

Bulk retail and refill systems

The regulatory framework and sectoral guidance applicable in France

Brussels, August 2026

Author

- [Réseau Vrac & Réemploi](#) on behalf of ECOS

Contents

Executive summary.....	3
Key findings.....	3
Background and purpose of the report.....	4
Purpose	4
Scope.....	4
Definitions: bulk retail sales and refill.....	5
The concept of bulk retail sales in France.....	5
The concepts of “refill” and “refill station” in the European Union.....	5
Operational requirements for retail refill systems.....	6
Hygiene and product safety.....	6
Consumer information and point-of-sale labelling.....	7
Traceability and documentation	8
Measurement, quantity selection and fair pricing.....	8
Reusable containers and consumer responsibility	9
Roles and responsibilities across the value chain.....	9

Food products: specific implementation guidance.....	10
Product categories and a risk-based approach	11
Allergens and cross-contamination.....	11
Secondary shelf-life and storage after opening.....	11
Non-food products: Cosmetics and detergents.....	11
Cosmetics.....	11
Detergents and chemical products	12
Conclusion	12
Annexes.....	13
References	19

*ECOS gratefully acknowledges financial support from the **Norwegian Retailers' Environment Fund** for our work to prevent and reduce plastic consumption and pollution, through improved reuse and refill.*

Views and opinions expressed belong to the author(s) only and do not necessarily reflect those of our funding partners, who cannot be held responsible for them.

Executive summary

In France, bulk retail sales (referred to as “refill” under European terminology) constitute a retail distribution model for fast-moving consumer goods (FMCGs). They represent both a means of preventing packaging waste at source and a form of packaging reuse by consumers, while maintaining a high level of consumer protection, consumer information and product safety¹. France provides one of the most advanced regulatory frameworks in this field. Bulk retail sales are legally definedⁱ, consumers may use reusable containers under clear conditions, and retailers and suppliers have developed best practices covering hygiene, traceability, labelling and metrology.

This report builds on the French legal framework and on the sectoral guidance developed by Réseau Vrac & Réemploi. Its objective is to support the implementation of the Packaging and Packaging Waste Regulation (PPWR)², in particular article 28 on obligations relating to refill systems, article 51 on measures promoting refill systems, and annex VI, Part C on requirements applicable to refill stations.

Key findings

- Bulk retail systems can be regulated as robust reuse models without compromising consumer protection rules.
- The absence of primary packaging requires adapted point-of-sale information, not a reduction in information provided to consumers.
- Consumers' right to use their own reusable containers can be combined with clear responsibilities regarding information on hygiene and suitability requirements.
- Metrology rules are essential: consumers must be able to choose the quantity purchased and must not pay for the weight of their container.
- Suppliers and retailers require a clear allocation of responsibilities to ensure product safety and traceability.
- Implementation of the PPWR should promote a harmonised and proportionate approach rather than fragmented national solutions.

Although the recommendations set out in this document primarily concern bulk retail sales, many of them are equally relevant to takeaway food services where consumers use their own containers or reusable containers provided by the food business operator. Principles relating to consumer information, hygiene requirements, the allocation of responsibilities between operators and consumers, the acceptance of reusable containers, traceability, and product safety represent good practices that can be applied to the HORECA sector and support the consistent implementation of the PPWR provisions on refill systems.

The main policy recommendation is therefore straightforward: the PPWR implementation framework should treat bulk retail and refill systems as a central pillar of packaging waste prevention and reuse, supported by practical EU-level guidance that is sufficiently clear for retailers, suppliers, enforcement authorities and consumers.

ⁱ Since bulk retail sales is expressly defined in France as a method of packaging reuse by consumers, it falls within the scope of the Household Packaging EPR (Extended Producer Responsibility) sector, as defined notably by the Order of December 2, 2025 setting out the terms of reference for producer responsibility organizations (PROs). The latter are therefore obligated to financially support the development of bulk sale solutions in retail stores and to raise consumer awareness.

