

JBCE and the Japanese 4EE industrial associations' (JP4EE) comments on a "repairability score" for household appliances and other goods under the legal provisions related to ecodesign and energy labelling

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JBCE;

JBCE (Japan Business Council in Europe)

and

JP4EE;

JEMA (The Japan Electrical Manufacturers' Association)

JEITA (Japan Electronics & Information Technology Industries Association)

JBMIA (Japan Business Machine and Information System Industries Association)

CIAJ (Communications and Information Network Association of Japan)

Background and general comments

At the European Commission, efforts are being made to accelerate the transition towards a more circular economy and sustainable products based on the Circular Economy Action Plan. The Joint Research Centre has been working on a repairability scoring system for several years

On the other hand, France already introduced a repairability index in 2021¹ and it already plans to introduce a new durability index that would integrate the current repairability index which is expected to come into effect in 2025. And other Member States are following, with Belgium planning to introduce its own Repairability Index, lately to evolve into a Durability Index, from April 2025.

The implementation of these measures at Member State level without a harmonized EU-wide regulation impedes the free movement of goods. Furthermore, both EU companies and non-EU ones bringing their products into the EU market face the challenge of ensuring compliance in complicated market situations, in addition to their efforts towards greater sustainability.

We support the objectives of the EU's sustainable product initiatives, encouraging consumers to opt for more repairable products and urging manufacturers to enhance product repairability. However, we believe that any new measure should be grounded in comprehensive impact assessments that consider the entire product lifecycle and take into account interdependencies among various aspects such as safety, marketability, and energy efficiency.

In addition, we would welcome appropriate consideration given by the European Commission to promote the smooth international trade of goods and services, and believe that practical guidance should be provided and common ground standards should be utilized (harmonized as international standards).

¹ This applies to a range of products including washing machines, dishwashers, vacuum cleaners, smartphones, TVs, high-pressure cleaners, and lawn mowers.

This time, the Consultation Forum (CF) specifically discussed a proposal to introduce a repairability score for household tumble dryers, Will the European Commission consider similar measures for other products in future?

Since this is the first time the “Repairability Score and its Labelling Program” is being introduced, we suggest that it should be evaluated and reviewed regularly.

Comments and proposals

1. Improve the regulatory process for enforcement (request for an effective implementation)

(1) Avoiding fragmented implementation

The implementation of these measures (like an Ecodesign assessment for repairability score and its labelling) at Member State level without a harmonized EU-wide regulatory process, would represent a burden on both manufacturers and consumers and may impede the free movement of goods. Furthermore, manufacturers and related economic operators bringing their products into the EU market face the challenge of ensuring compliance in complicated market situations, in addition to their own efforts towards sustainability.

Therefore, if the European Commission introduces these new requirements, **we believe it should provide "visible and open information" on how member state will enforce legislation, including how they will handle the possible existing overlapping between the EU score and national ones.** When the repairability index is developed, we believe it is essential to consider different stakeholders' views in order to develop a scoring methodology that appropriately reflects different stakeholders' positions and ensure a level playing field for every manufacturer, thereby providing consumers with meaningful information. Simultaneously, once the EU-wide repairability score is introduced under EU legislation, any national initiative, whether potential or existing, should be replaced with this EU-wide repairability score. This is to avoid imposing a double burden on business and to prevent confusion among consumers faced with multiple labels. Additionally, it is important that the European Commission works closely with Member States to avoid multiple national initiatives introducing repairability scores within the EU.

A minimum requirement should be that it recognizes the link with future implementation of ESPR and common rules promoting the repair of goods (amending Regulation (EU) 2017/2394, Directives (EU) 2019/771 and (EU) 2020/1828) , thus **avoiding fragmented implementation.**

(2) Prepare Practical Guidance Document and FAQs

For the implementation of these measures, **we kindly request the European Commission to consider appropriate measures to facilitate the smooth promotion of international trade in goods and services. At the very least, practical guidance documents should be provided, and common ground standards** should be utilized (harmonization as international standards²).

On the other hand, at first glance, **the scoring system appears to be unified based on a calculation methodology that follows a general formula (involving multiple parameters). Unlike a B- to- B situation, it may not be easy for consumers to understand the methodology behind the scoring in B-to-C situations.** Would it be possible to adopt a similar approach to energy labeling (using an A-to-G score) based on a reproducible energy efficiency measurement method?

We believe that **if the European Commission expands the application of these measures to many goods, it will be very important for consumers to understand the precise meaning and how to interpret the complexity of the score, in the future.** In order to ensure smooth and accurate B-to-C communication, **we would urge the European Commission to take various measures, such as promoting awareness among consumers and providing easy-to-understand explanations by retailers (including online sales), etc.** Adequate measures would ensure effective communication not only with consumers but also between supply chains.

The above-mentioned considerations aim to ensure that there is “no confusion in European single market” and to provide reasonable preparation time for both EU and non-EU manufacturers (and related economic operator) to comply with this proposal. Additionally, when stakeholders, including consumers, have a better understanding of the interpretation of repairability scores, it can help avoiding miscommunications and/or pointless arguments.

2. Methodological issues

We also respect any content that has been considered so far regarding the scoring methodology and calculation framework, which follows a general formula (involving multiple parameters). On the other hand, if the European Commission applies these measures to a wide range of goods, a product-specific principle shall be taken into consideration to ensure relevance. Hence, we would like to raise some methodological points as follows.

