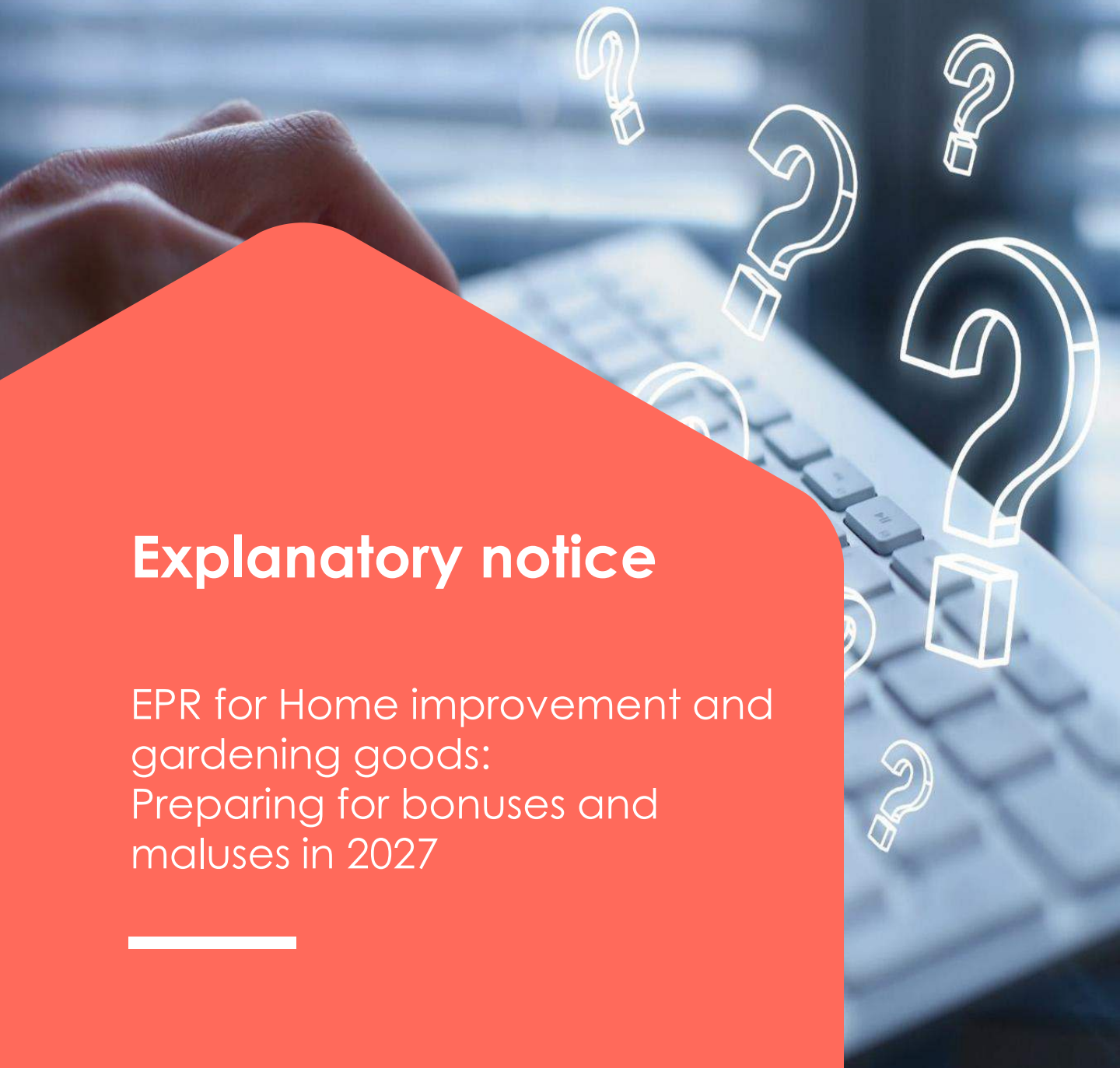


A background image showing a hand typing on a keyboard, with several white question mark icons floating above it. A large red hexagonal shape is overlaid on the left side of the image.

Explanatory notice

EPR for Home improvement and
gardening goods:
Preparing for bonuses and
maluses in 2027

Version 1.0 23/09/2026



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IT configuration



ÉDITO

Dear members of the Home improvement and gardening goods (ABJ) EPR scheme,

On 1 January 2026, a new eco-modulation will be introduced to adjust the amount of your eco-contribution based on the environmental performance of your products containing wood.

This eco-modulation will apply to the eco-contribution amounts implemented in 2026. We have prioritised continuity: the structure of the fee schedule and the wording of the headings remain unchanged.