Background and purpose of the report

Purpose

- Describe the rules and best practices applicable in France to the bulk sale of food, cosmetic and detergent products in retail outlets.
- Support the implementation of Article 28, Article 51 and Annex VI, Part C of the PPWR.
- Draw regulatory lessons from the French framework for bulk retail sales, particularly for food and non-food fast-moving consumer goods (FMCGs).

Preventing packaging waste is a central objective of the PPWR. The Regulation introduces a more ambitious framework across the European Union for packaging design, reuse, refill systems, waste prevention and extended producer responsibility. It entered into force in 2025 and will generally apply from August 2026. In this context, refill systems deserve particular attention because they prevent waste at source by encouraging consumers to reuse packaging.

The PPWR already contains several provisions directly relevant to refill systems. Article 28 requires economic operators offering refill services to inform end users about the types of containers that may be used, applicable hygiene standards and the responsibilities of end users.

It also requires refill stations to comply with Annex VI, Part C. Article 51 requires Member States to adopt measures encouraging refill systems in an environmentally sound manner, without compromising food hygiene or consumer safety. Annex VI, Part C further specifies that refill stations must:

- Provide clear information.
- Include a measuring instrument or equivalent means allowing consumers to select a specific quantity.
- Ensure that the price paid does not include the weight of the container.

It should also be assessed considering European legislation on food contact materials and articles, hygiene of foodstuffs and the provision of food information to consumers³, and their national application.

To facilitate the translation of these legal obligations into practical guidance, this report uses the French bulk retail framework as a case study, drawing on legal guidance developed by Réseau Vrac & Réemploi for retailers and suppliers. The report covers both food and non-food retail sectors, primarily cosmetics and detergents.

Scope

- Bulk retail sales in retail outlets, both self-service and assisted-service.
- Food and non-food products, including dry goods, liquids, cosmetics and detergents.
- Consumer-owned containers and retailer-provided containers.
- Operational requirements relating to hygiene, consumer information, traceability, metrology and responsibilities.

Definitions: bulk retail sales and refill

An effective implementation of the PPWR requires an examination of the differences and similarities between the French concept of **bulk retail sales** and the European concepts of **refill**ⁱⁱ and **refill stations**. While these models are not strictly identical, they largely overlap in practice.

The concept of bulk retail sales in France

French law defines bulk retail sales as the sale to consumers of products offered without packaging, in quantities chosen by the consumer, and placed in reusable containers. Bulk retail sales may be carried out through self-service systems, assisted-service systems, or, under specific conditions, through distance selling.

This definition is useful for PPWR implementation because it captures the essential characteristics of the model:

- The absence of single-use primary packaging at the point of sale.
- Consumer choice regarding quantity.
- The use of reusable containers.

It also recognises that bulk retail sales may operate through different retail formatsⁱⁱⁱ and across different product categories.

A 2023 decree establishes a list of products prohibited from bulk sale and products subject to restrictions, particularly in self-service bulk retail systems (below).

The concepts of “refill” and “refill station” in the European Union

The PPWR uses the term refill to describe situations in which end users purchase products by filling a container at a refill station. Article 28^{iv} and Annex VI, Part C focus on the operational obligations of economic operators, including consumer information, hygiene requirements, container suitability, measuring instruments.

These concepts are defined in the same manner under Article 1(2) of the amended CLP Regulation⁴. Ongoing revisions of the European Detergents Regulation and Cosmetics Regulation are also expected to incorporate these concepts.

ⁱⁱ In France, the concept of a 'refill' corresponds to a system with a reusable parent packaging (which remains at home) and a single-use refill (pouch/sachet): the parent packaging is refilled at home by the consumer using a refill (referred to as 'intermediate packaging') designed for this purpose.