- **Define "priority parts" (parts that are easy to disassemble) and weighting (weighting factor)**

During this scoring evaluation, we would request the identification of "priority parts" (those that are easy to disassemble) aligned with the requirements of WEEE Directive.

² Existing EN standards and harmonization with International standard development.

EN45554:2020 General Methods for the assessment of the ability to repair, reuse and upgrade energy related products already included the methodological guidance of “repairability”. In addition, IEC TC111 will be considering developing a new IEC standard based on EN 45555, following Frankfurt Agreement. However, any modification to certain contents will be considered from the perspective of international harmonization.

Additionally, concerning weighting, we believe that subjective factors cannot be entirely avoided.

Life cycle assessment methodologies (based on ISO 14040/14044) also generally do not recommend the publication of unified impact assessments based on weighting, as it is only suggestive comparison.

While the weighting (and weighting factors) has been thoroughly considered in a preliminary study, we suggest it evaluating and reviewing it on a regular basis.

Methodology – priority parts

$$S_{DD} = DD_{WP} \times 0,14 + DD_B \times 0,09 + DD_{DB} \times 0,25 + DD_D \times 0,08 + DD_M \times 0,05 + DD_{MB} \times 0,28 + DD_F \times 0,05 + DD_{MC} \times 0,06$$

Priority parts	Acronym part	priority	Weighing factor	Value weighing factor
Water pump	WP		α_{WP}	0.14
Drum bearing	B		α_{DBe}	0.09
Drum belt	DB		α_{DB}	0.25
Door	D		α_D	0.08
Motor	M		α_M	0.05
Main electronic board	MB		α_{MEB}	0.28
Fan	F		α_F	0.05
Motor capacitor	MC		α_{MC}	0.06

Source : CF - 11 March 2024, Repairability score on tumble dryers (EC presentation material)

- Repair fees

During the recent Consultation Forum (CF – 11 March 2024), various discussions arose regarding the potential integration of "Repair fees" as one of parameters for the "Assessment for Repairability Score", and its associated "labeling information".

Regarding repair fees, there is a distinction between spare parts (parts that consumers can handle and parts that repairers can handle) and labor costs. These should be carefully deliberated upon, as price levels are likely to vary by region, manufacturer, and repairer, hence making it difficult to reflect them in an EU-wide repairability score.

In any case, we recognize that "Repair fees" should be discussed as a completely separate issue. It is inappropriate for them to be evaluated as parameters or linked to labeling information.

3. Matters concerning repair skills

Although the role of these measures is emphasized as the "right to repair for consumers", **there are safety concerns, such as internal heat source, high-voltage power supply, high-pressure element or the risk of dust explosions due to inappropriate handling of powders, depending on the repair content and the functionality of goods. Considering such factors, scoring levels and exclusions should be prepared for disclosure content, including dismantling parts and the repair process.**

After making a wise purchase, it is the consumer's free choice to decide who repairs their goods. However, for instance, in the Low-Voltage Directive 2014/35/EU, access levels are defined. These access areas are limited based on the expertise of individuals, whether they are ordinary people, educated individuals, or experts. Therefore, we would request harmonization in accordance with directives other than EU environmental regulations, such as Low Voltage Directive 2014/35/EU.

We would appreciate it if you could consider these views, especially when focusing on other goods in preliminary studies.

We believe that the assessment for reparability score information should be divided between parts that can be handled by consumers and parts that can be handled by repairers and/or manufacturers. Indeed, safety needs to be fully considered during repair implementation.

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About JBCE

Founded in 1999, **Japan Business Council in Europe (JBCE)** is a leading European organization representing the interests of over 100 multinational companies of Japanese parentage active in Europe. Our members operate across a wide range of sectors, including information and communication technology, electronics, chemicals, automotive, machinery, wholesale trade, precision instruments, pharmaceutical, textiles, and glass products.

For more information: <https://www.jbce.org/>

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EU Transparency Register: 68368571120-55

About JEMA

The Japan Electrical Manufacturers' Association (JEMA) consists of major Japanese companies in the electrical industry including: power & industrial systems, home appliances and related industries. JEMA will contribute to sustainable global development through improvement and enhancement of social and living infrastructures by strengthening international competitiveness of Japanese electrical machinery equipment industry.

<https://www.jema-net.or.jp/>

<http://www.jema-net.or.jp/English/>

About JEITA

The objective of the **Japan Electronics and Information Technology Industries Association (JEITA)** is to promote the healthy manufacturing, international trade and consumption of electronics products and components in order to contribute to the overall development of the electronics and information technology (IT) industries, and thereby further Japan's economic development and cultural prosperity.

<https://www.jeita.or.jp/japanese/>

<https://www.jeita.or.jp/english/>

About JBMIA

Japan Business Machine and Information System Industries Association (JBMIA) is the industry organization which aims to contribute the development of the Japanese economy and the improvement of the office environment through the comprehensive development of the Japanese business machine and information system industries and rationalization thereof.

<https://www.jbmia.or.jp/index.php>

<https://www.jbmia.or.jp/english/index.php>

About CIAJ

Mission of **Communications and Information network Association of Japan (CIAJ)**. With the cooperation of member companies, CIAJ is committed to the healthy development of info-communication network industries through the promotion of info-communication technologies (ICT), and contributes to the realization of more enriched lives in Japan as well as the global community by supporting widespread and advanced uses of information in socio-economic and cultural activities.

<https://www.ciaj.or.jp/>

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