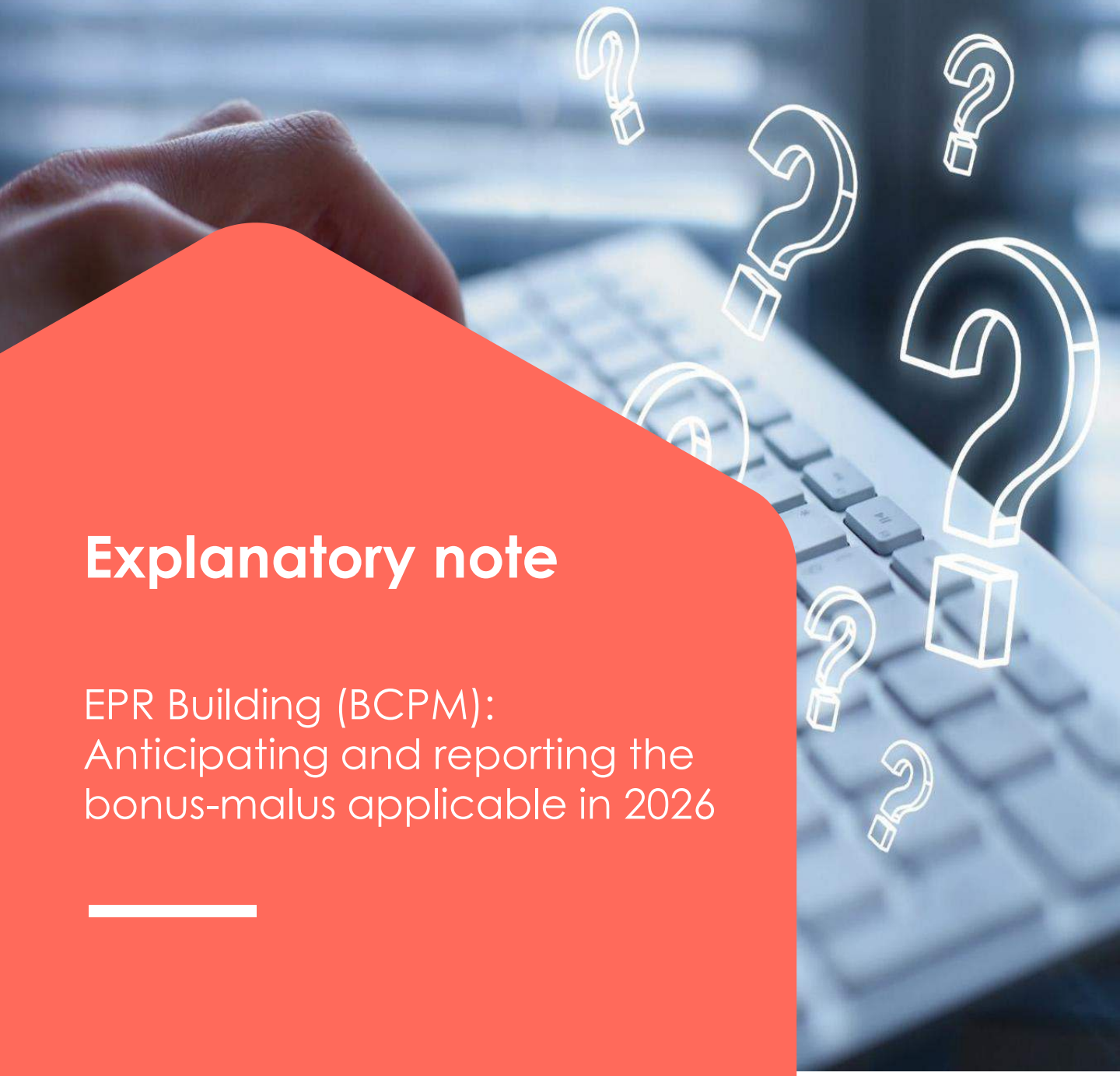

# Explanatory note

## EPR Building (BCPM): Anticipating and reporting the bonus-malus applicable in 2026

Version 3. 21/04/2026

valobat

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# EDITO

Dear members of the Building sector (BCPM),

As of 1 July 2026, eco-modulations for BCPM products will evolve.

These eco-modulations, included in the 2026 pricing schedule, will be applied to the eco-contribution amounts that you implement from 1 July 2026 onwards.

In the meantime, and until 30 June 2026, the eco-modulations to be applied will remain those already in place under the 2025 pricing schedule. You can find their details in the 2025 pricing schedule.

Aware of the time required to implement these changes, and with the aim of simplifying your administrative processes as much as possible, Valobat invites you to refer to this explanatory note now.It will help you identify products eligible for eco-modulations and prepare you to pass on these bonuses to your customers by applying these preferential rates as from 1 July 2026.

It also includes, for producers placing products on the market, a link to a template letter addressed to your suppliers to collect the supporting documents required to benefit from bonuses or avoid applicable maluses. This template is also available for download in your member document area.

We wish you an informative read.

