

15 January 2021

## **FEAD reply on the new European Commission initiative - Designing mobile phones and tablets to be sustainable – ecodesign**

**FEAD**, the European Waste Management Association, represents the private waste and resource management industry across Europe. Private waste management companies operate in 60% of municipal waste markets in Europe, and in 75% of industrial and commercial waste.

FEAD welcomes the European Commission's proposal for a Commission implementing Regulation on Ecodesign for mobile phones and tablets, fully in line with the Green Deal and the new Circular Economy Action Plan.

From a waste management perspective, FEAD deems this proposal in the right course of action to achieve the circular economy with more and more ambitious targets in terms of **quantity** and **quality**, and we would like to highlight the following needs:

- **Ecodesign**

While designing mobile phones and tablets, their end of life should be kept in mind: they must be durable, repairable, dismantlable and recyclable.

The average lifespan of a smartphone is two-three years and the reasons for the early replacement of the device we live with all day, are different: fashion, the rapid evolution of technology (everything gets old in a short time) and industrial logic.

Nowadays repairing smartphones and tablets in case of breakdown is almost impossible because companies design them inaccessible. They are not designed to be repairable, with unobtainable spare parts and without manuals that favor any intervention.

Regarding recyclability of mobile phones and tablets, in order to improve it, the following general rules should be kept in mind:

- phase out substances of very high concern;
- try to substitute as much as possible critical raw materials;
- make parts easy dismantlable trying to use less glue as possible and more joints;

Incorrect disposal and untargeted collection of batteries and accumulators pose a high risk to people and the environment through fire incidents in waste sorting systems. **Mobile phones and tablets using batteries or accumulators** must be designed in such a way that batteries' waste derived from them **can be removed easily by any end consumer**, discharged without prior pack-disassembly and ensure easy access to a hole for the fire-hose as fires are the main problems of mobile batteries' waste.

- **Marking**

Uniform marking of devices is also crucial to help consumers use and handle correctly the devices, to safely remove components and to ensure a proper and ecologically sound disposal.

- **Hazardous substances**

We recommend the restriction in the use of hazardous substances in mobile phones and tablets to protect human health and the environment and to reduce the presence of such substances in waste, allowing for a safe recycling at reasonable costs.

- **Recycled content**

Supplies of rare elements used in the manufacturing of mobile phones, tablets and PCs are at risk of exhaustion because older devices are not being recycled and elements such as indium, yttrium or tantalum could run out within a century as stocks deplete.<sup>1</sup>

Therefore recyclability and market of recyclates must be boosted within the sector.

It is estimated<sup>2</sup> that for one million cell phones that are recycled, 16,000 kg of copper, 350 kg of silver, 34 kg of gold and 14 kg of palladium can be recovered.

Mandatory recycled content in products is essential for the creation of a stable and competitive market for recycled raw materials in Europe. The mandatory integration of recycled content in mobile phones and tablets will boost the recycling market in Europe, foster investments in innovative recycling technologies and decrease the environmental footprint of the product.

In order to guarantee a level-playing field, minimal recycled content should also be mandatory for imported goods.

- **Enforcing the control of illegal movements of mobile phones and tablets' waste**

FEAD calls for an effective **control and enforcement** mechanism for the exports of used **mobile phones and tablets** to avoid illegal shipments and to ensure environmentally sound treatments.

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<sup>1</sup> RSC: Royal Society of Chemistry

<sup>2</sup> EPA: US Environmental protection Agency data