

6th September 2023

Re: Consultation on the Rules Promoting the Repair of Goods Directive

Sent via email: conspol@enterprise.gov.ie

Dear Sir/Madam,

Bord Gáis Energy (BGE) welcomes the opportunity to respond to this consultation. We support the need to ensure the lifecycle of a product is maximised and are keen to play our part, by ensuring cooperation with this Directive.

After a thorough examination of the proposed Directive, we have formulated the following response:

Scope of the Directive

BGE currently offer servicing and installation of oil boilers, gas boilers and heat pumps. Additionally, we offer energy efficiency solutions for customers with regards to solar panel technology. BGE also focus on the sale of 'Hive' products which are a collection of smart home technologies. These include hive smart lighting, smart plugs, smart sensors, and smart thermostats.

After thorough examination of the proposed Directive, Bord Gais Energy are of the view that the entirety of the Directive relates to all goods, as defined in Article 2(5) of Directive (EU) 2019/771 except for water, gas and electricity. BGE are of the belief that this legislative Act relates to any products fitting this definition.

However, the specific repair obligation element only relates to product groups associated with Annex II only. Article 5(1) sets limits on when and what needs to be repaired. It says that things should only be repaired if there are rules about how they can be fixed in laws from the Union. These rules are listed in Annex II of this Directive. Thus, any equipment not meeting these definitions do not have to comply with the repair requirement. It is BGE view that our product range does not currently meet the product groupings referred to in Annex II. We kindly request clarification on this point and would appreciate guidance if an alternative interpretation is applicable?

Repair Platform

Article 7 stipulates that member states should establish an online platform for consumers to find repairers, including search functions for goods, repair conditions, and quality standards. BGE would like to clarify if this relates to all goods or only those referred to in Annex II? BGE would welcome any further engagement/consultation on the development of the platform, as we can see a potential benefit in its scope being strengthened, to envelop a broader range of repair services than those referenced in Annex II.

We hope that you find our response to this consultation useful and would be happy to discuss our views and queries further. If you require any further detail or clarification, please feel free to contact me.

Yours Sincerely,

Donal Hynes

Regulatory Analyst, Bord Gáis Energy