



Compliance & Risks

Webinar

Consumer Electronics Compliance: *2024 Year in Review*

13th of November, 2024



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Q&A
Session

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Webinar
Recording



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Meet the Team



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Mission Statement

Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change

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Thermo
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GARMIN™



100K
+
Regulations

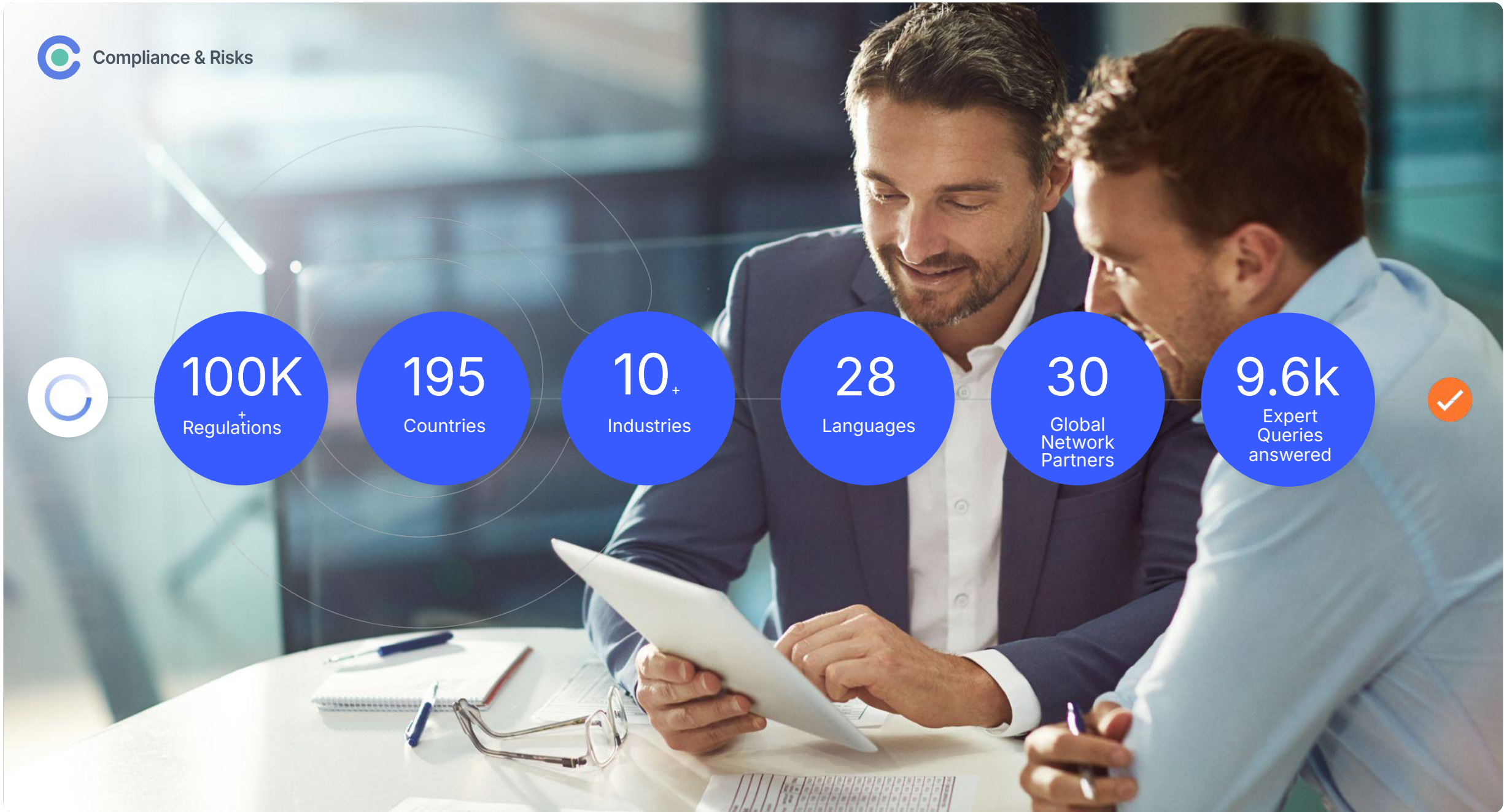
195
Countries

10
+
Industries

28
Languages

30
Global
Network
Partners

9.6k
Expert
Queries
answered



WHAT WE DO

Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.