**Florence Collot**
Director of Member Relations

# 1

# FOCUS ON ECO-MODULATIONS

# ECO-MODULATIONS

## WHAT ARE ECO-MODULATIONS ?

A key component of the implementation of the EPR scheme for Building Construction Products and Materials (BCPM), eco-modulations adjust the eco-contributions of Valobat members through bonuses and penalties, taking into account the environmental performance of construction products placed on the market. This regulatory requirement, aimed at encouraging stakeholders in the building sector to engage in eco-design practices, is being rolled out progressively, with a phased implementation over the coming years, from 2025 to 2027.

## HOW ARE THESE ECO-MODULATIONS DEFINED ?

The eco-modulation criteria, as well as the bonus amounts, are defined by Valobat members through a series of working groups bringing together representatives from the different sectors, and are based on a study jointly conducted by the four Producer Responsibility Organisations approved for the sector.

These criteria are the result of collaborative work between Valobat and its members. All of these eco-modulations have been approved by the various sector committees within Valobat and by Valobat's governance, and are currently under review by the public authorities.

Eco-modulations are therefore defined through to 2027. They may be adjusted when the corresponding pricing schedule is published, in order to reflect the actual characteristics of products placed on the market.

### PLEASE NOTE: THRESHOLDS

The thresholds for achieving eco-modulations have been defined so that only a proportion of products can benefit from them. The objective is to encourage the sector to improve environmental performance, for example by increasing the incorporation of recycled materials.

Regarding the recycled content incorporated into products, the eco-modulation threshold allows access to the bonus, but some products may contain significantly more recycled material than the threshold.

Furthermore, the types of waste concerned (pre-consumer, post-consumer, open-loop and closed-loop) may vary between products, as may the eligibility thresholds. These depend on industrial processes and the mechanisms implemented by each Producer Responsibility Organisation. Eco-modulation criteria are therefore designed to differentiate between similar and comparable products (for example, two glass wool insulation products).

## WHAT CHANGES ARE EXPECTED FOR ECO-MODULATIONS IN 2026 ?

In 2024, Valobat activated the eco-modulation criterion related to the incorporation of recycled material for 30 pricing lines.

Since 1 July 2025, more than one hundred pricing lines are now affected by eco-modulations, across 6 major eco-modulation categories, adapted to ensure relevance for each product type.

From 1 July 2026, further changes will come into effect to encourage greater eco-design of products. These developments notably concern certain doors, which will now be eligible for bonuses related to durability, recycled material incorporation, and sustainable management.

In addition, the thresholds for obtaining the bonus linked to recycled material incorporation have been increased for certain products, such as floor coverings, certain plastic products, and rock wool products, in order to encourage producers placing products on the market to increase the share of recycled materials in their products.

## WHAT CRITERIA HAVE BEEN SELECTED? FOR WHAT PURPOSES ?

| Criterion | Objectives |
|---|---|
| **Recyclabilityed material** | to encourage the use of recycled materials in products |
| **Disassembly** | to encourage the design of products that can be easily reused, and to inform consumers and professionals about best practices |
| **Durability and repairability** | to create products with a longer lifespan (enhanced performance or repair possibilities) |
| **Recyclability** | to avoid recycling disruptors and overly complex products |
| **Hazardous substances** | to reduce hazardous substances and products, in order to improve recyclability and reuse at end of life |
| **Sustainably managed renewable resources** | to encourage the use of traceable wood, in order to ensure sustainable forest management |

# 2

# GENERAL RULES AND CONTROL OF ECO-MODULATIONS

# GENERAL RULES FOR ECO-MODULATIONS

Eco-modulations apply to different lines of the Valobat pricing schedule. As mentioned in the previous section, they may take the form of bonuses or maluses.

- Where several bonuses apply to a product, they can be combined.
- Where both a malus and a bonus could apply to a product, if the product is subject to a malus, it cannot benefit from a bonus.
- Maluses are mandatory.
- Certain criteria have specific conditions of application. For example, a product containing recycling disruptors or hazardous substances is not eligible for the recycled material incorporation criterion. Please refer to page 21 for further details.

# HOW DOES VALOBAT VERIFY YOUR ECO-MODULATION REPORTING?

Eco-modulations applied in 2026 will be subject to verification starting in 2028.In the first half of 2026, you will be asked to submit your forecast placing on the market for 2026. This declaration may include a number of eco-modulations.
In the first half of 2027, you will then be required to submit your actual placing on the market for 2026. This declaration will be subject to verification from 2028 onwards.

It will therefore be verified that the products actually placed on the market in 2026 meet the eco-modulation criteria declared in your actual 2026 report, submitted in the first half of 2027.

Companies will be audited by an external audit firm to verify their declarations. For this purpose, supporting documents will be requested by the auditor depending on the eco-modulations applied by the company. These supporting documents are listed in the table on pages 10 to 11, depending on the type of eco-modulation activated and the product category. They must be retained for 3 years after the declaration.

Download the template letter to be sent to your suppliers in order to collect the information required to benefit from eco-modulations.

