GCE Response To Right to Repair Consultation

Introduction

Generation Climate Europe is a coalition of youth-led networks focusing on environmental and climate issues. At GCE, we fight for a system that respects human rights and the planet, that includes the youth voice and acknowledges our common responsibility. We want to empower young people to meaningfully engage in EU decision-making processes on climate, environmental and sustainability issues because we believe that their voice needs to be heard to achieve a green and fair transition that ensures intergenerational justice.

One of the issues we advocate for is the promotion of circularity in the ICT sector and with our contribution to this public consultation we would like to focus on this sector, explaining why we believe that an ambitious Right to Repair is a step in the right direction to achieve intergenerational justice by promoting circularity in the digital sector.

Our Views

The upcoming Right to Repair proposal is a great opportunity for society to speed up the transition to a circular economy across different sectors. We have an overarching motivation to push for the right to repair, which is closely linked to the concept of intergenerational justice. Not overburdening the waste recycling system with products that could be repaired means reducing waste and preserving resources for future generations.

The short life span of ICT products is often purposely exploited by manufacturers to drive consumption. Given that in the majority of cases these materials are not sourced sustainably, ICT products have significant negative impacts on both the environment and human rights. This also implies that precious materials are overexploited, with negative consequences on ecosystems and future generations.

Over-exploitation damages the environment and hinders its ability to sustain human life, as we depend on a healthy planet. It also means that future generations and local communities are deprived from resources that, if sourced sustainably, could provide income for local communities and contribute to tackle the future challenges resulting from climate change. This is evident in the case of rare minerals, such as lithium, which could contribute to power the transition towards cleaner energy but are also at the basis of the production of ICT products through their employment in batteries for digital devices.

Since the energy transition is among the EU's top priorities[1], intergenerational justice also means preserving these materials to enable the new generations to meet their needs through a green and digital future both on the global and local level.

Implementing a strong Right to Repair and amending warranty rules to make repair easier would not only extend the lifespan of products with benefits to consumers and the environment, but it would also increase the attractiveness of jobs in the repair sector for the new generations empowering them to be part of the green transition.

Our Views

In addition, the last two years of the COVID-19 pandemic have increased the use of digital devices in society. The future remains uncertain and businesses, schools, and public services are still resorting to online solutions to avoid the spread of the virus. Remote learning has also increased the dependency of young generations on ICT products for their education. Making repair more accessible and strengthening consumer rights with regard to repair would thus facilitate access to education by making it easier and cheaper for young students to equip themselves with the digital devices they need.

As mentioned above, our support for the Right to Repair initiative is motivated by the importance that it holds in terms of intergenerational justice. To ensure the right of future generations to sustain themselves, we advocate for the instruments of high intervention listed in the Commission's inception impact assessment. Due to the urgency and importance of the problem, it is crucial to take actions that have the potential to change seller and consumer behaviour more decisively than others. Ultimately, we support a package of instruments to tackle the environmental impact of ICT products standpoints.

The low and medium intervention options would not constitute strong enough incentives for the uptake of repair services. Low intervention options would only rely on voluntary instruments, which do not drive real and ambitious change in seller and manufacturer behaviour. Medium options are also not ambitious enough as they do not tackle the current challenges. Among others, they would only promote repair when it is less expensive than replacement, which is rarely the case nowadays. According to a recent study commissioned by the European Commission, consumers who did not repair products in the past did not do so mainly because they expected repair to be too expensive and preferred getting a new product[2].

The goal of this initiative should be to strengthen consumer rights and reduce waste generation, resource use, and emissions associated with the lifespan of products. In order to do so, the initiative should improve access to spare parts and instructions and promote the uptake of affordable repair services.

Conclusion

Overall, it seems that a combination of the options listed in the high intervention **option 3** would be the minimum level of intervention required to achieve the desired objectives, as these tools are the most ambitious and binding compared to the moderate and low intervention options. Such a combination would act on different levels, namely prioritising repair over replacement, extending the guarantee period and obliging manufacturers to extend repair beyond the guarantee period, and allowing the seller to replace defective goods

Endnotes

[1] Joint Declaration of the European Parliament, the Council of the European Union and the European Commission EU Legislative Priorities for 2022 2021/C 514 I/01.
[2] Consumers' engagement in the circular economy - behavioural study contracted by DG JUST (October 2018)9

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