

## Ecodesign – Repair and resource-related provisions

This document shows how the provisions relating to resource efficiency and repairability of several products have changed over time.

### Washing machines

Early draft of regulation (August 2018)	Latest draft of regulation (October 2018)
<p>Requirements for <b>disassembly</b> for the purpose of <b>repair</b> and for material recovery and recycling while avoiding pollution.</p> <p>Household washing machines and household washer-dryers shall be designed so that the access to and the removal of the following components (when present) is possible without the use of any tool which is not readily available for purchase:</p> <p>[...]</p> <p>Manufacturers shall document <b>the sequence of dismantling operations needed to access the components listed above, including for each of these operations, the type and the number of fastening techniques(s) to be unlocked, and tool(s) required.</b> This information should be accessible under the same conditions as the repair and maintenance information under (3).</p>	<p>Requirements for <b>dismantling for material recovery and recycling</b> while avoiding pollution.</p> <p>Manufacturers shall ensure that household washing machines and household washer-dryers are designed in such a way that the materials and components referred to in Annex VII to Directive 2012/19/EU can be removed without the use of any tool which is not readily available for purchase.</p> <p>Manufacturers shall provide information free of charge about preparation for re-use and treatment of household washing machines and household washer-dryers to preparation for re-use facilities and to treatment and recycling facilities, as provided in Point 1 or Article 15 of Directive 2012/19/EU.</p>

**Main difference:** The original proposals aimed at making washing machines and dishwashers easier to disassemble and consequently more easily repairable. Instead, the latest draft shifts the focus towards recyclability by replacing requirements for non-destructive disassembly with dismantling operations at the end of the product's life cycle.

EU officials also removed provisions to make repair guides and information available to independent repairers, echoing concerns from the industry that competitors may use this information to infringe their

copyright and replicate their products. The information is now limited to professional repairers that meet several conditions.

[NGO position paper on the latest draft submitted for vote by EU governments](#)

[Industry's position paper](#)

## Dishwashers

Early draft of regulation (August 2018)	Latest draft of regulation (October 2018)
<p>Requirements for <b>disassembly for the purpose of repair</b> and for material recovery and recycling while avoiding pollution.</p> <p>Household dishwashers shall be designed so that <b>the access to and the removal of the following components (when present)</b> is possible without the use of any tool which is not readily available for purchase:</p> <p>[...]</p> <p>Manufacturers shall document the sequence of dismantling operations needed to access the components listed above, <b>including for each of these operations, the type and the number of fastening techniques(s) to be unlocked, and tool(s) required.</b> This information should be accessible under the same conditions as the repair and maintenance information under (3).</p>	<p>Requirements for <b>dismantling for material recovery and recycling</b> while avoiding pollution.</p> <p>Manufacturers shall ensure that household dishwashers are designed in such a way that the materials and components referred to in Annex VII to Directive 2012/19/EU can be removed without the use of any tool which is not readily available for purchase.</p> <p>Manufacturers shall provide information free of charge about preparation for re-use and treatment of household dishwashers to preparation for re-use facilities and to treatment and recycling facilities, as provided in <b>Point 1 or Article 15 of Directive 2012/19/EU.</b></p>

Same as per washing machines above. The same arguments from the industry apply to dishwashers and the text has also been changed accordingly.

[NGO position paper on the latest draft submitted for vote by EU governments](#)

[Industry position \(same link as for washing machines\)](#)

## Lighting

Early draft of regulation (Nov 2017)	Latest draft of regulation (October 2018)
<p><b>Removal of light sources and separate control gears</b></p> <p>Manufacturers and importers shall ensure that light sources and separate control gears in scope of this Regulation can be readily removed without permanent mechanical damage by the end-user from any product containing them that is placed on the market. Where light sources and separate control gears in scope of this Regulation cannot be readily removed by the end-user, manufacturers and importers shall ensure that the containing product is designed in such a way that light sources and separate control gears in scope of this Regulation can be readily removed by qualified professionals. Containing products shall be accompanied by instructions on how light sources and separate control gears can be readily removed by either the end-user or by qualified professionals.</p>	<p><b>Removal of light sources and separate control gears</b></p> <ol style="list-style-type: none"> <li>1. Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be removed without being permanently damaged for verification purposes by market surveillance authorities. For containing products, instructions shall be available on request on how light sources and separate control gears can be removed for verification without these being permanently damaged.</li> <li>2. Manufacturers and importers of containing products shall ensure that light sources and separate control gears can be dismantled from containing products at end of life. Instructions shall be available on request.</li> <li>3. Manufacturers and importers of containing products shall provide information about the replaceability or non-replaceability of light sources and control gears by end-users or qualified persons without permanent damage to the containing product. Such information shall be available on free-access websites. For products sold directly to end-users, this information shall be on the packaging, at least in the form of a pictogram, and in the user instructions.</li> </ol>

Many lamps sold on the market still come with individual light bulbs that are impossible to replace. That means that when one light bulb stops working, consumers are forced to replace the whole lamp.

