

Not yet accessible, affordable nor mainstream: campaigners tighten the screw on new EU Right to Repair

After two last-minute delays, the EU Commission launched today a very limited but essential text of the “EU Right to Repair proposal”. We, the Right to Repair coalition (R2R), welcome the step forward, but note the EU’s lack of ambition to make repairability an affordable reality. Once again, the opportunity to make the Right to Repair universal is missed.

Today’s proposal does not address the burning issues of the affordability of repair - despite claiming to do so - and of anti-repair practices. The proposal focuses on reducing replacement of products within legal guarantee, by requiring sellers to repair when costs are equal or lower. It also requires manufacturers to provide a repair option beyond guarantee, but only for a very limited set of products (including e.g. household washing machines, tumble dryers, vacuum cleaners, dishwashers, and in the near future smartphones and tablets). However, this approach does not tackle the cost of repair: requiring manufacturers to provide a repair service does not mean that it will be affordable, and the proposed legislation doesn’t cover the cost of spare parts either. For customers to feel confident in repairing, it should be made accessible, affordable and mainstream.

Some steps in the right direction

Among the small wins, today’s proposal introduces an obligation for Member States to create **national online platforms to register repairers, refurbishers and purchasers of defective goods for refurbishment** - with the possibility to extend its scope to include **business-to-business** relationships as well as **community-led repair initiatives**. We welcome this proposal as a first step to support citizens looking for repair options or circular venues for their old devices. This is also an important step towards legitimising the role of independent repairers in providing remedies in the case of product failure (e.g., getting access to parts and information).

Another small improvement is that, upon consumer’s request, **repairers shall submit a harmonised repair quote/estimation called the "European Repair Information Form"** including mandatory information such as the type or repair suggested and its price or, if the precise cost cannot be calculated, the applicable calculation method and maximum price of repair. Unfortunately, while consumer information is essential, the suggested harmonisation of quotes won’t automatically make any repair affordable. When presenting the proposal, EU Commissioner Reynders stressed that the tool will make repair affordable, by creating a competitive environment for repair SMEs. But we consider this insufficient, without tackling expensive spare parts and other barriers to repair.

Primarily, the proposal focuses on repair during legal guarantees and repair within manufacturer’s networks. On one hand, it introduces an **obligation for sellers to repair devices within the legal guarantee**, but only when the cost of repair is equal or lower than cost of replacement.

The prioritisation of repair over replacement is the right direction to reduce the environmental footprint of unnecessary waste. However, the obligation, as proposed, would only apply to a very small portion of real life cases. On top of that, the Commission does not clarify who should verify whether a repair would be more affordable than a replacement and via which methodology.

The proposal completely sidelines the circular economy potential of independent repair providers. We advocate for a universal right to repair: consumers should have the right to seek repair with any provider they choose, also during the legal guarantee period.

On the other hand, the proposal introduces an **obligation for Original Equipment Manufacturers (OEMs) to repair beyond legal guarantee** upon consumer request, **if the product concerned is covered by ecodesign measures for repairability**.

Once more, this will apply to an extremely limited set of products, and nothing is foreseen to ensure the affordability of such repairs. As OEMs determine the price of spare parts and are able to prevent use of third party parts via software serialisation, they have very little to no competitive pressure from other repairers. Therefore if the competitive disadvantage of independent repairers is not addressed in the further negotiations of the proposal, OEMs will continue to have great control of repair, which won't help to reduce repair prices. Also, by limiting the range of products covered to those already covered by ecodesign, this legislation doesn't change repair conditions for a huge portion of consumer products.

We are still far from a universal Right to Repair

The Commission's proposal focuses primarily on the direct role of manufacturers and vendors and only covers a tiny scenario of repair cases. Yet empowering independent repair networks is essential to make repair more mainstream and ensure affordability. Therefore, we see as highly problematic that [our demands for a truly universal Right to Repair](#) were ignored in the proposal, including universal access to affordable spare parts, repair manuals and diagnostic tools; bans on all anti-repair practices, and measures actively ensuring the affordability of repair.

Failing to grant consumers horizontal and fair access to repair, the Commission is set to keep wasting precious resources in a growing mountain of hazardous e-waste. In the current geopolitical context, this is also a missed opportunity to reduce our dependence on critical raw materials and components imported from abroad. As documented by the [EU Commission's own research service](#), promoting repair would create local jobs, as the sector is relatively labour-intensive, local and has low skills entry barriers.

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Cristina Ganapini, Coordinator of the Right to Repair Europe coalition, said:

“We welcome this attempt at making repair more accessible, especially via the introduction of online registers for repairers and the harmonisation of cost estimations. However, the Commission missed an opportunity to concretely address the burning issues of the affordability of repair and of anti-repair practices. We need a truly universal right to repair including independent providers and granting universal access to affordable spare parts,

repair manuals and diagnostic tools.

The proposed concrete obligations to repair are too narrow to bring on the repair revolution that we need. Asking sellers to repair during the first two years, but only when cheaper than replacement, and granting consumers post-guarantee access to repair, but just for a few product categories, simply isn't enough. We call on the EU Parliament and Council to step up the ambition of this first right to repair proposal in the EU."

Claire Darmon, Head of Public Affairs at Swappie, said:

"Consumer legislation needs to promote a universal right to repair, where every consumer in Europe has the possibility to seek repair from the provider of their choice. Independent service providers should be given a chance to compete with producers and sellers by offering their services, both within and outside of warranty periods. We need to prohibit producers from restricting independent repairs through limiting practices such as component serialisation and software pairing. This is the only way to effectively promote repair over replacement and push for more sustainable consumption patterns."

Katrin Meyer, Coordinator of Runder Tisch Reparatur, said:

"Making it easier for consumers to find quality repair services is an important step toward the right to repair. However, it will only lead to a more sustainable use of resources if repair costs go down. And contrary to what the EU commission is communicating, today's proposal doesn't tackle the affordability of repair. Expensive repairs are the number one reason for consumers not to opt for a repair solution. We need affordable spare parts, we need to make it easier to use second-hand and third-party spare parts, and we need funding schemes like the repair bonus to encourage consumers to get their things repaired."