

Reparability score system for smartphones and tablets

Minutes of the 1st stakeholder meeting (Webex, 07/09/2021)

LIST OF PARTECIPANTS

• EC DG GROW	• BAM (Bundesanstalt für Materialforschung und –prüfung)	• ANEC/BEUC
• EC DG ENV	• FEICA (the Association of the European Adhesive & Sealant Industry)	• Danish Energy Agency
• EC DG JRC	• Apple	• Vorwek
• CENELEC	• iFixit	• Xiaomi
• Intel	• Whirlpool	• Sony
• Miele	• Miljødirektoratet	• HP
• Bulgarian Ministry of Economy	• Belgian federal public service	• Netherlands Enterprise Agency
• Telefonica	• OPPO	• SIMPPLE
• EEB	• Vodafone	• KU Leuven
• Federal Ministry for Economic Affairs and Energy [DE]	• Ministry of Environment, Climate Protection and the Energy Sector [DE]	• Malta Competition and Consumer Affairs Authority (MCCAA)
• Restart project	• Oekopol Germany	• Lighting Europe
• Interel	• IK-Ingenieria	• SECIMAVI
• Fraunhofer IZM	• Microsoft	• ENEA [IT]
• Topten	• ECOS	• Ministry of Slovakia [SK]
• Finnish Energy Authority	• Panasonic	• Cisco
• APPLIA	• EuroCommerce	• VHK
• TU Delft	• FOD Economie [BE]	• Samsung
• Alliance Française des Industries du Numérique (AFNUM)	• Ministerio para la Transición Ecológica y el Reto Demográfico [ES]	• Ministry of Consumer Affairs [ES]
• Swedish Environmental Protection Agency	• Swedish Energy Agency	• CLASP
• German Environment Agency (UBA)	• Sustainable Energy Authority of Ireland (SEAI)	• Magazin für Computertechnik (heise)

AGENDA

1. Welcome and introduction to the meeting
2. Presentation of Repair Score Method
 - 2.1 General Method and Priority Parts (Presentation and Q&A)
 - 2.2 Repair parameters and Weighting (Presentation and Q&A)
 - 2.3 Scoring, Aggregation and Guidance (Presentation and Q&A)
3. Closing of the meeting

1 Welcome and introduction to the meeting

DG GROWN and DG ENV presented the aim of the meeting, the context of the draft ecodesign regulation and the relevance of the reparability scoring system for smartphones and tablets in the context of the new Circular Economy Action Plan.

2 Presentation of Repair Score Method

2.1 General Method and Priority Parts

- A stakeholder (Apple) asked whether the list of priority parts was selected entirely on the basis of the parts reported in the draft ecodesign regulation and also whether feedback provided by stakeholders on the draft regulation were considered. JRC stated that the approach for developing the scoring system was based on the preparatory study data and ecodesign draft regulation. Feedback from stakeholders on the regulation was not taken into account for this preliminary Score proposal. DG GROW specified that comments received from the stakeholders are being analyzed and if changes are implemented in the draft regulation, they will be considered also in the scoring system.
- A stakeholder [IT] asked about the reasons for selecting the ecodesign regulation requirement as a starting point. In some cases, the minimum requirements could be the maximum achievable level. Furthermore, they asked if the setting requirements are only valid for smartphone and tablets or the criteria will be extended to other products. DG GROW answered the ecodesign requirements are based on reasonably stringent levels that are deemed feasible for products currently on the market and product that are likely to come in the next years. The reparability scoring system intends to use the proposed requirements as a starting point. The index is built for the specificities of smartphone and tablets. If the work is extended to other product groups, the specificities of other products should be taken into account.
- A stakeholder (ECOS) asked about the rationale behind replacing level 3b parts with parts related to folding and rolling mechanism (4a and 4b parts respectively). and noted that 3b components presented highly functional relevance. Another stakeholder [BE] suggested to have a priority list with a 80% weighting and 20% weight for additional parts, while another proposal suggested limiting priority parts to those of level 1 and 2 Another representative (Restart Project) commented that the 5% weight assigned to the connectors is considered

low based on the failure likelihood data from the Community Repair Initiative. JRC explained that priority parts were selected in order to integrate parts related to different technologies and at the same time not to sacrifice the weight of parts with high failure likelihood and functional relevance. Furthermore, the inclusion of additional parts would lead to weights for some parts low relevant in the scoring system. JRC stated that the relative weight was assigned on the basis of the data reported in the ecodesign preparatory study, but stakeholder feedback and proposals were welcome.