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Consumer Electronics Compliance: **2024** *Year in Review*



Agenda

- 01. USA Right to Repair**
- 02. EU - Right to Repair for Consumers**
- 03. Directive (EU) 2024/825 on Empowering Consumers to the Green Transition**
- 04. EU Law on Liability for Defective Products**
- 05. Energy Efficiency and Ecodesign for Consumer Electronics**
- 06. Saudi Arabia Approving the Product Safety Law**
- 07. A Smarter Way to Manage Product Compliance**





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USA Right to Repair



Laws Approved in US States

California: Right to Repair Act, Senate Bill 244 (In force January 1, 2024)

- **Intended to provide a fair marketplace for the repair of *electronic and appliance products* - also to prohibit intentional barriers and limitations to third-party repair**
- **Electronic or appliance product** - a product manufactured sold or used in California, as described in subdivision (h), (i), (j), or (k) of Section 9801 of the Business and Professions Code:
 - **Electronic set** - television, radio, video camera, video game, computer system, photocopier, or fax machine used/sold for personal, family, household, or home office use, etc.
 - **Appliance or major home appliance** - refrigerator, freezer, range, microwave oven, washer, dryer, dishwasher, trash compactor, or room air-conditioner used/sold for personal, family, household, or home office use, or use in private motor vehicles
 - **Antennas and rotators used with antennas**
- Includes products sold to schools, businesses, local governments, or using other methods outside of direct retail sale

Laws Approved in US States

Oregon, Senate Bill 1596 (Entry into Force January 1, 2025)

Original equipment manufacturer (OEM) - make available to an owner (consumer) or an independent repair provider, on fair and reasonable terms, any documentation, tool, part or other device or implement that the OEM makes available to an authorized service provider for use in diagnosing, maintaining, repairing or updating covered equipment

First US state to outlaw "parts pairing" - prohibits software barriers used by electronics manufacturers to prevent or inhibit consumers, fixers, and repair pros from replacing parts

An OEM may not use *parts pairing* to:

- prevent or inhibit an independent repair provider or owner from installing or enabling functional replacement parts, this includes parts the OEM has not approved;
- reduce functionality or performance of consumer electronic equipment; or
- cause equipment to display misleading alerts/warnings that owner cannot immediately dismiss

Prohibition on *parts pairing* is intended to encourage harvesting of spare parts from defunct devices for use in other, salvageable devices - **crucial aspect of repairability**

The U.S. Proposed Fair Repair Act

USA: Digital Electronic Equipment Fair Repair Act, House Bill 8544 (Proposed in May 2024)

Original equipment manufacturer (OEM) - make available to any *independent repair provider* and *owner (consumer)* of digital electronic equipment, on *fair and reasonable terms*, any *documentation, parts, and tools* needed to *diagnose, maintain, or repair* digital electronic equipment and parts

Prohibition on the Use of Certain Parts - An original equipment manufacturer **shall not use** parts pairing or any other mechanism to -

- prevent the installation or functioning of any otherwise-functional part, including a non-manufacturer approved replacement part or component;
- inhibit or reduce the functioning of any part, such that replacement by an independent repair provider or the device owner would cause the device to operate with reduced functionality or performance;
- create false, misleading, deceptive, or non-dismissible alerts or warnings about parts;
- charge additional fees or increased prices for future repairs; or
- limit who can purchase parts or perform repair services.



EU - Right to Repair for Consumers



EU Right to Repair

Directive 2024/1799 on Common Rules Promoting the Repair of Goods *(In Force July 30, 2024)*

- Limited scope - goods purchased by consumers - applies to products for which the EU Ecodesign legislation lays down reparability requirements, i.e.
 - **washing machines**
 - **dishwashers**
 - **refrigerators**
 - **vacuum cleaners**
 - **electronic displays**
 - **mobile phones, cordless phones and slate tablets**
 - **welding equipment**
- Mandate the Repair of Goods for a defect **outside of legal guarantee period** of the seller
- Manufacturers make available free of charge information on their repair services in an easily accessible, clear and comprehensible manner

EU Right to Repair - Producer Requirements

The Repair shall be:

- carried out free of charge or for a reasonable price,
- repair is carried out within a reasonable time from the moment the manufacturer has physical possession of the good,
- manufacturer may provide the consumer with the loan of a replacement good,
- for impossible repair, a refurbished product may be offered.



