

SUBMISSION:

Right to Repair Inquiry Australian Government Productivity Commission

1 February 2021

To Whom it May Concern,

I write to you as a concerned citizen, and as someone who has worked and volunteered publicly in the repair space in Australia for nearly 10 years. These are my personal and professional views.

I'm Australia's leading clothes-mending practitioner and author of the book *Modern Mending*. My mending has been displayed in art exhibitions, and I teach mending workshops across Australia and online to students worldwide. I run an online shop – modernmending.com – selling clothes-mending tools and supplies.

I am actively involved with the Repair Cafe movement, volunteering regularly with my local Repair Cafe (teaching others how to mend and mentoring other menders) and having organised (and volunteered with) other community repair initiatives over the past nine years.

I'm also the founder and former managing director of Bright Sparks Australia, a not-for-profit social enterprise and registered charity that repaired, reused and recycled small electrical appliances to keep them out of landfill. From August 2015 to April 2016 Bright Sparks diverted 6,132 electrical appliances from landfill as well as cables, batteries, light globes and printer cartridges – more than 15 tonnes of e-waste. *Lessons from Bright Sparks*, my record of our experience, goes into detail about the challenges with e-waste in Australia and what we learned: <http://tinyurl.com/lessonsfrombrightsparks>

Bright Sparks demonstrated not only that there is a strong demand for repairs but that people are willing to travel long distances to repair their small appliances – but awareness of existing repair services is key. Community engagement via media and social media was a huge factor in our success.

Through the project we learned just how much work is involved in reuse, repair and the collection of small appliances and why it is not more commonly done. Although we intended to bring back Bright Sparks in a new-and-improved form in 2018, ultimately we did not have the resources (namely funding and space) to keep it going and wound up the company. Without financial incentives for consumers to prioritise repairing items over recycling or binning and buying new ones, it is unlikely that similar initiatives to Bright Sparks can get started now.

My recommendations for the inquiry can be found below. My first recommendation is to read *Lessons from Bright Sparks*, my record of our experience. This story goes into detail about the challenges with repairing and recycling electrical appliances in Australia today – including planned obsolescence – and what we learned. <http://tinyurl.com/lessonsfrombrightsparks>

I also have incredibly rich data from the pilot that I would be thrilled to share if you would like to better understand the scope of the problem. Please do not hesitate to contact me for details.

Regards,
Erin Lewis-Fitzgerald

Recommendations for the inquiry

1. Read Lessons from Bright Sparks (as noted in my introduction).

<http://tinyurl.com/lessonsfrombrightsparks>

2. Provide financial incentives to businesses and consumers to encourage more repairs, and financially support repair apprenticeships to encourage industry growth.

Repairs are as vital as, if not more vital than, recycling when it comes to reducing waste in Australia and globally. Yet the cost of starting a repair business in Australia now is prohibitive (as experienced firsthand with Bright Sparks and with my own paid clothes-mending services). Consumers are less inclined to have their goods professionally repaired (or to pay fair price) when the cost of labour in Australia is much higher than the cost of labour in overseas factories where new goods are produced.

If repair practitioners were offered tax concessions for the work they do, and repair services and spare parts were exempt from GST, it would help the repair industry to flourish. As noted in the inquiry issues paper (Table 1), the Swedish model of tax breaks for repair businesses is one that I support and encourage.

For an Australian model I propose a GST exemption for repair services and repair tools and supplies. If we want to encourage Australians to repair their goods, we need to support all of the forms that might take – not just professional repair services. That includes GST-free (or entirely free) spare parts, tools and repair supplies for home menders and repairers. And that includes funding for Repair Cafes, which are run by volunteers with no financial support. They have to expend time and energy to find funding to subsidise the basic necessities: glues, liability insurance, test-and-tag equipment, and hiring fees for the physical spaces in which to hold their events. A healthy repair environment needs funded Repair Cafe organisers and dedicated spaces. It shouldn't have to be up to volunteers to find funding opportunities; there should be dedicated funding set aside for community repair initiatives to support them and keep them going, and dedicated physical spaces so organisers can increase their visibility, with less time spent marketing, and less time setting up and packing up tools, tables and chairs each session.

