From: Right to Repair Europe

To: Jessika Roswall, Commissioner for the Environment, Water Resilience and a Competitive Circular Economy;

Henna Virkkunen, Executive Vice-President of the European Commission for Tech Sovereignty, Security and Democracy

Subject: Urgent Action Needed to End Software Obsolescence and Protect Consumers, the Environment, and EU Competitiveness

Brussels, 1 October 2025

Dear Commissioner Roswall,

Dear Commissioner Virkkunen,

On 14 October — ironically, International E-Waste Day — Microsoft has planned to end automatic free support for Windows 10, which runs on nearly half of all Windows computers. This mass obsolescence could generate over **700 million kilograms of e-waste**. In the lead up to International Repair Day (18 October), thousands of repair events around the world are installing open source operating systems into laptops, saving people money and cutting waste. This growing movement is proof: people are fighting back against fast tech. But where are the EU institutions? Existing legislation offers no protection against this looming e-waste tsunami.

After months of campaigning, Microsoft has confirmed that Windows 10 users in the European Economic Area (EEA) will get one more year of free updates if they log in with a Microsoft account. But this is just a temporary fix, around 400 million devices will not be eligible to upgrade to Windows 11 and the situation won't substantially change by October 2026. A single extra year just delays the inevitable, forcing users into one of four options: purchase a new device, pay or sign-up to additional Microsoft services for another temporary extension, switch to an alternative operating system, or continue using unsupported and insecure software.

Software obsolescence undermines circularity strategies while driving **environmental harm and unnecessary costs for consumers**. This issue is not limited to computers. It affects a wide range of devices, including medical equipment, smart home devices (thermostats, lights, cookers), wearables, and even toys (see US PIRG's "<u>Electronics Graveyard</u>" report).

Current EU measures are **insufficient and difficult to enforce**, leaving consumers unprotected and devices prematurely obsolete:

- **Ecodesign rules** only specify minimum software update duration only for smartphones and tablets (5 years). Laptops and countless other devices are excluded.
- The **Digital Content Directive** (DCD) requires suppliers such as Microsoft to provide (security) updates "as long as the consumer can reasonably expect". A vague provision with no binding duration, making enforcement nearly impossible.

Cybersecurity rules contain major loopholes: manufacturers can withhold updates if
a device's "expected lifetime" is under five years. Regulation (EU) 2024/2847 (Article
13.8) on horizontal cybersecurity leaves critical gaps. It fails to define the required
support period and allows broad exemptions for products deemed to have short
lifespans, undermining consumer protection.

Without clear obligations to provide long-term software and security updates matching the technical lifespan of devices, consumers face no safe or practical option other than premature replacement.

We therefore call on the European Commission to introduce **EU Ecodesign requirements** for laptops, guaranteeing at least 15 years of software updates. We also urge the Commission to set strong horizontal requirements on minimum durability and repairability, with software and security support to match the potential lifespan - not just for computers, but for all products with a plug or battery. No more devices designed to break or become obsolete before their time.

Millions of citizens and businesses are affected. Ending software obsolescence is essential to building a sovereign, competitive, and circular EU tech economy. An international coalition of **circular economy and digital rights experts** is already pressuring Microsoft to extend free, automatic support for Windows 10. U.S. PIRG delivered a <u>letter signed by 590</u> businesses, elected officials and organizations, among which 382 repair businesses and nonprofits from around the world and 49 environmental and consumer advocacy organizations. <u>Right to Repair Europe</u>, <u>Halte à l'Obsolescence Programmée</u>, <u>U.S. PIRG</u>, <u>Repair.org</u>, <u>iFixit</u>, <u>Consumer Reports</u> and <u>Euroconsumers</u> co-signed the letter. Furthermore, national campaigns are underway in <u>France</u>, <u>Denmark</u>, <u>Germany</u>, <u>the US</u>, and beyond. Meanwhile, the tech giant Microsoft made <u>€87 billion in profits in 2025</u>, a nearly 30% increase since announcing the end of Windows 10 support in April 2023. Users shouldn't be required to pay additional fees to keep using laptops they already own.

How can the EU achieve **digital and circular competitiveness** if citizens and businesses remain subject to digital feudalism? Strong, enforceable rules against software obsolescence are urgently needed.

Yours sincerely,

Right to Repair Europe

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The <u>Right to Repair Europe</u> coalition represents over 180 organisations from 30 European countries, including environmental NGOs, repair and refurbishing businesses, social enterprises, spare part distributors, repair cafés and citizens advocating for their right to repair. This is a rapidly growing movement, and its objective is to make repair affordable, accessible and mainstream.