Aware of the time required to implement this change, and with the aim of making your administrative procedures as simple as possible, Valobat invites you to refer to this explanatory notice now.

It will enable you to identify the products eligible for eco-modulations and prepare for the coding of your products.

It also includes a [link to a template letter](#) to send to your suppliers to obtain the supporting evidence required to benefit from the applicable bonus. This template can also be downloaded from your member document area.

We hope you enjoy reading.

Florence Collot

Director of Member Relations



WHAT IS CHANGING IN 2027

► Declaration of products mainly composed of single-material plastics with physical recycling disruptors

As part of the 2027 fee schedule, a new eco-modulation in the form of a malus is being introduced. It applies to single-material plastic products and is associated with the following criterion: "The product contains a physical recycling disruptor".

All the information required to declare these products can be found on page 9.

► Increase in the bonus amount for the "Availability of spare parts" criterion

To make the bonus more attractive, it will increase from 5% to 10% in 2027. The eligibility conditions remain unchanged.



1

ZOOM ON ECO- MODULATIONS



ECO-MODULATION

► WHAT ARE ECO-MODULATIONS?

Key elements of the implementation of the Home improvement and gardening goods (ABJ) EPR scheme: eco-modulations adjust Valobat members' eco-contributions through bonuses and penalties that take into account the environmental performance of ABJ placed on the market.

This regulatory requirement, which aims to encourage producers to adopt an eco-design approach, is being rolled out progressively. Three eco-modulations apply to the 2027 fee schedule:

- The first is a bonus based on the availability of spare parts for products
- The second is a malus based on the unsustainable management of the wood contained in the product.
- The third is a malus based on the presence of physical recycling disruptors in single-material plastic products

In parallel, bonuses for incorporating recycled plastic material are available.

Eco-modulations are part of a dynamic approach aimed at strengthening our shared commitment to protecting the environment. Each year, EPR scheme operators may adjust the eco-modulations to keep you informed of changes to the environmental criteria and encourage improvements and eco-designed innovations. These changes may affect the amount of the bonus or malus, the products concerned, and the thresholds for the criteria.

► HOW ARE THESE ECO-MODULATIONS DEFINED?

Valobat's eco-modulation criteria can be defined in two ways:

- Eco-modulation criteria imposed by public authorities through the EPR scheme specifications or a regulatory order
- Co-construction of criteria with our members, who are experts in the sector

The objective is to define relevant and differentiating criteria that help move the sector towards better eco-designed products.

► WHEN WILL THEY BECOME APPLICABLE?

Some of the eco-modulation criteria can already be activated. All criteria will be applicable as of 1 January 2027.



A RETENIR :

- Bonuses are optional
- Maluses are mandatory
- Maluses prevent bonuses from being applied



THE 2027 ECO-MODULATION CRITERION: “AVAILABILITY OF SPARE PARTS”

▶ WHAT IS THE DEFINITION OF THIS CRITERION AND THE ASSOCIATED AMOUNT?

Bonuses are amounts that reduce the eco-contribution of products placed on the market in 2027.

For the Home improvement and gardening goods EPR scheme, this eco-modulation was already applicable in 2025 and the bonus amount has changed in 2027.

Criterion	Bonus / Malus	Amount
Availability of spare parts (excluding fastening elements)	Bonus	10% de bonus

To meet this criterion, the product must comply with the following conditions:

- Spare parts must be available for 5 years after the end of the product marketing period
- Spare parts must be available within fifteen business days to professional sellers, refurbishers, repairers and individuals

▶ WHICH PRODUCTS ARE ELIGIBLE FOR THIS BONUS?

The products concerned by this bonus are ABJ products composed of at least two components (excluding fastening elements). The list of eligible products is available in the product **coding file**.

The spare part concerned must be essential to the use of the product. It is not initially intended to be replaced, but it may need to be replaced following:

- **Accidental damage,**
- **Long-term wear** (with a duration close to or equivalent to the product’s service life),
- **Premature wear** due to improper use,
- **Quality issues,**
- **Loss,**

The spare part does not have to have the same appearance (colour) as the original part, provided that it offers the same functionality and can be replaced by a repairer or an individual.



THE 2027 ECO-MODULATION CRITERION: “UNSUSTAINABLE WOOD MANAGEMENT”

▶ WHAT IS THE DEFINITION OF THIS CRITERION AND THE ASSOCIATED AMOUNT?

Maluses are penalty amounts that increase the eco-contribution of products placed on the market in 2027.

Where a product may be subject to a malus, the producer is required to prove that the product does not meet the relevant criterion.

