



The Paris office of Hogan Lovells is pleased to provide this English language edition of our monthly e-newsletter, which offers a legal and regulatory update covering France and Europe for May 2025.

Please note that French legal concepts are translated into English for information only and not as legal advice. The concepts expressed in English may not exactly reflect or correspond to similar concepts existing under the laws of the jurisdictions of the readers.

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For additional information, please speak to your usual contact.

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Audio-visual

France – New CNC Guidelines on Programming Commitments

On 8 May 2025, the French National Centre for Cinema and the Moving Image (CNC) published <u>new guidelines</u> concerning programming commitments. Developed in consultation with relevant professional organizations, these guidelines are intended to inform the assessment of proposals submitted for approval, within the framework set by the Cinema and Moving Image Code.

Established by the law of 29 July 1982, the programming commitments mechanism aims to ensure the diversity of cinematic offerings, the promotion of European and underrepresented works, and the pluralism of film distribution and exhibition. The new guidelines replace those issued in 2022 and reflect both market developments and lessons learned from the health crisis, as well as the recommendations of the Lasserre report on industry regulation.

This updated framework introduces limits on multi-screening based on the type of cinema establishment, reinforces requirements regarding the diversity of films and support for independent distributors, and regulates the free promotion of films. It also aims to strike a balance between uniform rules and consideration of local specificities. These commitments, approved for a period of two years, form part of a broader effort to modernize the regulation of the cinema sector.

Authored by Iris Accary and Léonie Barrat

Capital Markets

France – amending certain provisions relating to capital markets

The <u>Law 2025-391 of 30 April 2025 concerning various provisions adapting European Union law in economic, financial, environmental, energy, transport, health and free movement of persons matters ("DDADUE Law") was published in the Official Journal on 2 May 2025.</u>

This law amends in particular the following provisions:

- it prohibits investment service providers from receiving payment for order flow (paiement par flux);
- it adapts the regime applicable to European green bonds, and in particular designates the French *Autorité des Marchés Financiers* as the competent authority to ensure the application in France of the provisions of the <u>regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds; and</u>
- it postpones the obligation for certain companies to publish a sustainability report, in line with the <u>Directive (EU) 2024/794 of the European Parliament and of the Council of 14 April 2025 amending Directives (EU) 2022/2464 and (EU) 2024/1760 as regards the dates from which Member States are to apply certain corporate sustainability reporting and due diligence requirements, and lightens the information to be mentioned in said report.</u>

In addition, the government has been granted powers to transpose by ordinance (i) <u>Directive (EU) 2023/2864 of the European Parliament and of the Council of 13 December 2023 amending certain Directives as regards the establishment and functioning of the European single access point and (ii) <u>Directive (EU) 2024/1619 of the European Parliament and of the Council of 31 May 2024 amending Directive 2013/36/EU as regards supervisory powers, sanctions, third-country branches, and environmental, social and governance risks.</u></u>

Authored by Charlotte Bonsch

Commercial

France – Regulation of promotions for food products: publication of the guidelines by the Directorate General for Competition, Consumer Affairs and Fraud Control ("DGCCRF")

On 27 May 2025, the DGCCRF published an updated version of its <u>guidelines</u> on the regulation of promotional practices, following the enactment of Law No. 2025-337 of 14 April 2025. Since Law No. 2020-1525 of 7 December 2020, known as the "ASAP" Law, a dual limitation—both in value and in volume—has applied to promotional advantages, whether immediate or deferred, for food products and products intended for animal consumption sold by any professionals offering food products for sale, whether to other professionals or to consumers.

Since 2024, this framework has been extended to cover all fast-moving consumer goods ("PGC") and to lapse in April 2028. It distinguishes between promotional caps in value applicable to food (34% of the consumer sale price or an equivalent increase in quantity sold) and non-food (40% of the consumer sale price or an equivalent increase in quantity sold) products, across all distribution channels.

The DGCCRF stresses that the value cap is intended to apply only to offers with a specific price reduction, offers with an increase in the quantity offered, and product-allocated loyalty such as cashback tied to a specific product or deferred benefits. Furthermore, the limit of promotional benefits rates applies at the moment the benefit is granted to the customer.