ⁱⁱⁱ Bulk retail sales are defined by Articles L120-1 and 2 of the French Consumer Code. The second article, which concerns hygiene and consumer information rules, expressly targets only 'retail stores', thereby excluding catering and food service establishments from the scope of application of the article. However, **many rules relating to hygiene, traceability, and consumer information—particularly regarding the use of containers—can be applied to the food service sector.**

^{iv} Even though Article 28 of the PPWR does not target the HORECA sector, the European Commission's draft guidance specifies that final distributors include **'shops, bars, and restaurants'**. Therefore, a restaurant that allows a customer to fill their container for consumption on-site or to take away (or that fills the consumer's container itself) is indeed performing a refill operation within the meaning of the PPWR, e.g. a consumer bringing their own container to buy a takeaway meal or using a deposit-return box for takeaway. The rules, particularly regarding hygiene and safety under Article 28, do apply to this service model.

Model	Essential characteristic	Legal basis
Bulk retail sales (France)	Consumer goods sold in a retail outlet without primary packaging and in quantities chosen by the consumer.	Articles L.120-1 and L.120-2 of the French Consumer Code
Refill in a refill station (PPWR)	The consumer fills, or has filled, a container at a dedicated point of sale.	Article 28 and Annex VI, Part C of the PPWR, article 1(2) of the CLP Regulation

Operational requirements for retail refill systems

Hygiene and product safety⁵

Refill systems and bulk retail sales do not reduce product safety obligations. Food products, cosmetics and detergents sold in bulk remain subject to the same product safety requirements and sector-specific regulations as products sold in conventional packaging. The difference lies in the operational model: the absence of primary packaging means that retailers and suppliers must manage specific risks associated with storage, hygiene, labelling, traceability and reusable containers.

For food products, the main risks include allergens, pest contamination, temperature control and humidity management. For non-food products such as cosmetics and detergents, key risks include chemical safety, correct product use and appropriate labelling.

In all cases, retailers remain responsible for the suitability and maintenance of bulk dispensing equipment. French experience demonstrates that these risks can be effectively controlled through practical operational protocols⁶. Retailers should:

- Maintain written hygiene procedures.
- Clean and disinfect refill equipment according to defined schedules.
- Avoid contact between incompatible product categories.
- Keep records of cleaning operations, batch changes and incidents.

Suppliers should provide technical information adapted to bulk retail sales, including:

- Storage conditions after opening.
- Secondary shelf-life where applicable.
- Recommended dispensing equipment.
- Container compatibility.
- Cleaning instructions.

Best practices – hygiene protocols

- Define cleaning and disinfection frequencies for each type of equipment and product category.
- Clean dispensing equipment between batches where appropriate and record the operation.
- Separate dispensing areas and equipment used for food and non-food products.
- Control pest-related risks during receiving, storage and sales operations.
- Train staff in refill operations and consumer assistance.

⁵ In the food sector, Réseau Vrac et Réemploi and the FCD (*Fédération du Commerce et de la Distribution*) have drafted a Good Hygiene Practice Guide (GBPH) for bulk retail sales of food products, which is currently under review by the competent authority (DGAL). In the cosmetics sector, the competent authority in France (DGCCRF) initiated work in 2025 (still ongoing) to draft guidelines for professionals in the bulk retail sales of cosmetic products. Similar work is to be undertaken for detergent products following the ongoing revision of the European Detergents Regulation.

Consumer information and point-of-sale labelling

For packaged products, essential information is displayed on the primary packaging label. For bulk retail sales, the same objective must be achieved through information provided at the point of sale. The absence of packaging should therefore shift information obligations from the packaging itself to refill stations, shelf labels, signage, digital interfaces or consumer information materials.

Food products

For food products, the following information should be clearly accessible:

- Product name.
- Allergen information.
- Price per unit of measure.
- Origin where required.
- Specific storage or usage conditions.

Additional information may enhance transparency, traceability and consumer confidence^{vi}, including:

- Ingredients.
- Batch number.
- Shelf-life after opening.
- Nutritional information.

For organic products, sector-specific legislation may require certification-related information.

For alcoholic beverages, health warnings and sector-specific EU labelling requirements must also be respected. Sector-specific labelling rules also exist for animal feed and olive oil. In France, olive oil may be sold in bulk only through assisted-service systems. These sector-specific rules often require consumers to leave the point of sale with a labelled container.

