



RIGHT TO
REPAIR



IFIXIT

Current State of EU Right to Repair

Brussels, October 2024



The [Right to Repair Europe](#) coalition represents over 170 organisations from 27 European countries. It represents environmental NGOs and repair actors such as community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement, and its objective to make repair affordable, accessible and mainstream is aligned with the objectives of the European Green Deal and the Circular Economy Action Plan. Browse member organisations by country [here](#).



Summary

Over the last few years, the term ‘Right to Repair’ has become a household name. Several laws have recently been adopted, in the EU and elsewhere, to ensure that consumers can choose repair over discarding broken products. However, it would be quite a stretch to state that the Right to Repair has fully become a reality in Europe - or elsewhere for that matter. This paper takes stock of the current state of affairs, explains where the policy falls short, and offers a vision for a true European Right to Repair.

The first section explains the different types of policy tools that are used to promote repair in the EU. These include mandatory requirements, repairability scores, environmental labels, and financial incentives.

The second section explains how these policy instruments are used to address potential barriers to the repair of concrete products, in terms of product design and after-sales service. This includes aspects such as the ease of disassembly, the availability of spare parts, or the repair options offered by the manufacturer. For each criterion, we explain when and how it applies and to which products.

This paper is only concerned with regulations applicable to products sold in the EU. While Europe is often regarded as leading the way for the Right to Repair, similar policies have been adopted in other regions across the world.¹

¹ For instance, an overview of the state of affairs in the United States can be found here: <https://www.repair.org/know-your-rights>.

Types of policy tools

The whole concept of the European Union is based on a free internal market. Nevertheless, policymakers can influence the products and services that are available on the EU market as well as the choices made by various market actors. Policy measures can be thought of as ‘sticks, carrots and sermons’, meaning that some policies use hard constraints to ban the worst practices, whereas others rely on incentives or information campaigns to encourage the best practices.

Hard policies: Minimum requirements

As a general rule, products can circulate freely within the EU market. However, in order to enter the European market, either by being locally produced or by being imported, products have to meet certain requirements, with the CE label of conformity serving as a sign that a product is suitable for sale in the EU. These requirements for market access include not only safety, but also environmental and other aspects. Member states may similarly decide on obligations for market actors. Manufacturers or importers that do not respect these obligations risk fines or even judicial sentences. This can be seen as the ‘stick’ approach.

In the last few years, repair-related minimum requirements for new products placed on the European market have been included in various *Ecodesign regulations* as well as in the *Battery Regulation*. This approach started in 2019, resulting in requirements for servers, welders, TV’s, fridges, washing machines and dishwashers applicable from 2021 onwards. It has since been extended to a few other household and electronic appliances.² As a consequence, for these products, requirements

It is illegal to sell certain products in the EU if they cannot be easily disassembled or spare parts aren’t available

² See Regulation (EU) 2019/424 for servers and data storage products, Regulation (EU) 2019/1784 for welding equipment, Regulation (EU) 2019/2019 for refrigerating appliances, Regulation (EU) 2019/2021 for electronic displays, Regulation (EU) 2019/2022 for household dishwashers, Regulation (EU) 2019/2023 for household washing machines and household washer-dryers, Regulation (EU) 2023/1670 for mobile phones, cordless phones and slate tablets, Regulation (EU) 2023/2533 for household tumble dryers, and Regulation 2023/1542 for battery-operated products including light means of transport. Regulation (EU) 2019/2020 also requires for the light sources of light fixtures to be exchangeable - unless the manufacturer can justify that it wouldn’t be appropriate...

such as the ability to remove certain components with certain tools and the availability of spare parts for a certain amount of time are now mandatory³. In other words, it is illegal across the EU to sell any products that don't meet these criteria.

In addition, as of August 2026, manufacturers or importers of those same products will also be under the obligation to charge reasonable prices for spare parts and to actually provide repair services to consumers under the recently adopted *Common Rules to Promote the Repair of Goods* (EU 2024/1799).⁴

Since 2023, France also has binding requirements for the availability of spare parts for computers and smartphones, for certain means of transportation, for sports and leisure items as well as for gardening tools (*Code de la consommation* L111-4-1, R111-4-2, R111-4-2).

Soft policies: information and incentives

The softer approach consists of trying to influence market dynamics via informative means ('sermons') or incentivizing best practices with financial or other advantages ('carrots'). Without actually forcing the hand of any economic actors, such policy instruments try to encourage both producers and consumers to opt for more repairable products, and to repair products instead of replacing them.

