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ONLINE SUBMISSION

Ms. Yvette Goss. 1 February 2021
Right to Repair Team
Productivity Commission
4 National Circuit
Barton ACT 2600, Australia

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Submission: Right to Repair – Productivity Commission *(the "**Inquiry**").*

LG Electronics Australia Pty Ltd (**LG Electronics**) welcomes the opportunity to comment on the Inquiry with reference to the productivity commission Right to Repair Issues Paper released in December 2020 above.

LG Electronics Inc. is a global organisation providing communities and businesses with innovative solutions to improve convenience and quality of life through evolving technologies which are delivered through every day-use products within the Household Appliance & Consumer Electronic categories including: Television, Computer Monitor, Mobile Devices, Kitchen and Laundry Appliances, Audio Electronics, Vacuum products and we also supply a growing range of Air Conditioner Systems and Solar Energy products.

General Comment:

LG Electronics acknowledges the broad nature of considerations which underpin the consumers "right to repair ". LG Electronics viewpoints are expressed specifically in relation to the products which we currently manufacture and supply in the Australian marketplace.

LG Electronics supports the development of a structured, harmonised and ongoing consultation, between key stakeholders and policy developers to ensure that when policy is required it is clear, consistent, supports manufacturers' freedom to innovate in a global market and creates competitiveness (competition) . Robust regulatory impact analysis and data which confirms the net benefit to Australian communities and environment – should be completed and available before consideration of any new regulatory proposals are introduced.

An Australian Right to repair framework, should include product policies which are based on harmonised methodologies and lifecycle approaches, which appreciates that repair, should not jeopardise consumer safety and advocates for measurable standards and their development.

The safety of consumers is paramount and utilizing qualified, certified repairers ensures that products will be repaired to the necessary safety protocols, applicable product safety standards and occupational health and work safe requirements are met. Authorised repairer networks are utilised where appropriate training and assessment of key competencies specific to LG Electronics products have been undertaken and ongoing support is provided. Authorised Repairers ensure confidential technical data is protected in order to maintain competitive differences in the highly innovative technology industry.

LG Electronics recommends that overall community safety and manufacturers' product technical data are kept protected, that highly technical, complex and confidential data is not accessible where product safety and integrity may be compromised and counterfeit production is a risk.

LG Electronics endorse the use of qualified service technicians who are trained to assess, diagnose and repair LG products to meet the consumer guarantees requirements under the Australian Consumer Law. We would be concerned that Do It Yourself 'DIY' repairers or third party repairers would not be able to meet the requisite standards (including safety and performance). DIY repairer's skills & competencies will vary dramatically and many products will require specialized skills and tools to repair appropriately, we should ensure that safety for all repairers remains a priority.

Specific Comment:

- Rights to Repair 'RTR' in Australia: should involve a unified – Australia wide approach, which advocates that consumers have access to qualified and professional repairers of defective products offering these services at competitive prices. Right to Repair proposals should consider Australia' current Consumer laws, safety standards and regulatory and environmental arrangements. Right to Repair in Australia should distinguish between product types and product categories to ensure that the appropriate measures are applied accordingly, and no industry suffers unnecessary burden as a result of issues identified and unique to another industry.

- 'Unnecessary Barrier' to repair should be carefully and clearly defined – Product Safety precautions should not be captured or considered a 'barrier to repair'.

- Reparability, Durability & Liability. Manufacturers are constantly striving to achieve and balance regulated product design requirements between mechanical function, performance, optimal reparability, durability and ease of use. A balanced approach to design where the use of recyclable materials and product durability are achieved, and the creation products for easy repair likely requires a trade off to the product design (e.g. fused versus plugged parts). Many factors which contribute to the final product design and quality of LG products require that qualified technicians who have the service knowledge, product familiarity and competencies to deliver the product to its acceptable and near to original condition, are vital for a successful repair return to our valued customers.

  Durability of the product is supported by access and availability to genuine spare parts, manufacturer' must forecast and supply for current repair networks where spare parts suppliers stock levels must be managed carefully and often with limited supply levels, any additional demand puts suppliers at risk of being unable to supply spare parts to repair service networks. It has been noted that within the electronics industry a number of bad actors do not request spare parts to service customers but for re-sale into the black and grey markets. Providing technical data and drawings to product design and parts design will inevitably leave the opportunity open to counterfeit products and parts. Genuine parts availability ensure that products will meet final product (safety and performance requirements) and LG authorised repairers are contractually obliged to protect LG intellectual property and ensure that brand and product integrity is maintained.

