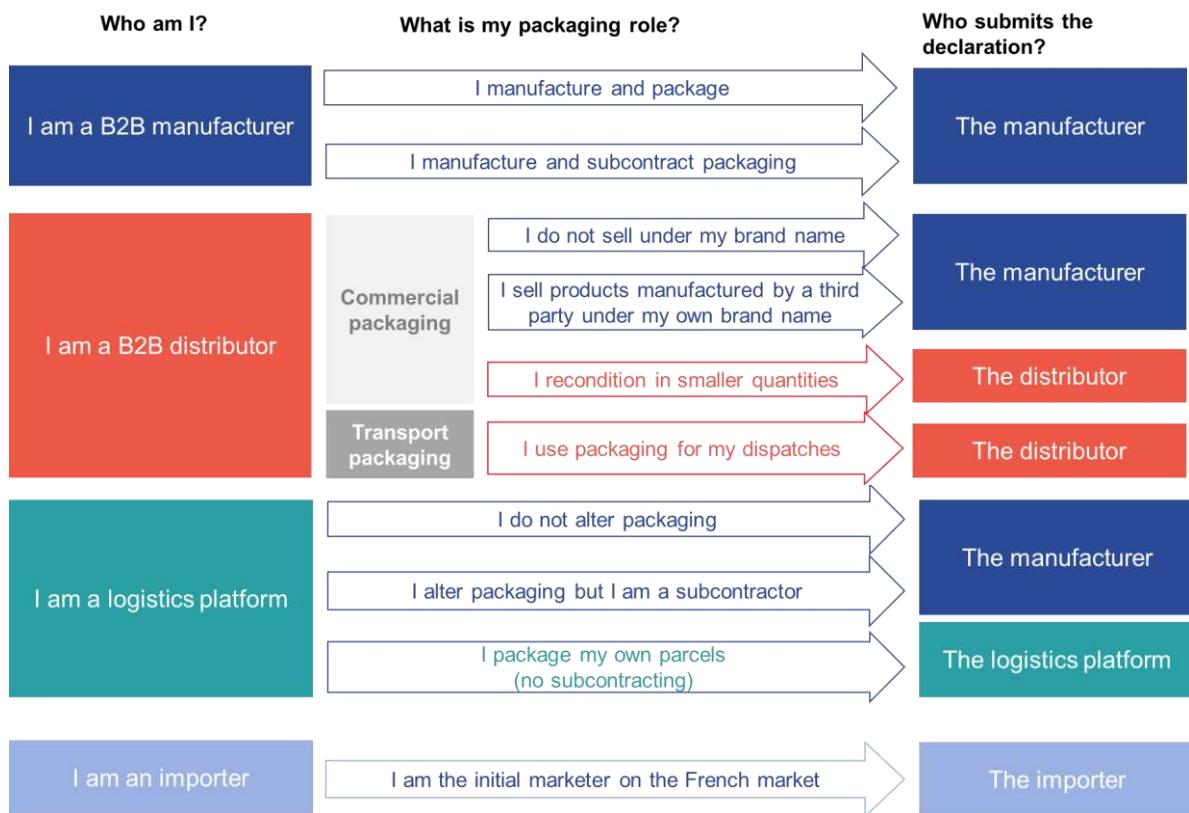
**In the case of subcontracting**, the counting is undertaken by the outsourcing party. This may consist in subcontracting the packing of a product in packaging, or subcontracting an operation carried out on the product.

##### Details:

The above definition of producer applies to data concerning packaging placed on the market in 2025 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 2026 and subsequent years.

##### Who is concerned by the obligation to declare data?



**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).

<sup>1</sup>See [article R541-350](#) of the French Environmental Code (*Code de l'environnement*).

