

Arguments supporting Right to Repair in Australia

This submission to the Right to Repair enquiry has been prepared by the Brunswick Tool Library and has been endorsed by:

- The Share Shop, Newcastle, NSW
- Mullum Cares Library of STUFF, Mullumbimby, NSW
- Triangle Tool Library, Cobargo, NSW
- Share Shed Inc, Sailsbury, QLD
- Gold Coast Tool Library, Robina, QLD

About us

The Brunswick Tool Library is a non-profit, community organisation that aims to challenge disposable culture by making it easier for people to repair, restore and upcycle.

We are a 'library of things', meaning we lend things other than books to our members. Specifically, we offer affordable and shared access to tools & equipment, rehome people's unwanted tools and run workshops and repair cafes.

We have been operating for nearly 8 years, with many in our community who've been involved in professional service and repair, or DIY fixing, for decades.

We provide an alternative to disposal for waste-conscious people when products fail or break. We are seeing an increasing demand for library of things and repair cafes, locally and globally, which points to a need for policy and product stewardship that supports conscious consumers.

Barriers to Repair

Our organisation represents people from a variety of backgrounds, including veteran and self-taught fixers, qualified tradespeople, novice repairers and, most importantly, everyday consumers.

The common barriers to consumer repair access that we've recognised are:

- Few options for consumers when a product malfunctions outside of its warranty
- Inbuilt obsolescence and poor (cheap) quality of manufacturing
- Products not manufactured for serviceability or repair ('one way process' — not built to be disassembled or reassembled)
- Lack of spare parts availability
- Lack of product support and or documentation for service and repair
- High cost of repair compared to cost of replacement, which discourages repair

The members of our organisation and community support policy changes such as those examples given in Table 1, pg 25, of the Productivity Commission's 'Issues Paper, December 2020'. In particular we highlight that the fundamental problem of 'product waste' lies in the culture of manufacturing without consideration for 'repair' in the life cycle of a

product. We believe that a number of policy changes could either ensure or encourage manufacturers towards making products repairable and reducing overall landfill waste.

Our organisation would like to add the following considerations as our submission to the 'Right to Repair' Enquiry.

Repair should always be a consideration before recycling

- The resources inside modern consumer electronics are highly valuable, sometimes toxic and often can't be easily or fully recycled. This may be due to:
 - A lack of capacity in recycling plants
 - Because they are made up of composite materials which can't be separated.

Recyclability is a limitation, even for products that are designed with end-of-life as a major consideration, such as the modular Fairphone 2 smartphone, [which is only 30% recyclable](#).

- Product stewardship is an important responsibility for companies when repair is not feasible. It is often difficult for consumers to dispose of products responsibly when repair is impractical. This cost should be borne by the companies making the products to discourage planned obsolescence, rather than allowing them to shift the burden to local communities who must deal with their waste.

Skills and safety training should be more accessible

- At our most recent Repair Cafe, in January 2021, four licensed electricians were able to save 25kgs of waste from landfill. Relying on highly qualified volunteers will always create a bottleneck for repair.
- Components that are designed to fail, such as fuses, should be designed to be easily replaced by non-skilled people. A component like a fuse may fail outside of warranty and render an appliance useless, but the cost to repair the appliance will not be worthwhile in many cases, especially with cheap appliances.
- Reconsideration should be given to the laws which prevent people from performing electrical maintenance. We support laws which prevent people from undertaking dangerous electrical work that poses a risk to themselves or others. For example, a damaged power cable can provide a fatal risk if wiring is exposed. In some cases, hiring an electrician or replacing an appliance may be prohibitive and discourage people from improving the safety of electrical appliances. Allowing simple repairs, such as replacing a power plug, could encourage people to improve the safety of their appliances. Regulation could evolve to be more like laws around automotive repair, where untrained people can perform repairs, but must get certificates from licensed mechanics to make the car roadworthy.

- Repair can create secure work. Providing a level of qualification into fixing items that often break could provide people with an avenue into skilled work.
 - This will lower the barrier to entry for those performing basic repairs, which will lower the cost of repairs for the consumer and create a bigger market for local repair.
 - Registered training providers will be able to offer courses to a new market of students on electrical repair and safety.
 - In many cases, repair cannot be outsourced, which creates long-term secure employment for people with basic training.

Manufacturers must be incentivised to provide repair as a viable option compared to replacement

- Manufacturers should have longer commitments to provide replacement parts and repair support to their customers.