- Liability is an equally important issue to be considered when deciding who should be able to conduct repair services on a product. Manufacturers providing repair services, will ensure qualified professionals who are trained and competent in the products technical systems and componentry, service customer products appropriately.

- Planned Obsolescence:
  Premature obsolescence and deliberate attempts to reduce a products life cycle do not serve manufacturers or consumers and also contribute to product waste streams.
  Durability and reparability of products can expand a products lifespan or lifecycle, for home appliance and electronics these factors are implemented into the design phase and vary based on quality of component, manufacturing processes, consumer use of the

product etc. Using a UK Example, Table 1: shows how different lifecycle expectations and estimates apply to Refrigerator Appliance across industry.

Table 1:

Domestic Refrigerator	
Consumer Expectations (UK)[1]	7- 10 Years expected lifetime
Consumer Expectations (UK)[2]	8 Years – Average Age
Product replacement (UK)2	50% of purchases in 2012 study were replacing product less than 8 years old.
BSH[3]	15 Years
ASHRAE Handbook [4]	15-20 Years
Eco Design[5]	Lowest: (UK) 5.1 Years average Highest: (Sweden) 6.8 Years average
CECED technical database (2005)	15 Years Lifetime.

- ACL Law and Current Legislation

  The ACL is an adequate legislative instrument to address the product types and ranges which LG Electronics currently supplies into the Australia and NZ Markets. The household (home) appliance and electronics product streams. LG Electronics Australia considers that Australian Competition and Consumer Commission has substantial powers under the Consumer Act 2010 (Cth) (CCA) to address Right to Repair without the need to introduce new regulation. Amendments or reforms of current legislation would be an appropriate and efficient method of addressing 'repair as first remedy' under a Right to Repair proposal, in Australia.

[1] SMPT09_065 Public Understanding of Product Lifetimes and Durability, A Report for Defra

[2] WRAP Switched on to Value 2014, page 6
http://www.wrap.org.uk/sites/files/wrap/Switched%20on%20to%20Value%2012%202014.pdf

[3] Feedback from BSH (Bruno Vermoesen) following the project Durability Workshop in November 2014
[4] ASHRAE Technical Committee 8.9. Handbook Chapter 49 page 3
[5] 6 ISIS Preparatory Studies for Eco-design Requirements for EuPs Lot 13: Domestic Refrigerator & Freezers, Final report Tasks 3-5 December 2007.

- Repair Markets:

  It is noted that competition issues in repair markets such as OEM restricting third parties from supplies, contractual arrangements between OEMs and repairers creating monopolies, these issues should be assessed further where substantial harm is identified and where remedies can be sought under the CCA in particular relating to anti-competitive contracts (s. 45), misuse of market power (s. 46), and exclusive dealing (s. 47)[6].

- IP Rights Protections

  Information about the design of products is commercially valuable and confidential covered by Intellectual Property Rights Protections, technological protection measures (TPMs) (also known as digital rights management), and end-user licensing agreements. Regulatory measures to introduce new exceptions or defenses should be backed by evidence that the IP protections are a significant barrier to repair. We do not believe this to be the case in the household appliance and electronics sector.

  Highly sensitive technical diagrams, maintenance of trade secrets and protections of company property/works ensure competitiveness in the market. Access to technical drawings are only permitted to authorised service partners to ensure the protections are upheld and product technical information is only used for repair purposes.

  Test programs which contain unlocked software, specific tools that industry cannot disclose, or which allow products to function outside normal parameters. Sharing these tools poses a threat to intellectual property rights and creates vulnerabilities where products can be modified or copied to produce counterfeits. Counterfeit devices and parts are typically sub-standard, poorly designed products and give rise to multiple concerns regarding product safety, device security & data breaches, which would be harmful to consumers[7].

  Some testing programs required by repairers require access to the company' servers, sharing these could result in potential consumer and company data and privacy security risks. In addition, some test programs only work in conjunction

[6] CCA : 2010 -Part IV – Restrictive trade practices https://www.legislation.gov.au/Details/C2020C00352

[7] US Example: https://au.pcmag.com/mobile-phones/49314/refurbished-galaxy-note-4-batteries-recalled-over-fire-risk

with additional expensive hardware such as calibration machines which are only accessible by the company' technical experts.