Criterion	Bonus / Malus	Amount
UNSUSTAINABLE WOOD MANAGEMENT	Maluses	100% MALUS

For this criterion not to apply, the product must be mainly composed of sustainably managed wood certified by PEFC, FSC or an equivalent certification.

▶ WHICH PRODUCTS ARE ELIGIBLE FOR THIS BONUS?

The products concerned by this bonus are ABJ products composed mainly of wood (>50% by mass).

▶ WHAT ARE THE CONSEQUENCES IF MY PRODUCT IS SUBJECT TO A MALUS?

Products subject to this malus will have a higher eco-contribution than products mainly composed of sustainably managed wood.

In addition, products subject to a malus are not eligible for a bonus.



THE 2027 ECO-MODULATION CRITERION: “PRESENCE OF PHYSICAL RECYCLING DISRUPTORS”

▶ WHAT IS THE DEFINITION OF THIS CRITERION AND THE ASSOCIATED AMOUNT?

This new eco-modulation will be activated for 2027. Maluses are penalty amounts that increase the eco-contribution of products placed on the market in 2027.

Where a product may be subject to a malus, the producer is required to prove that the product does not meet the relevant criterion.

Criterion	Bonus / Malus	Amount
Presence of a physical recycling disruptor	MALUS	10% malus

For this criterion not to apply, the single-material plastic product (>90% by mass) must not contain any of the **following physical recycling disruptors**:

- Mineral fillers >40%
- Complex polymers (cross-linked, woven, reinforced, composite*)
- Presence of wood, another resin and/or an electrical or electronic component that is difficult to separate using common tools

**A composite matrix is understood as plastic resins which, when combined with reinforcements (natural or mineral fibres or particles), form a composite material with enhanced physical and mechanical properties*

▶ WHICH PRODUCTS ARE ELIGIBLE FOR THIS BONUS?

The products concerned by this bonus are ABJ products composed of single-material plastic (>90% by mass).

▶ WHAT ARE THE CONSEQUENCES IF MY PRODUCT IS SUBJECT TO A MALUS?

Products subject to this malus will have a higher eco-contribution than other single-material plastic products.

In addition, products subject to a malus are not eligible for a bonus.



2

STEPS TO FOLLOW TO PREPARE FOR BONUSES AND MALUSES



STEP 1: IDENTIFY YOUR PRODUCTS SUBJECT TO MALUSES

For all malus fee schedule lines, the producer must demonstrate that their products are not subject to the malus. The malus must be applied if you do not have the supporting evidence required to avoid it. These maluses prevent bonuses from being applied to your products. Under the eco-modulations, maluses apply to products meeting the following criteria:

- The product contains more than 50% unsustainably managed wood
- The single-material plastic product (>90% by mass) contains a physical recycling disruptor

The malus must be applied. Otherwise, you must demonstrate that the malus does not apply to your product.

To do so, you must obtain information about the composition of the products from your suppliers or internally. **The “Supporting evidence” sections on page 15** detail the information required for each malus.

STEP 3: DETERMINE THE ASSOCIATED FEE SCHEDULE CODE

The current code contains 10 digits. The bonus / malus is indicated by the last two digits of the code. All relevant codes are included in the fee schedule. Part 4 of this guide details the process, and this document also includes an Excel file containing all product codes.

STEP 2: FOR PRODUCTS NOT SUBJECT TO A MALUS, IDENTIFY THOSE ELIGIBLE FOR A BONUS ON THE ECO-CONTRIBUTION

The bonus is optional, but allows you to apply a reduced eco-contribution to your product:

- Product for which the spare parts essential to its use are available to extend its service life

You must obtain supporting documents from your suppliers or the necessary information. **The “Supporting evidence – Availability of spare parts” section on pages 13–14** details the information required.

STEP 4: UPDATE YOUR INFORMATION SYSTEMS

As soon as it is published, the eco-modulated fee schedule will allow you to update your information systems using the modified codes you have determined.



3

ECO-MODULATION CHECKS



ECO-MODULATION CHECKS

If eco-modulations have been applied to your products, a check may be carried out from 2028 onwards. Where applicable, you will be asked to provide supporting documents. These must be retained for 3 years after the declaration. Valobat provides you with a [letter template](#) to obtain the necessary information from your suppliers in order to benefit from the eco-modulation.

These are defined in the table below. You must be able to provide both items of supporting evidence indicated, No. 1 and No. 2.