DOWNLOAD THE TEMPLATE LETTER TO SEND TO YOUR SUPPLIERS

| Criterion | Proof points |
|---|---|
| **Incorporation of recycled material** | **For glazing in joinery products:** Environmental Product Declaration (EPD/FDES) including a declared climate change indicator less than or equal to 1.9 kg $CO_2$eq/mm (thickness)/m² of glass<br><br>**For concrete:** Delivery notes including the concrete mix design, compliant with standard NF EN 206+A2/CN<br>**For all other products:**<br>Mass Balance (credit method) is excluded; chemical recycling is included.<br>*Note: For plastics, recycled raw materials whose purchase invoice indicates food-grade (or equivalent mention, relevant standards, etc.) cannot be taken into account in the calculation.*<br>Please note: for the recycled content criterion, you may need to justify that it is exclusively post-consumer recycled material. In this case, the supplier's statement or the certification rules must specify this. See the precise definitions in the eco-modulation Excel table<br><br>*Supporting documents must indicate the relevant period (year, etc.).*<br>**If you are a manufacturer:**<br>• Certification (LNE Recyclé, RecyClass, VinylPlus® Product Label, ISO 14021-compliant declaration, etc.).<br>• Certifications based on Mass Balance using the credit method (ISCC Plus, etc.) are not accepted.<br>• or purchase invoices + mass balance + formulations,<br>• or detailed traceability with weighing tickets for internal systems + formulations.<br><br>**If you are not a manufacturer :**<br><br>o Certification (LNE Recyclé, RecyClass, VinylPlus® Product Label, ISO 14025-compliant declaration issued by an accredited third party, etc.). Certifications based on Mass Balance using the credit method (ISCC Plus, etc.) are not accepted.<br>o or supplier statement specifying the type of recycled material (pre-consumer, post-consumer; the calculation method must comply with the Valobat guide), and purchase invoices from the supplier. You may use the recycled content declaration available for download on our website<br>o or any other equivalent level of proof.<br>+<br>**For all products :** technical data sheet, safety data sheet (SDS), label, or supplier statement demonstrating the absence of hazardous substances and recycling disruptors. |

| Criterion | Proof points |
|---|---|
| **Durability** | **For bathtubs:** Provision by the producer placing the product on the market of an anti-scratch repair kit, as specified in the warranty, general terms and conditions of sale, or specific conditions<br><br>**For composite shell swimming pools :** Manufacturer's certificate guaranteeing watertightness for 30 years, or General Terms and Conditions of Sale stating this. If the warranty is optional, a document confirming this choice for each concerned customer.<br><br>**Products concerned by the traceability criterion** (elevators and external doors)<br><br>Photo of the product showing the marking, along with an explanation from the manufacturer specifying how to access the documents. The minimum documents that must be available are :<br><br>**For elevators:** technical documentation, repair guide, performance guide<br><br>**For external doors:** maintenance guide (e.g., cleaning, lubrication, etc.), service guide (e.g., adjustment, component replacement, etc.), references or equivalents of hardware components |
| **Repairability** | **Other products concerned by the repairability criterion:** repair/replacement instructions for parts + exploded view diagram of parts + availability of spare parts specified in the warranty, General Terms and Conditions of Sale, or specific conditions |
| **Disassembly** | **Floor covering :** technical data sheet, Technical Application Document (DTA), installation guide, product sheet, standard specification or any other document indicating the installation method recommended by the manufacturer and clearly corresponding to the eco-modulation (e.g. glued installation, loose-lay, semi-loose, click system…<br>The product can only benefit from the bonus if fully glued installation is not recommended, or only recommended for areas greater than 20 m²<br>The product may still be spot-glued at specific and limited points while remaining eligible for the bonus (for example, in front of bay windows) |
| **Sustainable management** | PEFC/FSC certification covering the entire product and the full chain of custody |
| **Recyclability / Recycling disruptor** | Technical data sheet, SDS, label, or any other document detailing the product composition, or a supplier statement |
| **Hazardous substances** | Technical data sheet, SDS, label, or supplier statement |

**This list is not exhaustive; please contact us to propose a supporting document at ecoconception@valobat.fr**

### Supporting documents not accepted for the recycled material incorporation bonus

- FDES (except for glazing)
- EPD
- ISCC Plus using Mass Balance (credit method)

# 3

# IT CONFIGURATION OF CODING UPDATES

## IT configuration of coding updates

The pricing code includes two additional digits compared to the 2023 pricing code, corresponding to eco-modulations.

- The suffix "00" indicates that no eco-modulation applies or that the product is not eligible.
- Another suffix indicates that the product benefits from an eco-modulation.

**Root code** **Eco-modulation suffix**


**Download the 2025 coding file** (pricing schedule applicable until 30 June 2026)
**Download the 2026 coding file**
(pricing schedule applicable from 1 July 2026 onwards)

**EXAMPLES :**

Rock wool insulation products, with pricing code 0501003, have three possible pricing codes :

- 050100300 if the product does not activate a bonus and is not subject to a malus
- 050100310 if the product is eligible for a bonus
- 050100301 if the product is subject to a malus

If your import files contain only 7 digits, the MyValobat Member tool will prompt you to select the suffix corresponding to your product.

Metal partition and ceiling accessories, with pricing code 0401003, which are not subject to any eco-modulation, now have a new product code: 040100300. To simplify reporting, if the product code in your import files contains only 7 digits, the suffix "00" will be automatically added.