- E –Waste:
  The Federal Department of Agriculture, Water & the Environment and the Battery Stewardship Council collect and retain information on the composition of e-waste and the extent of hazardous material under the Federal Product Stewardship Australia 'PSA' regulation for e-waste (computers & TV products - NTCRS[8], Mobile Phone Products[9]) The Australian government has recently introduced the Recycling and Waste Reduction Bill (Act) 2020 - which will replace the PSA. Manufacturers, Suppliers and Importers are subject to the regulatory requirements outlined in the Act Objective 3.1(c)[10] , LG Electronics products are designed and developed with sustainable material efficiency protocols to optimise products for re-use, recycling and material recovery methods which support a circular economy in Australia[11].

Summary Statement

- A Right to Repair framework in Australia should place the safety of customers at the forefront of the proposal and include safeguards to ensure only qualified and competent person(s) are able to provide repair services for consumer goods and provide these services at competitive prices.
- A unified approach by government, states and territories, coupled with co-regulatory consultation and development will be critical to deliver support, surveillance and a reporting matrix which supports a Right to repair framework.
- Consumer choice – Consumer needs, and demand guide the manufacturing pathways as new and innovative technologies are developed to meet the needs of

[8] https://www.environment.gov.au/protection/waste/product-stewardship/products-schemes/television-computer-recycling-scheme

[9] https://www.environment.gov.au/protection/waste/product-stewardship/products-schemes/mobilemuster

[10] To develop a circular economy that maximises the continued use of products and waste material over their life cycle and accounts for their environmental impacts.

[11] Page 24-25 Life Cycle Assessment & Increasing Resource Efficiency https://www.lg.com/global/pdf/Sustainability-Report/2019-2020%20Sustainability%20Report.pdf

modern societies (larger screens for TV, smaller screens for mobile, faster charging or long battery life). The important choice which rests with the consumer is repair or replacement of defective products, where approximately 80% of LG customer's first preference is to replace their goods.

- Manufacturers should not have their control over repair removed, rather, a collaborative approach to cultivate a professional qualified network of repairers in Australia, to educate and encourage the general public toward the repair of their goods and to create volume for the repair market.
- IP Protections are vital for businesses to remain competitive in the market and combat the development of counterfeit products and parts. The implications of facilitating mandated access to embedded software is far reaching and we do not believe that there is sufficient detriment or harm to Australian communities in a right to repair context to warrant that manufacturer's rights to protections of their properties or works be impinged.

LG Electronics provides responses to the questions in the inquiry at **Appendix A** of this submission.

LG Electronics are available to engage at any stage with the Productivity Commission regarding the Inquiry. LG Electronics Australia' Industry Association partner, Consumer Electronics Suppliers Association Australia (CESA) who represent multiple Consumer Product Manufacturers within Australia, are also available to discuss further and I provide the contact details of CESA representative IN CONFIDENCE.

Yours sincerely,

Grace Walker
Regulatory Affairs Executive
LG Electronics Australia Pty Ltd.

Appendix A: LG Electronics Australia - Responses to Inquiry Questions/Answers:

INFORMATION REQUEST 1: Australian Definition of 'Right to Repair'	
What would a 'right to repair' entail in an Australian context? How should it be defined?	**A Right to Repair which prioritises consumer and repairer safety and encourages accessibility to qualified, professional repairpersons to service products deemed to be defective and provide these services at competitive prices.**
INFORMATION REQUEST 2: Australian Priority products / areas - Right to Repair:	
a) What types of products and repair markets should the Commission focus on?	**a) Evidence-based, low durability products.** **-product categories with limited repair facilities available.** **LG Electronics Australia believes that Home Appliance and Home electronic products are covered appropriately by the current legislative instruments under the ACL.**
b) Are there common characteristics that these products share (such as embedded technology and software or a high/low degree of product durability), and which characteristics would allow policy issues to be considered more broadly?	**b) An in depth analysis and assessment is recommended to determine/classify the common characteristics of product types which may be appropriate to capture within a Right to Repair proposal.** **The home appliance and consumer electronic sector are covered appropriately within the ACL guarantees.**