Creating transparency

A typical example of the 'sermon' approach would be the creation of repairability scores as a way to nudge the market towards more repairable

³ Some of these regulations have already been adopted but are not yet applicable. The entry into force for various types of products is detailed in the section on criteria and products.

⁴ Somewhat confusingly, vacuum cleaners are not covered by these requirements even though they are listed in the *Common Rules to Promote the Repair of Goods*. Annex II, which lists union acts laying down repairability requirements, refers to Commission Regulation (EU) 666/2013 for vacuum cleaners. However since this Regulation doesn't actually set any requirements for repairability, and the obligation to repair under the *Common Rules* only applies to goods for which repairability requirements are provided for by Union legal acts listed in Annex II, vacuum cleaners are currently not covered by that obligation. Repairability requirements for vacuum cleaners are currently being developed, but they are not expected to be adopted before the second part of 2025. Annex II of 2024/1799 will then be revised as per Art. 5.9, at the latest 12 months after publication of such new Ecodesign requirements. At that point, the obligations under the *Common Rules* will also apply to vacuum cleaners.

products. These scores can be voluntary or mandatory in nature, and they can either be local or EU-wide.

Repairability scores are mandatory in France and are prominently displayed in webshops and physical stores

In France, a repairability index for a handful of products was introduced in 2021. Belgium will follow suit in 2026. Thus, while manufacturers are still free to produce poorly repairable products, they have to admit to this by prominently displaying a bad repairability score both in webshops and physical stores.

The same approach has also started at the EU level: from June 2025 onwards, a repair score will have to be displayed on the packaging of any smartphone sold in the European market as mandated by the relevant *Energy Labelling Regulation* (EU 2023/1669). Similar EU repair scores for vacuum cleaners, clothes dryers, printers and computers are currently under development. Once the EU scores are applicable, any national scores for the same products (such as the French and Belgian ones) will have to be retracted — which makes it all the more regrettable that the EU score does not match the French score in ambition. This is explained in more detail below in the section on criteria.

Another example of the information-based approach would be ecolabels. Several environmental labels including the European Ecolabel (the ‘EU flower’), national labels such as the German Blue Angel, and independent labels such as TCO Certified, now include criteria for repairability. Again the hope is to nudge the market towards more sustainable products. However due to the voluntary nature of this approach — it is up to the manufacturer to apply for these labels or not — the uptake can be very slow. For instance, there exists both an EU Ecolabel and a Blue Angel label for laptops, but no products have ever been certified under either label.

It should also be noted that the current diversity of labels is confusing for consumers. It is hard for them to distinguish between independently verified labels and self-produced labels which manufacturers may use to promote their products. The latter often comes down to straight-up greenwashing, with over half of the environmental claims found on products in the EU providing vague, misleading or unfounded information.⁵

⁵ See https://environment.ec.europa.eu/topics/circular-economy/green-claims_en.

The most reliable labels are type I labels according to ISO 14024, as these meet strict criteria for selecting product categories and environmental criteria and for assessing and demonstrating compliance.

In order to curb the manufacturers' leeway for potential greenwashing in the future, new rules have been proposed for the communication and substantiation of environmental claims (the so-called *Green Claims Directive*).⁶

Financial and other incentives

Public authorities may also increase demand for sustainable products through their own purchasing policy. This example of the 'carrot' approach is referred to as *Green Public Procurement*. Government institutions may define criteria, including for repairability, that products have to meet to be eligible for public purchase. This approach is related to the previous ones in that a minimum repairability score can be required, or an ecolabel may be accepted as proof that products meet the set criteria.

Government institutions can define repairability criteria that products have to meet to be eligible for public purchase.

Until now, green public procurement has been optional for public authorities, but the recently adopted *Ecodesign for Sustainable Products Regulation* (EU 2024/1781) empowers the European Commission to set mandatory performance requirements at the EU level for public procurement of certain products, and even to set targets for the proportion of environmentally sustainable products purchased. With public spending amounting to half the domestic product in some EU countries, this could provide a significant incentive for manufacturers to produce more repairable products - but it remains to be seen whether the principle will be implemented with sufficient ambition to actually influence the market.

⁶ See https://environment.ec.europa.eu/publications/proposal-directive-green-claims_en.