**A tool is available in your MyValobat Member Area to guide you step by step through this coding process.**

## 2027 TRAJECTORIES BY PRODUCT CATEGORY

**The trajectories are presented in summary tables: to check whether your products are subject to eco-modulations, please refer to, the 2025 coding Excel file (applicable until 30 June 2026), and the 2026 coding Excel file (applicable from 1 July 2026 onwards).**

| Product category | Products | Key issues | 2025–2026 criteria | 2027 trajectories |
|---|---|---|---|---|
| Floor coverings | Linoleum, carpets and textiles, plastic or multi-material floor coverings | Recycled material incorporationd improve disassembly to increase reuse potential | Recycled material incorporation<br><br>Disassembly | Recycled material incorporation: increase in the required recycled content threshold<br><br>Continue to encourage floor disassembly<br><br>Increase in bonus levels to further incentivise these approaches |
| Ceiling tiles | Gypsum, rock wool, glass wool, wood fibre | Depending on the material, incorporate recycled content and increase second-life potential | Recycled material incorporation<br><br>Absence of recycling disruptors | Recycled material incorporation: increase in the required recycled content thresholds<br><br>Continue to limit the presence of recycling disruptors<br><br>Improve the reusability of these products<br><br>Increase in bonus levels to further incentivise these approaches |

| Product category | Products | Key issues | 2025–2026 criteria | 2027 trajectories |
|---|---|---|---|---|
| Insulation products | Glass wool, Rock wool, PSE, XPS, polyuréthane, mousse phénolique | Intégrer de la matière recyclée, et améliorer leur Recyclability | Recycled material incorporation<br><br>Absence of recycling disruptors | Recycled material incorporation: increase in the required recycled content thresholds<br><br>Continue to limit the presence of recycling disruptors<br><br>Increase in bonus levels to further incentivise these approaches |
| "DDS" products (specific hazardous waste) | Paints, coatings, varnishes, stains, sealants, ... | Limit hazardous substances and enable a second life for packaging | Hazardous substances | Hazardous substances<br><br>Packaging reusability |
| Lifts | Lifts and their doors | Improve the repairability and reusability of these products | Repairability by making spare parts available<br><br>Durability (traceability) | Repairability<br><br>Durability (traceability) |
| Other equipment | Bathtubs, composite shell swimming pools | Increase product lifespan | Durability | Durability |

| Product category | Products | Key issues | 2025–2026 criteria | 2027 trajectories |
|---|---|---|---|---|
| Joinery | Joinery products, glazed or non-glazed | Increase the incorporation of recycled material in glazing or in PVC or aluminium profiles, and use sustainably managed wood<br><br>Increase the durability of doors | Recycled material incorporation<br><br>Sustainably managed renewable resources<br><br>Durability | Recycled material incorporation<br><br>Sustainably managed renewable resources<br><br>Durability |
| Plastics | Pool decks, tanks and reservoirs, rainwater downpipes, cable management systems, etc. | Incorporate more recycled material, without introducing recycling disruptors such as hazardous substances and without creating composites that are difficult to recycle | Recycled material incorporation<br><br>Absence of recycling disruptors | Greater incorporation of recycled material, with an incentive to use post-consumer recycled content<br><br>Absence of recycling disruptors<br><br>Increase in bonus levels to encourage higher use of recycled materials |
| Plastics | Composite swimming pools | Increase their durability | Durability through warranty period | Durability through warranty period |

| Product category | Products | Key issues | 2025–2026 criteria | 2027 trajectories |
|---|---|---|---|---|
| Metal products | Wires and cables, plastics used in circuit breakers and transformers, etc. | Incorporate recycled materials (in plastic or metal, depending on the products) | Increased incorporation of recycled material | Increased incorporation of recycled material<br><br>Increase in bonus levels to encourage recycled material incorporation |
| Gypsum products | Powdered gypsum, boards and panels, etc. | Incorporate recycled materials | Recycled material incorporation | Increased incorporation of recycled material, y compris pour le plâtre en poudre<br><br>Increase in bonus levels to encourage recycled material incorporation |

## Eco-modulations for inert materials in 2025 and 2026

| Product category | Products | Key issues | Critères 2025 - 2026 | 2027 trajectories |
|---|---|---|---|---|
| Inert materials | Concrete, bituminous mixtures | Increase or begin incorporating recycled materials | Recycled material incorporation | To be defined |

# 4

# APPENDICES

# TECHNICAL FOCUS: INCORPORATION OF RECYCLED AGGREGATES IN CONCRETE

Concrete products may benefit from a bonus linked to the incorporation of recycled aggregates, depending on their recycled aggregate substitution rate class. The summary table of criteria specifies the bonus amounts associated with classes R0, R1, or R2 and above. These R0, R1, R2 classifications correspond to those defined in standard NF EN 206+A2/CN, which provides the following table :

| Recycled aggregate substitution rate class | R0 | R1 | R2 | R3 | R4 | R5 | R6 | R7 |
|---|---|---|---|---|---|---|---|---|
| Range of total mass percentage of recycled aggregates (recycled sand + type 1 coarse aggregates) | 1-5% | 6-15% | 16-25% | 26-40% | 41-55% | 56-70% | 71-85% | 86-100% |
| Range of total mass percentage of recycled aggregates (recycled sand + type 2 coarse aggregates) | 1-2% | 3-7% | 8-12% | 13-20% | 21-27% | 28-35% | 36-42% | 43-50% |

Thus, the class also depends on the type of aggregate:

- Type 1 aggregate: all characteristics for recycled aggregates are CRB
- Type 2 aggregate: all characteristics for recycled aggregates are CRB or CRC
- Type 3 aggregate: all characteristics for recycled aggregates are CRB or CRC or CRD (not permitted in structural concrete)

Details of the required characteristics and the tests to be carried out to characterise an aggregate are provided in standard NF EN 12620 + A1.