EU Right to Repair - Producer Requirements

- Consumers must have access to list of prices for typical repair of products on a website
- Manufacturer cannot block the use of original or second-hand spare parts issued from 3D-printing, by independent repairers when those spare parts are in conformity
- Manufacturers cannot use any practices that hinder repair - such as contractual clauses, hardware or software techniques that impede the repair of goods unless justified
- Manufacturers cannot refuse a repair for the sole reason that a previous repair was performed on the product by another repairer



Timeline

EU Right to Repair

Entry into Force
30 July 2024

Publication
10 July 2024

Transposition by
Member States
31 July 2026

Operational
National Online
Platform
31 July 2027

Belgium Introduced a Product Repairability Index

Decree Determining the Terms and Conditions for Displaying the Index of Repairability on Goods (Published September 04, 2024)

Repairability Index - a score of 1 to 10 that indicates how easily a product can be repaired

The index will be mandatory for *dishwashers, vacuum cleaners, pressure washers, lawnmowers, laptops (except tablets)* and later also for *bicycles, electric bikes and electric steps*.

The Repairability Index Criteria:

- availability of technical repair information and maintenance manuals;
- ease of disassembly and necessary tools;
- availability of spare parts and delivery times;
- ratio between the price for replacement parts and the price of the new product;
- other specific criteria according to the product category.





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Directive (EU) 2024/825 on Empowering Consumers to the Green Transition



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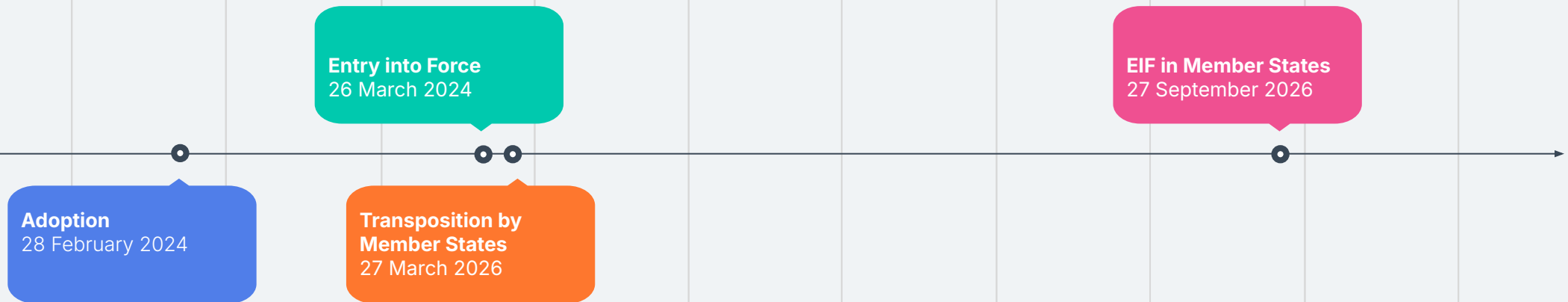
Amends Consumer Rights Directive and Unfair Commercial Practices Directive *(In Force March 26, 2024)*

Consumer Rights Directive - amended regarding misleading or unfair commercial practices and actions to include false information in relation to environmental or social characteristics of the product and its circularity aspects, such as durability, reparability or recyclability.

- Prohibiting the presentation of products as allowing repair when *such repair is not possible*.
- Provide consumers with information on the existence and the conditions of after-sales services, including repair services, where such services are provided
- Information about the availability, estimated cost and procedure for ordering spare parts that are necessary to keep the goods in conformity, the availability of repair and maintenance instructions and repair restrictions
- Provide consumers with pre-contractual information about durability, reparability and the availability of updates. Information should be provided to consumers in a clear and comprehensible manner and in line with the accessibility requirements of Directive (EU) 2019/882.

