

## Extended Producer Responsibility (EPR) for business sellers

**GUIDE.SUMMARY** What The French law against waste and for the circular economy aims to extend the liability of producers, importers and eBay sellers have specific obligations in relation to the products they put on the market, including their end-of-life. A producer responsibility organization is a French non-profit company empowered by the French public authorities, within the framework of Extended Producer Responsibility (EPR), to manage the end-of-life of the equipment they put on the market (collection, sorting, recycling, and recovery of waste). Extended Producer Responsibility (EPR) is an environmental policy that makes the party who first places a product subject to EPR requirements in the country (also known as Producer for EPR) responsible for the entire life cycle of the products that they introduce on the market, from their design until the end of life (including waste collection and take-back). One of the objectives of this law is the prevention and management of waste. In this respect, business sellers are facing 4 obligations:

- The Unique Identification Number (UIN)
- The eco-participation fee
- The repairability index
- The take-back policies

When The Law for waste management and a circular economy (Loi AGEC), dated February 10, 2020, expanded the legal framework for extending the liability of producers, importers and sellers for the entire life cycle of products they sell to buyers based in France, including their end-of-life. This law builds upon several other regulations that date from 1993 where the first recycling organization (producer responsibility organization) was established (for packaging).

Who B2C Sellers selling to buyers based in France

How To allow for seller compliance, we've updated our listing tools (Helix) so that sellers can enter the required information in the dedicated fields for any eligible items sold as "new" and new: others) in the categories subject to this new regulation.

Actions To learn more about your obligations for any of the below requirements, please reach out to a legal advisor or to the French Agency for

Ecological Transition (ADEME)</li> </li>Following this, sellers may need to contact one or several relevant producer responsibility organizations in order to provide some of the above information.</li> </ul> </h2></h2>

## GUIDE.RELATED\_LINKS Related Help Pages

</ul> </li>Extended Producer Responsibility for business sellers<br> <a href="https://www.ebay.com/help/selling/all-about-selling/selling-internationally/extended-producer-responsibility-for-business-sellers?id=5314">https://www.ebay.com/help/selling/all-about-selling/selling-internationally/extended-producer-responsibility-for-business-sellers?id=5314</a></li></ul>

Related links </ul> </li><a href="https://www.ademe.fr/en/about-ademe">ADEME</a></li>

<a href="https://www.ademe.fr/expertises/dechets/elements-contexte/filieres-a-responsabilite-elargie-producteurs-rep">ADEME (FR version)</a></li> </li><a href="https://www.legifrance.gouv.fr/jorf/id/JORFTEXT000041553759/">Legislation (FR version)</a></li>

<a href="https://www.ecologie.gouv.fr/cadre-general-des-filieres-responsabilite-elargie-des-producteurs">Ministry of Ecological Transition (FR version)</a></li> </ul>

</h2></h2>GUIDE.TALKING\_POINTS <a name="2023CommsCampaign"></a>

2023 Communication Campaign What happens to my listings if I cant register on time (by May 31st) with the PROs? </ul> </li>

If you do not get your listings in compliance, eBay automated process will kick in and start issuing warning emails.</li> </li>

If you do not remedy the situation, eBay will block the visibility of non-compliant listings on eBay.fr.</li> </li>

However, the delay between warning emails and the visibility blocks is adjusted to the response time of the PROs so they should not be a blocking point in the process.</li> </ul>

What happens if I registered with the PROs already but I did not update my listing by May 31st? Will you be able to detect that I am compliant? </ul> </li>

eBay also has ways to validate if you are compliant.</li> </li>However, they are less reliable than if you update your listings.</li> </li>

Our systems may not catch that your listings are compliant and initiate the

warning emails / the blocks</li> </ul> Will all my listings be affected or just the ones falling into the EPR categories? </ul> <li>eBay will block the listings for which you have not registered for recycling.</li> </ul> For packaging, all your listings will be affected. For other EPR categories (e.g. Electronics/Electric, Furniture), only the items in this EPR category will be affected.</li> </ul> Will the listings not published on eBay.fr but that offer shipping to France (passive CBT) affected by the visibility block if I am not compliant by May 31st? </ul> <li>The regulation applies as soon as you sell to France. eBay may restrict your selling privileges to the French market if your listings are not compliant with French EPR</li> </ul> Do you plan any transaction holds or payout blocks (eg. item sold before May 31st but payout after the date)? </ul> <li>No. The only blocking process that will take place is on visibility and hence future sales.</li> </ul> Will I be notified about visibility blocks on my listings? will the notification detail which listings have been hidden? what about 3rd party listing tools (APIs), will they be able to detect which listings are non-compliant so we can correct them? </ul> <li>You will be notified by email of the categories for which you are not compliant</li> </ul> Will only non-compliant listings be affected by visibility blocks? </ul> <li>Yes, only non-compliant listings will be affected&nbsp;but please note that for packaging, all your listings will be affected.</li> </ul> Is there a way to get compliant at account level (similar to EPR Germany requirements), rather than having to update all my listings? </ul> <li>As of now, it is not available. We might want to make this evolve in the future.</li> </ul>   Legal Why this change? </ul> <li>Due to a new French legislation (Law no. 2020-105 of 10 February 2020 on waste management waste and circular economy), marketplaces like eBay are now liable for enforcing this regulation upon their sellers.</li> </ul> B2C sellers will be requested for each listing to provide </ul> <li>1/ proof that they are compliant by providing their registration codes (UINs) with adequate recycling entities (producer responsibility organizations)</li> </ul> and 2/ specific item information. eBay has added specific fields at listing so you can be compliant.</li> </ul> </li> </ul> Why do you need all this

