

EUREFAS - The European Refurbishment Association statement on the Directive on common rules promoting the repair of goods.

Brussels, 24 March 2023

The European Refurbishment Association (EUREFAS) welcomes yesterday's publication of the Directive on common rules promoting the repair of goods. Our 18 members are all committed to promoting sustainable choices for consumer electronics. In order to support that, consumer legislation needs to not only recognise but promote refurbishment and repair to foster more consumer trust. The proposal is a step in the right direction as it will allow consumers to have more confidence in the repair sector, and nudge them to make more sustainable choices.

Our Association is committed to helping make the "European Repair Information Form" and national "Online platforms for repair and goods subject to refurbishment" easily usable by second-hand economic actors.

EUREFAS encourages EU policy makers to go further in regards to:

- The creation of a universal right to repair to ensure that every consumer can get their devices repaired wherever they want, at any point in time during its use.
- Ensure the European product policy framework prohibits producers from restricting independent repairs through limiting practices such as component serialisation and software pairing. Such a ban would have tremendous effects on consumers' ability to seek repair from the provider of their choice.
- Ensuring a level playing field between independent refurbishers or repairers with manufacturers. For example, refusing to perform a repair on a product that has previously been repaired in another professional network shall be made illegal to strengthen consumer's confidence in the repair and refurbishment market.

It is essential to incentivise producers to design their products with repairability in mind, however making repair the primary recourse may not always be the solution. For second-hand or refurbished products, repair is not always economically viable nor is it possible (for example because spare parts are no longer available). In such cases, it would be disproportionate and unrealistic to require the refurbisher to repair.

"To meet consumer demand for more sustainable options, we need to ensure devices are more repairable in the first place. The growing success of the refurbishment sector in Europe shows consumer appetite for quality second-hand devices. In fact, a refurbished smartphone saves up to



50kg of CO2! But to foster our virtuous activity, all stakeholders' contribution is needed, including manufacturers', for consumers to be able to understand not only the impact of their choices when it comes to sustainability and electronics, but to be rightfully nudged into making green choices. We need to ensure consumers get access to affordable repairs beyond the legal warranty period and that manufacturers are barred from deploying techniques that prevent refurbishment and repairs by independent service providers", says Augustin Becquet, President of EUREFAS.

As EUREFAS members committed to promote high quality and reliable products to consumers in their 2022 Pledge (link), this goal will be only feasible if the legislator undertakes the same commitment by allowing the repair and refurbishment of consumer electronics to properly develop in accordance with the Green Deal objectives. Only by fostering a competitive and strong European repair and refurbishment industry can we participate in achieving a true and universal right to repair for all consumers.

About EUREFAS:

The European Refurbishment Association (EUREFAS) aims to represent the IT refurbishment sector, in particular smartphones, including high-profile companies operating on technology, buyback, refurbishment and sale of second-hand high-tech devices. The association's main mission is to build a circular economy and to advocate and promote the interests of the sector across the European Union. Eurefas is driven by sustainability values and aims to play a significant role in shaping a greener world. Find out more at www.eurefas.com.

Eurefas has signed the transparency register of the European institutions under the number: 332404341982-26 and is thus committed to fully comply with its code of conduct while engaging vis à vis the EU officials.

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¹ Based on a typical two-year lifespan of a refurbished smartphone - 2022 study by the French Agency for Ecological Transition (<u>ADEME</u>): https://librairie.ademe.fr/dechets-economie-circulaire/5241-evaluation-de-l-impact-environnemental-d-un-ensemble-de-produits-reconditionnes.html