Timeline

Directive (EU) 2024/825 on Empowering Consumers to the Green Transition





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EU Law on Liability for Defective Products



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EU Directive on liability for defective products

Directive on liability for defective products and repealing Council Directive 85/374/EEC (Adopted October 10, 2024)

Specific provisions on liability for defective products

- Right to compensation
- Damage
- Defectiveness
- Economic operators liable for defective products
- Disclosure of evidence
- Burden of proof
- Exemption from liability

EU Directive on liability for defective products

Directive on liability for defective products and repealing Council Directive 85/374/EEC (Adopted October 10, 2024)

Liability Expiry Period

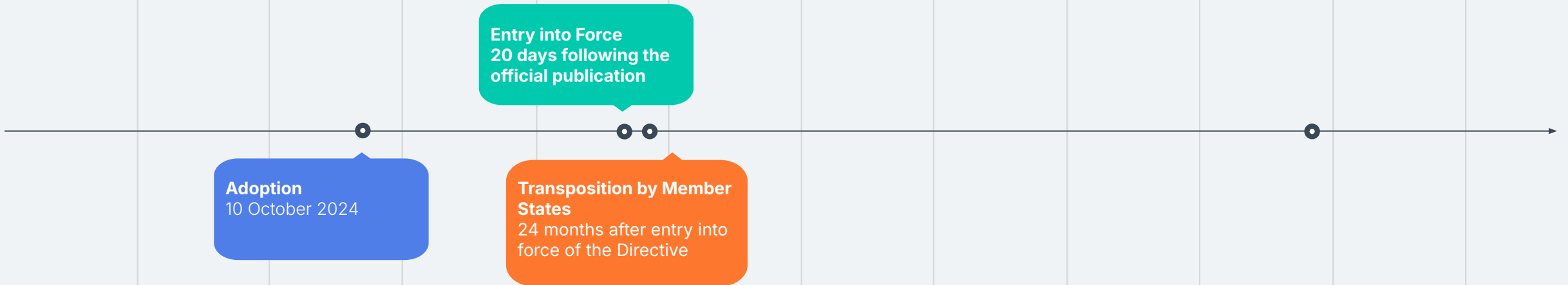
- 10 years from the placing on the market or putting into service of a product (the 'expiry period')
- 25 years in cases where the symptoms of a personal injury are, according to medical evidence, slow to emerge

Derogation from Development Risk Defence

Member States may maintain in their legal systems existing measures whereby economic operators are liable even if they prove that the objective state of scientific and technical knowledge at the time the product was placed on the market or put into service or during the period in which the product was within the manufacturer's control was not such that the defectiveness could be discovered.

Timeline

Directive on Liability for Defective Products





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Energy Efficiency and Ecodesign for Consumer Electronics



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Ukraine: Ecodesign Requirements for Electronic Displays

Technical Regulations on Ecodesign Requirements for Electronic Displays (Published August 22, 2024)

Products covered - electronic displays, including:

- televisions,
- monitors and
- digital signage displays.

Technical Regulations shall not apply to the following:

- any electronic display with a screen area smaller than or equal to 100 square centimetres;
- projectors;
- all-in-one video conference systems;
- medical displays;
- virtual reality headsets, etc

Ukraine: Ecodesign Requirements for Electronic Displays

Technical Regulations on Ecodesign Requirements for Electronic Displays, Resolution No. 949 (Published August 22, 2024)

Ecodesign Requirements

- energy efficiency requirements
- allowances and adjustments for the purpose of the EEI calculation and functional requirements
- Off mode, Standby and Networked standby mode requirements
- material efficiency requirements
- information availability requirements

Conformity Assessment - carried out based on the internal design control procedure, including the necessary technical documentation

The manufacturer shall not place on the market products designed to be able to detect they are being tested and to react specifically by automatically altering their performance during the test with the aim of reaching a more favourable level

Timeline

Technical Regulations on Ecodesign Requirements for Electronic Displays

Entry into Force
Simultaneously with the entry into force of the resolution on the recognition as invalid of the Resolution No. 359 "On the approval of the Technical Regulations for Energy Labelling of TVs

Stage 2 Requirements
After 2 years from the date of entry into force of the Technical Regulation

Publication
22 August 2024

State 1 Requirements
From the date of entry into force

Georgia: Energy Labelling of Electronic Screens

Technical Regulation on the Rules for Energy Labelling of Electronic Screens, Resolution No. 322, 2024 (Approved, coming into force on December 31, 2025)

Requirements for the labelling and presentation of additional information about electronic screens, including TVs, monitors and digital touch screens

Suppliers are required to ensure that:

- each electronic screen is accompanied by a printed label;
- the product information sheet is available free of charge in electronic format;
- the product information sheet is available in printed format, free of charge, upon the dealer's request,
- in any technical advertising material of a specific model of an electronic screen, provide information on the energy efficiency class of the model and the efficiency available on the label;
- the electronic label of the format and information is supplied to dealers for each electronic display model registered in the EU product database.