**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 2026, collective organisations may offer to collect their members' professional packaging data (packaging not falling within the scope of approval of a producer responsibility organisation). A collective organisation may be, for example, an industry federation, or a producer responsibility organisation without regard to its accreditation 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 fewer 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 m<sup>3</sup> of stone blocks sold on a pallet = 1 unit of packaged product
  - 6 m<sup>3</sup> of sand sold in 6 bulk 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 reels of 6 metres of cable = 2 units of packaged product

### Example of calculation of a producer's units of packaged product for 2025:



6,000 1L bottles of detergent sold in supermarkets and consumed by households (packed in cardboard boxes and palletised for transport)	8,000 2L bottles of detergent sold in supermarkets and consumed by professionals (packed in cardboard boxes and palletised for transport)	4,000 5L canisters of detergent sold in supermarkets and consumed by professionals (packed in pallet crates for transport)
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## 3.2 When to declare data?

The declaration period is open from **19 January 2026** until **29 May 2026** 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 2025 (or failing that, if the financial year does not make this possible, the total annual turnover declared in 2024)
  - 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 industrial and commercial packaging placed on the market in 2025, in units of packaging:
  - Total quantity of industrial and commercial packaging placed on the market in 2025;
  - Proportion of reused industrial and commercial packaging placed on the market in 2025.

### 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 2025 or failing this**, if the financial year does not allow this, your **turnover for 2024**.

#### **Please note:**

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 store
- 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 industrial and commercial packages (ICP)

Producers declare their quantities of industrial and commercial packages (ICP) placed on the market in 2025 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 ICP?

**Industrial and commercial packaging (ICP)** used or consumed by professionals (excluding food services professionals) is sales, grouped and transport packaging of products “used for the marketing of products consumed or used by professionals and 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).

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

The placing of industrial and commercial packaging (ICP) 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 8 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:**

##### → **Are you a member of an accredited producer responsibility organisation for packaging?**

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

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

- The EPR scheme for household packaging and graphic papers (HPGP).
- The EPR scheme for chemical products (CHEMP).
- The EPR scheme for building construction products and materials (family 2c of article R543-289 of the French Environmental Code).
- The EPR scheme for food services packaging (FSP).

Any packaging falling within the scope of approval of these four EPR schemes 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 placed on the market

Each producer calculates the total quantity of industrial and commercial packaging (ICP) that it placed on the market in France in 2025. How to calculate it?

$$\text{Total quantity of ICP} = \text{Number of reused ICP} + \text{Number of new reusable ICP} + \text{Number of single use ICP} \text{ (in units)}$$

### Definition of reused packaging:

This means packaging that has been used for 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 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 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 2025. How to calculate it?

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

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 annex 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

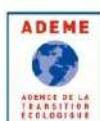
The declaration questionnaire can be accessed [HERE](#) from the Reuse National Observatory's dedicated page.

## 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 to the Reuse National Observatory.



Declaration of reuse of industrial and commercial packaging  
2025 data

Since 2023, all producers placing **more than 10,000 units of packaged products per year on the market** have been subject to a reuse obligation and must submit an annual declaration of their packaging data.

This declaration **only concerns your industrial and commercial packaging**, in other words packaging used by professionals – excluding food services professionals – placed on the market **between 1 January 2025 and 31 December 2025**.

If you require further information about this declaration, a [2026 Declaration Support Guide](#) can be found on the Observatory's website.

### It does not concern:

- your packaging falling within the scope of the [household packaging EPR scheme](#) ;
- your packaging falling within the scope of [chemicals EPR scheme](#) ;
- your packaging classified under group 2c (Article R543-289 of the French Environmental Code) of the [building construction EPR scheme](#);
- your packaging falling within the scope of the [food services packaging EPR scheme](#) ;

The packaging types listed above must not be declared in this form. Contact your producer responsibility organisation.

If you decide to declare your reuse data relating to **your industrial and commercial packaging via a collective organisation, you must not submit a second declaration to the Reuse Observatory.**

You are about to declare the reuse of your industrial and commercial packaging placed on the market in 2025 to ADEME.

### Before responding:

Make sure your declaration corresponds to that 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. It is not possible to declare at the level of an establishment (SIRET, French business establishment identification number).

Make sure you have familiarised yourself with the [2026 Declaration Support Guide](#) from the Reuse Observatory. Make sure you are able to enter all the information required before starting to complete the questionnaire below. Incomplete declarations cannot be saved for submission at a later date.

### What use will be made of the declared data?

The data declared by producers as a whole will be compiled and processed by ADEME. No individual data will be disclosed.