Regarding volume limitations, the promotional benefits must not apply to a quantity of product exceeding more than 25% of the forecasted volume under a contract related to the design and production of food products tailored to the buyer's specific needs, or to the turnover amount pre-determined by the contracting professionals in their *convention unique*. The forecasted turnover, and not the actual turnover, will serve as the basis for verification. An exemption is nevertheless provided for seasonal products.

The DGCCRF also points out that all professionals marketing food products are prohibited from using the term "free" in the promotion of such products but may use synonyms or similar terms such as "offered".

Lastly, regarding controls, the DGCCRF may take into account, on a case-by-case basis, the specific economic situation of the suppliers concerned in light of the impact of the volume limitations on promotional restrictions.

Authored by Maimouna Goudiaby and Camille Raymond

Data Protection

France – Telephone solicitation: Parliament adopts new consent-based regime

On 21 May 2025, the Senate passed the bill strengthening the fight against fraud in public aid, incorporating the provisions relating to telephone marketing of consumers. This bill is currently subject to a referral to the French Constitutional Council, but this referral doesn't concern the telephone marketing provisions.

The text introduces a major change in the legal framework: the former opt-out system for telephone solicitation (prohibition of canvassing consumers registered on the Bloctel list) is replaced by a prior consent regime, in which any marketing by telephone can only be carried out provided that the consumer has expressly given his/her consent.

An exception (already existing for Bloctel) remains for cases where the marketing occurs in a context of an ongoing contract performance and is directly related to the subject matter of the contract. This includes offers for related or complementary products or services.

A specific rule applies to the construction sector, prohibiting solicitation through other means (SMS, email, social networks), relating to offers for services, equipment sales, or home improvement works aimed at achieving energy savings, producing renewable energy or adapting housing to aging or disability, unless the solicitation occurs in the context of an ongoing contract performance.

It should be noted that, as was the case under the opt-out regime, these provisions will not apply to prospecting for the supply of newspapers, periodicals or magazines.

The entry into force of these provisions is scheduled for 11 August 2026, but may be delayed because of the Constitutional Council referral.

Authored by Olga Kurochkina, Augustin Lacroix and Elektra Argyris

Finance

France – Publication of the DDADUE Law creating the regime allowing a pledge over digital assets

The <u>Law 2025-391 of 30 April 2025 concerning various provisions adapting European Union law in economic, financial, environmental, energy, transport, health and free movement of persons matters ("DDADUE Law") was published in the Official Journal on 2 May 2025.</u>

In particular, this law creates a regime allowing a pledge over digital assets. This regime is largely inspired by the pledge over financial securities accounts' regime set out in article L.211-20 of the French *Code monétaire et financier*, subject to amendments to adapt to the registration of digital assets and to adapt the enforcement provisions over this pledge. It is also specified that the statement of pledge may be signed by means of an automatic clause executor (*automate exécuteur de clauses*).

The replacement of the term "digital assets" by "crypto-assets" will come into force on 1 July 2025.

A decree by the *Conseil d'Etat* is expected to complete this regime.

In addition, the government has been granted powers to transpose by ordinance <u>Directive (EU) 2023/2225 of the European Parliament and of the Council of 18 October 2023 on credit agreements for consumers and repealing Directive 2008/48/EC.</u>

Authored by Charlotte Bonsch

Insurance

France – Publication of the DDADUE Law, amending certain provisions of the French Insurance Code

The Law 2025-391 of 30 April 2025 concerning various provisions adapting European Union law in economic, financial, environmental, energy, transport, health and free movement of persons matters ("**DDADUE Law**"), was published in the Official Journal on 2 May 2025.

This law amends several provisions of the French Insurance Code:

- Article L. 451-1-1 of the French Insurance Code, requires that an information organiser establishes a database of insured motor vehicles for the purposes of mandatory motor vehicle insurance. This database is intended to inform victims of road accidents, as well as the French State and the Guarantee fund for Mandatory Damage Insurance ("fonds de garantie des assurances obligatoires de dommages"). The DDADUE Law adds to this list "drivers of a motor vehicle, [...] to verify that this vehicle appears in the database mentioned in the first paragraph of this section."
- Article L. 310-1-1-1 of the French Insurance Code, by replacing the term "entreprise" which can be translated to "business" with the term "société", which can be translated to company.

