



Right To Repair Consultation Document-Feedback

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Dear Sir or Madam,

Thank you for the opportunity to provide feedback on this document for which the need is becoming more urgent every day as the throughput of material grows. We are **very supportive** of regulations to address the Right to Repair. Our current resource consumption systems of linear-take-make-waste not only create waste but also generate a huge amount of greenhouse gases which constitute some of the discharges that threaten the environment and human health. In addition, the production of all of this material contributes to loss of habitat and biodiversity.

Zero Waste BC is a non-profit association dedicated to driving systemic change towards Zero Waste in BC. Zero Waste is the conservation of all resources by means of responsible production, consumption, reuse, and recovery of products, packaging, and materials without burning and with no discharges to land, water, or air that threaten the environment or human health. Our feedback is based on this definition and the [Zero Waste Hierarchy](#).

Please see our feedback below.

Sincerely,
Sue Maxwell
Board Chair,
Zero Waste BC

Q1. What are your views on a preferred approach to right to repair in Canada? Why?

There should be a Right to Repair in Canada. This will take coordinated actions and a comprehensive approach from the federal government as well as from provinces and territories. There should be national regulations to cover the aspects best suited to that level of government (mandatory warranties, provision of parts, avoiding planned obsolescence, ensuring intellectual property laws are not hindrances to repair, requirements for imports, etc.). Policy should consider impacts on consumers, product design/manufacturing, sustainability, fair business practices, and local repair initiatives. Both levels of government should remove taxes from repair. The provinces and territories can add in repair option requirements to existing and future Extended Producer Responsibility systems. It will be important to identify roadblocks to repair and then the most suitable level of government can address them.

The federal government could speed up the provincial/territorial regulation by offering a model policy and sharing the results of the Saskatchewan and Quebec regulations.

Manufacturers must design products with repairability in mind, ensuring access to parts, manuals, and tools and independent repairers (small businesses, technicians, community hubs) need knowledge, tools, and legal rights to repair. Policymakers must create regulations supporting repairability, sustainability, and fair economic practices.

A federal approach focused only on consumer rights misses the collaboration needed across the ecosystem so federal policies should encourage cooperation among producers, repairers, and consumers to make repair a commercial and societal norm.

Q2. Home appliances and consumer electronics are comprised of a variety of different products, each with distinct considerations. A repairability policy may be more appropriate for a range of products. In your view, which home appliances and consumer electronics should be in scope in a federal repairability policy? Why?

All home appliances, consumer electronics, as well as commercial, industrial and automotive equipment should be in the scope. A broader scope of products will help to build a strong repair network.

The document notes that consumer demands are driving complexity of home appliances and electronics but it is also because the manufacturers create more complex items in order to drive obsolescence. Often there is no choice for a simpler, high-quality item that would last longer, there is no information on how long an item would last and the warranties are shockingly short (as low as one year for a fridge when the old refrigerators used to last over twenty years). It is very important for the manufacturers/producers to be held accountable for their products in order for this to drive design change (from bells and whistles and obsolescence to a focus on functionality and durability). For example, we do not need a fridge to tell us what time it is -we do need it to keep items cold.

The inclusion of all of the items may be problematic to start so the government should expect to need to make revisions to the regulation to correct problems that arise or address new loopholes that are identified.

The repairability, interoperability and durability of home appliances or consumer electronics can be complicated and affects industry, repairers and consumers differently.

Q3. Whether you are primarily a manufacturer, repairer or consumer, what considerations do you have related to the repairability, interoperability and durability of home appliances or consumer electronics?

Q4. What further actions could the Government of Canada undertake to strengthen the repairability, interoperability and durability of home appliances or consumer electronics?

The producers should be required to provide a 5 -10 year warranty on their items which then will drive design change but also create the need to actually know what is in their products (in some cases the brand owner just contracts a manufacturer that may make several competing brands and the brand owner may not be sufficiently involved to know the exact parts). Longer warranties should then drive an increase in repair but not at a cost to the consumer but at a cost to the producer (who can then save money by producing better items). For example, Norway had five-year warranties on electronics. The government could consider scaling up the warranty length over time.

The producers need to be required to repair items and not just send a new replacement item unless it cannot be repaired. They should be required to provide the services (and so the systems needed such as parts and skilled tradespeople would be reestablished). There should be a cap on the fees charged for parts and repair by the producers in order to encourage repair over purchasing new items.

There should be EPR programs for all of these products in each province and territory and these programs should be required to check all items at end of life for the feasibility of repair or refurbishment. Those that cannot be repaired or refurbished should be harvested for parts and these programs should make the parts available to consumers and repair services. These parts banks should be connected across Canada so that a used part would be the quick and easy source for a part. There should not be a requirement to use a part made by the original manufacturer but any part coming from one to meet their warranty obligation should be guaranteed for its quality.

There should be requirements for parts to be available for a certain length of time (twenty years for appliances would be suitable, fifteen years for electronics) and delivered within a certain specified time. After the parts are not required to be provided, the producers should be required to provide a detailed parts map for the products and a pattern for each part so a local repair person or consumer could machine or 3D print the part. There should also be requirements for producer to provide online a repair manual for each different type of product (not the current system of manuals that may cover several items with different features and

where it may be hard for a consumer to know which model they have and what would apply to their actual item).

A minimum standard of repairability should be required; competition between manufacturers should come from going beyond that -longer warranties, simpler more durable products, faster servicing, loaner items, local service, etc. The use of non-standard tools to access equipment should be phased out as should the gluing of products rather than the use of screws, etc. to ensure a product can be repaired. In the interim, if any non-standard tools are required, the producer should be responsible for providing them in a timely manner **free of charge**.