Cosmetics and detergents

For cosmetics and detergents, consumers must receive, at the time of purchase, all mandatory safety and usage information that would normally appear on the product label. When consumers refill their own reusable containers, operators must ensure that consumers leave with a labelled container containing all mandatory information.

Implementation principle

- Bulk retail sales are fully compatible with comprehensive consumer information.
- Information must be clear, visible and accessible before purchase.
- For certain products, labelling of the consumer's container is mandatory or strongly recommended.
- Digital information may complement, but must not replace, mandatory safety information provided at the point of sale.

^{vi} Regarding labeling rules for products sold in bulk, our association has been arguing for several years that the labeling rules applicable to non-prepacked food products as provided for by [Regulation \(EU\) 1169/2011 \(INCO\)](#) are not suitable for self-service bulk retail sales (Annex 2 –Réseau Vrac et Réemploi's contribution on Regulation No. 1169/2011 (INCO)).

Traceability and documentation

Traceability is essential for both product safety and regulatory oversight. In bulk retail systems, traceability relies less on individual consumer packaging and more on robust documentation maintained by retailers and suppliers. Retailers should retain invoices, delivery notes, product labels, batch references and relevant technical documentation. They should be able to identify which batch was displayed and sold during a given period and conduct withdrawals or recalls when necessary^{vii}.

Suppliers play a critical role. They should provide bulk-specific technical data sheets and ready-to-use labels by consumers containing the necessary information: product name, batch number, durability date, storage conditions, allergen information and origin, where relevant. A dual-labelling system or digital traceability file can facilitate the transfer of information into retailer traceability records.

EU guidance under the PPWR⁷ should encourage such documentation practices without imposing excessive administrative burdens on small retailers. Standardised templates for refill station records, batch-change logs and cleaning records would improve compliance and consistency in enforcement activities.

Measurement, quantity selection and fair pricing

The ability for consumers to choose the quantity they wish to purchase is one of the principal advantages of bulk retail sales. It contributes to reducing overconsumption, preventing food waste and enabling consumers to purchase according to their actual needs. Achieving these objectives requires reliable measurement systems.

Annex VI, Part C of the PPWR already requires refill stations to provide a measuring instrument or another means ensuring that the end user can select a specific quantity. It also requires that the price paid by the end user does not include the weight of the container. These requirements are fully consistent with the French framework governing bulk retail sales, under which the tare weight of the container must be deducted, and legal metrology rules apply to weighing instruments and volume-measuring devices.

In practice, weight-based sales are often the most reliable option for retail refill systems, particularly for food products and many liquids. Volume-based self-service systems using dispensers or pumps may also be appropriate where certified measurement systems are available. Sales by unit or by dose may be suitable for certain bulk retail models.

Question	Required outcome	Recommended implementation
Container tare	Consumers must not pay for the weight of the container.	Scales with tare functions or equivalent procedures.
Quantity selection	Consumers must be able to choose a specific quantity.	Certified weighing systems, volumetric systems, or transparent unit/dose systems.
Price display	Prices must be understandable and comparable.	Price per kilogram, litre, unit or dose, depending on the model.
Verification	Measurements must remain reliable over time.	Periodic inspections and maintenance in accordance with legal metrology requirements.

^{vii} The management of a bulk section is often compared to that of a fruit and vegetable section or a traditional service counter (in terms of hygiene and traceability).

Reusable containers and consumer responsibility

Allowing consumers to use their own containers is a key feature of the French bulk retail model. Article 28 of the PPWR allows operators to establish refill rules, including requirements concerning acceptable container types and hygiene standards. It also allows operators to refuse refill requests when end users fail to comply with those requirements. The French framework provides a practical example of this approach:

- Consumers are responsible for the hygiene and suitability of the containers they bring.
- Whereas retailers remain responsible for the hygiene of the premises, equipment and service process.

This shared-responsibility model is essential. It prevents retailers from being held responsible for the microbiological condition of containers they did not provide, while preserving their right – and duty – to refuse containers that are visibly dirty, damaged or unsuitable. It also requires clear consumer information at the point of sale.