The DDADUE Law also deletes the second paragraph of Article 15 of Order 2023-1138 of 6 December 2023, which transposes the Directive (EU) 2021/2118 of 24 November 2021, amending Directive 2009/103/EC on insurance against civil liability in respect of the use of motor vehicles and the monitoring of the obligation to insure against such liability.

Source: Publication of the DDADUE Law amending certain provision of the French Insurance Code

France – Publication of a report by the CCSF for the better understanding of AML-CFT on regulatory obligations by financial institutions' clients

On 6 May 2025, the *Comité Consultatif du Secteur Financier* ("CCSF") published a report of its Chair aimed at improving clients' understanding and acceptability of the due diligence obligations imposed on them by financial institutions in the context of anti-money laundering and combating the financing of terrorism ("AML-CFT").

The report is based on findings by the CCSF, noting the dissatisfaction of some customers, because of solicitations deemed too frequent, inconsistent requirements, and sometimes insufficient communication.

The report identifies several proposals that can be implemented to improve clients' understanding and acceptability of due diligence obligations:

- Monitoring dissatisfaction or difficulties arising from the application of AML/CFT regulatory obligations, in order to better assess the related challenges;
- Simplifying the collection and updating of customer due diligence data;
- Providing training and improving communication;
- Clarifying expectations toward obliged entities; and
- Anticipating the impact of the development of digital identity on customer due diligence measures.

The CCSF also notes that AML/CFT requirements will be strengthened with the adoption of the new anti-money laundering package, which establishes the Anti-Money Laundering Authority ("AMLA"), with the main texts set to come into effect in 2027.

Source: Publication of a report by the CCSF on regulatory obligations for financial institutions' clients regarding AML-FT

France – Publication of the updated joint guidelines by the ACPR and Tracfin

The Autorité de Contrôle Prudentiel et de Résolution ("ACPR") and the French financial intelligence unit ("Tracfin") specialised in antimoney laundering and combating the financing of terrorism ("AML-CFT") published, on 23 April 2025, an updated version of their joint guidelines on due-diligence obligations relating to transactions, and obligations to report and inform Tracfin.

This updated version takes into account:

- recent case law from the ACPR Sanctions Committee and the French Council of State;
- the latest legislative and regulatory developments, notably the Order of 6 January, 2021 on AML-CFT internal control systems and asset freezing measures, as well as the contributions of the 5th Anti-Money Laundering Directive;
- the ACPR's findings and analyses regarding professional practices; and
- recent developments related to terrorist financing.

These guidelines notably include Digital Asset Service Providers ("DASPs") in their scope and also provide clarification on the use of artificial intelligence in transaction monitoring.

Source: Publication of the updated joint guidelines by the ACPR and Tracfin

France – Publication by the ACPR of three instructions relating to prudential documents to be submitted by various entities in the insurance sector

On 16 April 2025, the *Autorité de Contrôle Prudentiel et de Résolution* ("**ACPR**") published three new instructions, (i) Instruction 2025-I-01, applicable to entities under ACPR supervision that do not fall under the Solvency II regime and are not supplementary occupational pension institutions ("**ORPS**"), (ii) Instruction 2025-I-02, applicable to entities under ACPR supervision that fall under the Solvency II regime, and (iii) Instruction 2025-I-03, applicable to ORPS.

These new instructions update the list of prudential documents that the entities listed above are required to submit. They respectively replace:

- Instruction 2024-I-02 of April 17 2024, notably by adding an Appendix 6 (Appendix B to Articles 2-5, 3, and 4 of Instruction 2025-I-01):
- Instruction 2023-I-13 of October 12, 2023, notably by modifying its sole Appendix and Part I of Article 1; and
- Instruction 2023-I-01 of April 13, 2023, by (i) adding a sixth part of Article 5 concerning entities directly covering commitments under the Popular Retirement Savings Plan ("PERP") pursuant to Article L. 144-2 of the French Insurance Code, and (ii) removing Appendix 3 (Appendix C of Instruction 2023-I-01).

