Written evidence submitted by The Restart Project

The Restart Project (https://therestartproject.org) is a London-based charity and social enterprise that encourages and empowers people to extend the lifetimes of their Electrical and Electronic Equipment (EEE). We run community events in London called "Restart Parties," where members of the public work with skilled volunteers to fix their broken EEE. We support a UK-wide network of similar initiatives, collecting data on barriers to repair. Our work also includes a wider strand of repair activism and advocacy. We teach repair skills to schoolchildren and educate product design students about design for repairability. We work in collaboration with other repair organisations and environmental lobby groups worldwide to influence policy on repair, and product lifetime extension in the EEE sector.

While our submission to the inquiry in August 2019 is still entirely relevant, we are submitting a short addendum to address recent developments on Right to Repair at European level, which should be taken into consideration by the UK Government in understanding how to support the transition to a circular economy for electronic goods.

Right to Repair in Europe
A growing movement around Right to Repair is coming together across the world. In Europe, The Restart Project has co-founded a Right to Repair Campaign (https://repair.eu) bringing together over 30 organisations in 13 European countries, including in EU member states as well as in the UK and Norway. Campaigning from our coalition has contributed to influencing the European Commission in prioritising smartphones and other consumer electronics among products to be regulated between 2020-2024 and directly including "right to repair" as an objective for their Circular Economy Action Plan adopted in March. However our campaign also addresses national initiatives that individual countries can take, to contribute to longer-lasting, more resource-efficient products, as suggested below.

Repairability score index
One way to help consumers choose more repairable products is to require manufacturers to state the repairability of a product in much the same way as they are currently required to state its energy efficiency. While the EU is progressing slowly towards adopting a repairability index, France opted to move ahead and adopted its own initial repairability score index, as part of its new waste-prevention law adopted in January. From 2021 consumers in stores and online will be able to compare the repairability score of 5 initial

categories of products, including smartphones, washing machines, TVs, computers and lawn mowers - calculated factoring in the availability and pricing of spare parts, as well as the ease of disassembly of a product (Prompt Project, 2020). The UK government should consider adopting a similar approach and extending it to other product categories relevant to the UK context.

Software obsolescence and opportunities at UK level

In our original submission we had raised the growing concern about software obsolescence. We see favourably the proposed law by the UK government requiring manufacturers of consumer Internet of Things devices to explicitly state at the point of sale the minimum length of time for which the device will receive security updates. However we recommend that this law applies to all Internet-connected devices, including for example smartphones. Preventing premature obsolescence in this area is a priority: it is estimated that 40% of all smartphones running the Android operating systems are no longer receiving security updates (Which?, 2020). The UK has an opportunity to lead in this area, and to set the stage for similarly ambitious legislation to be adopted elsewhere.

New EU ecodesign regulations from 2021 and the UK position

Finally, we are concerned about the lack of alignment of the UK with already approved and upcoming EU ecodesign regulations. In recent discussions we held with Beis and Defra, it was confirmed that EU ecodesign regulations adopted in 2019 will not automatically be adopted in UK legislation when they enter into effect in the EU in March 2021. These regulations are broadly considered an important precedent, as for the first time they factor a product's resource efficiency in manufacturing in addition to energy efficiency while in use, specifically addressing the importance of product repairability: design for repairability; access to repair information and access to spare parts. The regulations will affect all new washing machines, dishwashers, fridges, electronic screens and lighting put in the market in the EU from March 2021. Given the little time remaining, and the fact that no formal consultations have been held so far on what the UK approach might be, we are concerned that lack of alignment might negatively affect both UK consumers and manufacturers. Consumers could end up with access to less repairable products no longer allowed to be sold in the EU. Similarly, UK manufacturers might face additional competition from products with lower repairability and environmental credentials, not accepted across the EU single market.

While the UK government has the opportunity in the long term to exceed EU product policy, as we highlighted in our original submission, we would like to see firmer commitment to this, including for future ecodesign regulations currently in development at

EU level for smartphones and computers.

References

Prompt Project (2020), 'Repair made easier in France thanks to new law' https://prompt-project.eu/repair-made-easier-in-france-thanks-to-new-law/

Which? (2020), 'Void Android: More than one billion Android devices at risk of hacking attacks' https://press.which.co.uk/whichpressreleases/void-android-more-than-one-billion-android-devices-at-risk-of-hacking-attacks/

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