Recommended refill rules for display at the point of sale

- Only use containers that are clean, dry, intact and suitable for the intended product.
- Do not use food containers for detergents or cosmetic products.
- Follow retailer instructions regarding weighing, taring and filling procedures.
- Retailers may refuse containers that are visibly dirty, damaged or unsuitable.
- Consumers remain responsible for the hygiene of the containers they provide.

Roles and responsibilities across the value chain

Refill systems require cooperation between suppliers, retailers, equipment providers and consumers. The regulatory framework should therefore avoid assigning all responsibilities to the final distributor.

A clear allocation of responsibilities improves compliance and reduces legal uncertainty.

Suppliers

Suppliers should ensure that products are suitable for bulk retail sale and provide the information necessary to maintain product safety and quality after opening. This includes:

- Storage and preservation conditions.
- Secondary shelf-life where relevant.
- Allergen information.
- Compatibility with dispensing equipment.
- Compatibility with reusable containers.
- Product-specific warnings.

Retailers

Retailers should ensure:

- Safe storage.
- Safe display and refill operations.
- Consumer information.
- Accurate measurement.
- Cleaning procedures.
- Traceability.

Consumers

Consumers should comply with refill rules when using their own containers.

Stakeholders	Main responsibilities
Supplier / Producer	Product compliance, bulk-specific technical documentation, traceability and safety information, recommendations regarding storage and containers.
Retailer / Final distributor	Safe refill station operation, consumer information, hygiene procedures, measurement, traceability, refusal of unsuitable containers.
Equipment provider (Annex 4 – Examples of bulk sales equipment)	Equipment suitable for repeated use, specific hygiene requirements of bulk sales and cleaning/disinfection, product flow, food-contact materials and measurement functions where applicable.
Consumer / End user	Clean and suitable containers, compliance with refill rules, safe use after purchase.

Food products: specific implementation guidance

Food products are often the category most closely associated with bulk retail sales. They are also the category for which consumer safety concerns are most sensitive. A proportionate PPWR implementation framework should therefore recognise that food refill systems are feasible, provided existing food safety requirements are translated into clear retail procedures.

Products prohibited from bulk sale under the 2022 French Decree include:

- Thermally treated liquid dairy products.
- Raw milk, except under specific direct-sale conditions.
- Infant formula and follow-on formula.
- Cereal-based foods and baby foods.
- Foods for special medical purposes.
- Total diet replacement products for weight control.,
- Food supplements.
- Frozen products.

Products that may only be sold through an “appropriate dispensing device” in self-service bulk systems include:

- Highly perishable food likely to present a health risk after a short period.
- Food stored at temperatures of -12°C or below at the point of sale, other than those listed in point 8° of article D.120-7.

Finally, Article L. 642-4-1 of the French Rural Code, resulting from the AGECE Law⁸, provides that: “Unless duly justified exceptions apply, the specifications for quality and origin identification signs provided for in Articles L. 641-1, L. 641-6, L. 641-11, L. 641-11-1, and L. 641-11-2 shall authorize non-prepacked sales. By January 1, 2030 at the latest, the specifications shall define, as necessary, the implementation conditions for non-prepacked sales; those that prohibit it shall justify this prohibition.” Indeed, most specifications for products under PDO (Protected Designation of Origin) or PGI (Protected Geographical Indication) do not contain specific provisions for bulk retail sales of these products, or even expressly prohibit this method of sale.

Thus, while certain specifications seem suitable, such as those for *Riz de Camargue*, *Quinoa d'Anjou*, *Sel de Guérande*, or *Vinaigre de Modène*, others still need to be modified or adapted, such as *Lentilles du Puy*, *Noix de Grenoble*, and *Noix du Périgord*.