c) If there are particular products that the Commission should focus on, what are the unique issues in those product repair markets that support such a focus?	**c) No additional comment to add.**
INFORMATION REQUEST 3: ACL Law :	
a) Do the consumer guarantees under the ACL provide adequate access to repair remedies for defective goods? If not, what changes could be made to improve access to repair remedies? Are there barriers to repairing products purchased using new forms of payment technologies, such as 'buy now pay later'?	**The ACL consumer guarantees, provide consumers entitlements to access repair remedies for defective goods for LG products. The guarantees could be reinforced to support a "repair first" – "replace last" offering. There is no evidence obtained by LG Electronics where barriers to repair are effected by new forms of payment (e.g. buy now pay later method.)**
b) Is the guarantee of available repair facilities and spare parts effective in providing access to repair services and parts? Or is the "opt out" clause being widely used, making the guarantee ineffective?	**b) Yes, the guarantee is effective in providing access to repair services to qualified service technicians, and driving the demand for repair services with genuine parts markets. Consumer preference toward replacement and refund options inevitably contribute to declining repair market demand and increase in the e-waste stream. The guarantees are not ineffective within the home appliance/electronics sector, however reforms to the ACL to include repair services as first choice will serve to support customer safety, repairer demand, product integrity and e-waste reduction.**
c) Should consumer guarantees seek to balance the broader societal costs of remedy choices (such as the environmental impacts of replacements) with consumer rights, and if so how? For example, should repairs be favoured as a remedy?	**c) When applied, the guarantees must; prioritise the safety of the consumer, drive demand for a qualified and professional repairer workforce and support a genuine spare parts market. Uphold manufacturer confidentiality involving technical design data and intellectual property in order to protect consumers from unsafe repairs and prevention of potentially unsafe and unlawful counterfeit products/ spare parts entering the market. Consumer options within the existing guarantees**

	are clear, however, the benefits of repair options conducted by qualified technicians are not emphasised and the target of the Repair Option becoming the favoured remedy for consumers should be endorsed by all key stakeholders involved in the RTR inquiry and engaged in e-waste reduction initiatives and schemes.
d) Are consumers sufficiently aware of the remedies that are available to them, including the option to repair faulty products, under the ACL's consumer guarantees? If not, would more information and education be a cost effective measure to assist consumers understand and enforce guarantees? What would be the best way to deliver this information? What other measures would be more effective?	**d) Manufacturers are required to provide information regarding consumer rights under the Australian Consumer Law and also through customer care correspondence. Awareness campaigns and education about the ongoing benefits of repairing goods using qualified service persons where safety and product quality is maintained, and extends product durability and lifespan, which supports circular economy targets in Australia – should be supported by all stakeholders in relation to the RTR inquiry.**
INFORMATION REQUEST 4: Repair Markets	
a) The Commission is seeking information on the nature of repair markets in Australia, including detailed data on the repair markets for specific products, covering: i) market size — by employment, revenue, number of businesses, profit margins ii) market composition — such as market share between authorised, independent and DIY repairers.	**No comment to add – Analysis of Repair Market data required by commission.**
b) Is there any evidence of a difference in quality, safety or data security between authorised repair networks and independent repairers? Are there ways to address concerns around quality, safety or data security while promoting a vibrant independent repair market?	**b) LG considers customer protection and safety is paramount in this Right to Repair inquiry /consultation. LG Electronics Australia implement an Authorised Service Centre 'ASC' Network of Qualified Technical Repairers who provide repair services in locations Australia –Wide. The complexity and confidentiality of LG products technical design and systems are of the highest value and importance to the organisation, enabling the**

	business to maintain competitive positions in the market, across multiple product types within the home appliance and home electronics sector in Australia and New Zealand. LG requires a set criteria of technical competencies, administrative skills and operational capabilities of its 'ASC' partners. The partnerships provide LG with confidence that safety, quality and confidentiality are maintained. Product and brand integrity are upheld.
c) Are there available examples of the contracts between OEMs and authorised repairers? Do these contracts limit effective competition in repair markets (such as by limiting the number and reach of authorised repairers or requiring authorised repairers to not be authorised by a competing brand)? What is the process to become authorised? Is it open and competitive?	**c) LG contractual agreements do not limit effective competition in repair markets.** **Authorised Service Centres (ASC) have access to proprietary software, troubleshooting and diagnostic processes to help them complete repairs. Manufacturer (LG) hosted training in the use of such resources is required to certify competency in their use. The process to become authorised requires many competency's to be met both in business processes and technical training. The scope and size of the service network is based on repair volumes and is adjusted accordingly. Repair volume dictates service network expansion.**
d) Are there specific examples or other evidence of practices by OEMs or their authorised repairers that create barriers to competition in repair markets? Do other factors also create barriers to competition in repair markets, such as short sighted consumer behaviours, switching costs, poor information availability or consumer lock in?	**d) There is no evidence based examples of deliberate practices that create barriers to competition in repair markets.** **LG continues to recruit and support new members to the service network as work volume dictates and based on skills and competency criteria that are required to fulfill the regions repair needs for LG product.**