- A stakeholder (Netherlands Enterprise Agency) asked how devices that include multiple connectors, buttons, microphone, speakers, etc. are treated in the scoring system. The JRC responded that (depending on the repair parameter) multiple parts of same type are assessed and only the part with the lowest score is considered in the calculation.

2.2 Repair parameters and Weighting

- A stakeholder (ECOS) commented on the possibility to address part serialization in the scoring system. DG GROW added that on the serialization aspect there is a synergistic approach between the ecodesign regulation and the propose scoring system.
- Different stakeholders commented on the opportunity to include parameters related to software and firmware updates (ECOS, iFixt and [DE]) over an extended period. Another stakeholder (Sweden Energy Agency) also suggested going beyond the period included in the regulation. JRC answered that even though software updates are an important aspect in terms of product lifetime, the scope of the scoring system is focusing on reparability
- Stakeholders (ECOS, iFixit, [DE]), also commented on the inclusion of spare part price in the scoring system. JRC explained that the spare parts price was not proposed due to its variability over regions and over time. The inclusion of such a parameter would make the scoring system less robust and could affect accuracy, assessment and verification.
- A stakeholder (Apple) asked why “Return option” of the products described in the standard EN45554 was not included. JRC clarified that the standard was widely considered both directly and via the JRC General Method (2019), but the relevance of "Return option" was going beyond the concept of reparability
- Stakeholders (Apple, [DE]) enquired about the weighting factor allocation, and the prominence of disassembly depth compared to the availability of spare parts or repair information. JRC explained that a higher weight was assigned to disassembly depth because it is a parameter not directly considered in the ecodesign draft regulation, but still amongst the most critical ones.
- A Stakeholder [IT] asked for clarification on the scoring rationale for different types of fasteners (removable, reusable). JRC explained that a reusable fastener increases the opportunity to repair the device compared to just a removable fastener
- A stakeholder [IT] asked how to ensure that the product after the disassembly and repair process, works again. JRC replied that the aspect related to the capability of a product to function properly after reassembly is embedded in the definition of disassembly. Cases where reassembly does not lead to operational device or even reassembly cannot occur are a matter of verification.
- Another stakeholder (BAM) suggested the inclusion of the skill level of the repairer as an additional parameter. JRC answered that adding this parameter would lead to challenges in the verification process.

2.3 Scoring, Aggregation and Guidance

- A stakeholder (iFixit) commented about combining the availability of spare parts with software for initialization. The JRC responded that the general principle on which the scoring system is based is that part functioning should be assured after replacement.
- A stakeholder (iFixit) suggested addressing bundling parts in the scoring system. Another stakeholder [DE] suggested that the display and battery should not be bundled and to limit the bundling of Level 3 spare parts to only two parts. The JRC stated that for the selection of priority parts, the draft ecodesign regulation was followed and that a discussion on bundling should be addressed at both levels: ecodesign regulation and scoring system
- A stakeholder (BAM) commented that the disassembly depth is not sufficiently differentiated and the number of steps for scoring classes III and IV are high. JRC responded that the range of steps in the classes can be fine-tuned and will be further assessed in the next calibration and validation stages of the study.
- A stakeholder [IT] asked for clarification regarding repair information and availability of parts to the end user and if the final repair process would be carried out by the end user who may not have the skills or by a repairer. JRC clarified that the availability of information and parts for professional repairers was set as a minimum requirement by the ecodesign regulation. Additional points and more granularity were introduced for non-complex repairs that can be carried out by the end user.
- A stakeholder (FEICA) commented that adhesive fasteners present additional benefits and suggested increasing the score from 3 points to 5 points for the adhesive provided with parts by OEMs. The JRC replied that the scoring system does not discriminate between different types of fastener technology.
- Stakeholders ([BE], Swedish Environmental Protection Agency), commented about the integration of the battery lifetime in the weighting of the scoring system. A stakeholder suggested to lower the repair weighting in the case of durable battery. JRC answered this aspect go beyond the scope of the reparability scoring system whereas the reliability of battery is considered in the ecodesign regulation.
- A stakeholder [BE] asked what is the reason for including in the scoring system only the "same reusable" and not "same removable" fasteners, considering that in the disassembly process the removal of "different removable" is more complex. JRC clarified that 'same reusable' means the same specific type of fastener, (e.g. screw). The removal of the same type of fastener is counted as a step. There is some overlap within disassembly depth that should be considered.

3. Closing of the meeting

DG GROW described the timeline of the next steps of the process related to the eco-design regulation and reparability score system for smartphone and tablets.

DG GROW and DG ENV requested feedback regarding which policy instrument should include the reparability scoring system either in the eco-design regulation or in the energy label.

DG GROW reminded the stakeholders that written contributions in the four weeks following the meeting are very appreciated.