Product categories and a risk-based approach

Dry products such as cereals, pasta, rice, nuts, biscuits, confectionery, spices, are generally well suited to bulk retail sales, provided that pest control, allergen management and storage requirements are properly addressed. Liquids such as oils, vinegars, syrups, juices, can also be sold through refill systems but require particular attention to measurement accuracy, container compatibility and secondary shelf-life. Fresh and animal-derived products may likewise be sold in bulk where temperature control and hygiene requirements are properly managed.

The PPWR should not create a general presumption against food refill systems. Instead, guidance should encourage a risk-based categorisation approach allowing competent authorities and operators to define proportionate conditions according to product sensitivity, shelf life, handling requirements, and consumer use patterns.

Allergens and cross-contamination

Allergen information is central to food refill systems. Suppliers must provide accurate information regarding allergens present in products. Retailers must display this information and manage risks arising from cross-contamination caused by dispensing equipment, utensils, consumer behaviour and product proximity.

A practical approach is to display product-specific allergen information at the refill station while also providing general information indicating that cross-contamination may occur in bulk retail environments. This approach is preferable to blanket disclaimers such as “Not suitable for allergy sufferers.” The objective should be informed consumer choice, not exclusion.

Secondary shelf-life and storage after opening

For bulk food products, opening the supplier’s original packaging and transferring products into dispensing equipment may affect microbiological quality, organoleptic quality, oxidation, moisture content, pest exposure. Suppliers and retailers should therefore establish appropriate secondary shelf-lives and storage conditions after opening.

The French sector has already identified product categories for which secondary shelf-life studies are particularly important, including biscuits, confectionery, edible oils, oilseeds, spreads, sauces, flours, olives in brine, juices and jams. EU-level guidance should encourage sector-wide testing protocols and shared methodologies to reduce costs for suppliers and retailers.

Non-food products: Cosmetics and detergents

Refill and bulk retail systems are also highly relevant for non-food products, particularly cosmetics and detergents. These categories generate substantial packaging waste and are well suited to refill formats, provided that specific safety and information requirements are respected.

Cosmetics

Under the 2022 French Decree, cosmetic products may be sold through assisted-service bulk systems and self-service systems using an appropriate dispensing device. Bulk cosmetic products remain fully subject to cosmetic product safety legislation. The responsible person must ensure that the product remains safe under the intended refill conditions.

This may require adaptation of the Product Information File (PIF), definition of compatible containers, cleaning protocols, retailer training and provision of mandatory consumer information both at the point of sale and after purchase.

Consumer-owned containers should be permitted where appropriate, but clear rules should be established regarding container suitability, cleaning requirements, product compatibility and labelling. Where safety cannot be adequately guaranteed, retailer-assisted refill systems or retailer-provided reusable containers may be preferable.

Detergents and chemical products

Detergents and other chemical products require clear hazard information, safe dispensing systems, and container compatibility. Under French legislation, certain products are prohibited from bulk sale because of hazard classification, volatility, corrosiveness and misuse risks (below). Other products may be sold in bulk through assisted-service systems and self-service systems using appropriate dispensing devices.

EU guidance should support a risk-based approach distinguishing low-risk refillable detergents from products requiring assisted service, products requiring specialised equipment, products that should be excluded from refill systems. Such an approach is necessary to preserve both consumer safety and the waste-prevention potential of refill systems.

Conclusion

Bulk retail and refill systems are sufficiently mature to be treated as a central component of PPWR implementation. French experience demonstrates that these models can operate safely in both food and non-food sectors when hygiene, consumer information, traceability, measurement and responsibilities are clearly defined.

The key question is no longer whether refill and bulk retail systems can be regulated. The real question is whether the PPWR will create the conditions necessary for their deployment across the European Union. Article 28, Article 51 and Annex VI, Part C already provide a solid legal foundation.

The next step is to develop practical guidance that:

- promotes refill and bulk retail systems.
- harmonises refill-related rules and best practices.
- protects consumers.
- avoids unnecessary barriers.

A proportionate EU-wide framework would enable refill and bulk retail systems to contribute directly to packaging waste prevention, consumer choice, resource efficiency and the transition towards a circular economy.