In the case of pre-mixed aggregates, only the recycled portion (for example: TX10 = 10%) should be taken into account.

# TECHNICAL FOCUS: RECYCLED MATERIAL INCORPORATION CRITERION

## CONDITIONS

One of the most commonly used eco-modulation criteria at Valobat is the incorporation of recycled material. This helps reintegrate waste as a substitute for virgin material.

**How can you determine whether the waste you incorporate makes your product eligible for a bonus ?**

To do so, you must :

- Determine whether your product contains elements that prevent eligibility for the bonus :
    - Recycling disruptors. These are listed in the summary table on page 21 of this document.
    - The presence of hazardous substances in quantities exceding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of The article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and the Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.
    - The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.
    - The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants.

- Not take into account recycled plastic materials that are food-grade and originate from food packaging waste

- Calculate the recycled content rate according to the type specified in the eco-modulation (post-consumer or pre-consumer, open-loop or closed-loop), in accordance with the formulas provided in this document.Note: for concrete, the calculation method and the type of recycled material to be considered are those defined in the relevant standards.

## Table of BCPM recycling disruptors preventing the application of the bonus (as of 30 June 2026)

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Concrete | Presence of substitutes for aggregates (oyster shells, hemp, wood, etc.) | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |
| Pool deck (slats only)<br>Rigid pool cover<br>Pipes, tubing, hoses and fittings<br>Plastic cladding éléments<br>Plastic tanks and réservoirs<br>Plastic outdoor and sanitation equipment<br>Plastic gutters, downpipes and accessories<br>Plastic sheets and panels | Other insulation products excluding metal. Multi-material is considered a recycling disruptor if a secondary material is difficult to separate from the main material using standard tools. The following joining methods are not concerned: screwing, clipping, etc. | |
| Expanded polystyrene (EPS)<br>Extruded polystyrene (XPS)<br>Other panels and rolls not otherwise specified | Other insulation | |
| Polyurethane<br>Phenolic foam | Other insulation (excluding facer) | |
| Rock wool<br>Glass wool | Other mineral wool, wood, wood fibre, coating, aluminium covering<br>For panels: previously listed disruptors and other insulation products | |
| All other products | _ | |

**Table of BCPM recycling disruptors – From 1 July 2026**

These disruptors are those leading to maluses in the pricing lines referring to this table and prevent the application of the recycled raw material incorporation bonus for products placed on the market from **1 July 2026 onwards**

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Pool deck (slats only)<br><br>Rigid pool cover<br><br>Pipes, tubing, hoses and fittings<br><br>Plastic cladding elements<br><br>Plastic outdoor and sanitation equipment<br><br>Plastic gutters, downpipes and accessories<br><br>Plastic sheets and panels | Multi-material products excluding metal. Multi-material is considered a recycling disruptor if a secondary material is difficult to separate from the main material using standard tools. The following joining methods are not concerned: screwing, clipping…<br><br>Multiple types of plastic resins (except PE/PP blends), composites, fibres and plant-based fillers, brominated flame retardants<br><br>Reinforced PE, PEX, PER, PE-RT in the presence of aluminium<br><br>For pipes, ducts and conduits: surface treatments | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br><br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br><br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |
| Plastic tanks and reservoirs | Coating (gel coat, etc.), insulation, fibres and plant-based fillers, multiple resins, composites | |
| Expanded polystyrene (EPS)<br><br>Extruded polystyrene (XPS)<br><br>Other panels and rolls not otherwise specified | Other insulation | |
| Polyurethane<br><br>Phenolic foam | Other insulation (excluding facer) | |
| Plastic cable management system | - Multiple types of plastic resins (except PE/PP blends), composites, fibres and plant-based fillers, brominated flame retardants<br>- Reinforced PE, PEX, PER, PE-RT in the presence of aluminium, surface treatments | |

**- Tableau des perturbateurs de recyclage PMCB – A compter du 1er juillet 2026 (suite)**

Ces perturbateurs sont ceux entraînant des malus dans les lignes barèmes faisant référence à ce tableau, et empêchent l'application du bonus à l'incorporation de matières premières recyclées.