► SUPPORTING EVIDENCE “AVAILABILITY OF SPARE PARTS”

Regulatory category	Product examples	Supporting evidence n°1	Supporting evidence n°2
Home improvement goods	Large items, machines and non-electrical, non-thermal tools, tools and equipment for working at height	Repair / spare parts replacement instructions + exploded-view diagram of the parts (Available online or in paper format)	You are a manufacturer: General Terms and Conditions of Sale or specific terms and conditions stating that the spare part is made available within 15 business days for 5 years after the end of the product marketing period + an indication on the product, in the catalogue or online confirming its availability
	Hand tools, PPE, accessories and tarpaulins	Proof that the spare part is offered for sale (catalogue evidence, online evidence, etc.)	You are a distributor: Your supplier's General Terms and Conditions of Sale or specific terms and conditions stating that the spare part is made available within 15 business days for 5 years after the end of the product marketing period + an indication on the product, in the catalogue or online confirming its availability
	Pots and containers	Not applicable	Not applicable



Regulatory category	Product examples	Supporting evidence n°1	Supporting evidence n°2
Garden maintenance and landscaping	Hand tools, PPE, accessories and tarpaulins	Proof that the spare part is offered for sale (catalogue evidence, etc.)	You are a manufacturer: General Terms and Conditions of Sale or specific terms and conditions stating that the spare part is made available within 15 business days for 5 years after the end of the product marketing period + an indication on the product, in the catalogue or online confirming its availability You are a distributor: Your supplier's General Terms and Conditions of Sale or specific terms and conditions stating that the spare part is made available within 15 business days for 5 years after the end of the product marketing period + an indication on the product, in the catalogue or online confirming its availability
	Pots and containers	Repair / spare parts replacement instructions (Available online or in paper format)	
	Outdoor structures, outdoor equipment and accessories	Repair / spare parts replacement instructions + exploded-view diagram of the parts (Available online or in paper format)	



► SUPPORTING EVIDENCE “UNSUSTAINABLE WOOD MANAGEMENT”

- **Manufacturer: PEFC or FSC certification, or equivalent, for the product, or a PEFC or FSC certificate, or equivalent, for the supply, together with a technical data sheet indicating the proportion of wood in the product**
- **Non-manufacturer (distributor, etc.): An invoice for the purchase of the product indicating PEFC or FSC certification, or equivalent, or technical documentation showing the composition of the product and the certification of the material**

► SUPPORTING EVIDENCE “PRESENCE OF PHYSICAL RECYCLING DISRUPTORS”

- **For all members: A technical data sheet describing the composition of the product and the composition of its various components.**

[DOWNLOAD THE TEMPLATE
LETTER FOR SUPPLIERS](#)



4



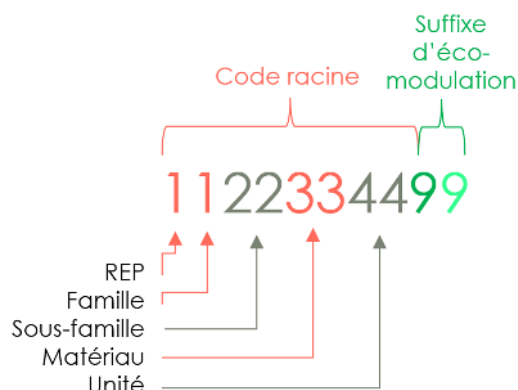
IT CONFIGURATION FOR CODING CHANGES



IT CONFIGURATION FOR CODING CHANGES

The fee schedule code contains 10 digits, the last two corresponding to the eco-modulations.

- The "00" suffix indicates the absence of an eco-modulation or that a product is not eligible for one.
- The "01" suffix indicates that the product benefits from the "availability of spare parts" bonus.
- The "10" suffix indicates that the product is subject to the "unsustainable wood management" malus.
- The "20" suffix indicates that the product is subject to the "presence of physical recycling disruptors" malus.



[Download the product coding file](#)

EXEMPLES :

I declare my products by weight. Large items, machines and non-electrical, non-thermal tools mainly made of wood, with fee schedule code 5302020000, have three possible fee schedule codes:

- 53020200**00** if the product does not activate its eco-modulation
- 53020200**01** if the product is eligible for the bonus.
- 53020200**10** if the product is subject to the malus.

Single-component plastic pots and containers with fee schedule code 53030500 and no associated eco-modulation have the following product code: 5303050000.

Please note:

To simplify your declaration, if the product code indicated, for example in your import files, contains only 8 digits, the 00 suffix will be added automatically.

For wood products, however, it is important to check whether they are subject to the malus!



**VALOBAT
IS HERE TO HELP!**

**Our teams are available to answer
your questions**

ecoconception@valobat.fr