extra info? <ul> <li>According to article L. 541-10 of the French Environment Code "code de l'environnement" manufacturer in or first importer into France and seller of items concerned by "extended producer responsibility EPR have to directly manage or contribute financially to the management of its end-of-life products.</li> <li>This is an old regulation (1993) modified by the law no. 2020-105 of 10 February 2020 on waste management and the circular economy which aims to support end-of-life products and promote recycling materials.</li> <li>This law modifies the EPR whereby marketplaces such as eBay must confirm that sellers on eBay are Extended Producer Responsibility (EPR) compliant or are to comply on their behalf. To know more on your obligations, please reach out to a legal advisor or to the ADEME (ecological transition agency: <https://www.ademe.fr/lademe>).</li> </ul> What are the 4 key requirements for B2C sellers in this law (summary - details in following questions) <ul> <li>Having UINs with the adequate producer responsibility organizations depending on the categories you sell in and sharing those with eBay during the listing process</li> <li>Having the eco-participation displayed in the listing for specific categories</li> <li>Having a repairability index displayed in the listing for specific categories</li> <li>Having free of charge one-for-one take-back policies offer displayed for specific categories</li> </ul> What is the requirement regarding UINs to prove compliance? <ul> <li>In France, to prove your compliance with EPR requirements, eBay will require you to add the UINs required for your listing.</li> <li>To get a UIN, if you are a producer in France or importer into France of a product, you have to register with the relevant producer responsibility organization depending on the product EPR category. For example, if you are selling: <ul> <li><u>Any product</u>: you need to register with a Packaging producer responsibility organization (Leko or Citeo), to account for recycling of the product packaging and the shipping packaging and labels</li> <li><u>Electronics or Appliance products</u>: on top of the Packaging producer responsibility organization<sup>mentioned above</sup>, to a DEEE producer responsibility organization (like Ecosystem or Ecologic, not exhaustive) and potentially a Bulb producer responsibility organization

(Ecosystem), a Battery producer responsibility organization (Screlec or Corepile), a leaflet producer responsibility organization (Citeo), not exhaustive

- Furniture product
- on top of the Packaging producer responsibility organization mentioned above, to a Furniture producer responsibility organization (Eco-mobilier or Valdelia), a leaflet producer responsibility organization (Citeo), not exhaustive
- Producer responsibility organizations are not exhaustive

The producer responsibility organizations you have to go to might also change if you sell B2C only or B2C/B2B. The full list of impacted categories is available on the website of ADEME and of the Ministry of Ecological Transition

- UINs are generated automatically since January 2022 onwards for all registered producers/ first importers and available to you via your producer responsibility organization(s) portal. If you are not the producer in or first importer into France, please contact your supplier to obtain the UIN of the product.
- You will need to provide these UINs to eBay for any of your listings concerned by the EPR requirements.

What are the other requirements outside of the UINs per listing?

- Listing in specific categories (Electronics/Appliance, Furniture, not exhaustive) should state the eco-participation paid as part of the total price (as asked by the producer responsibility organizations) - use the relevant field to do so
- Listing in specific categories (Electronics/Appliance, Furniture, not exhaustive) should offer free one-for-one take-back (collection of the used product when delivering the new item)
- Listings in specific categories should have a repairability score displayed (as one of the photos uploaded on eBay for instance)

I'm not a French based seller, why do I need to add these fields?

- (active CBT)

Since you are offering items with shipment into France, you are still impacted by the regulation.

- The cost of the collection, sorting and recycling occurs in France when the product/packaging will be disposed of by the French B2C customer.
- Therefore it is not important where the seller is located but where the buyer is located.

Will my listings be removed if I don't provide this information?

- Since we need to

make sure that listings on eBay comply with this regulation, if you sell products covered by the EPR to buyers located in France, but you fail to provide eBay with the valid UINs required for such products (including without limiting their packaging), eBay is legally liable to pay the corresponding eco-participation fees on your behalf, and reserves the right to charge the paid fees and any costs associated back to you.

eBay also reserves the right to take sanctions against any seller who does not comply with his legal obligations concerning Extended Producers' Responsibility (Law against Waste and for the Circular Economy), including without limiting ending or canceling listings, hiding or demoting all listings from search results on the site.

All fees paid or payable in relation to listings or accounts on which we take any action will not be refunded or otherwise credited to the seller's account.

In addition, eBay reserves the right to invoice the seller for any sums incurred by eBay due to the seller's non-compliance with the aforementioned legal obligations (such as in particular the absence of: communication of the unique identifier of the producer, display of the eco-participation, offer and display of take-back policies).

Is it also applicable to refurbished electronics?

