

**A Scoring System on Reparability to
support Ecodesign in a Circular
Economy - 2nd TWG meeting**

Brussels, 8/11/2018

Minutes of the meeting

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Agenda

Schedule	Topic
09:00 – 09:15	Registration and welcome Round table and objectives of the meeting (JRC)
09:15 – 9:45	Part I: Policy context (ENV)
9:45 - 11:00	Part II: Towards a Scoring System on Reparability: key elements of the generic scoring system (JRC)
11:00 - 11:15	Coffee break
11:15 - 13:00	Part III: Towards a Scoring System on Reparability: Product-specific aspects for laptops (JRC)
13:00 – 13:45	Lunch break
13:45 – 15:30	Part IV: Towards a Scoring System on Reparability: Product-specific aspects for vacuum cleaners (JRC)
15:30 – 15:45	Coffee break
15:45 – 17:30	Part V: Towards a Scoring System on Reparability: Product-specific aspects for washing machines (JRC)
17:30 – 18:00	AOB, wrap-up, next steps and conclusion (JRC)

List of organisations

Organisation
ANEC-BEUC
ADEME
AERESS
Apple
APPLIA
BSH Home Appliances Group
FEICA
Danish Energy Agency
DIGITALEUROPE
ECOS
EEB
EUnited Cleaning
Europa Insights
European Commission (ENER)
European Commission (ENV)
European Commission (JRC Seville)
European Commission (JUST)
European Garden Machinery Federation
European Heating Industry
European Remanufacturing Council
Federal Institute for Materials Research and Testing (BAM)
Finland Energy Authority
Fnac Darty
Fraunhofer IZM
Groupe SEB
Henkel AG & Co. KGaA
HOP (Halte à l'obsolescence programmée)
HP Inc
iFixit
iFixit Europe
Intel Corporation
KU Leuven
LightingEurope
Microsoft
Miele & Cie KG
Netherlands Enterprise Agency
Rijkswaterstaat (NL)
RREUSE
Samsung Electronics
Sony

Test-Achats
UK Department of Environment Food and Rural Affairs
Vorwerk Elektrowerke GmbH & Co. KG
Whirlpool UK Appliances Ltd
Wuppertal Institute

Welcome and introduction

The chair welcomed the participants and presented the agenda of the day, which was accepted by all present without comments. This was followed by a "tour de table" presentation by participants, who consisted of a representation of experts from the repair sector, business (industry, retailers and trade associations), academia and research institutes, government representatives, consumer and testing organisations, and environmental NGOs. Moreover, it was explained that this was the 2nd and last TWG meeting for this study, and that the objectives of the day were to present the revised assessment framework and to illustrate how this could be adapted to some illustrative products.

Part I: Policy context

DG ENV explained that the study must be finalised by the end of the year, and that it will be followed by a behavioural study to analyse consumers' understanding of communication on reparability aspects. Based on the results, the EC will further discuss and decide how the scoring system could be applied at EU level, for instance as tool integrated in ED/EL.

Initial feedback on possible integration in policy tools was collected: horizontal or vertical amendments to the existing product legislation were suggested by some participants. Some preliminary suggestions for the upcoming behavioral study were also provided, including possible questions addressing the consumer perception of reparability. It was also suggested to focus as much as possible on consumer understanding since technical issues are more for professionals.

Part II: Towards a Scoring System on Reparability: Key elements of the generic scoring system

JRC presented key elements of the revised scoring system. Stakeholders welcomed the comprehensiveness of the approach. Stakeholders asked for some clarifications and provided some additional input that will be used to finalize the general framework.

Stakeholders endorsed the focus on priority parts, as well the fact that their selection may depend also on technological and reliability aspects. Depending on the product, the definition of priority parts might require some flexibility and/or allow for additional granularity of product (sub-)classes. Reference was made to Chapter 5 of prEN 45554, which was reported to describe this issue.

Stakeholders supported also the overall list of key parameters and their split between minimum and rating criteria. No objections were raised about having prEN 45554 as main reference document for building the scoring system.