Another ‘soft’ policy approach is to provide financial incentives to foster repair across the board. This can either be done at the purchasing stage, by increasing the cost of unrepairable products compared to repairable ones, or at the repair stage, by lowering taxes on repair or even by providing subsidies for repair.

One instrument that can be used for this, is the system of so-called *Extended Producer Responsibility* (EPR) fees, through which producers are required to contribute to the costs of collection and treatment at the products’ end of life⁷. In France, these fees are ‘eco-modulated’, that is, they vary depending on a series of sustainability criteria: for instance, a coffee machine for which spare parts and repair information are available is subject to lower fees than one for which they are not. From 2025 onwards, the fee will also vary depending on the product’s repairability score as explained above. While the difference is currently insufficient to actually incentivise either design changes towards increased repairability or the sales of repairable products, the upshot is that this money is then used to lower the costs at the repair stage by financing repair vouchers for consumers. Similar repair subsidies, although not financed through EPR schemes, are also available in Germany and Austria.⁸

Another way to make repairs cheaper is by lowering taxes. For instance, many EU member states have applied a reduced VAT rate to bicycle repairs since decades. Since the 2022 revision of VAT rates (EU 2022/542), a tax reduction for repairs of household appliances is also possible – but so far not a single member state has implemented this.

In Sweden, half of the labour cost for appliance repair is deducted from the invoice as an immediate tax benefit.

Sweden has found another way to create a tax advantage for repair: since 2018, half of the labour cost for household appliance repair performed at a consumer’s home is tax-deductible. This was originally capped at 25.000 SEK per year (50.000

⁷ As the name implies, the Extended Producer Responsibility (EPR) system aims to keep producers responsible for their products throughout their lifecycle. In practice, the collection of used products is taken care of by organisations which are jointly managed by the manufacturers, but the fees are simply passed on to consumers. Although EPR is in theory an interesting policy instrument, the effectiveness of current EPR schemes is debatable, and different actors are calling for their reform (see also our [discussion paper on EPR schemes and repair funds](#)).

⁸ A detailed overview of repair funds and vouchers currently in place can be found here: <https://repair.eu/news/a-comprehensive-overview-of-the-current-repair-incentive-systems-repair-funds-and-vouchers/>.

SEK for people above 65 years old), but in 2024 the maximum amount was increased to 75.000 SEK per year.⁹ What makes this system very practical for consumers, is that it allows the repair service provider to immediately deduct the relevant amount from the invoice, so the customer never actually has to pay it. The tax reduction is financed through a tax on hazardous chemicals in electronic products.

The recently adopted *Common Rules to Promote the Repair of Goods* (EU 2024/1799) require every EU member state to develop at least one type of incentive for repair, be it financial or otherwise. It remains to be seen which options will be chosen by member states.

Standards as a policy tool

It should be noted that many of the above-mentioned instruments depend on an objective assessment of a series of repair-related aspects, which we will discuss in the section on criteria below. This requires very precise definitions, methods and thresholds to determine degrees of repairability. It is common for this type of ‘upstream’ work to be considered too technical for policymakers to deal with, and therefore to be delegated to one of the European standardisation bodies. These will then draft standards in order to precisely define what a certain criterion means and how it can be assessed.

Many of the current policy instruments related to repair rely heavily on a particular standard called *General methods for the assessment of the ability to repair, reuse and upgrade energy-related products* (EN45554:2020), which was developed upon the request of the European Commission under standardisation request M/543. This standard defines both design-related criteria such as the type of fasteners, the number of steps required to remove certain parts or the tools, skills and work environment needed to do so, and service-related criteria such as the availability of spare parts and repair-related information.

⁹ As of October 2024, these amounts translate to roughly €2200, €4400, and €6600 respectively.

Criteria and products

Various Right to Repair aspects are addressed through the different policy tools mentioned above, in ways that may differ from one product group to the next. In the next sections, we provide an overview of individual repair-related aspects covered by various EU policies, and the products to which they apply. It should be noted that most of the criteria mentioned below are currently only applicable to a small number of products - see the section on what is missing below.