Yes, but for the packaging only as it is newly introduced to the French market.

How much time do I have to provide all this information?

Sellers have been subject to this regulation since 1993 for specific categories. The only change today is that marketplaces have to enforce it.

Obligations for the marketplace are in place since 1st January 2022, so all listing from B2C sellers should provide the needed info today.

Is there a time limit for recycling obligation?

See answer above.

How much time / deadline is there to complete this information, to provide these identification numbers?

See answer above.

For products that sold before Jan. 1 2022, do I carry the liability of recycling?

For some categories, a retroactivity is implemented in the contract with the producer responsibility organization. Please contact a qualified producer responsibility organization or a legal advisor to have more information on your situation.

I am already compliant with

my EPR obligations. Do I have to let eBay know? <ul> <li>Yes, if you are already registered for all your EPR applicable products, you should provide eBay with your UIN(s) in the listing interface.</li> </ul> Where do I input the information in the eBay interface <ul> <li>You first need to be in the new listing tool. If you do not have it, while listing a new item, click on the top right use new listing tool</li> <li>Once in the listing tool, look for the section seller conditions.</li> <li>In the additional elements links you will find the links for 1/ EPR UINs, 2/ Eco-participation</li> </ul> I do not have the UIN(s) you are asking for, where can I find them? If you do not have the information to input on a listing: <ul> <li>If you produce the item in France or import the item in France, please register to the relevant producer responsibility organization for said product  <ul> <li>Please consult the website of ADEME (see below) or reach out to a legal advisor to understand with which producer responsibility organizations you have to register</li> <li>Some third party vendors can help you register rapidly to several producer responsibility organizations and get the UIN (first requirement only):  <ul> <li>RECYSTEM PRO recystempro.com </li> <li>THOT EXPERTISE thotexpertise.com </li> <li>TAKE E WAY take-e-way.fr</li></ul> </li> </ul> If you're not the producer in or first importer of the item in France, reach out to its producer if the item is produced in France or to its 1st importer of the item in France</li> <li>If you pack and ship the item, you will regardless have to register to one of the packaging/shipping producer responsibility organizations (Leko, Citeo or Adelphe)</li> <li>In case of questions please, reach out to a legal advisor</li></ul> How many EPR registration numbers do I need to provide for each category? <ul> <li>First, item in scope will have a UIN for the EPR category of the product (e.g. Electronics, Furniture, Toys, Sport, etc - not exhaustive </li> <li>Some items will also be in the scope of several EPR categories depending on their components and the content of the packaging. For instance, if the item includes a battery, a bulb or a leaflet, not exhaustive</li> <li>Finally, all items sold into France will have if not the original new packaging then at least the

shipping packaging and the shipping label.</li> </li>As a result, when listing an item, they may be several UINs required (one for the product, one for its product packaging, one for the parcel packaging (if such packaging comes from another producer) one for any printed paper added to the parcel, one for the battery and one for the bulb)</li> </ul> What will happen If I sell EPR applicable products to buyers located in France without providing any valid UIN(s)? </ul> </li>If you sell products covered by the EPR requirements to buyers located in France, but you fail to provide eBay with the valid UINs required for such products (including without limiting their packaging), eBay is legally liable to pay the corresponding eco-participation&nbsp;fee on your behalf, and reserve the right to charge the paid fees and any costs associated back to you.</li> </li>eBay also reserves the right to take sanctions against any seller who does not comply with his legal obligations concerning Extended Producers' Responsibility (Law against Waste and for the Circular Economy), including without limiting ending or cancelling listings, hiding or demoting all listings from search results on the site.&nbsp;</li> </li>All fees paid or payable in relation to listings or accounts on which we take any action will not be refunded or otherwise credited to the seller's account.&nbsp;</li> </li>In addition, eBay reserves the right to invoice the seller for any sums incurred by eBay due to the seller's non-compliance with the aforementioned legal obligations (such as in particular the absence of: communication of the unique identifier of the producer, display of the eco-participation, display of take-back conditions).</li> </ul> Are there any consequences if I do not provide the EPR registration information on my eBay account/listings? </ul> </li>See answer above.</li> </ul> If I understand correctly, if I do not provide these numbers, eBay will pay all fees for me. Are there any additional eBay commissions / fees? </ul> </li>It is likely that the cost incurred by eBay on your behalf that eBay reserves the right to charge back to you will be higher than the fee you might pay if you get in compliance on your own.</li> </ul> Do I need to register for Package including shipping parcel and product package? </ul> </li>In most cases, you will need to register with a Packaging producer responsibility organization to cover for the shipping packaging at list.</li>



