

## WHAT ABOUT REMANUFACTURING REGULATION ?

Currently, there are no specific regulations exclusively dedicated to remanufacturing. However, several existing legal frameworks support and encourage its development. This article aims to provide a non-exhaustive overview of these regulations at the international, European, and national levels. To begin with, it is essential to understand that waste regulation is closely linked to the circular economy. Before a product can be remanufactured or repackaged, it is typically classified as waste. The management of this waste is governed by key legal instruments at both international and European levels.

### INTERNATIONAL LEVEL – THE BASEL CONVENTION

The Basel Convention, established under the United Nations, regulates the transboundary movement of hazardous waste and classifies materials as hazardous waste, non-hazardous waste, or non-waste. It also defines two main categories of waste treatment :

- Final disposal without recovery
- Operation for waste recovery



BASEL CONVENTION

On May 25, 2023, Annex IV of the Convention was updated to formally recognize remanufacturing as a recovery operation. Two new official recovery codes were introduced :

- “R14 – Preparation for re-use (e.g. checking, cleaning, repair, remanufacturing)” and
- “R16 “Repackaging prior to submission to any of the operations in Section B”

This recognition is particularly relevant for suppliers of old cores and supports the integration of remanufacturing into international recovery practices.



### EUROPEAN LEVEL

Directive 2018/851 amends Framework Directive 2008/98/EC and reinforces the EU waste hierarchy, which includes preparation for reuse, recycling, and other forms of recovery. It also provides definitions for reuse, recovery, preparation for reuse, and recycling.

Although remanufacturing is not explicitly mentioned, the directive reflects a broader trend toward incorporating circular economy principles into EU legislation.

The Directive “Right to Repair (R2R), adopted on June 13, 2024, and effective from July 30, 2024, aims to facilitate product repair and reduce waste. Member States are required to transpose it into national law by July 31, 2026.

Key measures include:

- Access to spare parts at reasonable prices
- Clear consumer information about available repair services
- Extension of the legal guarantee by one year when consumers choose to repair rather than replace a product under warranty
- National initiatives to promote repair culture

### OTHER RELEVANT EUROPEAN REGULATIONS

The Directive, which is part of the EU’s Circular Economy Action Plan is one of the multiple existing legislations that collectively aim at extending the lifetime of consumer products.

- Ecodesign Directive (to be replaced by the Ecodesign for Sustainable Products Regulation) Promotes repair-friendly product design and requires the availability of spare parts.
- Directive (EU) 2024/825 on Empowering Consumers in the Green Transition. Aims to provide consumers with clear and accessible information on the durability and reparability of goods at the point of sale
- Corporate Sustainability Reporting Directive (CSRD). Encourages companies to adopt more sustainable practices, including transparency on environmental impacts—indirectly supporting remanufacturing efforts.

## AT NATIONAL LEVEL (France)

At the national level (France only), several regulations are in place.

- REP « Responsabilité élargie des producteurs »/Polluter pays Principle This regulation is recognised in the Waste European Framework Directive. The principle is simple: the producer, distributor, or product importer must manage the product at the end of its life. They are responsible for financing, organising, and implementing the collection, reuse, or appropriate recycling solutions for their products.
- Loi lutte anti-gaspillage et économie circulaire (AGEC): (Anti-waste and circular economy French legislation) This law aims to accelerate the transition towards more sustainable production and consumption models, in order to reduce waste and preserve natural resources, biodiversity, and the climate. Five main themes have been identified:
  - Phasing out single-use plastics
  - Providing better information to consumers
  - Fighting waste and promoting solidarity-based reuse
  - Combating planned obsolescence
  - Producing better



Regarding remanufacturing, as with the Directive on common rules to promote the repair of goods, manufacturers must provide consumers with information about the reparability of products and the availability of spare parts.

Repairers are now required to offer alternative spare parts from the circular economy when available.

- French decree 17/02/2022 on the use of the word « repackaged » and « repackaged » product This decree defines the use of the terms “repackaged” and “repackaged product”.

**IMPORTANT :** (extract from the text) : To this end, it reserves the use of these terms for second-hand products and specifies the conditions under which they may be used, with regard to the carrying out of tests, or even the requirement of one or more technical interventions, to ensure the safety and functionality of the product. In addition, to prevent consumers from being misled about the characteristics of a reconditioned product, this decree prohibits any reference to a new product and reserves the use of the words ‘reconditioned in France’ for reconditioning operations carried out entirely within France. These rules also apply to spare parts.

## CONCLUSION

**Although there is still no unified or specific regulation focused only on remanufacturing, both national and European frameworks increasingly promote circularity and product reparability.**

**The trend is clearly moving toward encouraging longer product lifespans through repair, reuse, and remanufacturing. The upcoming implementation of the Right to Repair Directive across EU Member States by 2026 will be a key milestone to watch.**

## FOLLOW REMANUFACTURING TRENDS

Moreover, several international associations continue to advocate for remanufacturing and represent key industry players in regulatory discussions—helping to shape future policy and reinforce the role of remanufacturing in the circular economy.

- Association European Remanufacturing Network – [www.remanufacturing.eu](http://www.remanufacturing.eu)
- Automotive Parts Remanufacturers Association (APRA) – <https://apra.org>
- European Remanufacturing Council – [www.europeanreman.eu](http://www.europeanreman.eu)
- France Auto Reman – [www.franceautoreman.com](http://www.franceautoreman.com)