Click "Next" to begin the questionnaire.

## 4.3 Information on the processing of personal data



Declaration of reuse of industrial and commercial packaging  
2025 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](#).

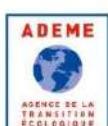
I accept the processing of my personal data in accordance with the information provided  
*You must accept to continue.*

[← Previous](#) [Next →](#)

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".



Declaration of reuse of industrial and commercial packaging  
2025 data

This single questionnaire constitutes **your declaration of ICP placed on the market between 1 January 2025 and 31 December 2025**.

The questions marked with a "\*" (an asterisk) are **compulsory**.

[← Previous](#) [Next →](#)

On this page, you will find information on the data to declare and the period concerned.

Click "Next".

## 4.4 Information about you

Please enter your contact details:

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

You must enter your e-mail address in order to receive a **declaration certificate**.

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

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



Declaration of reuse of industrial and commercial packaging  
2025 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:**

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## 4.5 Start your declaration

Choose one of the two answers according to your situation.



Declaration of reuse of industrial and commercial packaging  
2025 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

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

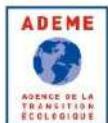
Click "Next" and go directly to part 4.6 *Information on the declarant*.

**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 to request this documentary proof.

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



Declaration of reuse of industrial and commercial packaging  
2025 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? \***

The information requested in the following pages is information about the producer whose declaration you have been appointed to submit.

Yes  No

**Information about the appointed representative**

Authorized representative's company name: \*

Authorized representative's SIRET: \*

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**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 NAF code (5 figures);
- Its annual turnover declared in 2025 by the declarant (failing this, that of 2024).

Lastly, state whether you placed more than 10,000 units of packaged products on the market in 2025 by ticking "Yes" or "No". To calculate your number of units of packaged products in 2025, refer to section 3.1 of this guide.



Declaration of reuse of industrial and commercial  
packaging  
2025 data

**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 NAF code: \*

Declarant entity's annual turnover declared in 2025 (if not known, 2024 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).*

€

**Do you place more than 10,000 units of packaged products on the market per year? \***

*The number of units of packaged products must be calculated across all the sectors of packaging (professional, household, etc.) placed on the market in France in 2025. For example, a pallet of 20 car parts (with boxes, pallet film, filters, etc.) is equal to 20 units of packaged products. Further information can be found in the 2026 Declaration Support Guide.*

*If you placed more than 10,000 units of packaged products on the market in 2025, you are required to declare your packaging. If you are below this threshold, you may declare your packaging on a voluntary basis.*

Yes, I placed at least 10,000 units of packaged products on the market in 2025  
 No, I placed less than 10,000 units of packaged products on the market in 2025 but I want to declare voluntarily

[Previous](#) [Next](#)

[Finish later](#)

**⚠ Rule: The NAF code is selected from a drop-down list**

Enter the first few characters in the search bar, either the NAF code (e.g. 0112Z), or the activity classification (e.g. Growing of rice), then select the corresponding code.

**⚠ 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 typing its first letters in the selection box. 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.

Next, enter your annual turnover declared in 2025 (failing this, that of 2024). The turnover of a declarant not headquartered in France is the turnover of the declarant's business activities in France.

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

Lastly, state whether you placed more than 10,000 units of packaged products on the market in 2025 by ticking "Yes" or "No". To calculate your number of units of packaged products in 2025, refer to section 3.1 of this guide.



### Declaration of reuse of industrial and commercial packaging

2025 data

#### 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:** \*

**Declarant entity's annual turnover declared in 2025 (if not known, 2024 turnover):** \*

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

 €

**What is your main business sector?** \*

**Do you place more than 10,000 units of packaged products on the market per year?** \*

*The number of units of packaged products must be calculated across all the sectors of packaging (professional, household, etc.) placed on the market in France in 2025. For example, a pallet of 20 car parts (with boxes, pallet film, fillers, etc.) is equal to 20 units of packaged products. Further information can be found in the 2026 Declaration Support Guide.*

*If you placed more than 10,000 units of packaged products on the market in 2025, you are required to declare your packaging. If you are below this threshold, you may declare your packaging on a voluntary basis.*

Yes, I placed at least 10,000 units of packaged products on the market in 2025  
 No, I placed less than 10,000 units of packaged products on the market in 2025 but I want to declare voluntarily.