Repairable design

In order for a product to be repaired, it first needs to be repairable — in other words, it should be possible to replace faulty components. This is currently mandatory, or will soon be the case, across the EU for a handful of products. For all new **servers** (from March 2020), **welders** (from January 2021), **TV's, fridges, washing machines and dishwashers** (from March 2021), **phones and tablets** (from June 2025) and **tumble dryers** (from July 2025), the *Ecodesign regulations*¹⁰ define which parts have to be replaceable for each product category. They often also specify who should be able to do so (consumers or professional repairers) and how i.e. in which type of work environment and using which kind of tools. Depending on the product and the type of part, these may be so-called basic tools such as common screwdrivers or wrenches, or they may be more specialised tools that only a professional repairer is likely to have. The *Batteries Regulation* (EU 2023/1542) sets similar requirements for **portable batteries and for the batteries of light means of transport** (such as e-bikes and e-scooters), from February 2027 onwards. Similar regulations are currently being drafted for vacuum cleaners.

From 2027 onwards, all batteries have to be removable without specialised tools

In addition, the 'ease of disassembly' (which may include a number of steps, the types of tools used, etc.) is also a criterion in several mandatory repair scores, notably the *indice de réparabilité* displayed in French stores since

¹⁰ See note 2 for the respective regulations.

2021¹¹ for **lawn mowers, pressure washers, vacuum cleaners, washing machines, dishwashers, TVs, laptops and smartphones**, and the EU repairability score which will be displayed on the packaging of **smartphones and tablets** from 2025 onwards.

Furthermore, several voluntary ecolabels such as the Blue Angel label for **laptops** or the TCO Certified label for **computers, tablets and smartphones** also require the product to be designed to enable repair.

Spare parts availability & price

Being able to remove a faulty part is of no help if there is no new part to replace it with. Manufacturers of the aforementioned types of appliances therefore have to provide spare parts for a set period of time. The availability of replacement parts is mandated by the same EU-wide policy instruments as the ease of disassembly, i.e. the Ecodesign and Batteries regulations. The duration of availability depends on the type of product: 10 years for **washing machines, dishwashers, tumble dryers, and welders** (from March 2021, March 2021, July 2025, and January 2021 respectively), 8 years for **servers** (from March 2021; note that the requirement only applies to firmware), 7 years for **fridges** (from March 2021), **TVs, phones and tablets** (from March 2021, June 2025 and June 2025) and 5 years for the batteries of any **portable product or light means of transport** (from February 2027).

The regulations define a list of spare parts to be made available for each product. For most products, a distinction is made between availability to professional repairers¹² and availability to consumers, with a much more limited list of parts - or none at all - made available to the latter. All parts have to be made available within a set delivery time and they have to be sold for a ‘reasonable’ price¹³ — however there is currently no definition of what that means in practice.

¹¹ Belgium is set to introduce a similar index for the same types of products from 2026 onwards.

¹² For smartphones and tablets, refurbishers are included in the regulation’s definition of professional repairers, giving them the right to access spare parts. The other regulations don’t take refurbishment into account. Other stakeholders such as parts resellers aren’t considered either, except in the case of batteries which have to be made available to all interested parties.

¹³ The *Batteries Regulation* (EU 2023/1542) calls for a ‘reasonable and non-discriminatory price’ (art. 11.7) and the *Common Rules to Promote the Repair of Goods* (EU 2024/1799) mandate ‘a reasonable price that does not deter repair’ (art. 5.4).

It should be noted that these obligations only apply to products of which the first unit was placed on the market after the entry into force of the relevant regulation - there are no retroactive requirements for products that were already in use, nor for new products sold after the entry into force of the regulations in case the product model was already on the market before.

In France, manufacturers and importers of **computers and smartphones** sold since 2022 as well as **cars, bicycles, e-bikes, scooters, sports and leisure items, and gardening tools** sold since 2023 have to provide spare parts for a number of years after the end of sales: 5 years for most products, 7 for non-electric bikes and 10 years for gardening tools (*Code de la consommation* L111-4-1, R111-4-2, R111-4-2). There is also an obligation for manufacturers of any type of portable goods to inform retailers of the duration of availability of spare parts - however, that information might just consist of the fact that spare parts are not available at all.

One of the key features of the French *indice de réparabilité*, which is mandatory for **lawnmowers, pressure washers, vacuum cleaners, washing machines, dishwashers, TV's, laptops and smartphones**, is that it not only takes into account the duration of availability of parts, the delivery time and the target groups to whom parts are made available (professionals, consumers and parts retailers), but it also has a scoring grid for the price of spare parts, with scores ranging from 0/10 for average parts prices exceeding 30% of the product price, to 10/10 for parts not costing more than 10% of the product price.