Annexes

Annex 1 – French regulatory texts governing bulk sale

- Article L.120-1 of the French Consumer Code, as introduced by the 2020 AGECE Act.
- Article L.120-2 of the French Consumer Code, as introduced by the 2020 AGECE Act.
- Decree No. 2023-837 of 30 August 2023 establishing the list of products that may not be sold in bulk, or that may only be sold in bulk under specific conditions for reasons of public health. This decree is a key component of the French regulatory framework governing bulk sales. It confirms the principle that bulk sale is permitted for fast-moving consumer goods, while providing for restrictions or specific conditions for certain product categories on grounds of safety, hygiene or public health. It therefore provides a useful regulatory basis for the implementation of Article 28 of the PPWR concerning refill rules, consumer information and the conditions for accepting customers' containers.
- Decree No. 2025-1102 of 19 November 2025 on targets for retail floor space dedicated to the sale of fast-moving consumer goods offered without primary packaging. Adopted pursuant to Article 23 of the Climate and Resilience Act⁹, this decree sets out the methodology for calculating the target requiring that 20% of products sold in retail stores larger than 400 m² be offered without primary packaging. It explicitly recognises the contribution of bulk sales, reusable packaging and refill systems. The decree provides three alternative calculation methods (retail floor space, turnover or number of product references) and introduces adjustments for certain product categories.

Annex 2 – Réseau Vrac et Réemploi's contribution on Regulation No. 1169/2011 (INCO)

- <https://ecostandard.org/publications/reseau-vrac-et-reemplois-regulation-1169-2011-inco/>

Annex 3 – List of detergent products or chemical substances prohibited or restricted for bulk sale, whether through self-service or assisted service

pursuant to Decree No. 2023-837 of August 30, 2023, which establishes the list of products prohibited or restricted for bulk sale, and Regulation (EC) No. 1272/2008 on Classification, Labelling and Packaging (CLP), as amended in 2024

- <https://ecostandard.org/publications/detergent-substances-restricted-bulk-sale/>

Annex 4 – Examples of bulk sales equipment

Photos: Réseau Vrac & Réemploi and Clan d'œil.

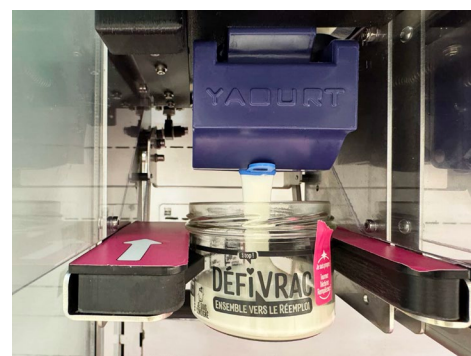
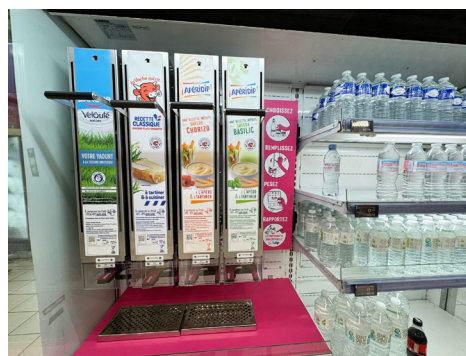
Examples of bulk sales equipment for dry food products



Examples of bulk sales equipment for powdered products



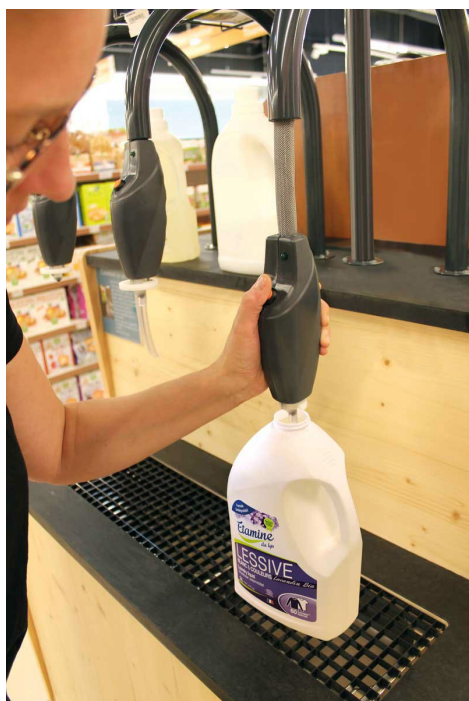
Examples of bulk sales equipment for fresh products



