



CONEBI Feedback to the Sustainable Consumption of Goods initiative

CONEBI represents the European Bicycle, Pedal Assist E-Bike, Parts & Accessories Industries via its national industry members. In the EU there are about 1,000 companies providing more than 155,000 direct/indirect jobs. Via the CONEBI's national industry members, more than 600 small, medium and large companies are represented in CONEBI.

CONEBI welcomes the European Commission's initiative 'Sustainable consumption of goods – promoting repair and reuse'. The bicycle industry takes sustainability seriously and strongly supports efforts to reduce waste and produce more environmentally sustainable products to promote the move towards a circular economy.

Cycling and bicycles are the key elements facilitating the green transition in Europe. More and more people are choosing cycling in order to be healthier, but also to reduce their climate footprint and contribute to a more sustainable future. The bicycle industry is determined to continue providing customers with high quality and long-lasting products, in line with efforts to reduce unsustainable consumption. That being said, when introducing new policies, it is crucial to always ensure high consumer and product safety.

One of the aims of the initiative is to encourage producers to design goods that last longer and are easily repairable. This is a welcome goal; bicycles and e-bikes are known to be high quality and very long-lasting products. This can be attributed to high-quality components, availability of spare parts, adequacy of service network and last but not least the consumer's positive attitude towards repairing and maintenance of their (electric) bicycles. Depending on the type of repair needed, consumers or bicycle repair shops can easily do it in most cases; bicycles are modular products and repairability is one of their inherent features. At the same time, it is important to keep in mind that relevant technical and safety considerations need to be upheld at all times to ensure safety of the products for the consumers. For example, replacing a tire is a simple and relatively risk-free process. However, when it comes to the ever-growing segment of e-bikes, repairability of electric components (in particular battery packs) is limited due to product safety regulations.

Since the right to repair initiative aims to cover a vast range of products, it is important to point out that different requirements are necessary for the different product categories in order to take into account the repairability of the specific products and possible safety implications attached. Moreover, even within product categories, repair needs to follow a multi-staged model. In this sense, repair could be ordered based on the safety impact and the possible risk for the user as well as the complexity of

the repair (and therefore the technical skill and certification, adequate equipment and facility as well as liability insurance necessary):

- Easy and self-made repair (changing a tyre, replacing a saddle)
- Safety relevant, but complex repair and therefore recommended to be done by a qualified independent bike dealer (changing stem or steering)
- Safety-relevant repair and therefore need to be performed by a certified entity (or even the manufacturer).

Furthermore, consumers should be entitled to have their goods repaired correctly. Therefore, a sound technical framework for repairing of products must be put in place; continued adherence to the European and international standards developed by the bicycle industry (referenced in key European legislation including the EU Machinery Directive and the EU General Product Safety Directive) should be ensured. If a clear framework for repair is lacking, repairing of products can lead to potentially unsafe situations during actual use.

We would like to use this opportunity to address a specific issue in regard to battery-containing products and vehicles. Batteries are electro-chemical devices and must fulfil a series of international, European and national safety requirements during their production, transport, storage, use and end-of-life management. Particularly important for lithium-ion battery safety are the so-called UN 38.3 type tests, which ensure that the product meets basic safety requirements. The tests range from altitude simulation tests to thermal and short circuit tests. Passing the UN 38.3 tests successfully will result in a certificate ensuring the type approval as long as all other pieces of the series are built in the same way using the same new components. Therefore, any operation that changes parts of battery packs – like cells or other safety-relevant parts like the BMS – will change the status of the battery as a type approved battery according to UN 38.3. For safety reasons, policy makers therefore must treat battery packs as spare parts for repairable products and not like repairable products themselves. Therefore, batteries should be excluded from a direct right to repair.

In addition to this, liability concerns should be considered when it comes to responsibility of producers for repaired products; the same applies to the issue of legal guarantees.

The bicycle industry is a strong supporter of measures that enhance sustainable consumption and repairability. However, safety of products must be an absolute priority in order to make sure that European consumers can enjoy the benefits of cycling - staying safe at all times.

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