



# RIGHT TO

# REPAIR

## JOINT LETTER TO TRILOGUE NEGOTIATORS ON INCREASING CIRCULARITY OF CRITICAL RAW MATERIALS

The [Right to Repair Europe](#) coalition represents over 100 organisations from 21 European countries. It represents environmental NGOs and repair actors such as community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement, and its objective to make repair affordable, accessible and mainstream is aligned with the objectives of the European Green Deal and the Circular Economy Action plan. Browse member organisations by country [here](#).

As stakeholders deeply invested in the circular economy of electric and electronic products, the members of the Right to Repair Europe coalition call on all participants in the upcoming trilogue negotiations for the Critical Raw Materials Regulation to prioritise ambitious circular economy provisions. These provisions should not only favour recycling but also promote repair and refurbishment, as this approach will ensure maximum resource efficiency while minimising adverse environmental impacts.

The success of key initiatives shaping the future of the European Union (including strategic autonomy, and the twin green and digital transition), ultimately hinges on continued access to critical raw materials. Relying solely on primary material extraction carries severe social and environmental consequences, while also exposing the EU to new geopolitical vulnerabilities.

Adopting a circular economy approach is the only viable solution to address these vulnerabilities in an environmentally sustainable and socially just way, as recognised by Section 1 of the draft Critical Raw Materials Regulation. However, the full potential of the circular economy remains untapped due to an excessive focus on recycling, neglecting product lifetime extension strategies like re-use and repair.

Historically, EU policies have focused almost exclusively on recycling, as highlighted by a recent report from the Court of Auditors<sup>1</sup>. This emphasis on recycling is also reflected in a tendency towards the early recycling of repairable items, as demonstrated by a 2019 study in Bavaria showing that almost half of WEEEs destined for recycling could easily be prepared for re-use<sup>2</sup>. In the context of critical raw materials, this over-emphasis on recycling hinders the Regulation's objectives and misses opportunities to address the raw materials challenge effectively.

Many critical raw materials within consumer products occur in low concentrations, making their recovery very challenging under current technological and economic conditions. Rare Earth Elements (REEs) being a case point, as this group of metals is characterised by a high importance

<sup>1</sup> European Court of Auditors (2023) "Special report 17/2023: Circular economy – Slow transition by member states despite EU action". <https://www.eca.europa.eu/en/publications/SR-2023-17>

<sup>2</sup> L. Messmann, S. Boldoczki, A. Thorenz, A. Tuma (2019) "Potentials of preparation for reuse: A case study at collection points in the German state of Bavaria", p. 1543. <https://www.sciencedirect.com/science/article/abs/pii/S0959652618336679>

for advanced technologies, minimal recycling rates (< 1%)<sup>3</sup>, and excessive dependency on a single supplier. Changing this situation will take time, but implementing product life-extension strategies, supported by the right incentives, can be immediately scaled up to optimise resource efficiency by keeping such resources in the economy for as long as possible before their eventual recycling.

Focusing on the so-called inner loops of the circular economy (repair, re-use etc.) not only mitigates environmental impacts associated with the production of new items, but also yields superior environmental outcomes compared to recycling. For instance, a study commissioned by the French agency ADEME showed how refurbishing a single smartphone would prevent 77 kg of CO2 emissions and 178 kg of e-waste, while also saving 77.000 litres of water<sup>4</sup>.

Additionally, embracing repair and re-use generates more employment opportunities. Recent studies show that repair generates 404 jobs per 10,000 tonnes of waste per year, compared to just 115 jobs for recycling<sup>5</sup>. A report based on data from social enterprises in the RREUSE network further support this, indicating that up to 140 jobs can be created for every 1000 tonnes of Waste Electrical and Electronic Equipment (WEEE) prepared for re-use<sup>6</sup>.

While increasing recycling rates for critical raw materials is essential, this alone will not suffice to achieve the objectives of the Regulation, nor will it yield the maximum environmental and employment benefits. We call upon all co-legislators to include ambitious provisions that foster product lifetime extension through repair and re-use in the text. Only by doing so, can we unlock the full potential of the circular economy as a solution to the critical raw materials challenge.

Therefore, as the Right to Repair coalition we call on all co-legislators to focus on the following elements during the upcoming negotiations:

- **Art. 25, para, 1 point a:** ensuring that the collection of waste containing CRMs is carried out in accordance with the waste hierarchy, by maintaining the possibility of introducing reusable products into appropriate preparation for re-use systems, thus preventing the early recycling of re-usable goods.
- **Art. 25, para 1, point b:** promoting the uptake of prevention, repair and refurbishment practices in addition to re-use, as well as including a ban on single-use products containing CRMs (such as disposable e-cigarettes).
- **Art. 25, para 1, point c:** employing public procurement guidelines to promote the refurbishment of products containing CRMs.
- **Art. 27, para 6:** ensuring that independent refurbishers and repairers have access to the necessary information to enable the re-use and repair of products containing permanent magnets.

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<sup>3</sup> United Nations Environment Programme, & International Resource Panel (2011). *Recycling Rates of Metals: A Status Report*, p. 19. <https://wedocs.unep.org/20.500.11822/8702>.

<sup>4</sup> ADEME (2022). Assessment of the environmental impact of a set of refurbished products. <https://librairie.ademe.fr/dechets-economie-circulaire/5833-assessment-of-the-environmental-impact-of-a-set-of-refurbished-products.html>

<sup>5</sup> Ribeiro-Broomhead, J. & Tangri, N. (2021). Zero Waste and Economic Recovery: The Job Creation Potential of Zero Waste Solutions. Global Alliance for Incinerator Alternatives. <https://www.doi.org/10.46556/GFWE6885>

<sup>6</sup> RREUSE (2021) Job creation in the re-use sector: data insights from social enterprises. [https://www.rreuse.org/wp-content/uploads/04-2021-job-creation-briefing.pdf?\\_ga=2.257899275.1618100919.1651046569-1321864878.1646733841](https://www.rreuse.org/wp-content/uploads/04-2021-job-creation-briefing.pdf?_ga=2.257899275.1618100919.1651046569-1321864878.1646733841)