<li>In details: <ul> <li>For French companies:  <ol> <li>if you buy the packed product abroad, you have to register with a packaging producer responsibility organization and provide one UIN for both product package and shipping parcel. </li> <li>if you use a shipping provider, you still have to register with a packaging producer responsibility organization and provide a UIN for the product packaging and shipping parcel </li> <li>if you buy the packed product in France, you can provide your product suppliers UIN for the product packaging and you have to register with a packaging producer responsibility organization for the shipping parcel and provide your UIN for the shipping parcel.</li> </ol> </li> <li>Add-on: The company concerned by the law is the company "packing" the product <ul> <li>For DE/foreign companies selling to B2C: You need to get your own UIN for the product and shipping parcel </li> </ul> </li> <li>Can I use the package provider's EPR registration number? My package supplier is registered? <ul> <li>See answer above.</li> </ul> </li> <li>Can I use the WEEE provider's EPR registration number? My supplier is registered. <ul> <li>For French companies, YES, if the supplier is based in France. </li> <li>For DE companies (and in general companies without legal entity in France), NO.</li> </ul> </li> <li>FR and DE has different package requirement. If I sell product forward deployed in DE to French customer, should I re-package this to suit for FR EPR requirement? <ul> <li>In France, sorting instructions have to be displayed. You may "adapt" your product/packaging. Please contact a qualified producer responsibility organization to obtain more information.</li> </ul> </li> <li>I have forward deployed items in DE/FR Warehouse selling to other EU countries (neither DE nor FR). Should I register? <ul> <li>FR: if no products are sold in France, you are not concerned by the regulation and you do not need to register.</li> </ul> </li> <li>I ship from China, should I register? <ul> <li>As long as you import items (concerned by EPR) and packaging into France (= selling to buyers located in FR) you need to register to qualified producer responsibility organization(s) for such item and packaging.</li> <li>Please contact a qualified producer responsibility organization to have

more information.</li> </ul> I've registered for DE EPR Categories. I have forwarded items in Germany selling to France, can I leverage my DE EPR registration? <ul> <li>No, unfortunately, DE and FR EPR systems are separate. As long as you import items (concerned by EPR) and packaging into France (= selling to buyers located in FR), you need to register to qualified producer responsibility organization(s) for such items and packaging.</li> <li>Please contact a qualified producer responsibility organization to have more information.</li> </ul>

Should I provide my UIN if I list on non-FR site and selling to French buyer? <ul> <li>Yes, every product sold to a French buyer is concerned. The origin of the website/product is not taken into account. </li> </ul>

Should I register if I list on non-DE/FR site and sell to German/French buyer? <ul> <li>See answer above</li> </ul>

Should I register if I list on US site? I have selling very limited orders to FR/DE, say, 10 orders annually? <ul> <li>See answer above</li> </ul>

Should I register by company, or account, or category or brand or SKU? <ul> <li>Registration has to be by legal entity which is selling in France and by EPR category. If your company produces in or imports into France any item, you should register with a producer responsibility organization.</li> <li>Please consult a legal advisor to obtain information on your EPR obligations.</li> </ul>

Should I register by the same company as my eBay account company information? <ul> <li>See answer above</li> </ul>

Is it allowed to register EPR by the company of my eBay account? Per checking, the legislation does not require so. <ul> <li>See answer above</li> </ul>

What categories should I register? For example, I sell home appliances, LED light, USB, should I register for them all? <ul> <li>You must register for every EPR product category that applies to your assortment (see complete list of EPR categories below).</li> </ul>

What is my responsibility in EPR? Should I also provide recycling service besides registration? <ul> <li>In addition to the registration, you need to declare your sales in France and pay the relevant eco-participation fee to the producer responsibility organization</li> <li>Take-back policies, display of eco-participation and of repairability

index may be required when selling some new items to buyers located in FR (cf section related to take back) Please consult a legal advisor to obtain information on your EPR obligations.

What is the package requirement in FR? Should I name the date sold on package?

No. Please contact the producer responsibility organization. They will provide guidelines.

If I am not a manufacturer, if I only sell furniture to the French market, do I have to register and provide eBay numbers? Can I provide the numbers of the Polish manufacturer that produces this furniture?

No, if you are the first importer of the item in France, you need to register with a qualified producer responsibility organization.

Unique Identification number (UIN) What are the EPR categories and the PROs?

EPR categories schemes	Relevant recycling producer responsibility organizations (indicative)
Electrical and Electronic Equipment (EEE)	<a href="http://www.ecologic-france.com" target="_blank">www.ecologic-france.com</a> - opens in new window or tab <a href="http://www.ecosystem.eco/en" target="_blank">www.ecosystem.eco/en</a> - opens in new window or tab <a href="http://www.soren.eco/" target="_blank">www.soren.eco/</a> - opens in new window or tab
Furnishing items (including upholstered seat or sleeping products and textile decorative items;)	<a href="http://www.ecomobilier.fr" target="_blank">www.ecomobilier.fr</a> - opens in new window or tab <a href="http://www.valdelia.org" target="_blank">www.valdelia.org</a> - opens in new window or tab
Packaging	<a href="http://www.citeo.com" target="_blank">www.citeo.com</a> - opens in new window or tab <a href="http://www.leko-organisme.fr" target="_blank">www.leko-organisme.fr</a> - opens in new window or tab <a href="http://www.adelphe.fr/" target="_blank">www.adelphe.fr/</a> - opens in new window or