Some clarification was needed to explain that the "minimum" used as the entry level for the scoring system shall not be confused with mandatory minimum requirements as set in the ED framework. A product not fulfilling minimum requirements would be considered to fail minimum reparability conditions and would get the lowest possible score (e.g. zero).

At the level of aggregating scores assigned to parameters for each priority part, it was explained that indices have to be refined. These can be used to provide summary information to consumers, although the background data used for their calculations should be also provided for transparency.

A participant proposed to have a label for self-repair and another one for professional repair. This could be tested in the consumer behavior study.

It was remarked by participants from industry that the proposed approach to assign the overall score of a single parameter based on the worst priority part in terms of reparability might not be fair for products that have majority of their priority parts scoring very well. JRC clarified that such approach incentivizes the manufacturer to have all priority parts at a good score. The possibility to weight scores for different priority parts, for instance based on their frequency of failure/replacement, was also considered an option, although it much depends on the availability of robust quantitative information.

Regarding the spare parts availability, a participant asked if Member State Authorities (MSA) have the capacity to check the actual availability of spare parts, e.g. travelling to the countries where the manufacturer keeps the spare parts (which might be outside of the EU). A participant representing an NGO mentioned that this should not be necessary, and an MSA could do a rather straightforward check by placing the order of the spare part, to check its availability.

A participant from NGOs reported that only a small part of users manages to get their products repaired. Main causes are cost, quality and difficulty of repair, as well as asymmetry of information. Some participants suggested the integration of economic aspects (e.g. max price of spare parts), which the EC considered very difficult to rate at European level. However, it was explained that these are handled indirectly through the selected technical parameters, which altogether aim to contribute to facilitate the repair process.

Moreover, it was discussed how durability should be considered (or not) in the system. JRC proposed to focus on reparability (since that was the mandate) but taking into account durability aspects in the definition of parts to be assessed and related requirements (e.g. in case the advantages of a more durable design can be demonstrated).

Finally, the inclusion of a parameter on the guarantee was considered controversial by some participants. Some of them considered that this parameter should focus at product level and be considered as an alternative to all previous parameters. The direct connection between guarantee and repair was also questioned, especially for ICT products under guarantee, which are more frequently replaced to ensure a continuous availability of the product to users. The products collected for repair under guarantee are often sent to a remanufacturing process, and tracking this process and whether it actually ends in a repaired product re-joining the market is rather difficult. The equivalence of commercial guarantee services provided by different manufacturers under different economic and contractual conditions was also questioned by some participants.

Part III: Towards a Scoring System on Reparability: Product-specific aspects for laptops

JRC presented product-specific aspects for laptops. Some stakeholders were concerned about the use of the product-specific approaches for ED/EL purposes. It was explained that the goal of the work was to develop a general framework and to see how that could be shaped at product specific level. The work was in fact to be considered as preliminary to the understanding of which information system could be

proposed for further discussion in the policy area, and not to be taken already as an implementation activity. If agreed at European level, the application of such information system would require further ad-hoc studies and structured consultation processes. This was referred to as “step-by-step” approach, which was considered wiser than trying to cluster many aspects in shorter time with the risk of obtaining poor results.

Some of the key discussion points for laptops were:

- Disassemblability: reversibility of the process has to be considered.
- Fasteners: also those connected to parts have to be considered.
- Tools: the differentiation between basic and proprietary tools is considered not sufficient since also specific tools should be considered.
- Information: this also has to be improved.
- Spare parts: the proposed delivery time of spare parts (2 days) was considered unfeasible in practice by some industry representatives; awarding standard interfaces was also questioned by a manufacturer as possible barrier to innovation.
- Guarantee: the guarantee issues were questioned by several participants, especially in terms of providing more details of the expected guarantee which would be evaluated in the scoring system. JRC clarified that the reference to "commercial guarantee / extended warranty" is intended to mean a commercial contract offered by manufacturers/retailers including a "commitment to free repair" as first option. It was however recommended to refer to manufacturers only. A participant from an NGO proposed the inclusion of all repair actors under the guarantee. A participant from industry explained that laptops under guarantee are not repaired but replaced as general policy of the respective company, and those faulty laptops are then remanufactured and sold. It was pointed out that including the commercial guarantees which cover the average lifetime of a laptop in the scoring system could make unnecessary the evaluation of the rest of parameters.
- Software: according to a manufacturer the compatibility with open software is not a relevant aspect for reparability and it is not necessarily considered an advantage, nevertheless products on the market can support open software.