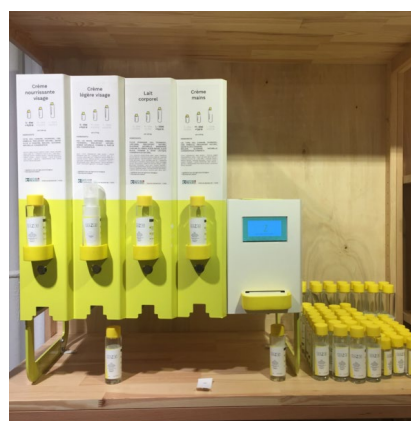
Examples of bulk sales equipment for liquid food products



Examples of bulk sales equipment for liquid or solid detergent products



Examples of bulk sales equipment for liquid or solid cosmetic products



References

- ¹ ADEME - [Panorama et évaluation environnementale du vrac en France](#) (2021).
- ² Regulation (EU) 2025/40 of the European Parliament and of the Council of 19 December 2024 on packaging and packaging waste, amending Regulation (EU) 2019/1020 and Directive (EU) 2019/904, and repealing Directive 94/62/EC. eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:L_202500040
- ³ Regulation (EC) No 852/2004 of the European Parliament and of the Council of 29 April 2004 modified on the hygiene of foodstuffs eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:02004R0852-20210324&qid=1784203792318 Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 modified materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC. eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:02004R1935-20210327&qid=1784203404965 Regulation (EU) n° 1169/2011 of the European Parliament and of the Council of 25 October 2011 modified on the provision of food information to consumers eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:02011R1169-20250401&qid=1784203847231
- ⁴ Regulation (EC) n° 1272/2008 of the European Parliament and of the Council of 16 Decembre 2008 modified on classification, labelling and packaging of substances and mixtures (CLP). eur-lex.europa.eu/legal-content/en/TXT/PDF/?uri=CELEX:02008R1272-20260701&qid=1785500007263
- ⁵ ADEME - <https://librairie.ademe.fr/consommer-autrement/5065-analyse-et-recommandations-liees-aux-risques-sanitaires-de-la-distribution-en-vrac-en-france.html> (2021) and [Analyse comparative des prix de produits vendus en vrac VS en préemballé](#)
- ⁶ Réseau Vrac et Réemploi, Good Hygiene Practice Guide (GBPH) for bulk retail sales of food products. Réseau Vrac et Réemploi, Legal guide to bulk retail sales for stores, version 16, August 2025. Réseau Vrac et Réemploi, Legal guide for suppliers of products intended for bulk retail sale, version 11, January 2025.
- In 2022, the A.I.S.E. (International Association for Soaps, Detergents and Maintenance Products) published a note entitled “Bulk and Refill Sales for Consumer Products: Guidance on safety & regulatory requirements”.
- ⁷ European Commission, Communication Guidance document for Regulation (EU) 2025/40 on packaging and packaging waste (March 2026). [eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=PI_COM:C\(2026\)3702](https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=PI_COM:C(2026)3702)
- ⁸ Law No. 2020-105 of February 10, 2020 on the fight against waste and the circular economy (AGEC Law). [/www.legifrance.gouv.fr/loda/id/JORFTEXT000041553759](https://www.legifrance.gouv.fr/loda/id/JORFTEXT000041553759)
- ⁹ Law No. 2021-1104 of August 22, 2021 on combating climate change and strengthening resilience to its effects. www.legifrance.gouv.fr/loda/id/JORFTEXT000043956924?fonds=ALL&init=true&page=1&query=Loi+n%C2%B0+2021-1104+&searchField=ALL