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Saudi Arabia Approving the Product Safety Law



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Saudi Arabia: Product Safety Law

Royal Decree No. M/36, 2024 approving the Law on Product Safety System (Approved, coming into force on November 14, 2024)

Public Safety Obligations

Prohibition on Unsafe Products: the manufacture, import, marketing, trading, or advertising of unsafe products is strictly prohibited.

Safety Criteria: a product is deemed safe if it poses no risk under normal use or if any risks are acceptable and comply with specified safety levels and technical regulations.

Compliance Responsibility: manufacturers, authorized representatives, and importers are accountable for ensuring that their products meet safety standards and technical regulations before they are made available in the market.

Saudi Arabia: Product Safety Law

Royal Decree No. M/36, 2024 approving the Law on Product Safety System (Approved, coming into force on November 14, 2024)

Manufacturer Obligations

- **Ensure Safety:** Manufacturers must ensure that products are safe or presumed safe before they are released into the market.
- **Compliance with Technical Regulations:** Products must fully adhere to the applicable technical regulations and safety standards.
- **Risk Assessment:** Manufacturers are required to conduct a thorough evaluation of potential risks associated with their products to ensure appropriate risk mitigation.
- **Proof of Safety:** When requested by authorities, manufacturers must provide evidence of the product's safety, including relevant specifications and compliance documents.
- **Corrective Actions:** Manufacturers must be ready to take necessary corrective actions, clearly outlining their responsibilities and duties.

Saudi Arabia: Product Safety Law

Royal Decree No. M/36, 2024 approving the Law on Product Safety System (Approved, coming into force on November 14, 2024)

Product Information and Traceability

- **Marking and Labelling:** Manufacturers are required to label products with their trademarks and contact information, including the manufacturer's name and identification details.
- **Data Management:** Manufacturers are responsible for the development and maintenance of this data, ensuring accurate and up-to-date information is available.

Monitoring and Corrective Measures

- **Awareness of Risks:** Even after products are introduced to the market, manufacturers must stay vigilant about any emerging risks.
- **Taking Corrective Measures:** If risks are identified, manufacturers must take appropriate actions, such as notifying consumers or initiating product recalls.



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Holistic Market Access Solutions

A Smarter Way to Manage Product Compliance



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Supporting Your Product Compliance Journey