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Plastic drainage system components | - Multiple types of plastic resins (except PE/PP blends), composites, fibres and plant-based fillers, brominated flame retardants<br>- Reinforced PE, PEX, PER, PE-RT in the presence of aluminium,<br>For pipes, ducts and conduits: surface treatments | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |
| Gypsum lining complex<br>Gypsum block<br>Gypsum partition (honeycomb, movable or demountable)<br>Gypsum ceiling tiles | Glass fibres where the content is > 2%, cellulose excluding cardboard facing, vapour barrier, glass fabric, glass veil or glass fibre-based materials | |
| Gypsum boards and panels<br>Exterior gypsum cladding<br>Gypsum partition accessories<br>Other gypsum products | Glass fibres (where content exceeds 2%), cellulose excluding cardboard facing, vapour barriers, glass fabric, glass veil, or materials based on glass fibre | |
| PVC or other polymer coverings | - Multiple types of plastic resins (except PE/PP blends), composites, fibres and plant-based fillers<br>- Reinforced PE, PEX, PER<br>- PE-RT in the presence of aluminium<br>- Brominated flame retardants | |
| Transformers<br>Circuit breakers and other small electrical equipment | Between 50% and 60% of recyclable materials (metal, or ABS/PS/PE/PP without brominated flame retardants and with a density < 1.1), but less than 50% metal,and one of the recyclable plastic parts is bonded to other materials by gluing, overmoulding, co-injection, crimping, thermoset inserts, or ultrasonic welding. (Screw, clip or rivet connections are not concerned) | |

- **Table of BCPM recycling disruptors – From 1 July 2026 (continued)**

These disruptors lead to maluses in the pricing lines referring to this table and prevent the application of the recycled raw material incorporation bonus.

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Curtain wall façade elements and other types of glazed façades<br>Fencing mesh<br><br>GatePool enclosure<br><br>Balcony partition<br><br>Movable/demountable partition (excluding gypsum)<br><br>Window<br><br>Indoor staircase<br><br>Guardrail<br><br>Handrail<br><br>Rooflight, roof access, hatch, smoke vent frame and ventilation opening<br><br>Physical barrier<br><br>Sliding or folding door<br><br>Revolving door<br><br>Fence<br><br>Blind<br><br>Veranda and glass structure, vault<br><br>Hinged shutter<br><br>Sliding shutter<br><br>Industrial door, grille and shutter curtain<br><br>Shelter, garage and carport<br><br>Sunshade<br><br>PergolaLouver / jalousie | PVC/wood/metal bonded or not separable from other resins or materials (e.g. PVC bonded to wood)<br><br>Plant-based fillers | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br><br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br><br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |

- **Table of BCPM recycling disruptors – From 1 July 2026 (continued)**

These disruptors lead to maluses in the pricing lines referring to this table and prevent the application of the recycled raw material incorporation bonus.

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Garage door | For the "frame" component :<br>- PVC/wood/metal bonded or not separable from other resins or materials (e.g. PVC bonded to wood)<br>- Plant-based fillers<br>If the door contains wood: presence of MDF, HDF, cardboard, insulation | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |
| Entrance door<br>Internal door leaves<br>Internal doors | Presence of MDF, HDF, cardboard, insulation, etc. | |
| Technical door<br>External and service doors<br>Door frames | For the "frame" component:<br>- PVC/wood/metal bonded or not separable from other resins or materials (e.g. PVC bonded to wood)<br>- Plant-based fillers | |
| Roller shutter, with or without housing<br>Tunnel box and external half-lintel box | For the PVC box component: bonding or assembly not easily separable from other materials, presence of fibres, composites, or insulation | |
| Perforated screen | Fabrics, composite plastics, or other materials (recyclable or not) combined in a complex way with the main recyclable material (stitching, strong adhesive, or any other assembly that is difficult to separate during sorting, dismantling or preparation stages) in a product whose main material would be recyclable without this assembly | |

**- Table of BCPM recycling disruptors – From 1 July 2026 (continued)**

These disruptors lead to maluses in the pricing lines referring to this table and prevent the application of the recycled raw material incorporation bonus.

| Products | Specific disruptors | General disruptors |
|---|---|---|
| Concrete<br>Cement | Presence of substitutes for aggregates (oyster shells, hemp, wood, insulation materials, other non-inert materials, plant-based components, plastic fibres, organic fibres, metallic fibres, etc.) | - The presence of hazardous substances in quantities exceeding 0.1% by mass (or the threshold indicated in Annex XVII of REACH, where applicable), within the meaning of Article L541-9-1 du code de l'environnement, and as defined in Annex XIV of REACH and l'Arrêté du 30 août 2023 relating to the identification of hazardous substances in waste-generating products.<br>- The presence of substances subject to restriction under Annex XVII of REACH in quantities exceeding the specified limit.<br>- The presence of substances listed in Annex IV of règlement 2019/1021 du Parlement européen et du Conseil on persistent organic pollutants. |
| Rock wool<br>Glass wool | Other mineral wool, wood, wood fibre, coating, aluminium covering, other insulation, cement, gypsum, waterproofing membrane, mesh, bituminous covering, metal grille | |
| Bituminous mixtures<br>Bituminous shingles<br>Bituminous waterproofing membranes<br>Textiles and carpets<br>Linoleum<br>Sandwich panels, insulation materials of sandwich panels<br>Metal cable management systems<br>Wires and cables<br>Other products not listed | – | |

# TECHNICAL FOCUS: RECYCLED MATERIAL INCORPORATION CRITERION (continued)

## DEFINITIONS

The definitions of the different types of recycled material are as follows :

### - Production offcuts :

Materials diverted from the waste stream during a manufacturing process and that can be reused within the same process that generated them. They are not placed on the market, are reintegrated into the same manufacturing process or the same product with or without prior processing, and there is no change of ownership.