[← Previous](#)

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[Next →](#)

[Finish later](#)

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.

## 4.7 Quantities of industrial and commercial packaging placed on the market in 2025

Depending on the details of your data, choose whether to enter a detailed or simplified report of the quantity of industrial and commercial packaging by checking the box of your choice.



Declaration of reuse of industrial and commercial packaging  
2025 data

### Quantities of INDUSTRIAL AND COMMERCIAL packaging placed on the market in 2025 (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 2025 (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

In the rest of this declaration, the industrial and commercial packaging used by professionals (other than food services professionals, included in the food services packaging EPR scheme) is abbreviated as "industrial and commercial packaging".

**Important note:** Only declare your industrial and commercial packaging placed on the market **between 1 January and 31 December 2025** to the Observatory.

← Previous

Next →

✓ Finish later

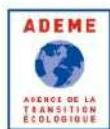
#### a. In the case of detailed data

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 2025 (in packaging units)
- Quantities of **new reusable** industrial and commercial packaging placed on the market in 2025 (in units of packaging)
- Quantities of **reused** industrial and commercial packaging placed on the market in 2025 (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 Annex 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.



## Declaration of reuse of industrial and commercial packaging 2025 data

### Quantities of INDUSTRIAL AND COMMERCIAL packaging placed on the market in 2025 (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 2025 (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

In the rest of this declaration, the industrial and commercial packaging used by professionals (other than food services professionals, included in the food services packaging EPR scheme) is abbreviated as "industrial and commercial packaging".

**Important note:** Only declare your industrial and commercial packaging placed on the market between 1 January and 31 December 2025 to the Observatory.

Quantity of single-use industrial and commercial packaging placed on the market in 2025 (units): \*

packaging

Quantity of new reusable industrial and commercial packaging placed on the market in 2025 (units): \*

packaging

Quantity of reused industrial and commercial packaging placed on the market in 2025 (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 2025 (in units of packaging),
- The **proportion** of industrial and commercial packaging placed on the market in 2025.

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 2025 data

### Quantities of INDUSTRIAL AND COMMERCIAL packaging placed on the market in 2025 (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 2025 (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

In the rest of this declaration, the industrial and commercial packaging used by professionals (other than food services professionals, included in the food services packaging EPR scheme) is abbreviated as "industrial and commercial packaging".

**Important note:** Only declare your industrial and commercial packaging placed on the market between 1 January and 31 December 2025 to the Observatory.

**Total quantity of industrial and commercial packaging placed on the market in 2025 (units): \***

\_\_\_\_\_ packaging

**Proportion of reused industrial and commercial packaging placed on the market in 2025 (%): \***

\_\_\_\_\_ %

### 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 2 or 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

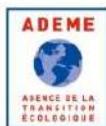
[← Previous](#) [Next →](#) [Finish later](#)

Click "Next".

## 4.8 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 available to download online.

Click “**Save**” to validate and send your declaration.



Declaration of reuse of industrial and commercial packaging  
2025 data

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

By clicking on **Save**, you confirm that the information you declare is correct and your declaration will be sent to the Reuse National Observatory. A certificate for your declaration will be sent to you by email and you will be able to access your form again if you wish to correct any data. **Remember to download your certificate, which will be available until 31 August 2026.**

← Previous

✓ Save

## 4.9 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 31 August 2026.**

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



Declaration of reuse of industrial and commercial packaging  
2025 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. This message is automatically generated by the service provider's email system.

Please check your spam folder if you have not received it at the email address provided earlier in the declaration.

## 5. Contact details

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

E-mail address: [assistance-declaration-reemploi@ademe.fr](mailto: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 French Environmental Code (*Code de l'environnement*) are expressed in terms of sales units or sales unit equivalents. Each producer must monitor their quantities of packaging in compliance with this unit of measure, which differs according to 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.