Textiles (clothing products, new footwear or household linen, new textile products for the home)	<a href="https://refashion.fr/pro/fr" target="_blank">refashion.fr/pro/fr</a> - opens in new window or
Batteries and accumulators	<a href="http://www.corepile.fr" target="_blank">www.corepile.fr</a> - opens in new window or
	<a href="http://www.screlec.fr/" target="_blank">www.screlec.fr/</a> - opens in new window or
Contents and containers of chemicals	<a href="http://www.ecodds.com" target="_blank">www.ecodds.com</a> - opens in new window or
	<a href="http://ecosystem.eco/en" target="_blank">ecosystem.eco/en</a>
(flares)	<a href="http://pyreo.fr/" target="_blank">pyreo.fr/</a>
Printed papers and papers for graphic use	<a href="http://www.citeo.com" target="_blank">www.citeo.com</a> - opens in new window or
Construction products or materials	<a href="http://www.eco-mobilier.fr" target="_blank">www.eco-mobilier.fr</a> - opens in new window or
(non inert)	<a href="http://ecominero.fr" target="_blank">ecominero.fr</a> (non inert)
	<a href="http://valdelia.org" target="_blank">valdelia.org</a> (inert)
	<a href="http://valobat.fr" target="_blank">valobat.fr</a> (both inert and non-inert)
Toys	<a href="http://www.eco-mobilier.fr" target="_blank">www.eco-mobilier.fr</a> - opens in new window or
Sports and leisure articles	<a href="http://ecologic-france.com" target="_blank">ecologic-france.com</a>
DIY and garden items	<a href="http://www.eco-mobilier.fr" target="_blank">www.eco-mobilier.fr</a> - opens in new window or
	<a href="http://Ecologic-france.com" target="_blank">Ecologic-france.com</a> (internal combustion tools only)
	<a href="http://ecodds.com" target="_blank">ecodds.com</a> (paint accessories only)

Mineral or synthetic, lubricating or industrial oils				
<a href="http://cyclevia.com">cyclevia.com</a>				
Tires				
<a href="https://aliapur.fr/fr" target="_blank">https://aliapur.fr/fr</a> - opens in new window or tab				
<a href="http://www.gie-frp.com" target="_blank">http://www.gie-frp.com</a> - opens in new window or tab				
Tobacco				
Agriculture inputs				
<a href="http://adivalor.fr">adivalor.fr</a>				
Boats				
<a href="http://recyclermonbateau.fr">recyclermonbateau.fr</a>				
Medications / drugs				
<a href="http://cyclamed.org">cyclamed.org</a>				
Syringes / auto-tests				
<a href="http://dastri.fr">dastri.fr</a>				
Vehicles				
No producer responsibility organization mandated				
Foodservice packaging				
Planned for 2023				
Chewing gums				
Planned for 2024				
Sanitary textiles				
Planned for 2024				
Fishing				
Planned for 2025				
Industrial packaging				
Planned for 2025				

The above information is not exhaustive and does not in any way constitute legal advice. Mandated producer responsibility organizations may evolve over time and this table may be updated. Please consult a legal advisor to obtain information on your EPR obligations. I have registered with a producer responsibility organization to get my UIN, but have not received it yet. What should I do?

- Please keep checking the portal of your producer responsibility organization for your UIN.
- Once you've received the UIN, provide it to eBay immediately.
- While I sell same

product, I have different entity operating different account. Should I register only 1 UIN for the product or should I register different UIN according per entity? <ul> <li>Registration has to be by legal entity shipping to France even in the case of the same product; several registrations might be required.</li> </ul> Where are these numbers given / supplemented? <ul> <li>We advise you to either:  <ul> <li>a) contact your supplier (or producer in/first importer in France) or </li> <li>b) to register to a relevant producer responsibility organization, if you are the producer or importer in France.</li> </ul> </li> </ul>   Producer responsibility organization What is a producer responsibility organization? <ul> <li>A producer responsibility organization is a French company empowered by the French public authorities, within the legal framework of EPR, to manage the end-of-life of the product put onto the market (collection, sorting, recycling, and recovery of waste).</li> </ul> Is it mandatory for me to be registered with a producer responsibility organization? <ul> <li>If you are a producer or importer into France, you need to register with a producer responsibility organization and complete all the formalities (registration, declaration and reporting, and payment of eco-participation fees).</li> <li>If you are not producer in or first importer of the product into France, please ensure you have a valid UIN for such product.</li> </ul> How long does it take to register? <ul> <li>It depends on the producer responsibility organization. Some might answer within a day. It also can take weeks. Please contact a qualified producer responsibility organization to obtain more information.</li> </ul> How to register and to whom I should register? <ul> <li>You should register to a qualified producer responsibility organization (list above).</li> </ul> Should I replace the old eco-recycling logo on the product packaging? <ul> <li>Yes. Please contact the producer responsibility organization. They will provide guideline and logos</li> </ul> Should I use Triman logo? Can I print Triman logo to attach to the package? <ul> <li>Yes. Please contact the producer responsibility organization. They will provide guidelines and logos.</li> </ul> Should I report to authority regarding my sales? <ul> <li>No, the

producer responsibility organization will do it.

- Eco-participation Where do I get the amount for the eco-participation fee for my item?
- If you produce in France or import in France an item, the law requires you to register to the qualified producer responsibility organization for such product. The producer responsibility organization will provide you with the amount of the eco-fee.