*Example: defective products or unsold surplus (constituting an industrial stock), if they can be reintegrated into the same process that generated them; offcuts reintegrated into the same process.*

These materials are never taken into account in eco-modulations.

### - Pre-consumer recycled materials :

Materials diverted from the waste stream during a manufacturing process and reintegrated into a manufacturing process other than the one that generated them. The owner of the process may be the same or a third party who has recovered them after transfer as waste. They may undergo processing before being reintegrated into a production cycle and may change ownership.

*Example: defective products or unsold surplus (constituting an industrial stock), if they are reintegrated into a manufacturing process different from the one that generated them, whether by the same owner or by a third party who has recovered them after transfer as waste. Slag from the steel industry used in rock wool insulation products is considered pre-consumer material. Rock wool offcuts from sandwich panels, if not reintegrated into sandwich panels, are also pre-consumer material. A change in composition (chemical and/or mechanical treatment) of waste generated by a manufacturing process is considered a different manufacturing process; therefore, the resulting material is classified as pre-consumer.*

These materials are sometimes taken into account in eco-modulations.

### - Post-consumer recycled materials :

Materials generated by households or by commercial, industrial and institutional facilities in their role as end users of the product, which can no longer be used for their intended purpose.

*Examples: end-of-life waste, installation offcuts, defective products that have been sold, or unsold products that have been placed on the market (by a distributor or installer)*

These materials are always taken into account in eco-modulations

# TECHNICAL FOCUS: RECYCLED MATERIAL INCORPORATION CRITERION (continued)

## CALCULATION FORMULA

In year n, when reporting your placing on the market, for the recycled material incorporation criterion, you must take into account the recycled raw material (RRM) rate incorporated during the previous year n-1.

*Please note :*
- *For concrete, calculations must be carried out in accordance with the applicable standards*
- *Mixed aluminium and steel joinery is considered as aluminium and may be eligible for the bonus, provided that aluminium represents at least 40% of the aluminium/steel mix.*

A mass balance must be carried out for year n-1. The basis for calculating the mass balance must be as granular as possible: at product level or, where traceability is not available because production is carried out by line, at product line level.

If a product is manufactured in several plants with different Recycled material rate s, the result must be weighted according to the production volumes of each plant.

"Commercial reference" refers to a range of similar products (i.e. same designation and technical performance, but possibly different colours or dimensions).

The calculation must be performed at component level or, more rarely, at full product level. This is defined in the eco-modulation criteria for each pricing line. **For simplicity, the term "component" will be used in both cases.**

*Please note: you may also choose to perform monthly mass balances instead of annual ones, particularly if processes are not yet stabilised.*

### GENERAL FORMULA

Recycled material rate (%) = $RRM_{component}$

$$= \textit{Recycled content rate in the component of a product with commercial reference Z} = \frac{\Sigma \textit{ mass of recycled content in the component of the product with commercial reference Z}}{\textit{Total mass of the component of the product with commercial reference Z}}$$

**See special cases on page 28**

### Special case 1: where a component (of a product with the same commercial reference z) is manufactured in several plants with different RRM rates

Recycled material rate (%) = $RRM_{component}$ =

$$\frac{\sum_i \left(\text{Recycled content rate in the component of the product with commercial reference Z manufactured in plant } i * Production_i\right)}{\text{Total production}}$$

=

$$\frac{\sum_i \left( \frac{\sum \text{mass of recycled raw material in the component of the product with commercial reference Z from plant } i}{\text{Total mass of the component of the product with commercial reference Z manufactured in plant } i} \right) * Production_i}{\text{Total production}}$$

$Production_i$ = production of product with commercial reference Z containing the component, manufactured in plant I

Total production = sum of the production of the product with commercial reference Z

### Special case 2: where a component is purchased by an assembler from different suppliers (with different RRM rates) and integrated into a product with the same commercial reference Z. The rate to be taken into account is the one provided by the supplier.

Recycled material rate (%) = $RRM_{component}$ =

$$\frac{\sum_i \text{Recycled content rate in the component assembled in product Z } \textit{originating from} \text{ supplier } i * Production_i}{\text{Total production}}$$

Productions i = Production of the product with commercial reference Z containing the component manufactured in plant I

Total production = Sum of the production of the product with commercial reference Z

## Specifics for joinery products :

Joinery assemblers purchase profiles from their suppliers, which may or may not contain recycled material, and then use these profiles to manufacture different product ranges, including several references.

**How do I determine the recycled material rate of my product?**

Step 1 : Determine the component of my joinery product for which I must justify the recycled material rate

- To do this, refer to the Pricing Schedule Excel file indicating the specific eco-modulation.
- Example: for sunshades, this is the slats

Step 2 : Determine the material of the component (wood, PVC, aluminium)

Step 3 : Contact my supplier of this component to request the recycled content rate, and ask them to complete the declaration or provide a certification

The calculation may be made using a weighted average across a product range, or it is possible to use a standard joinery product in accordance with UFME recommendations. By default, this standard joinery product corresponds to a two-leaf configuration with dimensions of 1.23 × 1.48 m and 1.48 × 2.18 m (dimensions in accordance with standard NF EN 14351-1)

The recycled material rate must not be assessed for the entire product, but only for the specified component, and may be calculated as a weighted average over the period from 1 January to 31 December.