Source: Instruction 2025-I-01, applicable to entities under ACPR supervision that do not fall under the Solvency II regime and are not ORPS; Instruction 2025-I-02, applicable to entities under ACPR supervision that fall under the Solvency II regime and Instruction 2025-I-03, applicable to ORPS

France – DORA – Reminder by the ACPR on the legal framework regarding the submission of the registers of information

On 11 April 2025, the *Autorité de Contrôle Prudentiel et de Résolution* ("ACPR") published a reminder on the legal framework governing the submission of the registers of information listing all information communication and technology ("ICT") service providers, as required under Article 28(3) of Regulation 2022/2554 on the digital operational resilience of the financial sector ("DORA Regulation").

The ACPR specifically refers to two key reference documents (please see the French Legal and Regulatory Update of March 2025):

- The ACPR's Q&A on DORA, originally published on 14 December 2022 and lastly updated on 16 March 2025; and
- The Q&A titled "Reporting of registers of information under DORA" published by the European Supervisory Authorities (ESMA, EBA, and EIOPA) ("ESAs"), updated on 28 March 2025.

The ACPR also reminded that the deadline for submitting the register of information to the authority was set for 15 April, 2025.

Source: Reminder by the ACPR on the legal framework regarding the submission of the register of information under DORA Regulation

European Union – Publication of a corrigendum to the Technical Standards regarding DORA Regulation

On 15 May 2025, the European Commission published a corrigendum to Delegated Regulation (EU) 2024/1774, which supplements Regulation (EU) 2022/2554 on the digital operational resilience of the financial sector ("DORA Regulation") with regard to regulatory technical standards specifying information communication and technology ("ICT") risk management tools, methods, processes, and policies and the simplified ICT risk management framework.

This corrigendum amends point (d) of the first paragraph of Article 22 concerning the ICT-related incident management policy, notably by replacing the reference to Article 15 with a reference to Article 8(2) of Delegated Regulation (EU) 2024/1772.

Source: Publication of a corrigendum to the Technical Standards regarding DORA Regulation

European Union – Update by the ESAs of its Q&A on the key information document under PRIIPs Regulation

The European Supervisory Authorities (ESMA, EBA, and EIOPA) ("ESAs") updated on 5 May 2025 their Q&A regarding the application of Regulation (EU) 1286/2014 on key information documents for packaged retail and insurance-based investment products ("PRIIPs"), specifically concerning the drafting and use of the key information document ("KID").

This update notably covers the following areas:

- the assessment of market risk, particularly the determination of the market risk class;
- the simulation of performance scenarios based on standardised methodologies; and
- the calculation of summary cost indicators, taking into account both recurring and non-recurring fees.

Source: Update by the ESAs of its Q&A on the key information document under PRIIPs Regulation

European Union - Launching of six consultations by the EIOPA regarding IRRD Directive

The European Insurance and Occupational Pensions Authority ("EIOPA") published on 29 April 2025 a set of six consultations on Directive (EU) 2025/1, establishing a framework for the recovery and resolution of insurance and reinsurance undertaking ("IRRD Directive").

The IRRD Directive will enter into force in 2027 and establishes an harmonised recovery and resolution framework for (re)insurers in European Union, aiming to limit both the occurrence and consequences of failures among these entities.

These consultations propose draft guidelines and technical standards that will constitute the practical modalities to implement the IRRD Directive.

The topics addressed by the EIOPA in these consultations include, in particular:

- the information to include into pre-emptive recovery plans;
- the criteria for determining which (re)insurers are required to develop pre-emptive recovery plans, notably with regard to the requirement that at least 60% of a given market is covered by this obligation;
- the criteria for identifying functions considered critical, the interruption of which could impact policyholders and the broader economy;
- the criteria for assessing (re)insurers' resolvability and their resolution strategy; and
- the measures that resolution authorities may take to mitigate obstacles to the resolvability of (re)insurers.

All stakeholders may submit their feedback on each consultation by responding to the online questionnaires, which will be available until 31 July 2025.

Source: Launching of six consultations by the EIOPA regarding IRRD Directive

Authored by Ghina Farah and Maxime Kaya

• Intellectual Property

France - Signing of a Declaration of Intent for the Implementation of a PPH with the INPI

On 21 May 2025, the French Patent and Trademark Office (INPI) signed <u>a declaration of intent with the Taiwan Intellectual Property Office (TIPO)</u> to implement a Patent Prosecution Highway (PPH), a framework aimed at accelerating patent grant procedures. This signature marks a new milestone in INPI's international cooperation, bringing the total number of PPH agreements concluded by the office to eleven.