Another point raised by participants was the need to have a scoring system that predicts the evolution of technology so future products can be assessed or plan an update when necessary. Moreover, it was clarified that possible misuses were considered in the selection of the priority parts.

Part IV: Towards a Scoring System on Reparability: Product-specific aspects for vacuum cleaners

JRC presented product-specific aspects for vacuum cleaners. Again, it was explained that the goal of the work was to develop a general framework and to see how that could be shaped at product specific level. The possibility to make a reality check with products on the market was considered interesting but to be done in a later stage due to time constraints in the current study.

Participants from industry pointed out the need to have a higher granularity of the product subtypes (e.g. mains operated and hybrid, cordless and robot) while a Member State representative mentioned that having one system for all VCs would be more efficient. Those types of VC which do not have a

specific priority part (e.g. battery) and/or are not affected by a specific parameter (e.g. software updates only for robot type) will not have to assess it. Such approach would need further development to allow a fair comparison among the different types of VCs.

In terms of priority parts, it was suggested to separate switches and electronic boards as they are related to different failure mechanisms. Batteries were suggested as a relevant priority part to be added to the proposed list. The distinction between priority parts and consumables was also discussed, as well as the consideration of possible misuses in the selection of the priority parts. From several participants it was confirmed that the post manufacture availability of consumables (e.g. filters) is as an aspect to be considered in the scoring system.

It was proposed by participants from industry to not make all repair information available to all possible repair actors. Safety issues have to be taken into account and only professional repairers should have access to, for example, information on disassembly of high-voltage parts of VCs. Nevertheless, the provision of information on safety issues is important for the entire potential audience. The target audiences will be reorganized taking into account such considerations (e.g. public and professional information). LVD and MD are the references for identifying safety issues.

Another point of discussion was how to deal with third party spare parts providers which are not provided by the OEM. It was discussed that manufacturers are required to make the parts available under the framework of ED/EL. Finally, similarly as for laptops it was considered that the delivery time set for spare parts is too short.

Part V: Towards a Scoring System on Reparability: Product-specific aspects for washing machines

JRC presented product-specific aspects for washing machines.

Stakeholders questioned the assignment of weights for the different parameters, that for washing machines is 2 for almost all the parameters in the current proposal. JRC clarified that this is something to be tailored at product specific level, and that the potential application of the same weight should not harm, since it would simply mean that all parameters are similarly important.

Clarification about the application of commercial guarantee to product or part level was asked, as well as how to deal with companies providing services of WMs (e.g. leasing). A participant mentioned that the scoring system should only apply to products.

JRC confirmed that the scoring system proposal is design to be applied at product and not service level. However, services are ultimately based on products. Also for this product group there were request for clarification about the guarantee issue. In particular the scoring related to the length of guarantee was considered not appropriate by a participant because not reflecting the expected lifetime of the washing machines in the European market. Moreover it was asked why the commercial guarantee for this product group related to the whole product and not to specific priority parts. JRC explained that further harmonization of the approach is needed.

Regarding the aggregation, some participants from industry proposed to have a priority part weight based on failure rates, an information which is however difficult to share, especially for new parts/products.

Comments similar to those raised for laptops and VC were reiterated for spare parts interface, provision of information.

Next steps and conclusion

Closing the meeting, the EC thanked stakeholders for the constructive discussion and communicated that their written feedback is expected by mid of November in order to allow using their input for the completion of the study, planned by the end of the year.