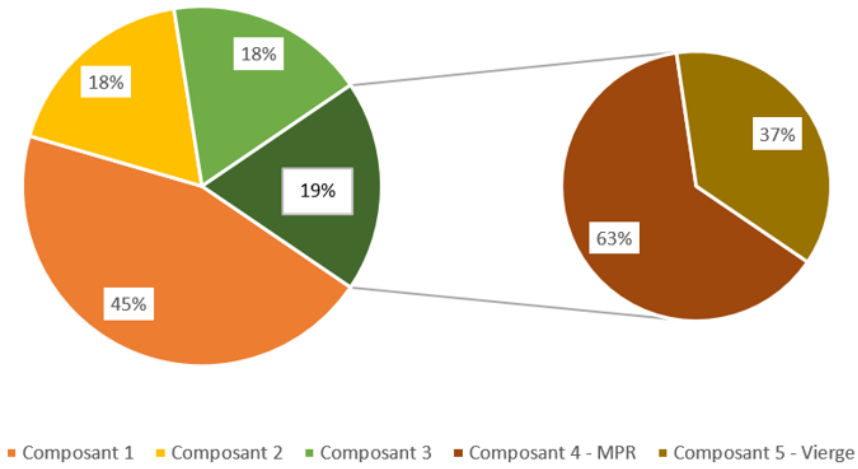
If your supplier's declaration states that PVC profiles of type ABC123 contain 37% recycled material, you may apply the eco-modulation to the entire range incorporating these profiles.

If several types of profiles with different recycled content rates are used within a product or product range, a weighted average must be calculated

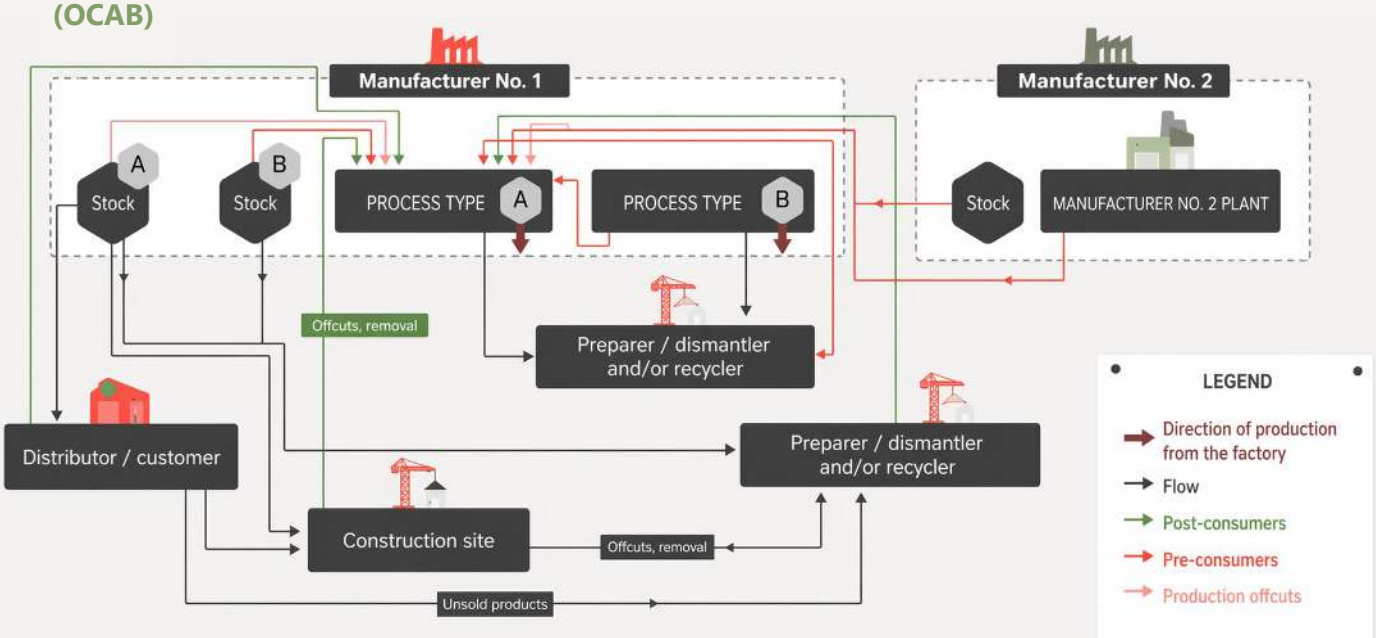
## Case of products containing a material that is only partially made from recycled content:

Please note: it is necessary to correctly calculate the recycled material rate, including in the case of chemical reactions (e.g. polyurethane…).

If a product is composed of 19% of a "recycled" material X, and this material X itself contains 63% recycled material and 37% virgin material, then the recycled material rate to be taken into account isest 63%*19%=11,97%




## DEFINE THE RECYCLED MATERIAL RATE OF PRODUCT A FROM MANUFACTURER NO. 1: DEFINITION BY THE APPROVED COORDINATING BODY FOR THE BUILDING EPR SCHEME (OCAB)



## VALOBAT
## IS AT YOUR SERVICE !

**Our teams are at your disposal to answer your questions**

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