- For French companies:
  - if you are not the producer of the item or first importer in France, contact your supplier (or to the producer of the item or first importer of the item in France) to obtain the amount of eco-participation. You should also find this information on your invoice. Or
  - if you are the producer of the item in or its first importer in France, please register/contact the relevant producer responsibility organization to obtain the eco-participation fee
- For non-French companies selling directly from abroad: please register/contact the relevant producer responsibility organization to obtain the eco-participation

To which categories shall I provide the amount of the eco-participation?

Please confirm with each producer responsibility organization

Do I need to pay for both product packaging and parcel packaging?

Yes, but all PROs that take care of one take care of the other.

Product packaging is the packaging unit used to wrap the product, for example, the branded box of a smartphone. UIN of such packaging can be added under Account Settings > Business Information > EPR FR number

Parcel packaging is the packaging used for the delivery boxes/bags in order to protect and ship the product when sent to the customer. This includes any filling material to protect the product. UIN of such packaging can be added under Account Settings > Business Information > EPR FR number.

How is the eco-participation fee of a product calculated?

Eco-participation fees depend on the list of prices of the producer responsibility organizations and on the characteristics of the product itself (size, weight, materials). It is not determined by price.

Will eBay collect and remit the fee if seller does not register by himself?

eBay reserves the

right to invoice you all fees paid on your behalf as they have to pay for all non compliant sellers

- How will eBay know how much to pay environmental taxes on my behalf, on what basis, product weight or how?
- eBay will apply the producer responsibility organization fees matching the item you are selling.
- The producer responsibility organization will provide simplified rate table to market places in order to cover this point.
- Please note, the fee could be higher as the declaration will be based on estimates.
- We advise you to directly join a producer responsibility organization.

Take-back policies

What does one-for-one Take back mean?

- The take-back service is a part of the EPR requirements that has already been mandated by national laws in France.
- In line with the current regulation, if you are selling certain products in France, you must provide the customers with the possibility to return their old similar-type products for recycling at the customers doorstep and free of charge.
- What do I need to do in France for the Take back?
- If you offer customers EEE products, furniture (above a certain annual turnover) , chemicals, pyrotechnics and fire extinguishers and single-use gas fuel cartridge products via eBay in France, you need to offer a take-back service free of charge for these products of the same type on a 1:1 basis by default.
- This needs to include a free of charge pickup service at the point of delivery or at a local collection point in case of transportable products.
- The old product can come from any sales channel. The information about take-back solutions is mandatory and must be displayed on your listings, when applicable.
- To which categories shall I provide the take back policies?
- Take-back policies must be offered for:
- The sale of electrical and electronic equipment; contents and containers of chemicals;
- Furniture (as well as upholstered seating or sleeping products, textile decoration items) (if your annual turnover exceeds 100.000 in this category), pyrotechnics and fire extinguishers and single-use fuel gas cartridges.
- From 1 January 2023, it will also cover toys, sports and leisure articles and garden and DIY articles (if your annual turnover exceeds 100.000 in this



category).

- If a seller sells a product, does he have to take back the old one (when delivering the new one) or he can ask the buyer to go to a collection point.

The take back of used products can happen either:

- where the new item is delivered,
- at a nearby collection point for products that can be transported without equipment,
- by providing a return solution free of charge for the buyer, such as a postal service or equivalent when the characteristics of the used products allow it.

Sellers can reach out to the relevant recycling producer responsibility organization for their category of product for more information, in particular on collection points

EEE:

[www.ecologic-france.com](http://www.ecologic-france.com) or [www.ecosystem.eco/en](http://www.ecosystem.eco/en)

Furniture: [www.ecomobilier.fr](http://www.ecomobilier.fr) or [www.valdelia.org](http://www.valdelia.org)

How would I update my take-back policies?

Here's how to add your take-back policies to your listing:

- Choose either to create a new listing or to revise an existing listing.
- Go to the item disclosures section and select the toggle to Add take-back policies.
- From the dropdown menu, search and select a default policy.
- For country-specific policies, select Add a policy for a specific country, select a country and from the dropdown menu search and select a country-specific policy.

Support What is eBay going to do to support me?

By providing these specific fields in listing flow, eBay enables B2C sellers to input and display (when relevant) UIN, eco-participation fee amount, repairability index and take back policies, allowing them to be compliant.

I entered the information but I'm getting an error message and cannot continue listing my item. What can I do?

Needs to be investigated if this is related to EPR.

