Repair Café Conference
9 June 2023, CfSD, Farnham
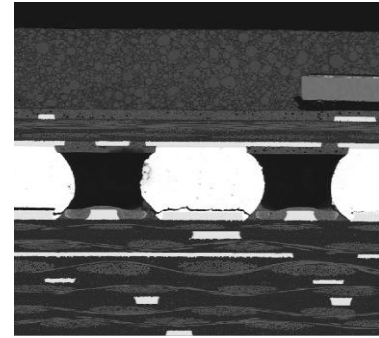
'Right to Repair' and
Product Policy

RINA

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What we do

- Failure investigations & root-cause analysis

- Materials and substance testing & analysis - In-house laboratories

- Product regulatory compliance
  - Supporting DESNZ via Ricardo

- Asset integrity - site wide

- Condition assessment, monitoring & predictive maintenance

- Cable consultancy
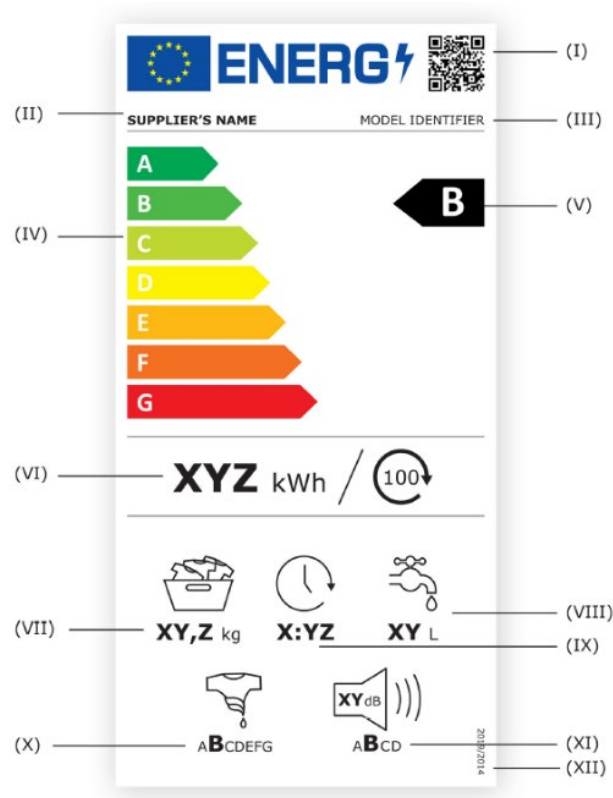
- Design support

- Modelling & simulation*

- …

* Finite element analysis, Computational fluid dynamics

'Right to Repair' and Product Policy

- How does policy impact product design?

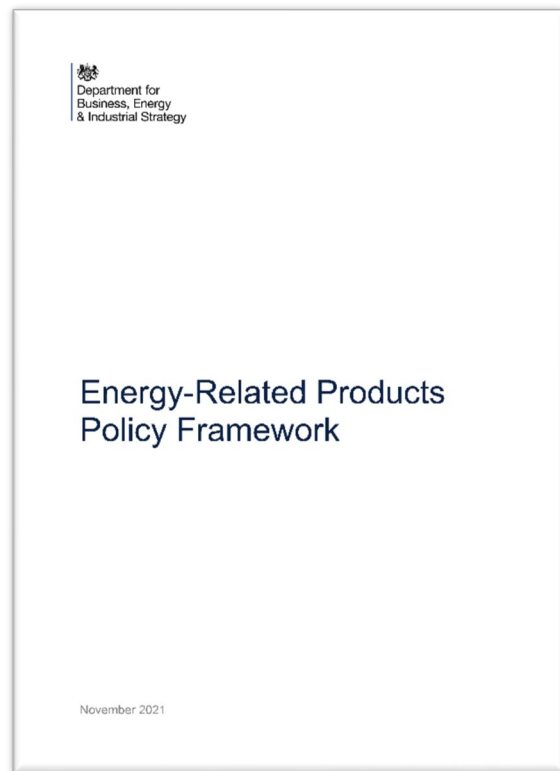- UK objectives

- Where is product policy heading?