The arrangement will enter into force on 1 July 2025. From that date, applicants will be able to request accelerated examination of a patent application filed in Taiwan, provided it contains claims sufficiently similar to those of an earlier application deemed patentable by the INPI. The system will also operate reciprocally for patent applications filed in France that claim priority from a Taiwanese filing.

This development addresses the growing interest of French companies in the Taiwanese market, as they currently rank tenth among foreign filers at the TIPO.

European Union - Agreement on Regulation Governing Compulsory Patent Licensing in Crisis Situations

On 15 May 2025, the European Parliament and the Council reached <u>an agreement on a new regulation establishing a mechanism for compulsory patent licensing in times of crisis</u>. This legal framework will allow the European Commission to temporarily authorize the production of patented products (such as vaccines or semiconductors) without the consent of the patent holder, in cross-border emergency situations affecting multiple Member States.

The mechanism includes fair remuneration for patent holders, along with strict obligations regulating the production and distribution of the concerned products, and sanctions in case of non-compliance. While welcomed for its responsiveness to health and industrial emergencies, the measure remains limited to the health and technology sectors, notably excluding areas such as defense and agriculture. This sectoral restriction raises concerns about the EU framework's ability to coherently address crises of a broader, cross-cutting nature, particularly those affecting food security.

The provisional agreement must now be formally approved by both the European Parliament and the Council. Once adopted by the colegislators, the regulation will enter into force upon its publication in the Official Journal.

International – Revision of the Industrial Property Code in French Polynesia

On 13 May 2025, the Economic, Social, Environmental and Cultural Council (CESEC) of French Polynesia issued <u>a favorable opinion on the proposed law aimed at amending the second part of the Intellectual Property Code, concerning industrial property</u>. This reform is part of a broader effort to align with recent developments in European and metropolitan law, in order to strengthen the protection of trademarks, patents, and industrial designs within the territory.

Although French Polynesia holds its own legislative competence in matters of intellectual property, it remains subject to international agreements and applicable rules for foreign applicants. The proposed text seeks to modernise the local legal framework while accounting for the specific characteristics of the territory.

While supporting the initiative, the CESEC made several recommendations: to consider establishing a systematic extension procedure for industrial property rights filed abroad, to simplify local registration, to transfer litigation to a court based in Polynesia, and to ensure prompt approval of the penalties outlined in the reform. It also highlighted the relevance of reactivating a local dispute resolution commission for conflicts between employee-inventors and their employers, as well as the importance of enforcing strict safety standards for spare parts to ensure consumer protection and insurability.

Authored by Iris Accary and Léonie Barrat

Life Sciences

France - Law DDADUE 5: New measures to prevent supply disruptions of medical devices

Law No. 2025-391 of 30 April, 2025 containing various adaptations to European Union law on economic, financial, environmental, energy, transport, health and the circulation of people (Law DDADUE 5) which was published in the Official Journal on 2 May 2025.

Regarding the health sector, the Law DDADUE 5 implements into French law provisions of Regulation (EU) 2024/1860 of the European Parliament and of the Council of 13 June 2024, applicable since 10 January 2025, relating to prevention of supply disruptions for medical devices and in vitro diagnostic medical devices.

This regulation requires manufacturers to report to their national competent authority, at least six months in advance, of any planned interruption or cessation of supply of a medical device likely to cause serious danger or a risk of serious danger for patients or public health. This obligation extends to economic operators who must communicate the information without undue delay to other actors in the supply chain and to the healthcare establishments they supply.

In response to this information obligation, the Law DDADUE 5 allows the French National Agency for the Safety of Medicines and Health Products (ANSM) to react when it is informed of an interruption or cessation of supply of a medical device and it considers that serious danger or a risk of serious danger for patients or public health may result. It can then take all measures that are strictly necessary and proportionate in order to ensure the continuity of medical treatment. This notably includes:

- publication of information relating to the planned interruption or cessation on its website;
- issuance of recommendations on available alternative solutions;
- information and support actions for healthcare professionals and patients;
- monitoring or suspension of the operation, export, wholesale distribution, packaging, marketing, holding, advertising, commissioning, prescription, dispensing or use of the medical device concerned.