Identify Relevant Regulations



Upcoming & Proposed Regulatory Changes



Communicate Compliance Requirements

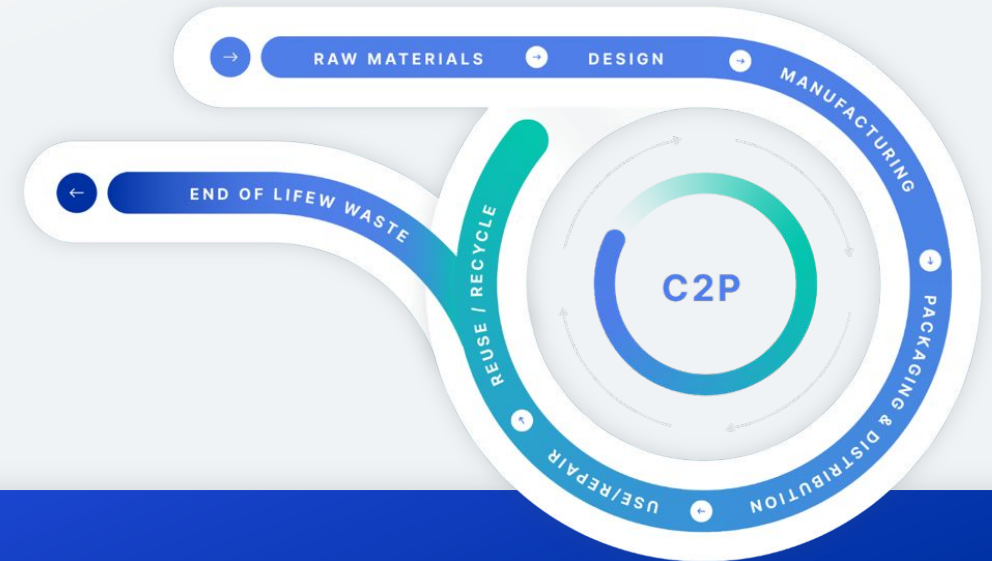


Manage Evidence Documentation



Extensive Regulatory Content Coverage

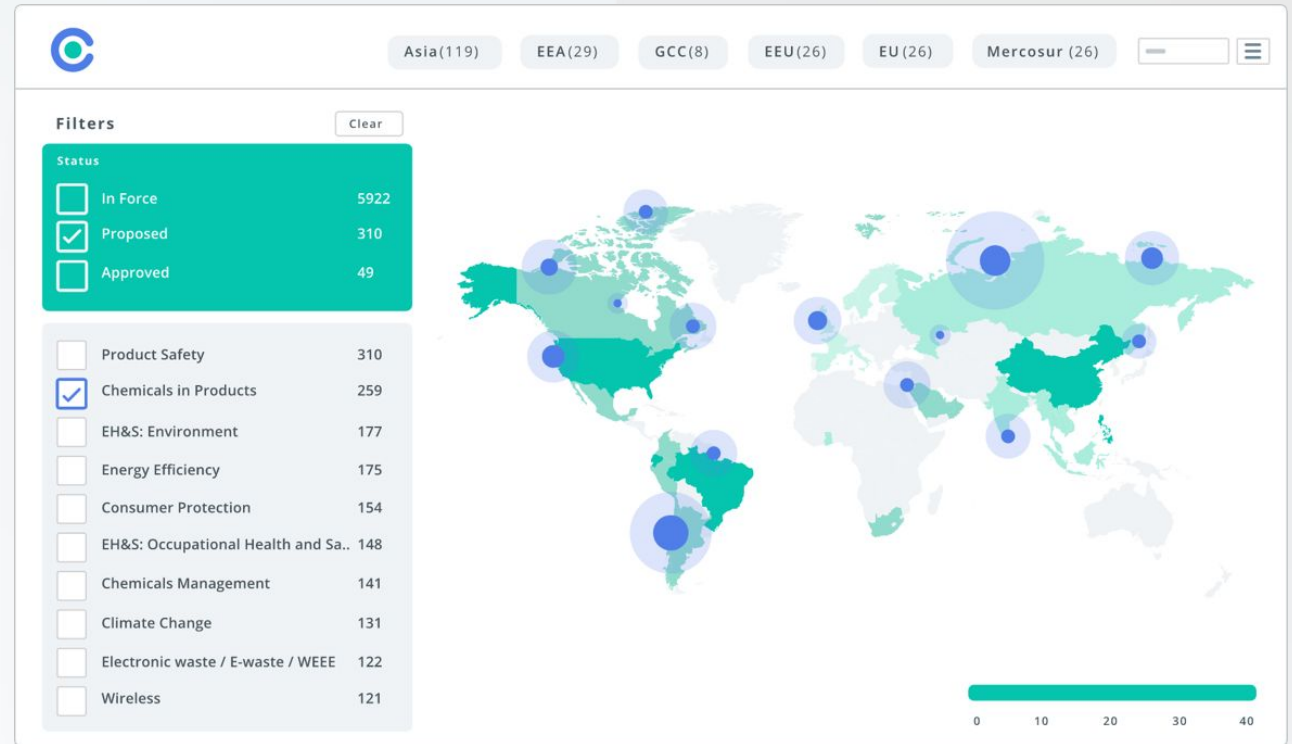
With C2P you have access to **100,000+** regulations, Standards & Product Requirements that enable you to gain and maintain market access for all your products globally.



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- Batteries
- Brexit
- California Proposition 65
- Carbon Footprint
- Chemicals in Products
- Chemicals Management
- Circular Economy
- Climate Change
- Conflict Minerals
- Consumer Protection
- COVID-19
- Cybersecurity
- Data Protection
- Drinking Water
- Ecodesign
- Ecolabeling
- Electromagnetic Compatibility (EMC)
- Electronic Waste / E-Waste / WEEE
- Energy Efficiency
- Explosive Atmospheres / ATEX
- EU Reach
- Food Contact Materials and Articles
- Globally Harmonized System (GHS)
- Illegal Logging
- Nanotechnology
- Packaging
- Product Safety
- Single-use Plastics
- Transboundary Movement of Hazardous Waste
- Transport of Dangerous Goods
- Water Efficiency
- Wireless

Manage all your Product Compliance in One Place...