Unlike the French repair score, the EU score does not take spare parts prices into account.

In spite of continuous insistence on behalf of the Right to Repair Europe campaign, EU policymakers haven't integrated such a criterion in the EU wide repair scores, claiming that prices fluctuate too much to be captured in a

static product label — which is all the more disappointing given that EU scores will replace national scores in the future. In light of the fact that unreasonable parts prices are currently one of the key barriers to products being repaired¹⁴, we find that the exclusion of the price criterion based on such a summary evaluation isn't justified, and we call for a thorough investigation of policy options for ensuring spare parts price transparency and stability.

¹⁴ An in-depth explanation of the issue of parts prices can be found here: <https://repair.eu/news/the-price-is-not-right/>.

Repair information & software

Repairing or maintaining a high-tech product may require detailed instructions or up-to-date software. Repairability requirements under Ecodesign for **washing machines, tumble dryers, dishwashers and welders, servers, fridges, TVs, phones and tablets** set requirements for the availability of information such as parts drawings, lists of spare parts, information on the required tools, wiring diagrams, error codes, etc.

The *indice de réparabilité* that accompanies any **lawn mowers, pressure washers, vacuum cleaners, washing machines, dishwashers, TV's, laptops and smartphones** sold in France, also contains a criterion on the availability of repair-relevant information.

In addition, France has also introduced requirements for the availability of plans allowing spare parts to be created by 3D printing if the original parts are no longer available (*Code de la consommation* L111-4). However this requirement is currently a dead letter: although it is theoretically applicable since 2022, it is unclear how it can be applied since no decree has been published yet to specify the types of parts or the categories of products that it would be applicable to.¹⁵

Planned obsolescence and anti-repair practices

In our current market, product lifetimes and repair options are often limited by a series of choices and practices on behalf of manufacturers seeking to maximise profits.

Planned obsolescence is a controversial concept denoting the purposeful shortening of product lifetimes through the use of inferior materials, planned faults and similar shenanigans. Although it is hard to prove the malicious intent behind such practices, prohibiting them has a significant symbolic value. Planned obsolescence has been a criminal offence in France since 2015. However, to date, no company has been convicted of this

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¹⁵ The Right to Repair Europe campaign's position on a proposed approach, which has not yet been implemented in draft regulations, can be found [here](#).

particular offence. The recently adopted *Ecodesign for Sustainable Products Regulation* (EU 2024/1781) also aims to restrict such practices at the EU level, by requiring that Ecodesign requirements ensure that products do not become prematurely obsolete due to design choices, the use of sub-par components, software triggers, etc.

Some manufacturers also apply strategies that may not be intended so much to shorten the lifetime of products as to maintain a monopoly over repair activities. One practice that the Right to Repair campaign has been particularly vocal about is a technique called *parts pairing*. This is a system in which some parts have a unique serial number, which manufacturers pair to an individual unit of a device using software. If any of these parts need replacing during a repair, the new part might not be accepted by the device, or it might lose some of its functionality unless remotely paired to the device again via software by the manufacturer.

The recently adopted *Common Rules to Promote the Repair of Goods* (EU 2024/1799) aim to limit such anti-repair practices by stating that manufacturers are not allowed to use any contractual clauses, hardware or software techniques that impede the repair of goods. However there is a gaping loophole: “unless justified by legitimate and objective factors including the protection of intellectual property rights”.

The *Batteries Regulation* (EU 2023/1542) similarly prohibits the use of software to impede the replacement of a portable battery with another compatible battery; however as there are currently no guidelines on what constitutes a compatible battery nor a precise definition of impeding, this prohibition is not as watertight as one might have liked.¹⁶

For smartphones, part pairing is explicitly allowed by the Ecodesign regulation on the condition that manufacturers provide non-discriminatory access to the procedure needed to ensure the full functionality of the part.¹⁷ They may take 3 working days to do so, which is a very long time for a phone repairer waiting to have a phone enabled after a repair that might only take half an hour. A potential ban on parts pairing for smartphones will be considered when the Ecodesign regulation is reviewed in 2027.

¹⁶ Manufacturers might claim that parts pairing only keeps *incompatible* third-party batteries from working, or the use of the battery might not be completely *impeded* but merely limited (as is the case with some smartphones that only display battery health information for the manufacturer’s own batteries, not for third-party batteries).