'Right to Repair' and Product Policy

- How does policy impact product design?
  - e.g. domestic washing machines
    - Energy Label - Regulation (EU) 2019/2014 >>>
    - Ecodesign Regulation (EU) 2019/2023 defines
      - **Spare parts:** which shall be made available to 'professional repairers' and/or end users (restricted) and for how long (10 years from last unit placed on market) – includes software/firmware
      - **Tools:** Must be commonly available and enable repair without permanent damage
      - **List of parts:** To be made freely available
      - **Instructions:** Availability and what they contain
      - **Delivery**: Time
      - **Professional repairer:** Process for registration, reasonable fees

'Right to Repair' and Product Policy

- UK objectives include

  - *"Reducing emissions by transforming how products use energy while minimising the disruption to consumers and businesses.*

  - *Reducing the lifetime running costs of products to increase energy bill savings for consumers, businesses and the public sector.*

  - *Building a circular economy in which products are **more repairable, durable and recyclable**, ensuring maximum retention of value in the economy for as long as possible.*

    - Next steps: *For each product group for which energy efficiency standards are to be introduced, consider introducing basic right to repair requirements – spare part availability, repair information, software and firmware updates.*

  - *Driving innovation by optimising smart technology use and instilling incentives for manufacturers to research and develop more efficient technologies"*

Department for
Business, Energy
& Industrial Strategy

Energy-Related Products
Policy Framework

November 2021

https://www.gov.uk/government/publications/energy-related-products-policy-framework

'Right to Repair' and Product Policy

- Where is product policy heading?

  - France – Reparability Index

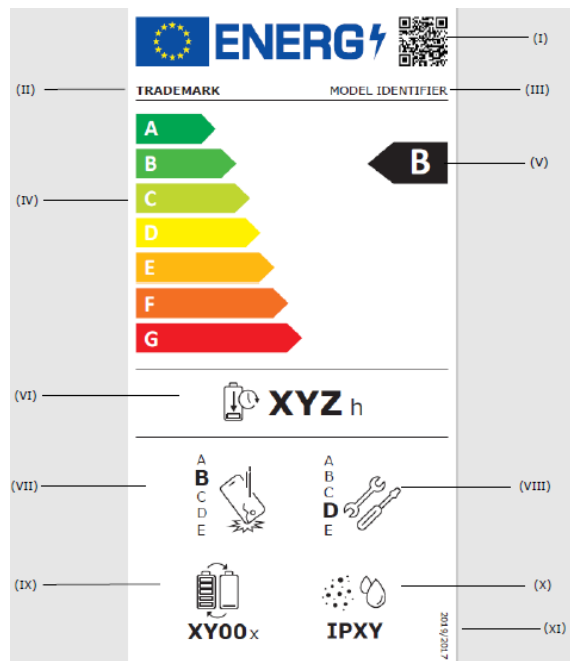Figure 1 - Graphical charter of the repairability index (French Ministry of ecological transition (MTE)

- Index mark to be displayed near the price in a similar font size at the point of purchase whether physically or online

- Applies to 'porthole' washing machines, smartphones, laptops, televisions and electric lawnmowers. More products to follow

- Score based on availability of documentation, ease of disassembly, availability and price of spares, etc.

See https://www.ecologie.gouv.fr/indice-reparabilite

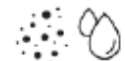# 'Right to Repair' and Product Policy

- Where is product policy heading?

