

EcoDesign for Sustainable Products Regulations (ESPR)

Definitions of 'remanufacturing' and 'refurbishment'

The following amendments concern refinements to the Commission-proposed definitions of either 'remanufacturing' or 'refurbishment'. The amendments are numbered 274, 275, 276, 309, 310, 315, 316, 317, 318, 319 and 320.

Neither the proposed definitions nor the amendments provide any additional clarity to existing definitions of these terms published elsewhere. The proposals include incorrect references to 'waste' as a source of feedstock. Furthermore, the proposed definitions do not acknowledge distinctions between remanufacture and refurbishment that have been adopted at a sector level.

Both of these product life extension terms have been defined in authoritative sources elsewhere, most recently in the 'Deutsche Normungsroadmap Circular Economy' (Standardization Roadmap Circular Economy) published by the German Standards Institute (March 2023). The English version is due to be published in April 2023. A DIN standard for remanufacturing **DIN SPEC 91472** is to be published in its final form in April 2023.

As a minimum, it would be helpful to remove 'waste' from the definitions as cited in amendments numbered 274, 275, 276, 310, 320. It may be even more helpful to step to a higher level and avoid defining both remanufacturing and refurbishment in the ESPR. Instead, describe them both as Value Retention Processes within the circular economy, i.e.

1. Remanufacture, Refurbishment, Reconditioning

These are all Value Retention Processes applied to used industrial, commercial and consumer products. Definitions for each process can be found in sector specific quality standards.

We would be glad to provide further information on the existing definitions and technical standards for these processes. The European Remanufacturing Council has member organisations from many different sectors. The sectors represented include imaging equipment, automotive components, agricultural equipment, IT and telecoms, medical equipment and logistics sectors. The sector has approximately €30 billion of sales in Europe and we aim to grow the sector to €100 billion by 2030.

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About the Council:

The vision of the European Remanufacturing Council is to triple the value of Europe's remanufacturing sector to €100 billion by 2030. We will bring together businesses from every product sector to share knowledge, and seek changes to policy with the aim of making remanufacturing a normal part of the product life cycle.

For more information about the CER please visit
www.remancouncil.eu

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About Oakdene Hollins:

Oakdene Hollins is a research and consulting business that advises clients on the circular economy and sustainability. From offices in the UK and Brussels we provide market research and science-based evidence for Government and business clients.

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