

## Information on extended producer responsibility (EPR).

**(Please note the deadline of 14/03/2022 mentioned in the text).**

The French government has enacted a new regulation (called "AGEC", the law against waste and for the circular economy) and established a mandatory compliance system. From 2022, each platform - and therefore **heyconnect** as well - must be able to prove that its partners selling on the French market have obtained a unique identification number ("Identifiant Unique", UIN) from ADEME (l'Agence de la transition écologique - the French Agency for Ecological Transition).

Therefore, any producer selling products in France that fall under an Extended Producer Responsibility (EPR) system (e.g., textiles, packaging) must register with a producer responsibility organization (PRO) that is responsible for the product categories they sell. Once registered, the unique ID number will be assigned by ADEME to the PRO; the PRO will share the new number with its members beginning in early 2022.

If you already have unique EPR identification numbers for your product range, please provide them to us as soon as possible. To do so, use the templates attached in the accompanying e-mail and upload the file that applies to you under the following form:

If you are currently unable to provide EPR numbers, please apply for them as soon as possible and submit them using the form above. For this purpose, we have prepared the most important information for you below. However, this information is only intended as a guide. You can obtain binding information from the official contact points.

### Who must apply for/provide the unique ID and why?

Extended producer responsibility (EPR) is an environmental directive that makes the party placing a product covered by the EPR provisions on the market for the very first time (also referred to as the "producer" in the context of EPR) responsible for the entire life cycle of the products placed on the market, from design to end of life (including collection of waste products). Under EPR regulations, responsible parties must mitigate the environmental impact of their products throughout the product life cycle.

Whether you yourself are considered a "producer" under the Environmental Directive is based on the following provisions:

- **With respect to packaging**, anyone who is the first to commercially place on the local market a packaging product filled with goods that typically collect as waste from private end users (Germany or France) is considered a "producer." Therefore, you are considered a "manufacturer" for the purposes of the EPR if your products are packaged in any manner (including secondary packaging for shipment to the end customer). (Note: You only need to provide EPR information on secondary packaging if you handle the final customer shipment yourself. Otherwise, this information will be entered by heyconnect itself).
- **In the other product categories**, a simple guideline is that you are considered a "manufacturer" if any of the following options apply to you:
  - if you manufacture and sell locally a product that is covered by the EPR regulations in that country, or respectively, and
  - if you import a product that is covered by the EPR regulations in the respective country, or or and
  - if you sell a product that is covered by the EPR regulations in the relevant country and you are not located in that country.
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### What do you have to do now?

- **If you are a manufacturer of products covered by the EPR regulations and you already have them**, you are required to provide heyconnect with your Unique IDs (even if you have already submitted them to a platform yourself, for example as part of your own Amazon business).
- **If you are considered a manufacturer and do not have registration numbers**, you must request them. To do so, register with the relevant authority in the country and or Producer Responsibility Organizations.
- **If you are not a manufacturer but sell products covered by the EPR regulations**, you must request the appropriate Unique IDs from your upstream supplier.
- **If you are not a manufacturer but cannot obtain the valid registration numbers from your upstream supplier**, you must register to request the Unique IDs yourself.

In either case, please complete the EPR template and submit it to us as soon as possible using the form above.

### Which Producer Responsibility Organization(s) do you need to contact?

Note: You will need at least one Unique ID per product category that applies to you, as well as for your primary packaging.

EPR Categories	Products	Producer Responsibility Organisations (PRO)	Link
1	<b>Electric and Electronic Equipment (EEE)</b>	Waste generated by Electrics and Electronics Equipment	<a href="#">Ecosystem</a> <a href="#">Ecologic</a> <a href="#">Soren</a>
2	<b>Batteries</b>	Used batteries and accumulators	<a href="#">Corepile</a> <a href="#">Screlec</a>
3	<b>Packaging</b>	Waste from households packaging (primary and secondary)	<a href="#">Citeo</a> <a href="#">Léko</a>
4	<b>Print Paper</b>	Waste from graphics papers	<a href="#">Citeo</a>
5	<b>Furniture</b>	Waste generated by furniture equipment	<a href="#">Eco-mobilier</a> <a href="#">Valdelia</a>
6	<b>Textiles</b>	Textiles, household linens, shoes, etc.	<a href="#">Refashion</a>
7	<b>Tires</b>	Waste generated by tyres	<a href="#">GIE FRP</a>

			<a href="#">Aliapur</a>
8	<b>Chemicals</b>	Chemical waste generated by household	<a href="#">EcoDDS</a>
9	<b>Medical piercing equipment for self-treatment</b>	Waste generated by piercing equipment used by patient in self-treatment	<a href="#">Dastri</a>

## How do you get your Unique IDs?

In most cases, once you are registered with the PRO, they will take care of the registration with ADEME for their members. We strongly advise all partners to contact the PROs to confirm this. The PROs in France will then send you your Unique IDs.

In most cases, your PRO should provide you with your Unique IDs when you log into your account on their website.

The Unique ID has the following format: FR239691\_01VNFV.

- It begins with a capitalized 'FR'.
- The six characters between 'FR' and '\_' are always numbers.
- The ninth character is always an underscore '\_'.
- The last four characters are capital letters, not numbers

For packaging, all ID numbers contain "\_01"; for textiles, all ID numbers contain "\_11". Except for the "FR" at the beginning, the other digits and letters are random.

Below are examples of invalid ID formats:

Unique ID number (UIN)	Why it's wrong
DE230691_01VNFH	Begins with 'DE' instead of 'FR'
fr230691_01VNFV	Begins with lowercase 'fr' instead of uppercase 'FR'
FR23069_01VNFV	Five numbers between 'FR' and '_' instead of six numbers
FR23GH54_01VNFV	Letters between 'FR' and '_' when it should be just numbers
FR23069101VNFV	No underscore '_'
FR23069101_VNFV	Underscore '_' not placed as the ninth character
FR230691_01VNFV (when submitted for textiles)	'_11' is the correct code for textiles
FR230691_11VNFV (when submitted for packaging)	'_01' is the correct code for packaging
FR230691_VNFV	No two digit code provided after the underscore '_', i.e. '_01'
FR230691_01VNF	Three uppercase letters at the end, instead of four
FR230691_01VNFVV	Five uppercase letters at the end, instead of four
FR230691_01vnfv	Last four letters should be uppercase
FR230691_01VN4V	Last four letters should not contain a number
FR 230691_01VNFV	Space before 'FR' - there should be no spaces anywhere

Unique IDs are each valid for one year and are renewed annually.

## What happens if you cannot prove your EPR compliance?

In accordance with legal requirements, failure to provide proof of EPR registration since the beginning of 2022 can theoretically lead to a sales stop of the affected goods in France. Fortunately, none of the platforms has yet made use of this drastic measure. Rather, the different communication of the platforms currently gives a picture of a "flowing transition" into compliance with the directive. Nevertheless, the EPR numbers must now be submitted as quickly as possible.

Since our platform partner Zalando has now specified 15.03.2022. as the submission deadline, we ask you to send us the required **information by 14.03.2022.**

If you do not have the EPR numbers by then, this is not the last possibility to submit them, but we cannot exclude that the platforms reserve the following measures until they are provided:

- Exclusion of the items from sale on FR channels.
- Collecting/passing on any applicable environmental fees if these are automatically paid by the platforms on your behalf to the relevant Producer Responsibility Organization(s) (PRO) when selling an unregistered brand/category. (Depending on the EPR category, Amazon, for example, will make the payments on your behalf at the end of each quarter or at the end of the year).

**Thank you for your cooperation!**