<u>Sales ICP</u>	<u>Grouped and transport ICP</u>
<p>Industrial and commercial packaging is counted <b>per sales unit</b>.</p> <p><i>Sales unit: product corresponding to a volume of product contained in a reference list, which is the subject of a transaction between two actors</i></p> <p>For products listed by unit, the packaging (which may comprise several components) connected with each product unit is counted as one package.</p> <p>For products listed by quantity (weight, volume, dimensions), each corresponding package (which may comprise several components) is counted as one package.</p> <p><b>Example of counting</b></p>  <p>1 plastic sachet with label = 1 package counted</p> <p>1 IBC with stopper = 1 package counted</p> <p>1 drum with cover = 1 package counted</p> <p><i>Examples of counting from the ADEME study “Counting the reuse of packaging in France”</i></p>	<p>Grouped and transport industrial and commercial packaging is counted <b>per package</b>.</p> <p><i>1 package counted = a packaging component with any associated ancillary component(s)</i></p> <p>A packaging component is considered as being an ancillary component in the following cases:</p> <ul style="list-style-type: none"><li>• The packaging component is a sealing component (lid, etc.)</li><li>• It is an element that is mechanically connected (screwed, glued, welded, etc.) to the packaging (label, tape, staple)</li></ul> <p><b>Example of counting</b></p>  <p>1 pallet with a label = 1 package counted</p> <p>1 rolling cart = 1 package counted</p> <p>1 pallet crate with cover and straps = 1 package counted</p> <p>1 box with tape and label = 1 package counted</p> <p><i>Examples of counting from the ADEME study “Counting the reuse of packaging in France”</i></p>

## Special cases

### Special cases: Sales ICP

#### 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:



1 box and fillers  
5 sachets

+

1 box and fillers  
5 sachets

1 sales unit  
**= 1 package counted**

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 (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  
**= 21 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  
**= 12 packages counted**

\*See the rule for fillers below.

## Special cases: Grouped and transport ICP (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

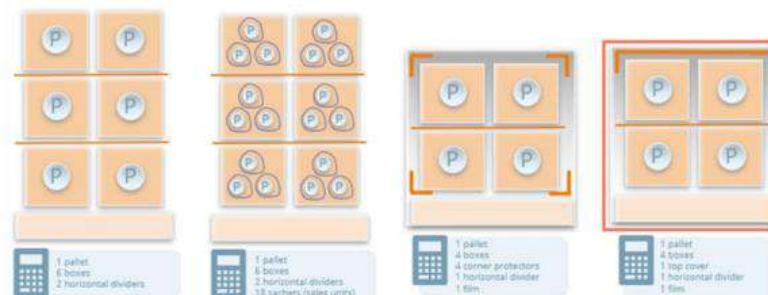
#### Case of dividers, pallet film, straps, corner protectors and top covers

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**



### Legend

- Product (without packaging)
- Counting of packaging

*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 or transport ICP 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 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 ICP: less than 40 % of the total weight\*** of the package concerned