Modern electronics contain 'black box' components, such as circuit boards. These cannot be replaced with approximate components because software and hardware requirements are highly specific. This means companies can withhold components that might otherwise repair a broken device.

Desktop and laptop computers are similar in complexity to TVs, though the former is traditionally far easier to repair than the latter. A strong history of DIY computer building, where components are standardised to be cross-compatible, means that a person can upgrade or replace obsolete components. A person who isn't comfortable with technology still has a wide range of options with third-party computer repair shops. A TV on the other hand, doesn't have the same history of hobbyist contribution. This means that the components inside a modern LCD TV can vary widely between brands, or even models.

We've seen this play out at our Repair Cafes. In one instance where an entire widescreen TV had to be discarded because one of its many circuit boards had failed. In this case, a skilled fixer (with decades experience, formerly working in tech in Silicon Valley) was able to isolate the troubled component with a multimeter, but could then only advise the owner that the unit was unfixable. These are not small or easily affordable items.

We need policies that reverse this trend towards disposability, by requiring companies to parts and repair support.

- Manufacturers must be made to create devices which can be accessed by third-party fixers.

Plastic clips and plastic welding can make items difficult or impossible to open without either specialist tools without damage to the item. James, an experienced

electrician who volunteers at our Repair Cafe, has repaired electrical circuits in appliances, which have still been discarded, because they can't be reassembled.

Clips and other methods for joining plastic may lower the cost of manufacture, but the customer ultimately bears the cost.

- The number of products on the market gives people a wide range of choice. However, it creates a problem for people trying to source parts for a specific make and model of an appliance or device. Parts must be readily available meaning:
 - Easy to find through retailers
 - Available for the reasonable lifespan of a product
 - More cost effective than replacing an item

One of our volunteers, Marcus, is a qualified electrician with a long history of repair experience and work in a parts-distributor warehouse. He says that distributors often have exclusive contracts to supply warranty and parts for manufacturers or retailers. This gives them an incentive to inflate the cost of parts or repair. In the worst cases components might be marked up to the point where the cost of repairing an item can cost near what it would cost to replace the item. This is a strong deterrent to repair.

People need easy access to information about repairability and their rights in regard to repairability

- It should be easy for people to make purchase decisions based on repairability.

Often when a person is researching a product, they are concerned with what it can do and how much it costs, rather than how it might break. A rating system, similar to health information about food, would allow people to make a judgement about an item's repairability when they buy it, rather than when it breaks.

One of BTL's maintenance volunteers, Richard, says the military are very interested in maintainability and in the 70s and 80s. He recalls a system with three levels of skilled fixers:

- Level one: simple repairs like fuses and plug-in module replacement.
- Level two: more complex repair, such as repairs that required the case to be opened.
- Level three: anything advanced, either because it is highly complex or dangerous.

A similar rating system for consumers could help people make more conscious purchasing decisions based on product end-of-life.

- Companies must be required to provide the manuals and schematics required for a competent person to undergo repair. This takes a lot of the guesswork out of repair, making it more efficient and affordable.

Companies are able to provide schematics and manuals and remain profitable. Companies like Bosch have a standard of sharing instruction manuals for their appliances. [On their website](#), they say, “Complete documentation is available for all Bosch products which includes valuable information about maintenance, spare parts and dealing with minor problems. All you need is the E-NR (model number) or full model name of your appliance to choose the appropriate manual.”

Many of our older fixers remember when manuals used to come with a car, appliance or device as standard. The accessibility gave people of their generation the opportunity to learn repair through tinkering from a young age, which has fostered lifelong passion and skill development.

- The ACCC states that consumer guarantees, “apply regardless of any warranties suppliers sell or give to you, apply for a reasonable time depending on the nature of the goods or services.”

There needs to be greater awareness amongst Australian’s that a limited warranty doesn’t exclude them from making claims under consumer guarantees. There also needs to be greater clarity around what a reasonable time frame for claims is. How do complexity of the product, price and other factors affect this time limit?

These suggestions are based on the diverse experiences of people in our community who care deeply about reducing waste and who believe that repair is an important element of that. We’re a part of a global movement of people who are fighting for our right to repair.

Australia may be a small country. In a globalised world, the laws we implement here have the power to change the way companies design and innovate products.

We believe that Australian’s can be leaders in the global repair movement, leading to better outcomes for communities and the natural environment.