30 January 2020

Submission for Right to Repair Inquiry

I am pleased to offer a response to the Right to Repair Inquiry looking into consumers' ability to repair faulty goods and to access repair services at a competitive price.

World's Biggest Garage Sale (WBGS) is commercialising the circular economy through the activation of unused and underutilised (dormant) goods. A pillar of the circular economy is looking at prevention, rather than cure and it is for this reason that the circular economy provides crucial considerations (and macro-level context) to the Right to Repair Inquiry. Having recently launched Australia's first Circular Economy Precinct, the national retail Partnerships, events, services and education we provide are capturing and diverting goods before they become landfill and helping communities and businesses to view the products that come through their business, or that they design, with a more circular, rather than linear lens.

As an industry leader in high-volume repair and repurposing, we are leading the charge in Australia for a paradigm shift towards a circular economy and resource efficiency, where quality is not just associated with newness and long-term becomes desirable again.

Through our work over the last few years, and in particular the last 18 months, which included working with major Australian retailer Officeworks to repair, repurpose and resell faulty/damaged/imperfect products, we have been able to transform products via our resource recovery process. This has ensured maximum resource efficiency and minimal product going to landfill, with repair being a fundamental activity within our framework.

One of the largest issues we face currently, is that we now have an economy that has developed around planned obsolescence, a consumer culture that has been trained into replacing rather than repairing or renewing items and retailer's looking for competitive advantage so offering a 'price-point' which means that products are made as cheaply as possible, with little consideration for repair or remanufacturing during product design. In other words, a whole-system problem.

The common plight of many consumers is, as soon as the warranty period of a device has expired, it breaks, with the familiar catch-cry, 'they don't build them like they used to' heard throughout the suburbs.

Usually it's just a small thing, but repairing it is impossible because:

- spare parts are difficult to acquire or there aren't any available, or
- you can't repair it because everything is glued instead of screwed or requires a special tool to open the unusual screws, or
- the repair would be more expensive than a new purchase,
- consumers are not encouraged or educated to care and repair.

So products that are commonplace in households e.g. washing machines, televisions or refrigerators, end up going to landfill.

Through our work at World's Biggest Garage Sale we have found that there is a cost involved in disassembling items and repairing them (if possible). Here is what we have found:

- In some cases it's relatively quick and simple to repair an item e.g. a chair with a broken wheel, missing part, minor damage.
- Consumers are definitely interested in seeing their products repaired or renewed to extend their life, with reupholstery of chairs being a value-added service customers are willing to pay for.
- Some products are designed to be extremely difficult to disassemble, requiring specialist tools and manuals that are often not available. This means the only solution for these imperfect goods is deconstruction into constituent parts (if possible) for repurposing. The deconstruction process can be very costly (time consuming) because the items haven't been made with end of life (or continued life) as a consideration.
- Products with electrical components that are no longer working, often automatically go through to eWaste for recycling, as the expertise needed is scarce and the business cost of the time required to:
    - a) deconstruct the product, then
    - b) identify the problem for repair, then
    - c) find the part to repair it,

  often far outweighs the original sell price of the product.

To date we have diverted over 4.3-million kgs of potential waste from landfill and contributed over $2.2-million in social value to the global economy. World's Biggest Garage Sale, forecasts processing thousands of Tonnes in 2021/2022.

If we consider repair, one of the inner loops of a circular economy and more resource efficient than recycling, there are several systemic changes that need to be made in order for it to be a realistic and economically viable option (in a broader framework of product life extension activities such as re-use, repurposing, remanufacturing and recycling):

- **Designing products for longevity** - ensuring products are made to endure, with products having a longer usable life, therefore replaced less frequently - reducing the volume discarded and meaning fewer resources are consumed in manufacturing.
- **Designing products for disassembly** - design for disassembly is a fundamental principle that considers end-of-life (or continued life) upfront, informing decisions and material choices, changing how products are designed, how materials are joined together and how they are layered so that components and materials can be deconstructed easily for repair, remanufacture or recycling.
- **Addressing planned obsolescence -** assessing product designs with manufacturers to ensure planned obsolescence (deliberate shortening of a product's useful life by the manufacturer in order to increase consumption), is reduced or eliminated.

Some suggested directions forward are listed below:

- **Design for disassembly and repair has to be a clear directive or component of any right to repair policies.**
    - We should be working towards manufacturers and products being assessed on how well they're doing this. For example, following France's "anti-waste law for a circular economy" by introducing a "repair index" and "durability index" on products, required by manufacturers. This would go a long way towards systemically changing product designs, improving repairability and increasing product life cycles. (1)
    - In Australia, it is not reasonable to reduce labour costs, however the aforementioned could decrease the complexities of the process, so that the time required to repurpose and repair is reduced, therefore making it a mass-market commercial viability.
- **High-volume, low value items could be required to include universally manufactured components.**

- These components would need to be easy to acquire internationally and straightforward for consumers to repair themselves. There may be pushback from manufacturers with regards to IP, however IP could still remain within the overarching item design ***and*** also with any firmware.
- Import of low-value products manufactured overseas would also need to be more stringently assessed with regards to the materials within them, and repairability and durability. If they fall below a particular standard, then they should not be imported into the country, due to the high likelihood they will become a future 'hard to handle' waste stream.

Finally, a 'Right to Repair' should not be considered in isolation, but rather in tandem with extended producer responsibility and novel materials. A whole-system approach is required to address a whole-system problem.

- **Extended producer responsibility:** If nobody can make money with end of service life products and nature cannot digest them (because they're synthetic), then they go back to the manufacturer, who made the profit in the beginning and has the knowledge of how they were built and how to process them at end of life; it cannot be up to municipalities to pay for problems created by profit-making industrial producers.(2)
  - Manufacturers or distributors should be encouraged to work with local organisations embedded in the community so that when an item no longer works or is not wanted, then it can be repaired and reused, repurposed or recycled locally, making it more accessible for consumers; however the manufacturer must pay for this service as part of their extended producer responsibility.
  - Manufacturers could be incentivised by governments to make this shift.
- **Novel materials:** to truly move into a circular economy, we want to prevent future legacy waste (synthetic materials that cannot easily be recycled or reabsorbed into the environment), so we need to explore circular chemistry, circular metallurgy and circular component disciplines.(2) Long-term this could be factored into any "repair index", "durability index" and "recyclability index".

As we move from a linear to a circular economy, repair must be considered integral in any policies and frameworks moving forward. Environmental considerations can no longer be ignored at the very critical phase of designing products, where options for repair should be examined. We thank you for your time and look forward to the outcomes of this inquiry and collaboration with the Australian Federal Government.

Kind regards,

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References

1. The anti-waste law for a circular economy https://www.ecologie.gouv.fr/loi-anti-gaspillage
2. Stahel, W.R., 2019, *The Circular Economy – A User's Guide* https://www.amazon.com.au/Circular-Economy-Users-Guide/dp/0367200171