Safety should be a consideration (which could be addressed in clear repair manuals showing where the potential dangers lie) but for too long this has been an excuse to sell more products and prevent repair. The same is true for intellectual property. Please ensure this is no longer the case.

While producers should be providing repair services during the warranty period, they should also be encouraged to do so beyond that. They need to work well with independent repair services. The government needs to put measures in place to avoid anti-competitive behaviour by the producers and support independent repair services, with a goal to have one in each community. One measure of support could be to stop taxing repair services (at the federal and provincial/territorial levels).

There should also be time requirements for interoperability and options to select electronics that can last longer by eliminating certain added features. Interoperability is closely related to repairability, and requires that manufacturers adopt manufacturing processes, standards, and protocols that allow third parties to develop innovative solutions that extend product lifespan and offer many other social and economic advantages.

Interoperability should be the default and further regulations to standardize design should stem from this. This could be similar to the EU requirement to have standard mobile phone chargers. The government should develop and enforce standards ensuring different devices and systems work together, make barriers to interoperability clear in competition law and empower the Competition Bureau to investigate violations, and promote open standards to reduce proprietary designs, fostering a sustainable approach to technology.

It is also important to factor in the energy demands that increase when electronics are embedded in items that do not require it (refrigerators, dishwashers, etc.). This both uses more energy and makes them harder to repair. Consider mandating a base product with a longer life span for each product line of appliances so a consumer has this choice.

The government should set up an office where consumers can report the ongoing challenges they may experience so that further regulation can be enacted to address issues as well as to administer fines for non-compliance by producers.

Durability standards need to be set for different product types. To date, most producers are developing products that do not last as long as their predecessors (particularly for home appliances and computers). Regulation will be required to reverse this. In some cases, claims of energy efficiency will be used to justify the shorter lifespans but the embodied energy (scope 3 emissions) should be factored in when determining if the energy efficiency claims hold any validity and over what time period. Overall the goal needs to be long-lasting, repairable and repaired, quality products rather than 100% recycling of short-lived, shoddy items.

The goal also should not be to make items cheaper (through the externalizing of costs to the environment by the producer) but instead to make the total cost of a quality item more affordable and a feasible option through better design.

Addressing these issues holistically fosters a sustainable, circular economy. A comprehensive approach ensures long-term benefits for manufacturers, repairers, and consumers alike.

Q5. A Canadian approach for home appliances and consumer electronics would take into account considerations from manufacturers, repairers, and consumers. What are your views on a preferred approach to further advancing a reparability policy in Canada? Why?

Q6. Repairability is a shared responsibility in Canada given provincial and territorial responsibility for consumer protection legislation. Policy measures focused on durability, reparability and interoperability will need to take into account multiple, additional considerations, including but not limited to: safety, product design cycle, skilled labour, affordability, consumer preferences, and the uniqueness and diversity of home appliances and consumer electronics. What considerations do you have in relation to a federal policy approach for Canada?

- The right to repair should be clearly defined and not just include the ability of a consumer to repair their own item but also the right to have an item repaired by the producer.
- There should be some requirements for the producers to provide the skilled labour (bring back the Maytag repairman).
- Consumer education is essential - knowing their rights, knowing where to access repair options (producers could be required to fund a centralized repair information hub that shows where repair options are per province or territory -for example, such as funding an addition to the Recyclepedia by the Recycling Council of BC), knowing where to get part, access to repair manuals, access to part patterns, etc. France was pursuing the ability of consumers to access a reparability index to inform new purchases while the UK had looked at requiring producers to inform consumers of the lifespan of software.
- The existing repair and spare parts ecosystem should be considered with additional funding from producers used to help expand this. Precautions should be taken to ensure producers do not squeeze out existing independent repair systems and shops.
- Often producers create consumer demand for new technology rather than producers creating new items to satisfy demand so some skepticism is warranted in catering to this

perception of consumers driving the design and the need for the complexity in some items.

- A circular economy/zero waste approach should be the underpinning of the Right to Repair regulations and policy.
- Trade agreements should eventually be tailored to support circular economy/zero waste and Right to Repair rather than the other way around. The more there can be alignment with bigger markets though on this front, the quicker product and system design will change.
- The system should involve collaboration across the sector and internationally.

Q7. Are there any considerations that have been missed or elements that should be explored further when addressing this topic?

- There should be goals/targets for repair and ongoing reports back to the public on progress
- There should be a goal for refurbishment of a certain percentage of products by category
- Key funding sources should be from the producers (ideally through EPR systems)
- EPR programs should be required to factor in reparability into ecomodulated fees
- A goal should also be to have local repair/green jobs
- Agricultural equipment is missing from this. In 2024, a resolution at UBCM highlighting the challenges of reparability of this equipment was submitted.
- Tailor reparability policies to support rural, remote, and Indigenous communities. These areas often face challenges such as limited access to repair services and higher costs. A targeted approach can enhance self-sufficiency and ensure equitable policy outcomes nationwide.
- As products become increasingly digital, federal policies should address access to diagnostic software, firmware updates, and other digital tools needed for repair. Additionally, the ability to install third-party software fixes is essential for extending device lifespans, particularly for internet-connected devices.
- Reparability is one part of a broader circular economy. Policies should integrate with recycling, remanufacturing, and sustainable design strategies to ensure a product's full lifecycle is considered, advancing long-term sustainability.
- Prohibit the practice of parts pairing, where manufacturers block independent repair by restricting parts functionality. This would protect consumers' right to repair across a wide range of devices.