The original proposals aimed to end this wasteful practice. That's until lobby group Lighting Europe convinced the Commission otherwise.

**Main difference:** end users and (independent) repairers may not be able to **repair/service** lamps as only surveillance authorities are now expected to remove the light bulb – and for verification purposes only. The dismantling at end of life often means destroying the product.

[NGO position paper on the latest draft submitted for vote by EU governments](#)

[Industry's position paper](#)

## Displays

Early draft of regulation (August 2018)	Latest draft of regulation (October 2018)
<p><b>Halogenated flame retardants</b></p> <p>The use of halogenated flame retardants is not permitted in the enclosure and stand of electronic displays.</p> <p><b>Repair and re-use documentation and information</b></p> <p>Suppliers shall provide to <b>third parties upon request information relevant for repair purposes including the information relevant for disassembly and replacement of defective components and location where repair information and spare parts can be found.</b></p>	<p><i>Deleted</i></p> <p><b>Repair and re-use information and documentation</b></p> <p>(a) The manufacturer or importer website, or an equivalent means of information, shall indicate the process <b>for professional repairers to register for access to information. Manufacturers or importers may require the professional repairer to demonstrate that:</b></p> <p><b>(i) the professional repairer complies with the applicable regulations for repairers of electrical and electronic equipment in the Member State where it operates. Reference to an official registration system as professional repairer, where such system exists in the Member State, shall be accepted as proof;</b></p> <p><b>(ii) the professional repairer is covered by relevant insurance, covering liabilities resulting from its activity.</b></p>

Flame retardants have been found in several consumer products, including toys manufactured from recycled plastic that was once part of ICT products. These chemicals are an [obstacle to recycling](#) and are also known to disrupt thyroid function and [cause neurological and attention deficits in children](#).

The Commission never officially proposed requirements to improve the **repairability** of ICT products such as displays, TVs and smartphones, despite their huge environmental impact and the frustration of consumers. Industry lobby group Digital Europe has consistently pushed against requirements for non-destructive disassembly which would make it easier to identify and fix internal problems in displays.

**Main difference:** The original draft regulation included provisions to prohibit the use halogenated flame retardants in some plastic components of displays. But the chemical's industry had different plans– see letter below.

[NGO position paper on the latest draft submitted for vote by EU governments](#)

[Industry position \(on flame retardants\)](#)

[Industry position \(Digital Europe\)](#)

## Fridges

Early draft of regulation (August 2018)	Latest draft of regulation (October 2018)
<p>3. Additional ecodesign requirements on repair and end-of-life aspects:</p> <p>From 1 April 2021, refrigerating appliances shall meet the following requirements:</p> <p>(a) manufacturers shall ensure that refrigerating appliances are designed so that the components described in Annex VII of Directive 2012/19/EU can be removed with non-proprietary and commonly available tools;</p> <p>(b) manufacturers shall be able to supply <b>end-users</b> with spare parts, including at least thermostats, temperature sensors and printed circuit boards, for</p>	<p>3. Additional ecodesign requirements on repair and end-of-life aspects:</p> <p>From 1 April 2021, refrigerating appliances shall meet the following requirements:</p> <p>(a) Requirements for disassembly for the purpose of repair and for material recovery and recycling while avoiding pollution:</p> <p>(1) manufacturers shall ensure that refrigerating appliances are designed so that the components referred to in Annex VII of Directive 2012/19/EU</p>

their refrigerating appliances for at least 7 years after the production of the specific model has ceased;

(c) door gaskets and light sources shall be replaceable without special tools and without permanent damage, and manufacturers shall be able to supply end-users with door gaskets and light sources for their refrigerating appliances for at least 10 years after the production of the specific model has ceased.

can be removed without the use of any tool which is not readily available for purchase;

(2) door gaskets shall be replaceable without special tools and without permanent damage;

(3) light sources in refrigerating appliances shall meeting the requirements for containing products set out in Regulation [OP – please insert Regulation number ecodesign regulation for light sources and separate control gears]1.

(b) Availability of spare parts:

(1) manufacturers shall make available necessary spare parts, including at least thermostats, temperature sensors, printed circuit boards and removable light sources for their refrigerating appliances to professional repairers, for a minimum period of seven years after placing the last unit of the model on the market;

(2) manufacturers shall make available door gaskets for their refrigerating appliances to end-users for at least 10 years after placing the last unit of the model on the market;

(3) the spare parts, identified in (1) and (2), and the procedure for ordering them shall be publicly available, for example on the manufacturer's website, at the latest two years after the placing on the market of the first unit of a model or of an equivalent model and until the end of the minimum period of availability of these necessary spare parts.



**Main difference:** Spare parts are now mainly made available to professional repairers, but not to end users (apart door gaskets). For example, the replacement of light sources for fridge-freezers has disappeared. Now only professional repairers can replace the light bulb in your fridge when it stops working even though it would be a relatively easy task for anyone.

[NGO position paper on the latest draft submitted for vote by EU governments](#)