

EuRIC reaction to the IIA of the Designing mobile phones and tablets to be sustainable initiative

27 January 2021

Improving the design of products is a pre-condition to transition towards a circular economy. As it has already been highlighted in the report released by the **European Recycling Industries' Confederation** (EuRIC) named "[Top 5 Priorities of the Recycling Industry for the Period 2019 -2024](#)", 80% of products' environmental impact are determined at a design stage.

Although the above-mentioned fact is also stated in the [Circular Economy Action Plan 2.0](#) (CEAP), the vast majority of products placed on the EU market – and not only – are still designed without any consideration for their end-of-life stage. Design for circularity is therefore of an utmost importance to move towards a more circular economy and needs to be extended to all products' categories, including mobile phones and tablets.

EuRIC thus fully supports the necessary Designing Mobile Phones and Tablets to be Sustainable Legislative Initiative to keep the already exploited resources in the market for as long as possible by connecting the dots between the design and end-of-life (**EoL**) phase of products.

The top **priorities** identified by EuRIC are the following:

1. EuRIC welcomes the initiative's point to tackle the problem of mobile phones and tablets left unused at home for a long period of time at the end of their useful life and supports the statement that this is a waste of resources that could, with the right process, be reused, recycled and/or recovered.

In that regard, EuRIC proposes the implementation of a **deposit refund system** that concerns all forms of distribution, including online sales. Deposit return schemes are already established in many countries where they are helping to tackle climate change and increase the collection of unwanted products that can be reintroduced into the market, through refurbished products or new recycled materials.

Although these schemes seem to have generated a positive impact from an environment standpoint, EuRIC sees that there is still significant room for improvement - as **online marketplaces** distributing mobile phones and tablets are not yet part of the equation. Inclusion of online marketplaces would bring tangible results as it will incentivize the customers to return a used device which would then enter into the right waste stream.

2. EuRIC strongly recommends that some key components in particular of mobile phones and tablets should be **marked clearly by a showy label or other appropriate marking**. This is extremely important, especially in the case of batteries, as it will make possible to “easy” remove and replace them from the above-mentioned devices by physical stores – and when possible by the consumer himself – during the lifetime of the product – allowing an extended lifetime of it.

Beside extending the lifetime of the previously referred products, the use of such markings will also enable the removal of the battery at the end-of-life-of the products by both consumers and WEEE treatment facilities. The removal of batteries by consumers at the end of life, is also interconnected with one of the targets mentioned in the recently proposed Battery and Waste Battery Regulation released by the EU Commission on December 10. With regard to WEEE treatment facilities, such markings will allow them to easily identify batteries and remove them - in case the battery is still incorporated in the device once the it has reached a treatment facility -, before mechanical treatment is performed. This will undoubtedly minimize the risk of and prevent any type of dust related incidents (explosions, fires etc.), with fires in end-of-life treatment operations being the most common and dangerous amongst them.

3. **Need to internalise in mobile phones’ and tablets’ prices proper design** so that design for re-use, recycling and recycled content is rewarded whereas the above referred products which are not taking into consideration their EoL phase shall be penalised via eco-modulation of fees when the products at stake fall under EPR Schemes and/or reduced VAT for design for recycling products. EuRIC therefore recommends that:
 - a. producers use mechanical methods for binding together mobile phones and tablets components, especially batteries. In the scenario that there is no other alternative and the use of adhesives is necessary, EuRIC proposes the use of soluble adhesives
 - b. materials are not welded or glued (except in the absence of any alternative, e.g., waterproof mobile phones)
 - c. producers reduce, whenever possible, the number of screws used in those devices
 - d. mobile phones and tablets should - going forward - contain removable batteries instead of built-in ones

These recommendations will not only allow the removal of batteries and other dangerous components without the use of special tools - speeding up the dismantling process -, but will also increase the safety of the employees working in treatment facilities.

4. For the devices covered by this initiative, **binding recycled content targets** – for critical raw materials, plastics, metal etc., - should be set in order to stimulate the demand for recycled materials and make the entire value chain more circular. Setting such targets will firstly stimulate end-markets and secondly reward WEEE recyclers and Electrical & Electronic Equipment (EEE) producers committed to a more circular economy.

With regard to the policy options considered, EuRIC strongly believes that **a combination between option number 3** (mandatory specific and/or generic eco-design requirements (according to Annex I and/or Annex II of the Eco-design Directive 2009/125/EC) and **option number 4** (energy labelling according to the Energy Labelling Regulation 2017/1369) is the most suitable approach and will allow us to take a step forward towards a fully circular economy.



EuRIC is the Confederation representing the interests of the European recycling industries at EU level. EuRIC, through its various Branches covering the vast majority of waste streams, brings together National Recycling / Resource Management Federations and Companies in lieu from more than 23 European countries active locally and globally.

EuRIC represents across Europe over:

- § 5,500+ companies generating an aggregated annual turnover of about 95 billion €, including large companies and SMEs, involved in the recycling and trade of various resource streams;
- § 300,000 local jobs which cannot be outsourced to non-EU countries;
- § Million tons of waste recycled per year (metals, paper, glass, plastics, WEEE, ELVs, tyres, textiles and beyond).

By turning wastes into resources, recycling is the link which reintroduces recycled materials into the value chains again and again. Recyclers play a key role in bridging resource efficiency, climate change policy and industrial transition.
For more information: www.euric-aisbl.eu