



Dishwashers & Washing Machines: Final recommendations on the repair requirements

7th January 2019

Environmental NGOs (ECOS, the EEB, the Coolproducts campaign) and repair actors notably the Restart Project, iFixit, RREUSE would like to make a series of recommendations ahead of the dishwashers and washing machines votes on 8 and 10 January. These comments are based on a review of the repair provisions included in the Ecodesign texts for displays and domestic refrigeration Member States agreed upon in late 2018.

Remove the “professional repairers” concept

Facilitating repair of products means generalising repair, carried out by all types of repairers (including independent repairers such as repair cafés) and consumers for simple repairs. By introducing the concept of ‘professional repairers’ and criteria to be considered as such, European institutions allow manufacturers to restrict the repair of appliances.

For domestic appliances such as dishwashers and washing machines even more than for the previously discussed products, we call on European decision-makers to remove barriers to repair, by giving access to repair information and spare parts to all types of repairers. The repair market must not be distorted through unnecessarily restricting the availability of information and spare parts.

The texts agreed upon for fridges and displays foresee that by being listed in an official registration system, professional repairers will be recognised as such. Should Member States decide to maintain the concept of professional repairers, we call on them to have these official registration systems set up before the entry into force of the repair requirements.

Reinforce the provisions on spare parts

One of the major factors causing unsuccessful repair of products is the availability of spare parts in terms of being able to find spare parts for purchase. The spare parts provisions need to be improved in several ways:

- Duration: all spare parts should be available during the average product lifetime, i.e. 12 years after the last unit is supplied.

- Delivery: A maximum delivery time of one week for spare parts should also be specified.
- Audience: spare parts access should not be restricted to professional repairers but should be open to all types of repairers. We firmly believe that no restrictions should be put to the availability of spare parts, to facilitate the involvement of as many actors as possible as described above. Spare parts have a cost, which will serve as a deterrent to unexperienced consumers.
- The list of spare parts to be made available to end-users should at least include:

Washing Machines	Dishwashers
motor	motor
motors' carbon brushes	motors' carbon brushes
pumps	circulation and drain pump
shock absorbers	
washing drum	
drum spider	
ball bearings	
heaters and heating elements	heaters and heating elements
door hinge	door hinge
door seal	door seal
door locking assembly separable into its constituent sub-components	structural and interior parts related to door assemblies, spray arms, seals and interior racks
pipng and related equipment including all hoses, valves and filters	pipng and related equipment including all hoses, valves and filters
printed circuit boards	printed circuit boards
liquid crystal displays	liquid crystal displays
thermostats	
batteries	batteries

We firmly believe that the list of spare parts available to end-users should be much longer than what has been agreed upon for displays and fridges, as the hazard level is much lower for these products.

- Prevent bundling of spare parts: the Commission proposal foresees that manufacturers are allowed to bundle spare parts into larger more expensive assemblies. This would have negative material efficiency impacts as whole assemblies would be replaced often unnecessarily instead of just the broken spare part, and repair would be discouraged by high costs for these integrated assemblies. Therefore, we urge European decision makers to include a clause to say that the spare parts in the list should not be bundled and make the disassembly of the above-mentioned list possible with commonly available tool.

Finally, we also call on Member States to build on some of the decisions that have been made on other products, such as providing mandatory firmware and software updates for at least 12 years, and the disassembly clause applying to the above listed spare parts.

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