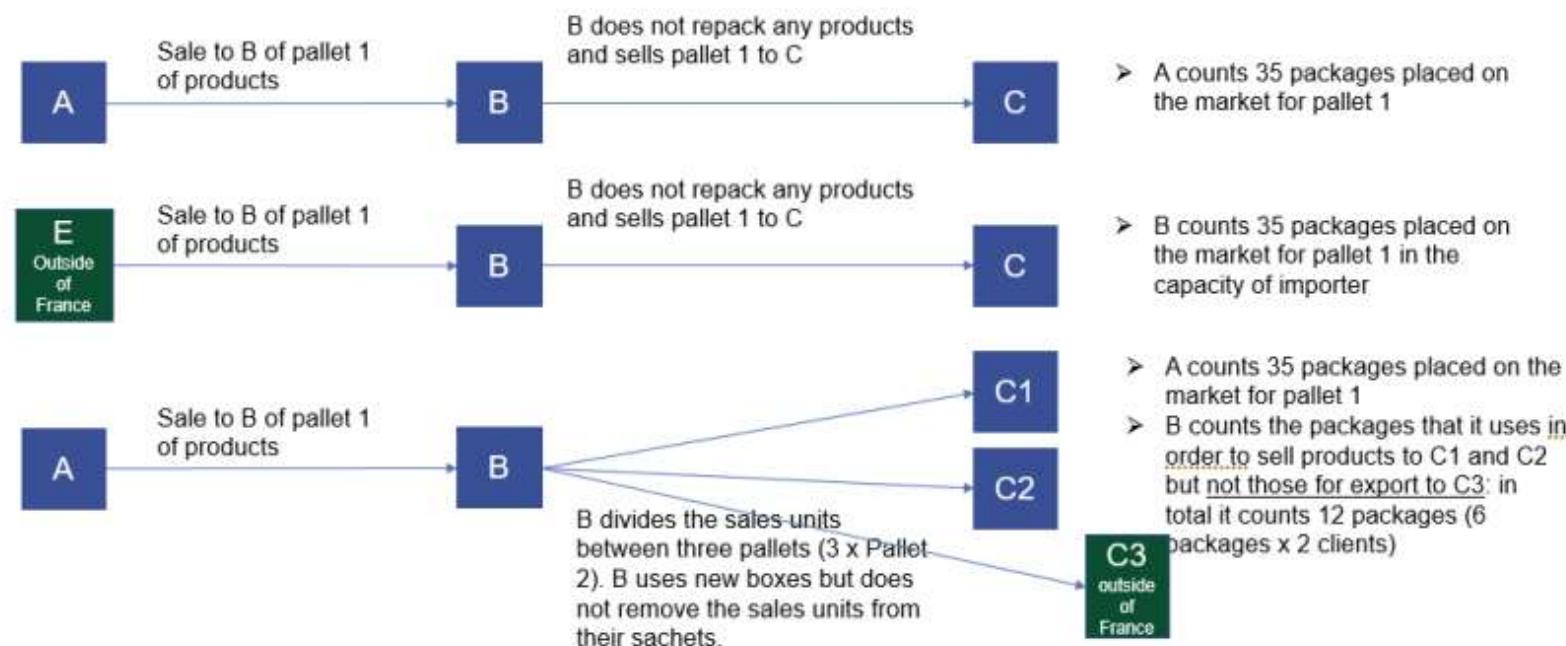
If a condition is not met, the sales unit or package is considered as being single-use.

