

# SMARTPHONES & TABLETS:



## Right to Repair analysis of ecodesign proposals

**This summer, the European Commission has proposed ecodesign and energy label requirements for smartphones and tablets.**

Across the European Union it is estimated that there are between 450 - 600 million smartphones in use at any time, with more than a third of users having to purchase new devices due to their current one failing or losing functions. On average our phones are replaced every three years, representing six new phones being sold every second.

The carbon footprint of all these devices exceeds the annual emissions of Estonia.

New measures are expected to make our devices longer lasting, easier to repair, and help citizens identify the best performing models.

The proposed rules are expected to apply to all phones and tablets sold in Europe from 2024 onwards. Before the measures are adopted, a consultation is open until 28 September to get your opinion of the proposals.

**See the consultation on the [ecodesign proposal](#)**

**See the consultation on the [energy label proposal](#)**

The European Right to Repair campaign have summarised what the proposal could mean for your devices and the repair community. ▶▶▶

# Summary:

## THE GOOD; THE BAD & THE UGLY.





## Repair information



Repair and maintenance information will be available to professional repairers for a “reasonable fee” for 7 years after the device is taken off the market. However, we believe that repair information should be freely available.



## The energy label

The most prominent part of the label scores the phone A to G according to battery runtime per charge. Smaller icons also cover the repair score, the drop test, the IP rating and the battery endurance.



## Durability and reliability



Devices without a cover should resist 100 falls without losing functions. They should be scratch, dust and water resistant. Battery endurance should be at least 500 cycles with 80% capacity remaining. However, the screen drop test does not cover cracks to the display. Battery management should prevent overcharging.



## Climate ambition

Overall the proposed measures are anticipated to deliver a 33% reduction in the life cycle primary energy consumption energy use from phones and tablets (including production). Given the EU has a climate target to reduce emission by 55% by 2030, the proposals should be more ambitious.



## OS updates



Free operating system updates should be available; for functions for only 3 years and for security for 5 years after the device is taken off the market.



## Repair authorisation

Parts pairing is permitted and users may need to notify manufacturers to authorise some repairs by professionals. However, parts pairing creates an unnecessary barrier to repair, any authorisation of repairs should be the choice of users rather than manufacturers.





## Human rights



No measures are proposed to ensure that human rights and due diligence are respected through the value chain of the phone.



## Repair label

The label will include a reparability index (a 5 point scale ranking devices from most to least repairable). Criteria included: “Disassembly Depth”, “Fasteners (type)”, “Tools (type)”, “Spare Parts”, “Software Updates (duration)”, “Repair Information”. Price, however, is not a criterion in the repair index, despite it being one of the main barriers to repair.



## Modular design (basic disassembly)



A limited set of spare parts (battery, display, back-cover, charger, SIM/memory tray) should be easily replaceable with no tools or basic tools. An exemption is made for durable phones (batteries that retain 83% capacity after 500 charges; batteries that retain 80% capacity after 1000 charges and waterproof for 30 minutes at 1m).



## Modular design (professional disassembly)

An extended list of spare parts (including the speaker, cameras and ports) should be replaceable with no tools or commercially available tools. All fasteners should be removable or reusable.



## Definition of professional repairers



Potential professional repairers need to register with manufacturers to get access to repair information, proving that they are a part of an official registry of repairers and covered by liability insurance. The same restriction may apply to access to spare parts. Manufacturers must accept requests within 5 working days and justify refusals. These requirements may exclude small repair shops and repair cafes.



## Timeline

The measures are expected to be adopted by the end of 2022. However most measures don't apply until 12 or 18 months after the entry into force. This timeline offers unnecessary extended delays for manufacturers.





### Price of spare parts



Manufacturers must only indicate an “expected maximum pre-tax price” of spare parts. Price is also not integrated in the repair label, despite it being one of the most important barriers for users to repair.

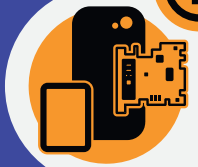


### Access to spare parts (for professionals)

An extended list of spare parts will be available to professionals for 5 years after the device is taken off the market. This includes battery; back cover; display; front/rear camera; audio port; charging port; buttons; microphone; speaker; hinge; folding display assembly; charger; SIM and memory tray.



### Access to spare parts (for end users)



A limited set of spare parts are available to end users (battery and back cover) for 5 years after the device is taken off the market. But there is an exemption for durable batteries.

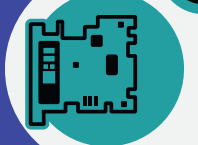


### Spare part delivery

A list of spare parts will be published on a manufacturers website with instructions for ordering them. Spare parts should be delivered in 5 working days.



### Assemblies (grouping of spare parts)



Spare parts should be sold separately not as assemblies to reduce the cost of purchasing them, except for the mic and loudspeaker; audio and charging port; hinge and display.

*For more information about the proposals and the Right to Repair campaign please contact*  
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