To the European Commission

Margrethe Vestager, Executive Vice-President for "A Europe Fit for the Digital Age"

Frans Timmermans, Executive Vice-President for "A European Green Deal"

Virginijus Sinkevičius, Commissioner for "Environment, Oceans and Fisheries"

Thierry Breton, Commissioner for "Internal Market"

Brussels, 02/12/2021

Dear Vice-Presidents, Dear Commissioners,

In its own-initiative report "*Towards a more sustainable market for consumers and enterprises*" in November 2020, the Parliament called for the development of a repair score on relevant products.

Countries like France have already implemented a repair score on five categories of electronic devices since January 2021¹. Now, other countries like Spain and Belgium have announced their willingness to develop similar tools.

According to an IPSOS 2021 EU-wide poll, commissioned by the Greens/EFA, 74% of Europeans surveyed want environmental labels on electronic devices, while 90% of Europeans surveyed think that durability is important when choosing a new electronic device. However, a study commissioned by the European Commission points out that one main barrier to consumers willing to purchase durable and reparable products was the lack of clear and comparable information.².

To this end, the European Commission should propose a mandatory EU-wide repair score. Such a score would take into account multiple criteria throughout the life cycle of products according to product category, based on research-based and transparent standards demonstrating relevance, proportionality and effectiveness in reducing negative environmental impacts and protecting consumers.

These criteria are as follows: documentation provided by the manufacturer, ease of disassembly of the product, accessible product design, availability and affordability of spare parts, usage counter (optional) or other criteria specific to the category of products concerned.

The repair score should provide immediately visible, clear and easy-to-understand information to consumers at the time of purchase, helping them to identify and compare the most devices available on the market. This repair score can be based on the success of the european energy label. Consumers will have increased confidence in products and markets, ultimately leading to sustainable consumption.

¹ Loi n° 2020-105 du 10 février 2020 relative à la lutte contre le gaspillage et à l'économie circulaire

² Behavioural Study on Consumers' Engagement in the Circular Economy - Final report, European Commission, DG JUST (2018)

Mandatory rules should apply to the repair score to ensure a minimum level of reparability, upgradability and durability of devices across Europe, while facilitating market surveillance. Indeed, the planned legislation should apply to all electrical and electronic equipment intended for consumers. For each category of electrical and electronic equipment, the Commission shall specify all of the criteria and sub-criteria including criteria specific to the category as well as the methods of calculating the index.

The EU legislation should provide for the EU repair score to pave the way for a durability index by adding greater traceability and information on materials, the degree of recyclability, of reusability, of circularity, its environmental footprint and energy efficiency.

As a first milestone, the European consumers should enjoy an effective right to repair, conditioned by the implementation of a repair score. We therefore call on the Commission to put forward a proposal for a mandatory EU-wide repair score.

Yours Sincerely,

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