



RIGHT TO REPAIR

For the attention of the European Commissioners:
President Ursula von der Leyen
First Executive Vice-President Frans Timmermans
Executive Vice-President Margrethe Vestager
Commissioner Kadri Simson
Commissioner Thierry Breton
Commissioner Virginijus Sinkevičius

Europe: A market for sustainable smartphones

Brussels, 12 February 2020

We call on you to include smartphones and other ICT devices as priority products in the Ecodesign Work Plan 2020-2024, and to confirm this commitment in the Circular Economy Action Plan.

Smartphones and other consumer electronics have rapidly become one of Europe's most wasteful, resource and carbon intensive product groups. The annual climate impact of Europe's stock of over 600 million smartphones is more than 14 million tonnes of CO₂ equivalent, which is more than the annual emissions of Latvia.¹

Due to energy intensive processes and rare metals involved, some 80% of the direct climate impact of smartphones results from the manufacturing stage². Moreover, smartphones tend to have a much shorter lifetime than other household electronics, with the average phone lasting a mere three years before being replaced. This results in more than six new phones being bought in the EU every second.³

The supply chain of ICT is notoriously problematic. Social and environmental dumping are foundations of disposable technology. Precarious employment and exposure to pollutants can be observed in extraction, assembly and waste management linked to the electronics industry across the globe. In Europe, consumers are frustrated with the short lifetimes of devices, and European businesses working in value retention (repair, refurbishment, and reuse) face unnecessary barriers.

Our own analysis⁴, confirmed by a subsequent study led by the European Economic and Social Committee⁵, has shown that extending the lifetime of Europe's smartphones by just one year would save 2.1 million tonnes of CO₂ equivalents annually, which is comparable to taking one million cars off the roads.

¹ <https://eeb.org/library/coolproducts-report/https://ec.europa.eu/eurostat/statistics-explained/pdfscache/1180.pdf>

² The manufacturing stage of iPhone 11 accounts for 83% of its total climate impact, for instance https://images.apple.com/environment/pdf/products/iphone/iPhone_11_Pro_PER_sept2019.pdf

³ <https://eeb.org/library/coolproducts-report/>

⁴ ibid (check Coolproducts report)

⁵ https://www.ceps.eu/wp-content/uploads/2019/11/impact_of_ce_on_fmccg_-_mobile_phones_case_study.pdf

The ecodesign framework⁶ is the best available instrument to increase the lifetime and improve the sustainability of smartphones. The recent inclusion of repair provisions for household appliances under ecodesign has set a welcome precedent to build on and should be extended to other products. While including smartphones and other ICT products was already considered in the 2016-2019 Ecodesign Work Plan⁷, it has regrettably not led to any concrete initiatives.⁸ This lack of regulatory action was criticised by the European Parliament in the past⁹ and once again in its response to the European Green Deal communication¹⁰. Addressing the environmental impact of electronics has, furthermore, been highlighted as a crucial future development by the Council in its recent Conclusions on circular economy.¹¹

The European Green Deal includes the ambition to improve the circular performance of electronics, supporting reparability and curbing “built-in” obsolescence. This sets a necessary tone for policy, but it should be stressed that these objectives will not be met through take-back schemes or recycling targets which will fail to address the underlying drivers of waste. Likewise, voluntary approaches that have been tried in the past are unlikely to achieve the desired results as they continue to perform badly for other products - most notably printers and set top boxes.

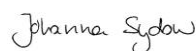
This is why we ask for the universal right to repair, requiring manufacturers to make repairable devices, provide access to spare parts, repair information and long-term security updates to all repairers and consumers. Europe must establish ambitious and robust ecodesign requirements for consumer ICT products, starting with a commitment on smartphones as the most urgent product in need of regulation.

On behalf of over 38 NGOs across Europe, we urge you to **commit to the swift development of minimum requirements for the design and after-sales support of smartphones, duly reflecting this in the forthcoming Circular Economy Action Plan as well as the Ecodesign Work Plan 2020-2024**. This should, furthermore, be part of a **broader strategy** aimed at encouraging reuse, repair, and remanufacturing activities in support of the EU’s climate objectives, with other ICT products (e.g. computers, printers and data centres, as well as smaller devices such as e-readers, tablets, and speakers) being addressed as a priority.

Yours sincerely,



Ugo Vallauri, Co-Founder & Policy Lead, The Restart Project



Johanna Sydow, Chairwomen, Runder Tisch Reparatur



Justin Wilkes, Executive Director, ECOS



Matthias Huisken, Executive Director, Ifixit Europe



Jeremy Wates, Secretary General, EEB

⁶ Ecodesign Directive 2009/125/EC and Energy Labelling Regulation (EU) 2017/1369

⁷ https://ec.europa.eu/energy/sites/ener/files/documents/com_2016_773.en.pdf

⁸ See also the letter to Commissioner Elżbieta Bieńkowska on 9 April 2019 and signed by ECOS, where the shortcomings of the approach to the implementation of the Ecodesign Working Plan are highlighted in further detail

⁹ https://www.europarl.europa.eu/doceo/document/A-8-2018-0165_EN.pdf

¹⁰ http://www.europarl.europa.eu/doceo/document/B-9-2020-0044_EN.html

¹¹ <https://www.consilium.europa.eu/media/40928/st12791-en19.pdf>

Signatories:

Anstiftung (Germany)
Association for Waste Prevention (Austria)
Catapa (Belgium)
Climate Action Network Europe (EU)
Deutscher Naturschutzring (Germany)
DUH - Environmental Action Germany (Germany)
ECOS (EU)
European Environmental Bureau (EU)
eReuse (Spain)
Ethikis Ad Civis (France)
Fair Danmark (Danmark)
Free ICT Europe (EU)
Friends of the Earth Norway (Norway)
Friends of the Earth Europe (EU)
Giacimenti Urbani (Italy)
Germanwatch (Germany)
Green Alliance (UK)
Halte à l'Obsolescence Programmée (France)
Ifixit (Germany)
Natuur & Milieu (Netherlands)
Netwerk Bewust Verbruiken (Belgium)
Netzwerk Reparatur-Initiativen (Germany)
Polish Institute for Circular Economy (Poland)
Repairably (Slovakia)
Repair Café Danmark (Danmark)
Repair Café International Foundation (Netherlands)
Repair Café France (France)
Repair & Share (Belgium)
Repair Together (Belgium)
Repanet (Austria)
Reparaturnetzwerk Wien (Austria)
Restarters Norway (Norway)
Reuse (EU)
Runder Tisch Reparatur (Germany)
Test Achats-Test Aankoop (Belgium)
The Restart Project (UK)
Zero Waste Europe (EU)
Zero Waste Poland (Poland)