

**Décret relatif aux conditions d'utilisation des termes « reconditionné »  
et « produit reconditionné »** Notification: 2021/0030/F

Contribution from the European Remanufacturing Council

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The **European Remanufacturing Council** welcomes the intention in this proposal to clarify the provenance of some pre-owned electrical equipment.

In the B2B (Business to Business) market, a similar need led to the adoption of national and international standards for remanufacturing. These standards are available from:

- BSI (8887:220)
- ISO (8887)
- SAC (GB/T 28619 2012)
- ANSI (RIC 001.1 2016) and
- CEN (EN45553:2020).

It seems likely that the current draft ISO 59000 standard for the Circular Economy will, in due course, include definitions relating to the several processes that are categorized under 'product life extension'.

The proposed adoption and promotion of the term 'reconditioning' is not unreasonable since it is already in use in a few B2B sectors, such as the rail industry. Our own view is that remanufacturing has been adopted globally and has been defined, whereas other terms such as refurbishment, reconditioning, overhaul, rebuilt – when not used as synonyms for remanufacture – are less well specified. Nevertheless, we are supportive of organizations that seek to extend the life of products and aim to do so in an honest, transparent, and safe manner.

The market is already adopting a schedule of terms to communicate the different grades of quality, beginning with 'as new'. We would discourage the banning of a reference to 'as new' since some companies wish to return pre-owned electrical products to an 'as new' condition with a warranty to match. This high standard of value retention is being achieved in the B2B market and in some cases in the B2C market. We hope to see this market grow in the future through appropriate fiscal, regulatory and policy developments.

The French Government is recognized as being a leading regulator for the development of the circular economy. If there are future plans to develop the market for consumer and business products that have been reconditioned, remanufactured, refurbished, overhauled and rebuilt, we would be delighted to be included in its list of consultees.

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