¹⁷ The debate is not yet settled as to whether the Batteries Regulation’s restrictions on parts pairing would be complementary to the requirements laid down in the Ecodesign Regulation for smartphones, however the Ecodesign Regulation is likely to take precedence as it is a more specific piece of legislation, which is often considered to take priority over general legislation.

Repair service - in and out of guarantee

For decades, the legal guarantee has protected European consumers against early defects. In case a fault manifests itself within the guarantee period (the duration of which can depend on the member state, with a minimum of two years), the consumer has a right to redress through repair, replacement, a price reduction or a refund. In principle, the choice between repair and replacement is up to the consumer; in practice, replacement is often the default solution. The recently adopted *Common Rules to Promote the Repair of Goods* (EU 2024/1799) have introduced a nudge in the repair direction through

The guarantee is automatically extended if a product is repaired.

a revision of the *Sale of Goods Directive* (EU 2019/771): the guarantee period will automatically be extended by an extra year if a product has been repaired under guarantee, but not if it has been replaced. These provisions apply to **all**

goods (in the sense of tangible moveable items) to the extent that they are **sold to consumers** - they have no bearing on products bought for professional use.

For faults occurring outside of the guarantee period, there was previously no obligation for sellers or producers to offer any repair services at all, even for products that legally had to be repairable. The above-mentioned *Common Rules* now require that manufacturers and importers of **washing machines, tumble dryers, dishwashers, fridges, TVs, welders, phones and tablets, battery-operated products and light means of transport** offer repair services for the parts covered by removability and availability requirements (see above), and for the duration of said requirements. As in the case of goods covered by guarantee, this obligation only applies to products sold to consumers. For any other product, there is currently no obligation at all to provide a repair option outside of the guarantee period.

Schematic overview

An overview of the key repairability requirements, the products they cover and the dates of entry into force can be found on the next page.



What's my right to repair?



Your product is broken and you want to claim your 'right to repair' that you have heard about?
Find out which rights apply and when

Regulation ... ■ is in force ■ will be in force ■ is being developed ■ is completely absent

SP = Spare parts

Product (group)	Repairable design & SP available	Replaceable battery	Reasonable SP prices	Repair offered by manufacturer	Right to use compatible SP & No software blocks	Repair score	Longer software updates
Relevant type of EU regulation	Ecodesign Regulations	Batteries Regulation	Right to Repair Directive	Right to Repair Directive	Right to Repair Directive	Energy label	Ecodesign Regulations
Large household appliances							
Washing mashine			31/07/2026	31/07/2026	31/07/2026		
Tumble dryer	01/07/2025		31/07/2026	31/07/2026	31/07/2026		
Dishwasher			31/07/2026	31/07/2026	31/07/2026		
Fridge			31/07/2026	31/07/2026	31/07/2026		
Oven							
Small household appliances							
Coffee machine							
Vacuum cleaner		18/02/2027					
Electric toothbrush		18/02/2027					
Other household appliances (Clothes Iron, Sewing Machine, Hair Dryer, Kettle, Toaster, Mixer, Fryer, Hand blender etc.)							
Consumer electronics							
TV			31/07/2026	31/07/2026	31/07/2026		
Smartphone	20/06/2025	18/02/2027	31/07/2026	31/07/2026	31/07/2026	20/06/2025	20/06/2025
Tablet	20/06/2025	18/02/2027	31/07/2026	31/07/2026	31/07/2026	20/06/2025	20/06/2025
Server			31/07/2026	31/07/2026	31/07/2026		
Laptop		18/02/2027					
Printer							
Desktop computer							
Other consumer electronics (Game console, Smartwatch, Headphone, Earbud, Speaker, Digital Camera etc.)		18/02/2027					
Vehicles							
E-Bike		18/02/2027	31/07/2026	31/07/2026	31/07/2026		
Bicycle							
Car							
E-Scooter		18/02/2027	31/07/2026	31/07/2026	31/07/2026		
Other product groups							
Welder			31/07/2026	31/07/2026	31/07/2026		
Sports Equipment (Indoor bike, Treadmill, Rowing Machine etc.)							
(Garden) Tools (Lawn mower, Chainsaw, Drill, Saw etc.)		18/02/2027					
Shoes and Textiles							
Toys		18/02/2027					
Furniture							

Schematic overview of key repairability requirements by product

What is missing?