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

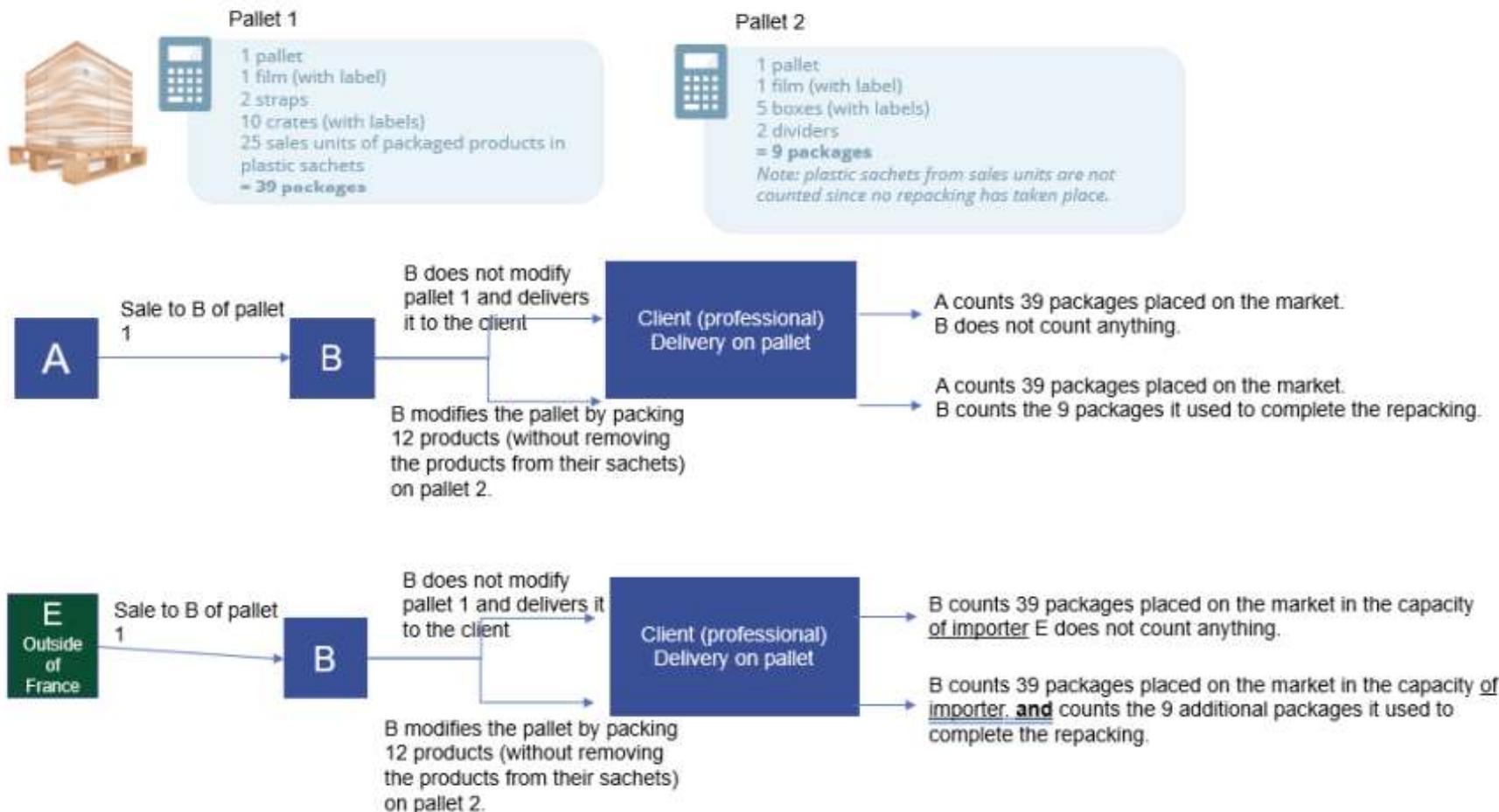
## Annexe 2: Examples of shared responsibility for counting of professional packaging

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.

