To:
Frans Timmermans - First Vice-President of the European Commission and European Commissioner for European Green Deal
Kadri Simson - Commissioner for Energy
Thierry Breton - Commissioner for Internal Market
Virginijus Sinkevičius - Commissioner for Environment, Oceans and Fisheries

We need to extend the lifetime of all electronics

A call for horizontal ecodesign requirements to improve the material efficiency of electronic products

Brussels, July 2023

Dear Commissioners Frans Timmermans, Kadri Simson, Thierry Breton, and Virginijus Sinkevičius,

It is time for the European Commission to kickstart the development of horizontal resource efficiency ecodesign requirements for electrical and electronic equipment, starting with ICT and other electronics. We, the co-signatories of this letter (33 European, national, and local organisations representing community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, and environmental NGOs), call for this to happen before the end of the year.

Certain consumer electronics and ICT products that fall under the conventional scope of ecodesign have not been taken forward in the Commission's Ecodesign and Energy Labelling Working Plan 2022-2024. Nor were they incorporated into the public consultation on 'New product priorities for Ecodesign for Sustainable Products'. As a result, these products will fall through the gaps. Unregulated, their potential environmental gains will remain untapped for the foreseeable future.

We urge the Commission to follow the European Parliament's lead by urgently tackling the footprint of ICT products. By voting for an environmentally ambitious Ecodesign for Sustainable Products Regulation (ESPR) on 12 July, the Parliament signalled its support for prioritising, among other things, ICT products and electronics in the 2024-2027 Ecodesign Working Plan. Their call is supported by new research, which shows that ICT should be among the top priority product groups for horizontal ecodesign measures (JRC, ICT Task Force study: Final Report). This research also outlines what such requirements could look like.

The Commission currently applies a vertical approach to material efficiency under ecodesign, meaning that requirements are developed product by product. Such requirements already exist for displays, servers and data storage products, washing machines, dishwashers and fridges. Soon, they will also exist for mobile phones and tablets. This approach is too time-consuming and fails to sufficiently address urgent environmental problems connected to e-waste. With growth rates 3 times faster than that of the world's population, this waste stream is the fastest growing in the world. The Commission itself, in its Ecodesign Working Plan 2022-2024, has estimated

that systematically considering durability, firmware and software aspects in ecodesign requirements for energy related products would result in at least 175 PJ in energy saving – equivalent to unplugging 412 million televisions. Products that are long-lasting and repairable would eventually mean less demand for critical resources and energy used to manufacture them, therefore lowering their environmental impact and reinforcing Europe's strategic autonomy.

Fundamental and horizontal requirements for reliability, repairability, reusability and recyclability can and must be implemented much faster. All products being sold to end-users or to professionals should be designed to last and to be repaired multiple times before being discarded. Repair should be accessible, affordable, and mainstream. We want a universal right to repair, and we want everyone to be able to access low-cost spare parts and repair manuals for a product's entire lifetime. As well as this, the purchase of second-hand electronics must be promoted.

The Commission can achieve this by kickstarting the development of a horizontal measure on resource efficiency for electrical and electronic equipment - especially covering the ICT product group. We provide suggestions in the annex to this letter.

For more information, please reach out to Mathieu Rama (mathieu.rama@ecostandard.org)

ANNEX - Horizontal resource efficiency ecodesign requirements for electrical and electronic equipment - especially covering the ICT product group

We suggest the following rules:

Durability:
- Protection against damage if knocked. Devices should pass a knocking test, using for example standard IEC 62841-1:2014, and still retain full functionality.
- Capacity of batteries should not decrease significantly during use. We suggest devices must enable a minimum of 1,000 charging cycles without losing more than 80% capacity.
- All sold devices must be labelled with an expected lifetime.

Repairability and reusability:
- Manufacturers must give information on the replaceable spare parts that compose their products and provide access to end-users for a minimum number of years (we suggest at least 10 years). Parts should be delivered to anyone who asks for them within a minimum number of working days (we suggest 5 working days).
- Manufacturers must provide access to information on the maximum price of spare parts and ensure that the price of these parts does not exceed 30% of the price of the product when purchased new.
- Software techniques that prevent the replacement of spare parts, or the usage of third-party spare parts or consumables, must be banned.
- Provide free access to all repair manuals and information (also accessible by manufacturer's repair services).
- Limit fastening to a limited number of techniques that allow non-destructive disassembly of products.
- Mandatory safe data deletion functions that can be operated by the end-user whilst safeguarding the reusability of the data storage product.
- Software updates available for a minimum number of years (we suggest at least 10 years). Updates must ensure safe use of the device without limiting its functionality.

Recyclability:
- For casing and large-sized parts made from plastic, uniform polymers should preferably be used and parts should be labelled with recycling codes.

Raw materials and use of recycled materials:
- Mandatory minimum recycled content to be determined for type of material used
- For all devices, information on the raw materials used, recycled content, and countries of origin of primary raw materials must be publicly available.

Standardisation:

- The device must be deliverable without accessories (such as chargers or batteries) in order to enable users to put together deliveries tailored to their needs and reduce resource consumption.
- Standardisation must be extended to important wearing and spare parts such as batteries, displays, switches, connecting elements, handles, accessories, lids, etc.

End-of-life:

- Retailers must give clearly visible information on the take-back of devices in operating instructions, in product advertising on the internet, and in the purchasing process for direct sales.

Further information can be found in the new report 'ICT: A top horizontal priority in Sustainable Product Policy'. The report calls attention to the need for ICT products to be prioritised in ESPR and Ecodesign by demonstrating significant material impacts in a number of broad product groupings that have yet to be properly addressed.