It will be clear from the sections above and from the schematic overview, that in spite of many optimistic press releases, a European citizen's so-called right to repair is still extremely limited at this point.

Firstly, very few products need to be designed in such a way as to be repairable in the first place: as of 2024, only half a dozen product types are covered.

Secondly, pressure on manufacturers and retailers to actually repair products when they break down remains quite limited. Within the guarantee period, retailers are still free to replace faulty products instead of repairing them if this turns out to be cheaper - which is usually the case. Beyond the guarantee period, manufacturers are only required to repair a certain number of parts in those few products that have to be repairable to start with, and only if these were bought in a private capacity (not for professional use).

As far as independent repairers are concerned, they are somewhat supported by the obligation for manufacturers to provide spare parts and information for the same few appliances, but manufacturers are free to set a series of conditions and procedures that can still make access complicated for repairers, especially if they are dealing with dozens or even hundreds of different brands. Except for smartphones, refurbishers aren't even considered as a target group having a right to access.

The right to repair one's own product is even more limited, as a consumer does not currently have the right to obtain any key internal part of any

A consumer does not currently have the right to obtain any key internal part of any product.

product. At this point, as the owner of an appliance, you only have the right to obtain a few, mostly exterior, parts and accessories for your refrigerator, washing machine or dishwasher: doors and their handles, hinges, locks and seals; filters,

detergent dispensers, spray arms, baskets and the like. You are also entitled to buy a replacement external power supply and remote control for your TV. As meagre as it sounds, this is the full extent of a European citizen's right to self-repair as of 2024. In 2025, this will be extended to a few, mostly external, parts of clothes dryers, phones and tablets, plus the display of the latter. From

2027 onwards, consumers will also get access to batteries for portable products, with the possible exception of smartphone batteries.¹⁸

In practice, what this all means is that if a few products are covered - albeit with a limited level of ambition - for the vast majority of products out there, there are no repair-related criteria or policies whatsoever.

For the vast majority of products out there, there are no repair-related criteria or policies whatsoever.

Most of the electric and electronic products in our lives, such as household and kitchen appliances, small electronics, sports and personal hygiene products, tools and toys, and many more, aren't covered by any repair legislation.¹⁹ A recently published report by the Open Repair Alliance²⁰ showed that out of

Out of 200.000 repairs at community events, only 4% would have been covered by current Ecodesign regulations

over 200.000 documented repairs conducted at community repair events in recent years, only a few dozen (or 0.0001%) were covered by Ecodesign regulations at the time - and only 4 % would have been covered if current regulations had been in place..

Lastly, current provisions to ensure that repair is financially accessible seem quite vague and therefore legally weak. Until a court has ruled on the issue, no one really knows what the obligation to provide repairs or spare parts for a reasonable price actually means.

¹⁸ The debate is not yet settled as to whether the Batteries Regulation, which would require all batteries to be user-replaceable, will take precedence over the Ecodesign Regulation for smartphones, which lists exceptions to this rule. See also note 17.

¹⁹ To name just a few categories of electric and electronic products not covered in any way by current or expected EU Right to Repair policies: these would include home appliances such as heaters, water heaters, air conditioners and fans; domestic systems such as lighting, solar energy systems, home automation, routers, and security systems; small household and kitchen appliances such as clothes irons, coffee machines, kettles, toasters, fryers, grills, juicers, blenders, and mixers; entertainment products such as set-top boxes, game consoles, e-readers, toys, and drones; music products such as digital media players, headphones, earbuds, speakers, and amplifiers; fitness equipment such as treadmills, rowing machines and cross trainers, personal hygiene products such as hair dryers, electric toothbrushes, shavers, trimmers, and epilators; DIY products such as drills, saws, and sanders; garden tools such as lawnmowers, hedge trimmers, chainsaws, and shredders.

²⁰ See <https://openrepair.org/open-data/insights/2024-report/>.

What a true Right to Repair would look like

We advocate for a universal Right to Repair. The word universal applies both to what can be repaired and to who can repair it. In other words, anyone who wishes to have any product repaired or repair it themselves, should be able to do so with the help of the service provider or spare parts supplier of their choice.

Everyone should have access to spare parts and repair manuals for the entire lifetime of a product.