e) What is the relationship between the intensity of competition in the primary product market and the risk of consumer harm from a lack of competition in repair markets? Can competitive primary markets compensate for non-competitive repair markets? Is an absence of effective competition in the primary market a necessary condition for consumer harm from non-competitive repair markets? To what extent would measures that enhance competition in the primary market address concerns about a lack of competition in repair markets?	**e) We do not believe that competition in the primary product market impacts competition in the repair market.** **The appliance repair industry is suffering a skills shortage both locally and globally. Often in many regional centres of Australia there is very limited or no repair facility and manufacturers are forced to apply 'Non-repair' remedy for customers because of this.** **Lack of competition is also connected to the decline in the number of repairers. (Short-sighted) Consumer behaviours and declining repair volumes are causing repairers to exit the market.**
f) Are the restrictive trade practices provisions of the CCA (such as the provisions on misuse of market power, exclusive dealing or anti-competitive contracts) sufficient to deal with any anti-competitive behaviours in repair markets?	**f) Yes. They are sufficient in relation to LG product categories.**
g) What policy changes could be introduced if there is a need to increase competition in repair markets and improve consumer access to, and affordability of, repairs? What are the costs and benefits of any such proposal to the community as a whole? How does it balance the rights of manufacturers and suppliers, with those of consumers and repairers?	**g) Policy reform to offer repair remedy as a preferred option may increase repair demand and therefore create a more competitive market. When presented with the option to repair or replace with a new product, typically customers choose to replace the product.**
INFORMATION REQUEST 5: Intellectual Property Rights Protections.	
a) To what extent do current IP laws already facilitate repairs by consumers or independent third parties (e.g. the spare parts defense under the Design Act)?	**No Comment to submit.**
b) Are there any aspects of IP laws where consumers' rights with respect to repairs are uncertain?	**No Comment to submit.**

c) Do current IP protections (e.g. intellectual property rights, technological protection measures, end user licencing agreements) pose a significant barrier to repair in Australia? If yes, please comment on any or all of the following: • the specific IP protections that prevent consumers from sourcing competitive repairs and/or inhibit competition in repair markets • the types of products or repair markets these barriers mainly affect • the prevalence of these barriers • the impacts of these barriers on third party repairers and consumers (e.g. financial cost, poorer quality repairs) • Options for reducing these barriers and their associated benefits, costs and risks (including potential impact on market offerings).	**No, Intellectual Protections laws do not pose a significant barrier to repair in the Home Appliance and Home Electronics sector.**
d) In what ways might government facilitate legal access to embedded software in consumer and other goods for the purpose of repairs? What are the pros and cons of these approaches?	**d) We reiterate our concerns about IP protection. With consumer safety at the forefront of discussion, developing open sources to technical data with all intents and good purposes – support and encourage grey goods & counterfeit markets. Test programs which contain unlocked software, which allow products to function outside normal parameters leave open opportunities which can be potentially harmful to consumers and businesses.**
INFORMATION REQUEST 6: Planned Obsolescence.	
a) What evidence is there of planned obsolescence in Australian product markets? Do concerns about planned obsolescence principally relate to premature failure of devices or in them being discarded still working when more attractive products enter the market?	**a) LG Electronics is committed to innovation and durability whilst maintaining product function and reliability of the product. Design for durability and reasonable product life cycle is expected by reasonable consumers and is an important consideration of the design phase for LG Electronics product ranges. With relevance to LG product streams it is noted that consumers are not inclined to discard these products if they are still functioning, but will hand them down ,**