- Design, build & collaborate on new products with confidence
- Keep all [compliance evidence](#) up to date & [live linked](#) back to their Regulations, Standards & Requirements
- Continually [monitor regulatory changes](#) & [keep ahead of proposed changes](#) before they happen



Industry Coverage



Consumer Electronics



Apparel



Household Appliances



Medical Devices



Home Furnishings



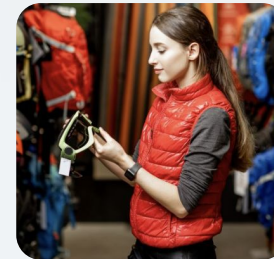
Automotive



Textile Manufacturing



Power Tools & Garden Machinery



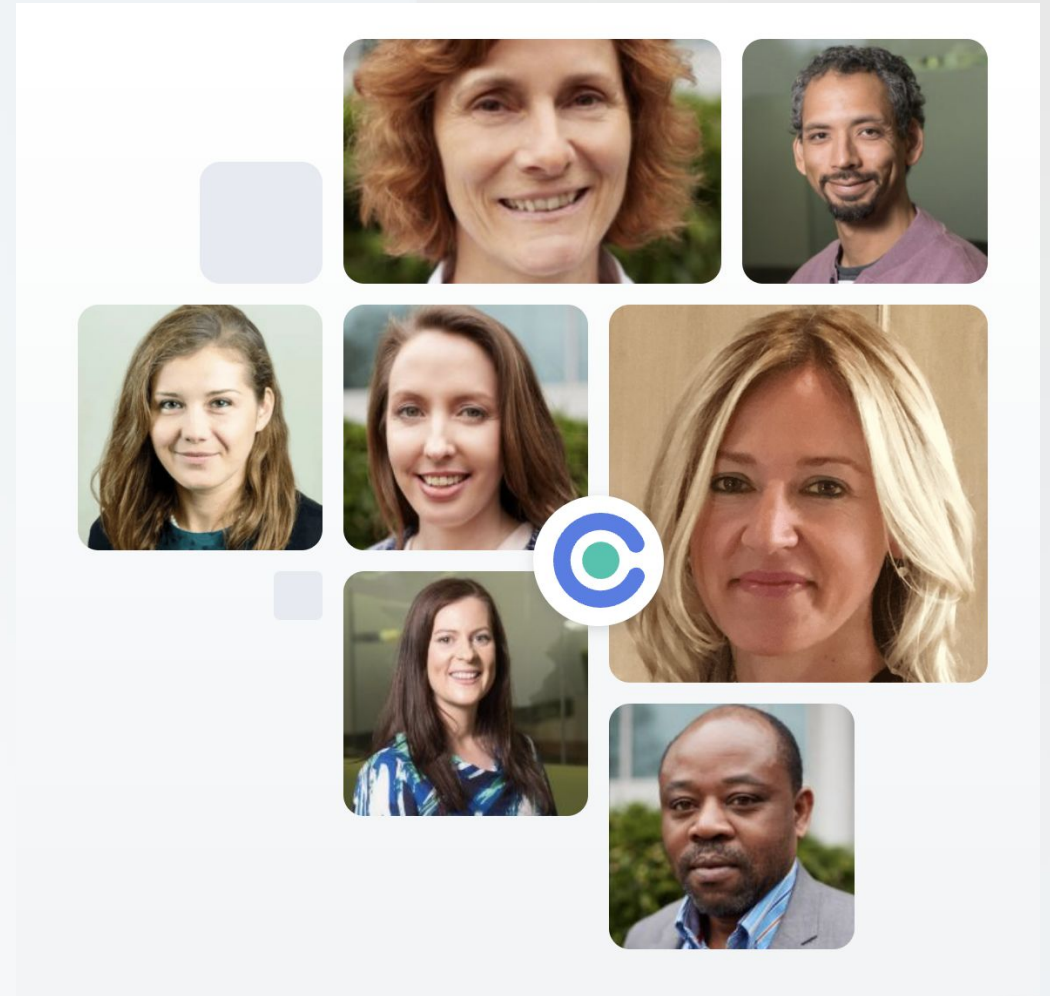
Leisure & Sporting Equipment



General & Online Retailers

Ask our Experts at the click of a button...

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- Extensive Knowledge Partner network
- Expertise across products, geographies & policy areas
- Addressing questions on laws & regulations including purpose, applicability, requirements highlights & more.



Questions?



Lets Talk



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