Everyone should have access to spare parts and repair manuals for the entire lifetime of a product, and legal barriers shouldn't prevent individuals, independent repairers and community repair groups from

repairing any broken product. Repair should also be affordable, meaning that repairing a product should cost significantly less than buying a new one.

In order to achieve this, products should not only be designed to perform and to last, but also to be repaired whenever needed. This implies design practices which support ease of disassembly. In order to ensure this, EU legislation should set horizontal minimum design requirements to ensure easy disassembly and replacement of key components in all products.

Furthermore, manufacturers should provide the necessary after-sales support to enable repair. We need the EU legal framework to guarantee access to spare parts, repair information and diagnostic tools to anyone who wants to repair, for all product categories, within a reasonable time. Manufacturers should also provide the software updates necessary for maintaining the product's functionality, for the entire lifetime of a product.

With soaring living costs and years of citizen calls for fairer access to the repair of electronics, tackling the affordability of repair is also a burning issue. Affordable access to repair is required in order to make it not just a viable, but even an attractive option for consumers. Specifically, regulations need to guarantee the access to spare parts and information at a reasonable cost, for a period corresponding to at least the expected lifespan of the product.

Ecodesign and similar policies should also foster refurbishment alongside repair in order to provide affordable access to more sustainable options than the purchase of new products. The EU must consider the repair and

refurbishment sectors as key European industries for the future, in which political, economic and fair competition support for their players must be ensured.

The EU should also ensure an open and competitive repair market, including the use of secondhand and third-party spare parts. Techniques preventing or

Techniques limiting repair beyond the networks authorised by manufacturers or using third-party spare parts must be banned.

limiting repair beyond the networks authorised by manufacturers or using third-party spare parts must be banned. This especially includes designs where the manufacturer has to remotely authorise a part replacement before full functionality is restored (part pairing / serialisation).

The Right to Repair should not be limited to consumer goods and consumer law, but instead should also cover professional products involved in business-to-business transactions.

All of this will take time. As we make our way towards more repairable products, in order to make responsible purchase decisions, citizens need to know at the time of purchase if the product they are buying is built to be repaired or destined to be disposable when it breaks. This would also provide an incentive for manufacturers to produce more repairable products even if this isn't yet legally required.

Therefore, information on product repairability should be made available at the point of purchase to citizens, as well as to repairers. To achieve this, the EU needs to introduce a Scoring System on Repairability as part of the existing energy label for all energy-consuming products. The scoring system needs to take into account the affordability of repair. It must be sufficiently differentiating to distinguish between repairable and not-so-repairable products and its calculation should be fully transparent, enabling any actor to verify the correctness of the score and the continued compliance with the commitments that the score is based upon.

A manufacturer's failure to comply with these requirements should give rise to sanctions as well as to a right to redress on behalf of the consumer.

What's next?

The default approach consists of the European Commission drafting additional Ecodesign regulations. The recently adopted *Ecodesign for Sustainable Products Regulation* (EU 2024/1781) requires for the Commission to come up with a working plan by April 2025 which should prioritise, among other products, energy related products, information and communication technology products, and other electronics. However, even if this were to lead to ambitious requirements (which is not a given - more often than not, product regulations do not go much beyond the 'business as usual' scenario), creating regulations on a product-by-product basis is a very slow process. It takes several years to enact a single piece of product-specific legislation.

The only way to address the issue at a speed that would match the emergency of the current climate and environmental crises would be to rapidly enact horizontal requirements that are directly applicable to a broad range of products. This could be done by including directly applicable repairability requirements in the *Ecodesign for Sustainable Products Regulation* (EU 2024/1781), as is the case with the requirements concerning the destruction of unsold goods, and by expanding the scope of the *Common Rules to Promote the Repair of Goods* (EU 2024/1799) to all energy-related products instead of limiting it to those products already covered by Ecodesign.

In order to make an actual difference in terms of product lifetimes and the associated footprint, the scope should not only be broadened but EU policies fostering repair should also be significantly more ambitious than is currently the case, so as to enable a true Right to repair as described in the previous section.

For its next term of office, the European Commission is planning to propose a New Circular Economy Act. It is crucial that this sets a vision that is coherent with the waste hierarchy, which has long been established but fails to be coherently transformed into policy. Even if tackling waste and demand for secondary materials is necessary, extending the lifespan of products through a universal right to repair is the most effective and sustainable way to lower their environmental footprint in order to achieve climate change reduction goals.

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