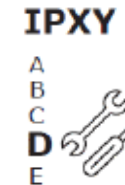 - EU - mobile phones and tablets (proposed)
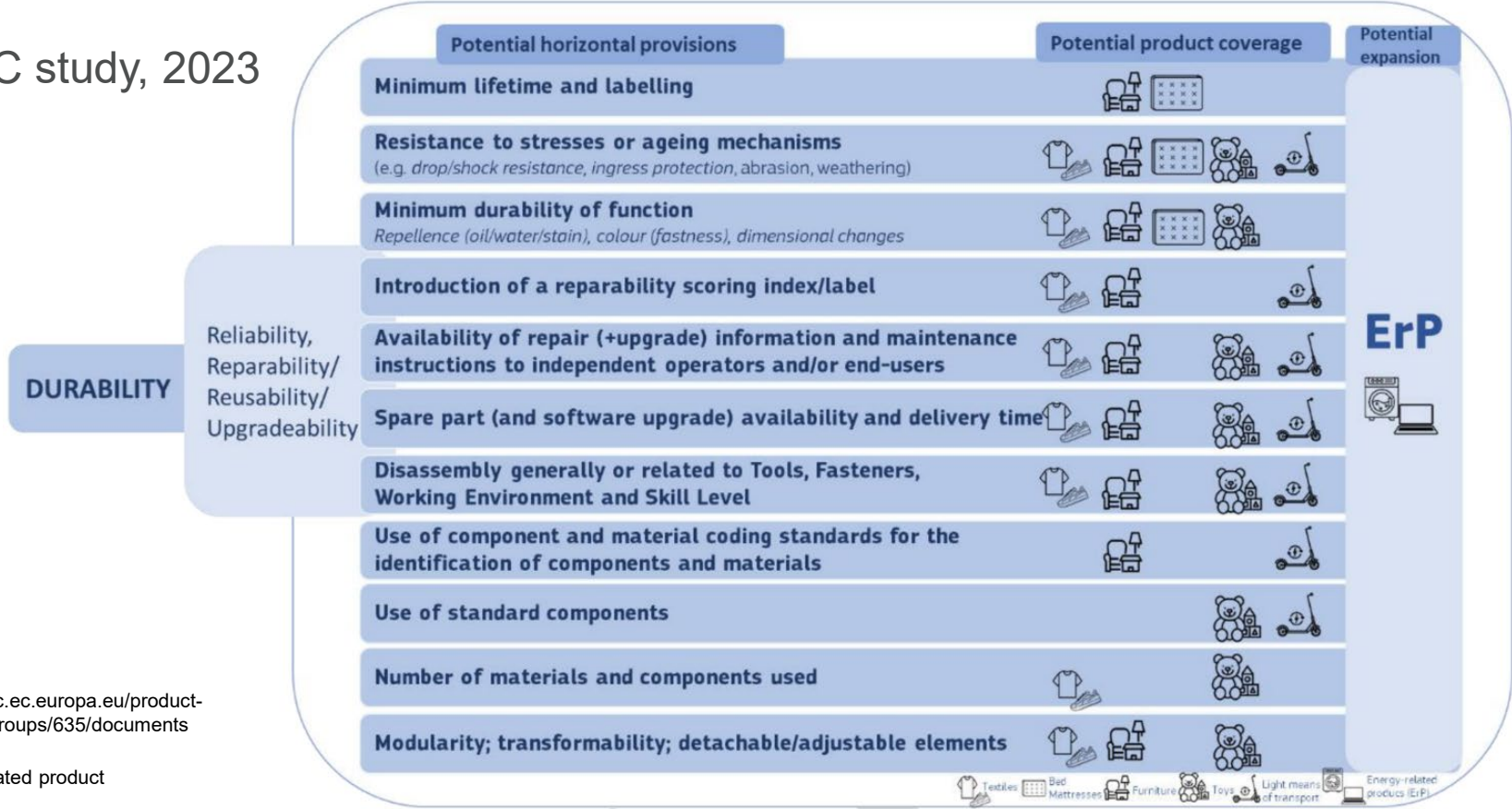

Battery endurance

Free fall reliability class

Water/dust ingress class

Repairability Class

Potential EU pan-product requirements

- JRC study, 2023

DURABILITY — Reliability, Reparability/ Reusability/ Upgradeability

Potential horizontal provisions	Potential product coverage	Potential expansion
Minimum lifetime and labelling		
Resistance to stresses or ageing mechanisms (e.g. *drop/shock resistance, ingress protection*, abrasion, *weathering*)		
Minimum durability of function *Repellence (oil/water/stain), colour (fastness), dimensional changes*		
Introduction of a reparability scoring index/label		ErP
Availability of repair (+upgrade) information and maintenance instructions to independent operators and/or end-users		
Spare part (and software upgrade) availability and delivery time		
Disassembly generally or related to Tools, Fasteners, Working Environment and Skill Level		
Use of component and material coding standards for the identification of components and materials		
Use of standard components		
Number of materials and components used		
Modularity; transformability; detachable/adjustable elements		

Textiles | Bed Mattresses | Furniture | Toys | Light means of transport | Energy-related products (ErP)

https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/635/documents

ErP = Energy-related product

The future

- More products likely to become subject to more R2R related-requirements. May affect

  - availability of spares (hardware, software, firmware), instructions

  - product durability

  - ease of disassembly

- Potential domestic products affected include

  - EU influence: Mobiles and tablets > Energy-related products

  - FR influence: 'porthole' washing machines, smartphones, laptops, televisions and electric lawnmowers > top-loading washing machines, Dishwashers, Vacuum cleaners, High-pressure cleaners

  - UK influence: Cooking appliances, and pan-product measures applied to ErPs*

  * Illustrative examples from Energy-related products Policy Framework, 2021

Products in Compliance 2023

Environmental and technical electrical and electro-mechanical equipment regulation explained

Wednesday 15th – Thursday 16th November 2023
Radisson Blu Edwardian Hotel, Heathrow, UK

Key themes

- Chemical substances
- Market access and technical conformity
- Sustainability
- Extended producer responsibility
- Ethical supply chain

Industry and manufacturing sectors that would benefit from attending

- aerospace and defence, consumer electronics, household appliances, IT and telecommunications, lighting, medical devices, control equipment and instrumentation.....

For more information contact

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- https://www.rina.org/en/media/events/2023/11/15/products-compliance

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