

# EUREFAS's Position Paper on the Review of the Ecodesign and Energy Labelling Requirements for Electronic Displays

## Executive Summary

EUREFAS appreciates the opportunity to contribute to the public consultation on expanding the Ecodesign and Energy Labelling Directive to cover a broader range of electronic displays, including small screens. The proposal to extend requirements beyond the current 100 cm<sup>2</sup> threshold to devices like small displays, video conferencing devices, and digital photo frames is a significant and necessary step.

As an association representing the refurbishment sector, EUREFAS supports this extension as it promotes durability, repairability, and reuse—key pillars of a circular economy. The inclusion of small screens will not only curb e-waste but also set a critical precedent for reparability and durability indexes in other product categories. This would help drive sustainable practices across the entire electronics industry.

## The Problem

However, the current directive excludes small screens, leaving a significant gap in addressing sustainability challenges. Several issues must be addressed to ensure these devices contribute meaningfully to the EU's circular economy objectives:

- **Increasing e-waste from small screens**
  - Small screens, and their respective devices, contribute significantly to electronic waste due to short lifespans and limited repairability. Especially digital photo frames and all-in-one video conferencing devices are typically discarded after a short lifespan due to their lack of repairability or support for upgrades.
  - The current directive excludes small displays, creating a gap in the EU's sustainability framework and allowing manufacturers to bypass design requirements for repair and recycling.
- **Challenges for refurbishers**
  - Limited access to spare parts: Manufacturers often restrict spare parts availability, making refurbishment of small-screen devices difficult or uneconomical.
  - Design barriers to repair: Small screens may sometimes feature non-standardized, glued, or integrated components, such as batteries or chips, that are non-replaceable, basically hindering repair by making it time-consuming and costly.
  - Lack of technical documentation: Refurbishers are often unable to access repair manuals or tools for small-screen devices.
- **Environmental impact**
  - Most small-screen devices are designed without recycled or recyclable materials, compounding their environmental footprint. The production of these devices therefore contributes to high carbon emissions due to resource extraction, manufacturing, and disposal practices.

- o Without ecodesign requirements, many of these devices are prematurely discarded, wasting resources that could otherwise be recovered through refurbishment or repair.

## **Proposed Solution**

To address these challenges, EUREFAS urges the European Commission to include small screens in the Ecodesign and Energy-Labeling Directives with the following measures:

- 1. Design for repairability and longevity**
  - o Mandate modular designs with standardized components for easy repair.
  - o Require easy replaceability of core components, like batteries, screens, and other key parts.
- 2. Availability of spare parts**
  - o Manufacturers should supply spare parts for at least 7 years after a product's last market availability.
  - o Set a maximum delivery time of 15 days for spare parts to ensure timely repairs.
- 3. Access to technical documentation**
  - o Require manufacturers to provide repair manuals, diagnostics tools, and schematics to professionals in the repair and refurbishment sector.
- 4. Sustainability metrics**
  - o Ensure reparability and the use of sustainable, long-lasting materials. One way could be by setting minimum thresholds for the use of recycled materials.
- 5. Reparability and durability indices**
  - o Introduce indices to assess and label the reparability and durability of small-screen devices. These could then serve as blueprints for their extension to other product categories.

## **Benefits of Inclusion**

As well as responding to these concerns, the implementation of these measures would bring significant benefits to the environment, the economy and consumers as a whole:

- **E-Waste reduction**
  - o Repairing and refurbishing small screens extends their lifespan, significantly reducing e-waste.
- **Economic opportunities for refurbishers**
  - o Expanding the scope of ecodesign requirements supports the growth of refurbishment businesses, fostering job creation and local economic activity.
  - o Keeping existing devices and resources in use longer decreases the EU's strategic dependency on global supply chains.
- **Consumer benefits**
  - o Repair-friendly designs empower consumers to opt for cost-effective, durable alternatives to new devices.
- **Alignment with EU sustainability goals**

- o This measure aligns with the Circular Economy Action Plan and the EU Green Deal, reinforcing the commitment to sustainable consumption and production.

## **Conclusion**

Including small screens in the Ecodesign Directive is a critical step to bridge gaps in sustainability efforts, reduce e-waste, and support a thriving circular economy. This initiative further enables refurbishers to play a pivotal role in achieving the EU's sustainability objectives while fostering economic growth and innovation. EUREFAS is ready to assist the Commission in further consultations and discussions to ensure this extension is implemented effectively.