I also support funding (i.e. grants or tax rebates) for repair businesses and practitioners to encourage the professional repair industry to grow. The issues paper states that the number of repair-and-maintenance businesses in Australia is decreasing (Box 3). I would challenge the data-collection methodology, though, and seek to find out how many repairers:

- operate as sole traders, not companies or traditional businesses
- operate their paid repair services according to the ATO definition of "hobby" (including not making enough money to earn a profit)
- have multiple jobs and/or income streams, so they are not reporting their industry to the ABS as "repair and maintenance" because they work in multiple industries
- have switched from repair as a business to repair as a hobby (including at Repair Cafes or Men's Sheds) because they don't have the energy, support or resources to continue operating at a business level

Professional repair services need to be seen as an essential part of the economy and waste solution and given appropriate recognition. Funding for Repair Cafes and similar initiatives is needed in Australia, too, but relying on volunteers to fix household broken goods is not an effective long-term solution. And relying on volunteers to run repair events without any compensation or support is not sustainable.

Volunteer repair-event organisers often burn out after a few years, with no succession planning (which is difficult when you're relying on committed volunteers). Two of Australia's most successful Repair Cafe organisers, from Melbourne Repair Cafe and from Repair Cafe Albury-Wodonga, have stepped down, with Melbourne Repair Cafe discontinued as a result and Repair Cafe Albury-Wodonga on the hunt for a new leader, with the estimated time required at 20+ hours per week.

Repair Cafes are often the first point of contact with the community, referring people on to professional repair services when required, providing awareness and trusted recommendations. We need both Repair Cafes and professional repair services for a vibrant, healthy repair industry.

Sandra Goldmark has recently published a book called *Fixation: How to Have Stuff Without Breaking the*

Planet. Sandra ran a series of pop-up repair events over many years in New York, US, and is an academic with a keen interest in the subject. One of her findings is that we need to encourage repair apprenticeships if we want the repair industry to grow, as so much repair knowledge is best taught from one person to another.

I have a long wait time for my mending services and often have to knock back work. Yet I'm unable to pay an apprentice to take on extra work; instead I limit the amount of repairs I take on and focus my efforts on other income-generating activities. Many repair businesses in Australia now are run by one person who is flat out with repairs (or has sporadic income from repairs and needs to supplement it with other income) and doesn't have the time or energy to promote their business further or the funds to take on an apprentice and scale up. By creating a fund that supports repair apprenticeships, we can create new jobs, keep those essential skills from dying out, and support further growth in the repair-and-maintenance industry. And – particularly in the electrical and electronic repair industry – we can pass on the essential skills of how to open up, diagnose and repair these items that contribute to so much e-waste, and whose manufacturers are not forthcoming with that information.

3. Require all electrical and electronic products imported into Australia to:

- **be able to be disassembled with standard tools without damaging the item** (no proprietary screws or fused plastics)
- **be designed for repair and able to be repaired by independent repairers without problems or legal concerns**
- **have instruction manuals available publicly online**
- **have diagnostic software and product documentation available to independent repairers**
- **have spare parts available for purchase or on-demand for 3D printing**
- **prioritise metal parts over plastic ones**
- **not be designed to self-destruct or become obsolete within 10 years**
- **Be made of 100% recyclable components** (that can be recycled in Australia)

with large financial disincentives for manufacturers whose products do not meet all of these criteria.

At Bright Sparks we often spent more time figuring out how to open up an appliance than we did diagnosing or repairing it. Two common barriers to repair success were broken plastic – we tried various industrial-strength glues but the repairs were never as strong as when new – and unopenable appliances. I remember a stick blender that took three of us to work out how to open, only to discover once we finally opened it that we physically could not remove the parts we needed to repair.

