

EGMF position paper

Comments on the ‘Sustainable consumption of goods – promoting repair and reuse’ Initiative

21 April 2022

Representing the major garden, landscaping, forestry and turf equipment manufacturers, so-called the outdoor power equipment industry, EGMF is a strong supporter of incentivising customers to use sustainable, long-lasting and repairable products by design.

Our industry produces equipment used by consumers municipalities, professional landscapers, greenkeepers, gardeners, and farmers to maintain green areas and large-scale undertakings alike. Our sector is highly committed to the highest standards for reparability, safety, robustness, durability, and circularity.

The products in our portfolio are being already developed repairable by design. Manufacturers ensure that garden machinery and outdoor power equipment are repaired and go through maintenance, when necessary, throughout their use in order to be able to continue guaranteeing safe use of the product with the expected performances.

We have also supported the European Commission’s approach to set sustainability requirements on a European level and a product-by-product basis¹, which we further back in our response to the ‘Right to repair’ public consultation questionnaire.

With this paper, we would like to provide additional feedback on the Commission’s consultation, underline some principles, and call for clarifications on specific issues, which we believe will be key to the success of this initiative:

‘Right to repair’ concept and scope

We would like to outline that the concept is relatively unclear in the questionnaire. It is oftentimes uncertain whether this ‘right to repair’ is intended to be free of charge in all instances, and who would take the associated additional financial burden. It is also not certain whether the ‘right to repair’ refers to availability of reparability. We support the availability for consumers to request and receive repair of their product, even after the end of the warranty period, which is currently part of the standard business within our dealer networks. However, to prevent damaging certain businesses, we must stress that the cost of repair will have to be borne by the client.

Clarification regarding the scope of the initiative is necessary, since some questions directly address consumer products (B2C), while others refer to professional products (B2B). We stress that the Commission should focus on products that cannot be currently repaired, or such with a very short lifetime. As a principle, B2B products should not be regulated in the same way as B2C products, as repairs and services are generally covered in our sector by contractual agreements.

¹ See EGMF position paper on the Sustainable Products Initiative [here](#)



Economic, environmental and maintenance aspects

We believe that customers should have both options of repair and replacement available to them. For businesses to function, their equipment needs to be repaired or replaced as soon as possible. In the cases of replacement, it is common to look for the latest technology with the highest energy efficiency. In many cases, costly repair could keep a product functioning even though it might no longer be sustainable and efficient according to newer standards, especially in the case of long-lasting products, such as ours. This is also a reason why restarting legal guarantees after repair poses the risk of this negative externality.

Secondly, for EGMF, interaction with the consumer in terms of providing advice from professionals on how extending the products' lifetime is already a major part of the business. In this regard, maintenance by the owner and following the manufacturers warnings and guidelines are key factors to ensure the optimum lifetime of a product. Therefore, we would like to indicate that focusing only on mandatory repair through EU incentives may result in negligence of user maintenance, which may result in potentially dangerous situation during use.

Second-hand and refurbished goods

The EGMF members already have processes in place for the sale and reuse of products and parts. Encouraging further voluntary commitments to repairing goods and promoting second-hand/refurbished goods will increase value retention for both businesses and consumers. However, questions such as how 'second-hand' and 'refurbished' goods are defined, who will pay for the incentives to purchase such goods, and most importantly, who will be responsible for the performance and safety risks evaluations, must not be ignored.

We also stress that a product should not be repaired if the damage has created safety hazards, which cannot be removed without increasing the repair cost above the value of a new product. In such cases, replacement is a better alternative, and the EU legislative system should allow it. Furthermore, second-hand products must be in a state to guarantee the same performance and safety to the user as an 'new product' to prevent unfair competition.

Independent repairers

We would like to raise caution about incentivising repair by independent repairers and companies. This poses the risk of having repairs executed by people that are not qualified for electrical and electronic equipment, which could lead to serious safety issues. Furthermore, we believe that sharing technical data with external entities could pose intellectual property dangers.

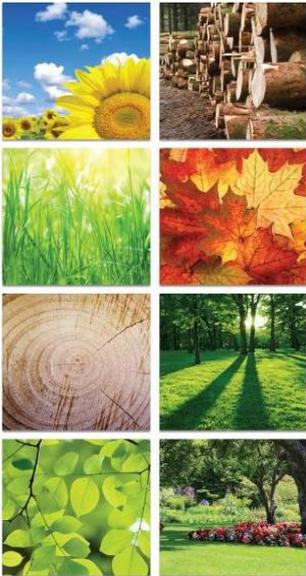
We would like to underline that the EGMF manufacturers already indicate certain repairs that can be made by the owners themselves such as replacement of certain parts, guided by the manufacturer's repair and maintenance instructions, which circumvent these risks.

Lastly, in this relation we wish to stress the need to 'educate' and raise awareness to consumers on the need to repair their products and having a proper maintenance.

EGMF would be happy to participate and further support the future work on this topic and field.



For further information, please contact: EGMF Secretariat, secretariat@egmf.org



The European Garden Machinery Industry Federation – EGMF – has been the voice of the entire garden machinery industry in Europe since 1977. With 30 European corporate members and 7 National Associations representing manufacturers of garden, landscaping, forestry and turf maintenance equipment, we are the most powerful network in this sector in Europe.

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