GCX agents need to escalate them in the standard process via Care Team

What should I do before

listing a product? <ul> <li>Before listing a product, if such product is subject to an EPR category, the seller must ensure the producer in or first importer into France of the product is registered with a qualified producer responsibility organization and has provided the seller with the UIN(s).</li> </ul> I use a different company to register EPR and operate my eBay account. Does this comply with eBay policy? <ul> <li>From a legal perspective, each company selling in France has to be compliant.</li> <li>The company offering the products on eBay needs to register with this company name (one exception: in the case of a legal authorized representative who takes over the EPR obligations).</li> </ul> Should I register for Toys in FR? It is not required on Amazon but is required by eBay? <ul> <li>Toys category is listed as an EPR category since 2022. Therefore, you should register with a producer responsibility organization if you produce or import such item into France (Article L541-10-1 of the Environmental code

<a href="https://www.legifrance.gouv.fr/codes/article\_lc/LEGIARTI000041599086/">https://www.legifrance.gouv.fr/codes/article\_lc/LEGIARTI000041599086/</a>)</li> </ul> Eco-fees: If the seller put 1 eur in the add a Value field and he is selling an item at 10 eur, in that case the buyer will pay the item 11 eur or still 10 eur? <ul> <li>10 EUR</li> </ul> Can fields be filled by data transfer? <ul> <li>The following tags can be used to upload EPR information + associated Take-back policy via File Exchange (FE): <ul> <li>"ecoParticipationFee",</li> <li>"producerProductId",</li> <li>"productPackageld",</li> <li>"shipmentPackageld",</li> <li>"productDocumentationId",</li> <li>"TakeBackPolicyID" </li> </ul> </li></ul>

<a href="https://www.ebay.com/help/selling/selling-tools/seller-hub-reports?id=4096&st=12&p os=1&query=Seller%20Hub%20Reports&intent=File%20exchange&docId=HELP107 5">Seller Hub Reports</a> replace the former CSV Manager: </li> <li>Using this tool and templates, sellers can create and upload files to add, revise, relist, and end

listings

- Where on listing should I put the EPR registration information?

Seller must display their UIN number(s) on their Terms and Conditions

## GUIDE.DETAILED\_INFORMATION

## Seller obligations

### 1/ Unique Identification Number (UIN) and

### 2/ Eco-participation

Any business seller selling into France should contribute to end-of-life.

The seller registers with a producer responsibility organization in charge of an industry (filière). In return they will give the seller a UIN (registration number).

On a regular basis (yearly to quarterly), sellers have to declare the volumes they introduced on the French market.

Following the declaration, they are sent an invoice: each item has a specific Eco-participation (the amount it takes to recycle the item) that the seller has to pay.

In some verticals, the seller has to show the amount the eco-participation represents on the total price for future items for sale.

### 3/ One-for-one takeback - Electronics and Appliances and Furniture

For large Electronics and Appliances and for Furniture, seller have to offer for free, at the moment of purchase, the option to dispose of any equivalent old item at delivery of the newly purchased one e.g. taking the old dishwasher for disposal when the new one is received.

For small Electronics and Appliance items, the seller has to indicate where the buyer can dispose of previous Electronics and Appliance items.

\*Seller has to offer a take back solution if his annual turnover in this category exceeds 100.000

### 4/ Repairability index

- specific categories only

The seller has to display on the product or on the web listing the repairability index of the product

eBay obligations

The new 2020 regulation makes eBay liable for all the listings on the platform, unless eBay can prove the sellers are compliant.

1/ if sellers are compliant

eBay has to collect the UINs of the sellers to prove compliance and share those UINs with producer responsibility organizations, as well as enable the sellers to display:

- the eco-participation
- the repairability index
- and take-back policies

2/ if sellers are

not compliant &lt;ul&gt; &lt;li&gt;Liability falls to eBay to make the volume declaration, pay the fee and display any missing information from a listing (except reparability index)&lt;/li&gt; &lt;/ul&gt; &nbsp; eBays measures Since eBay has to pay on behalf of non compliant sellers, eBay reserves the right to charge the amount it pays in eco-participation to the seller. 2023 Updates &lt;ul&gt; &lt;li&gt;eBay is planning to start a communication campaign in February for a limited number of sellers registered on FR, DE, UK, IT, APAC and smaller EU sites.&lt;/li&gt; &lt;li&gt;The communication plan includes a phone outreach and email communications. &lt;ul&gt; &lt;li&gt;Sellers will be informed that they need to get in compliance with the EPR regulation and update their listings by May 31st. &lt;ul&gt; &lt;li&gt;By this date an automated process will start hiding non-compliant listings from the ebay.fr site.&lt;/li&gt; &lt;/ul&gt; &lt;/li&gt; &lt;li&gt;Sellers will also receive warning notifications from eBay before the blocks come into effect.&lt;/li&gt; &lt;/ul&gt; &lt;/li&gt;

&lt;li&gt;See &lt;a href="https://cskb.qa.ebay.com/csKBapp/art?page\_content&id=GUIDE1813&ViewLocale=en\_US#2023CommsCampaign"&gt;here&lt;/a&gt; for talking points&lt;/li&gt; &lt;/ul&gt;

&lt;/h2&gt;&lt;h2&gt;GUIDE.INSTRUCTIONSSTEPS\_TO\_RESOLVE Instructions to sellers 1/ Unique Identification Number (UIN) &lt;ul&gt; &lt;li&gt;To obtain a UIN we advise you to either:

&lt;ul&gt; &lt;li&gt;(a) contact your supplier (producer in or first importer in France) or&lt;/li&gt; &lt;li&gt;(b) to register with a relevant producer responsibility organization, if you are the producer in or first importer into France.&lt;/li&gt; &lt;/ul&gt; &lt;/li&gt; &lt;li&gt;Here's how to add a UIN: &lt;ol&gt;