Planned obsolescence is alive and well, and many appliances are designed to fail and be replaced with new ones. Modern kettles are now made with fused plastics (and sometimes circuit boards!), so you can't disassemble them for repairs even if you wanted to. Many plastic kitchen appliances are made with brominated plastics, which cannot be recycled and are toxic in landfill. Then you have electric toothbrushes, which cannot be opened in any way (including for battery replacement) and are extremely difficult to recycle.

Printers are designed to self-destruct – many stop working after a certain number of prints (with a microchip controlling a 'kill' switch), so you're forced to replace them. And it's usually cheaper to buy a new printer than replace a printer's ink cartridges – death by design.

Appliances made of plastic are nearly impossible to repair once they crack – including food processors, blenders, DVD players, and anything with a plastic latch. I took my broken hot glue gun to my local Repair Cafe yesterday, after a piece of plastic snapped off inside and rendered the glue gun useless. A savvy fixer used a metal screw (much like a metal screw in bone) as a hack way of getting it to work again. I'm thrilled, but I'm also frustrated because we shouldn't have to rely on hacks from volunteers to get our stuff working again; if manufacturers are going to make things with cheap plastic parts that break irreparably, then the manufacturers need to have spare parts available. And we can't just make manufacturers of computers and smartphones play by these rules – we need all manufacturers of all electrical items to make these available, or not make the (shoddy) products at all. And we need mandatory product stewardship (not voluntary or co-reg) for anything sold in Australia that has a plug or runs on batteries. By forcing OEMs to take back their faulty and broken products, they will be encouraged to make higher quality items and incorporate repairs and servicing into their business models.

I strongly support Australia taking France's lead here and requiring "product labelling and other

regulations that improve consumer information about product reparability (for example, manufacturers selling products in France are required to report how long they will produce spare parts, and a reparability rating will be used for electrical and electronic products at point of purchase)", as noted in the issues paper.

If, as noted in the issues paper, OEMs are genuinely concerned that unauthorised repairers could perform substandard repair work, then we should set up a national industry-wide repair association, with accreditation and an open, transparent application process. Instruction manuals should be made available publicly to anyone (since they come with appliances anyway), and diagnostic software and proprietary documentation could be made available to repairers who've undergone a new, fair, national, repair-accreditation process (not one created by OEMs themselves).

The issues paper raised the question of whether becoming an OEM-authorised repairer is an open and competitive process (Information Request 4). In my experience it is not. And the Australian Appliance Repair Association includes it as a barrier to entry: each member must be "a warranty service representative for at least one manufacturer". It's all about who you know, not what you know. Bright Sparks did not achieve this eligibility requirement, yet we had an experienced appliance-repair technician, paid customers, proper policies and procedures and all the correct insurances.

By setting up a national umbrella organisation for repairers and menders in Australia, we could more easily work with OEMs and ensure that independent repairers are working to an agreed standard. And the networking opportunities would encourage further growth and shared knowledge within the industry.

4. Require every new electrical/electronic device sold in Australia to have the name of its manufacturer printed on it, and for every appliance/device manufacturer to have a prominent repair page on its company website.

At Bright Sparks 7% of appliances we received were recorded as 'unknown' because the manufacturer's name could not be found. This does not include cables, chargers, remote controls and the other accessories we regularly collected, which rarely bore manufacturer labels and were never built to last.

Requiring manufacturers to print their name on their products is the first step in making them take responsibility for those products. If we continue with voluntary and co-reg product-stewardship schemes as they are now, there's no incentive for fringe manufacturers (who still sell a huge amount of products in Australia, and often the most poorly made products) to join in and be accountable.

All manufacturers must share responsibility, and it cannot be voluntary — we can't limit it to the biggest manufacturers and hope they'll take part. And manufacturers need to offer aftercare services and provide spare parts in Australia if they're going to sell products in Australia.

We can't have manufacturers making it difficult to find repair information on their websites; it needs to be an industry standard to have a "repairs" or "support" page with information on the company's repair policy (including out-of-warranty repairs, which also need to be supported and encouraged) and steps to take to start the repair process.