	keep them as secondary devices or equipment, resell or trade them.
b) How can the Commission distinguish between planned product obsolescence and the natural evolution of products due to technological change and consumer demand?	**b) This will present quite a challenge for the Commission. LG observes that in relation to our smaller appliance and electronics products, often consumers choose to upgrade or "buy new " <u>before</u> products become defective or reach their average end-of –lifespan, due to multiple factors (economics, new product features, size preferences- larger TV screen/ smaller mobile screen, energy efficiency, societal trends). For larger appliances such as Refrigerator and Clothes Washer, consumers tend to use the product until its average completed lifespan.**
c) How does planned obsolescence affect repairers, consumers and the broader community in Australia?	**No Comment to submit.**
d) What measures do governments currently use to prevent planned obsolescence or mitigate its effects (in Australia and overseas)? How effective are these measures?	**No Comment to submit.**
e) What are the benefits, costs and risks of Australia adopting measures similar to those currently used overseas, such as product design standards and reparability ratings?	**We would not recommend adopting overseas measures as is, any measures should be customized to suit the Australian demographic and should be backed by evidence based data which demonstrates the scheme, proposal or regulation operates as intended and is suited for local conditions.**
f) Do consumers have access to good information about durability and reparability when making purchases? If not, how could access to information be improved?	**f) LG Australia does not hold information or data regarding the accessibility of durability and reparability information available to customers.**
INFORMATION REQUEST 7: Environmental Impacts	

a) What data is available on the amount of E-waste generated in Australia? • What data is there on the composition of e waste in terms of particular materials (such as hazardous materials) by product type? • How does hazardous E-waste compare to hazardous general waste in its prevalence and risks? Is there merit in distinguishing between hazardous e waste and non-hazardous e waste? And if so, how could this be done in practice?	**a) The department of Agriculture, Water & Environment collects data and information regarding the federal product stewardship regulations for e-waste products (TV & Computer), batteries & hazardous waste. Products are being reviewed in 2021 to be included in product stewardship schemes as prioritized by the department.**
b) What estimates are available on the costs of e waste disposal on the environment, human health and social amenity, in Australia and internationally? • How do the impacts differ by disposal type, or by the type of product or hazardous material?	**LG Australia does not hold information or data regarding estimate costs of e-waste disposal on the environment.** **LG Australia does not have available data about how the impacts differ by disposal type or by the product type.**
c) How much of Australia's e waste is shipped overseas for recycling? Is there evidence of circumstances where this creates problems for recipient countries? • Are there barriers to the expansion of domestic recycling facilities or the adoption of new recycling technologies in Australia (such as plasma arc incinerators)?	
d) What are Australia's current policy settings for managing the potential environmental and health effects of e waste (such as landfill bans, the National Television and Computer Recycling Scheme or Mobile Muster)? Are these policy settings broadly right — that is, are they proportional to the impacts of e waste on the community?	**d) The current policy settings which are applicable to the category sectors of Household appliance and electronics are trending positively toward waste reduction targets. The policy settings are appropriate to the product streams for which they are applied, it is noted that for television and mobile phone products, are often gifted or resold when following an upgrade. When a product is discarded by a consumer it becomes waste, when a product is in processing for reuse, refurbishment, repair or reselling it is excluded from the waste loop- The consumer choice is key to the status of waste for appliance and electronic goods in Australia.**
e) How can a right to repair policy further reduce the net costs of e waste in Australia, and would such an approach be an effective and efficient	**Many manufacturers including LG implement a prevention of waste and sustainable product in design phase to support less waste, sustainable sourcing,**

means of addressing the costs of e waste to the community?	**material optimization, lean production, sustainable packaging, optimization of material recovery and recyclability. Right to repair reform will only be meaningful if consumers choose a repair option, or are mandated to, repair their goods instead of replacing.**
INFORMATION REQUEST 8: Policy / Regulatory Reforms	
a) What policy reforms or suite of policies (if any) are necessary to facilitate a 'right to repair' in Australia?	**ACL Guarantees reform to make repair option of product the preferred remedy.**
b) Are there any other barriers to repair and/or policy responses that the Commission should consider?	**No comment to submit.**
c) What are the costs and the benefits of the various policy responses that have been proposed to facilitate repair (such as those outlined in table 1)?	**No comment to submit.**
d) Are there other international policy measures or proposals that the Commission should consider as part of this inquiry?	**No comment to submit.**