&lt;li&gt;Select Business Information under &lt;a href="https://accountsettings.ebay.com/uas"&gt;Account Settings&lt;/a&gt;.&lt;/li&gt; &lt;li&gt;Scroll down to the Business details section and select Add next to the EPR FR number.&lt;/li&gt;

&lt;li&gt;Select a category from the dropdown menu.&nbsp;&lt;/li&gt; &lt;li&gt;Enter the unique identifiers for your selected category in the EPR FR number field.&nbsp;&lt;/li&gt; &lt;li&gt;Confirm by clicking Add.&lt;/li&gt; &lt;/ol&gt; &lt;/li&gt; &lt;ul&gt; 2/ Eco-participation fees &lt;ul&gt;

&lt;li&gt;Business sellers must provide the amount of the recycling fee (eco-participation in French)

for items in the Furnitures and Electrical and electronic equipment (EEE) categories selling as New or New: others in France.

To obtain the amount of the eco-participation fee:

- Register to the relevant producer responsibility organization for said product if you produce the item in France or import the item in France.
- If you're not the producer in or first importer of the item in France, reach out to its producer if the item is produced in France or to its 1st importer of the item in France.

Once having obtained the information concerning the eco-participation fee, enter the amount in the appropriate field and the amount will be automatically displayed on the view item page.

Here's how to add the Eco-participation fee

- Choose either to create a new listing or to revise an existing listing.
- Go to the item disclosures section and select the toggle to Add eco-participation fee amount.
- Enter a value which will be included in the price of your listing.

### 3/ Repairability index

The repairability index is a score out of 10 to better inform buyers about the repairability of their items (10 being the highest rate).

Here's how to add the repairability index to your listing:

- Choose either to create a new listing or to revise an existing listing.
- Go to the item disclosures section and select the toggle to Add repairability index.
- Enter a score from 0.0-10.0 that will be displayed on your listing close to the price of the product.

To start, the repairability index applies to new products in the following categories:

- Washing machines with windows
- Smartphones
- Laptops
- Televisions
- Electric lawnmowers
- Top-loading washing machines
- Dishwashers
- Vacuum cleaners
- High pressure cleaners

According to the law, this list may evolve in the future.

To obtain the repairability index of a product, reach out to its producer in France or importer in France.

Please find more information via the following link:

[a](#)

<https://www.ecologie.gouv.fr/indice-reparabilite> I cannot see the option to add repairability index in my listing flow.

The solution for repairability index is available in the listing flow only for specific categories.

You can choose to list in a category that is enabling hazardous information [category list].

The limitation of category is only on the single listing tool (Helix) available. Advance sellers who use other listing tools (ex: BLING, API, Reports) can add the hazardous information to all listings regardless of categories.

Backup solution: You can add the required information to the gallery picture of your listing.

How can I include the repairability index in the app?

Native app: sellers will not be able to view or edit repairability index on their native apps. They will need to open dWeb to resume draft or revise the listing to view and edit.

How can I include the repairability index in BOLT?

C2C sellers: sellers who use simple listing tool (BOLT) will not be able to view or edit repairability index. They will need to click on Switch to business tool and use Helix to view and edit.

#### 4/ Take-back policies

When selling new items in certain categories, business sellers are obliged to offer, free of charge, the take back of the French-based buyers used product and to display this information on the listings concerned by the take back.

In distance selling, depending on the turnover thresholds, the business seller must offer to take back the used product when selling a new product in the following categories:

Electrical and electronic equipment

From 1 January 2022: contents and containers of chemical products, furniture elements as well as upholstered seating or sleeping products, textile decoration elements\* pyrotechnics and fire extinguishers; and single-use fuel gas cartridges

From 1 January 2023: toys, sports and leisure articles and garden and DIY articles\*

To sell, fill in the take back conditions in the field provided and the information will be displayed on your view item page.

\*Seller has to offer a take back solution if his annual turnover in this category exceeds 100.000

Here's how to add your

take-back policies to your listing: 

- Choose either to create a new listing or to revise an existing listing.
- Go to the item disclosures section and select the toggle to Add take-back policies.
- From the dropdown menu, search and select a default policy.   
For country-specific policies, select Add a policy for a specific country, select a country and from the dropdown menu search and select a country-specific policy.

  
Notes on current product UI / Bugs   
HELIX important notice 

- All fields (UIN, Eco-participation, Take-back) are only available in HELIX/BLING. Sellers cannot get in compliance with the old listing tool.
- Known product issues to be fixed at a later stage
  - Currently sellers can input 4 EPR numbers: one for the category e.g. electronics, furniture, fashion, one for the primary ( new product packaging, one for the shipping packaging, one for the shipping label. They do not have fields to input Bulbs or Batteries. If asked, we will of course not charge them for those. It will come at a later stage.
  - Technically speaking, we will only check if the seller has had at least one listing with the correct category which means he/she does not have to input it on every item. But we should encourage them to do so as they could actually be different per item.
  - In a later stage, we will no longer ask for EPR numbers items by items but in the seller hub (ETA tbd).