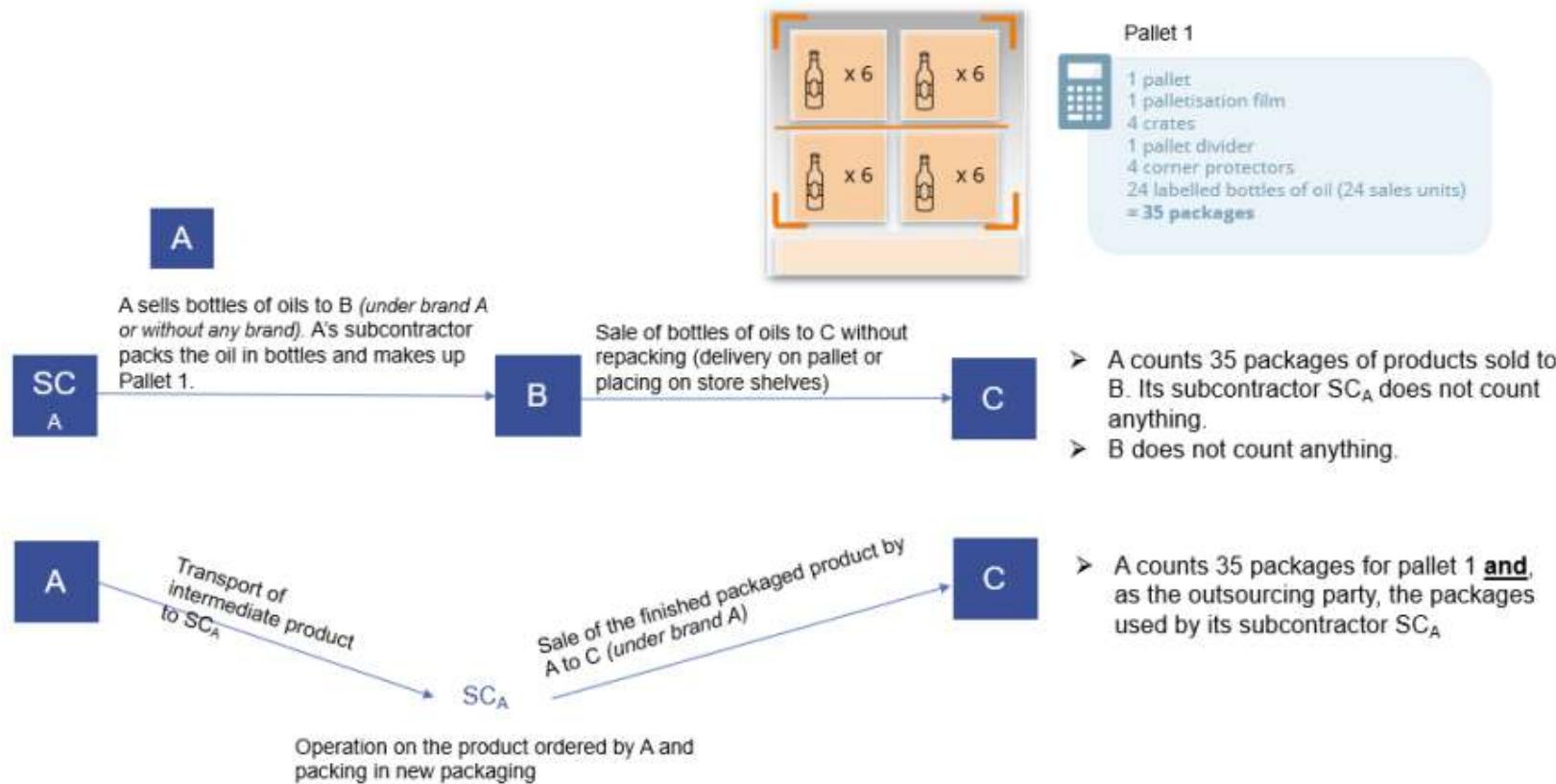
### *Case of counting, including the import/export of products*



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



## Case of counting with subcontracting



## ABOUT ADEME

At the heart of the missions entrusted to it by the Ministry for the Ecological Transition, the Ministry in charge of Energy, and the Ministry in charge of Research, ADEME – the French Agency for Ecological Transition – shares its expertise, provides funding, and supports the implementation of transformative projects across several fields: energy, circular economy, industrial decarbonisation, mobility, buildings, air, sustainable production, consumption and food, bioeconomy, adaptation, soil management and just transition.

It engages citizens, economic actors, and local authorities, by providing them with the tools to move towards a low-carbon and resource-efficient society. Firmly committed to tackling climate change and resource depletion, ADEME advises, facilitates, and helps finance numerous projects, from research to the dissemination of practical solutions. It leverages its expertise and foresight capacities to support the development and implementation of public policies.

ADEME is a public industrial and commercial institution (EPIC).

### ADEME'S COLLECTIONS



#### FACTS AND FIGURES

ADEME is a reference - ADEME provides objective analyses based on regularly updated quantitative indicators.



#### KEYS TO ACTION

ADEME is a facilitator - ADEME compiles practical handbooks and guidelines to help actors implement their projects methodically and in compliance with regulations.



#### FOCUS ON ACTION

ADEME is a catalyst - Actors and stakeholders talk about their experience and share their know-how.



#### EXPERTISE

ADEME is an expert - ADEME reports on research, studies and collective work carried out under its supervision.



#### HORIZONS

ADEME looks to the future - ADEME promotes a forward-looking and realistic view of the energy and environment transition and what is at stake for society, to build a desirable future together.

# DECLARATION OF REUSE OF INDUSTRIAL AND COMMERCIAL PACKAGING

## 2026 Declaration for 2025 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 AGEC Law). 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, managed by ADEME, is putting a transitional solution in place in order to collect professional packaging data from producers pending the introduction of EPR schemes.



*This guide is solely dedicated to producers' 2026 declaration of their data on professional packaging placed on the market in 2025 to the Reuse National Observatory.*