The Law DDADUE 5 provides for the application of the same rules to in vitro diagnostic medical devices.

Any failure to comply with the reporting obligations or with the measures taken by the ANSM may lead to financial penalties.

This law completes the provisions of Law No. 2025-199 of 28 February 2025 on the financial balance of French social security system for 2025, which allows, as part of the prevention against supply disruptions and in exceptional situations, the temporary coverage by French public health insurance system of an alternative medical device within the limit of the reimbursement rate of the unavailable medical device.

By strengthening the tools for preventing and managing disruptions, the Law DDADUE 5 consolidates the national framework in order to ensure a rapid and coordinated response to guarantee continuity of healthcare.

Authored by Mikael Salmela, Joséphine Pour, Karla Mary and Charlotte Sors

Public Law

France - Public procurement: publication of the "DDADUE law"

<u>Law No. 2025-391 dated 30 April 2025</u> containing various provisions for adapting to European Union law in economic, financial, environmental, energy, transport, health and movement of people matters (known as the "*DDADUE law*"), published in the OJFR of 2 May 2025, removed the provision of <u>article L. 2172-3 of the public procurement code</u> which, as a matter of principle, qualified as innovative the works, supplies or services offered by young innovative companies. Since 31 December 2023, this qualification has facilitated access to public procurement for the latter, in particular by allowing them to apply for innovation partnerships aimed at research and development of innovative products, services or works, within the meaning of article L. 2172-3 of the public procurement code.

France - Infrastructure: modification of the infrastructure advisory council's composition

The decree No. 2025-400 of 3 May 2025, amending decree No. 2020-1825 of 30 December 2020 relating to the infrastructure advisory council, and the order of 3 May 2025, appointing members to the infrastructure advisory council, published in the OJFR of 4 May 2025, modify the composition of this council. The council now comprises thirteen members, including two additional new members appointed for their expertise in transport and mobility, economic assessment, regional planning, environment, and public financing. As a reminder, the infrastructure advisory council was created by law No. 2019-1428 of 24 December 2019 on mobility orientation. This is a consultative collegiate body reporting to the Minister of Transport, which brings together political leaders and experts to advise the government on the programming of investments in mobility, territorial accessibility and energy transition.

France - Urban planning: extension of the validity period for planning permits

The decree No. 2025-461 of 26 May 2025 extending the validity period for planning permits issued between 1st January 2021 and 28 May 2024, published in the OJFR of 27 May 2025, aims to address the challenges encountered in the housing and construction sectors by extending the validity period of recently issued planning permits. On the one hand, article 1 of the decree extends to five years – instead of the three years of validity set by articles R. 424-17 and R. 424-18 of the urban planning code – the validity period of building, development or demolition permits and of decisions of non-opposition to prior declaration issued between 22 May 2022 and 28 May 2024. This extension, however, cannot be combined with a classic extension request within the meaning of articles R. 424-21 to R. 424-23 of the urban planning code. On the other hand, article 2 of the decree extends by one year the validity period of the same authorizations issued between 1st January 2021 and 27 May 2022.

France - Administrative jurisdiction: publication of the 2024 report

On 13 May 2025, the French Council of State published its 2024 public report, outlining the judicial and consultative activity of the administrative courts during 2024. Structured into four parts, this report provides an overview of this activity, presents the studies, events, partnerships, and European and international cooperation initiatives organized by the administrative courts, and reports on projects to reform and modernize the public service of administrative justice. The report highlights a continued increase in litigation activity and recourse to mediation, while noting an increase in expected judgment timeframes before the lower courts, contrasting with a slight improvement before the Council of State. Furthermore, the Council of State's consultative activity was particularly sustained, due to the numerous political changes that occurred in 2024, in addition to the opinions delivered to the government and four simplification studies carried out at the request of the Prime Minister. This report finally offers an analysis of a set of decisions, rulings, and judgments issued by the administrative jurisdiction.

Authored by Bruno Cantier, Astrid Layrisse and Elisa Brunet.

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