



RIGHT TO

REPAIR

FEEDBACK

On the Commission Implementing Regulation on the disclosure of unsold consumer goods

Brussels, July 2025

The [Right to Repair Europe](#) coalition represents over 180 organisations from 30 European countries. It represents repair actors such as community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, as well as environmental NGOs and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement, and its objective is to make repair affordable, accessible and mainstream. The coalition is represented in the Ecodesign Forum by its member organisations ECOS, EEB, The Restart Project, RREUSE and HOP.

The Right to Repair Europe coalition welcomes this opportunity to share feedback on the draft Commission Implementing Regulation laying down rules for the application of Regulation (EU) 2024/1781 as regards the details and format for the disclosure of information on discarded unsold consumer products.

The coalition supports the improvements suggested by our member organisation ECOS to the draft Implementing Regulation:

- Clarify that the ESPR reporting requirements will apply regardless of the date of application of the Implementing Regulation.
- Require companies that include unsold goods reporting in their sustainability reporting to clearly mention it on their website and indicate where to find that information in their report.
- Require limited assurance for all companies covered by the unsold goods reporting requirements.
- Companies should always partner with waste treatment operators and know the destination of their discarded products. “Unknown destination” should not be accepted in the reporting.
- Planned preventive measures should be specific to ensure that they are implementable and implemented, to avoid empty promises.

Please see ECOS's supporting document for more detailed information on these elements.

In addition, we would like to provide more detailed feedback on the product categories that companies should be required to report on, and specifically on the unsold goods that should be reported using a 4-digit CN code.

The ESPR has the power to impact countless everyday products and drive meaningful change. The disclosure on the destruction of unsold consumer goods could provide vital data on a wide range of products. The growing flow of e-waste is widely composed by a great diversity of small devices and gadgets. To maximize the effectiveness of reporting on unsold goods, the European Commission must ensure broad product coverage, capturing as many categories as possible. At the same time, maintaining a certain level of granularity is crucial for an accurate and comprehensive assessment. **We therefore wish to congratulate the European Commission for adding the following product categories to the list for which a 4-digit CN code is mandatory:**

Product category (ie. computers)	Source (ie. JRC/OR/WEEE)	CN-Code	Included in Annex II ?
Air conditioners	JRC	8415	Yes
Solid fuel boilers	JRC	8403	Yes
Dehumidifiers and fans	ORA	8415	Yes
Heat pumps	WEEE	8414, 8415, 8418	Yes
Refrigerators	JRC	8418	Yes
Dishwashers	JRC	8422	Yes
Power tools	ORA	8465/8467	Yes
Batteries and chargers	ORA	8506	Yes
Sound recording or sound reproducing apparatus	ORA	8519	Yes
Video recording or reproducing apparatus, whether or not incorporating a video tuner	JRC, ORA	8521	Yes
Discs, tapes, solid-state non-volatile storage devices, 'smart cards' and other media for the recording of	JRC, ORA	8523	Yes

sound or of other phenomena, whether or not recorded, including matrices and masters for the production of discs, but excluding products of Chapter 37			
Monitors and projectors, not incorporating television reception apparatus; reception apparatus for television, whether or not incorporating radio-broadcast receivers or sound or video recording or reproducing apparatus	JRC, ORA	8528	Yes

However, to ensure comprehensive coverage, the CN-code list should align with established frameworks such as Annex IV of the [WEEE Directive](#) and the [JRC study JRC139725 on product relevance for a Reparability Scoring System](#). We also propose to take into account the product categories of the [Open Repair Data Standard](#), and featured in the recent [Open Repair Alliance \(ORA\) report](#).

Tables 1 and 2 highlight the remaining gaps and further research is needed to identify the corresponding CN-Codes.

Table 1: CN-Codes for product categories identified as relevant by the JRC, the WEEE Directive and the Open Repair Alliance report still missing from Annex II

Product category (ie. computers)	Source (ie. JRC/ORA/WEEE)	CN-Code	Included in Annex II ?	Notes
Tumble dryers	JRC	8421	no	
Washing machines and washer-dryers	JRC	8450	no	
Lawnmowers	ORA	8433	no	Technically subgroup 843311
Scales	JRC	8423	no	
Massage appliances	JRC	9019	no	

Space and combination heaters	JRC	7322	no	
Water pumps	JRC	8413	no	
External power supplies	JRC	8536	no	
Power transformers	JRC	8504	no	
Electric motors	JRC	8501	no	
PC accessories (keyboards, mice, webcams)	ORA	847160	no	Covers input/output devices
Musical instruments	ORA	92 / 9207 (more specific)	no	
(portable) radios	ORA	8527	no	
Sewing machines	ORA	8452	no	
LCD photo frames	WEEE	8528	no	
Luminaires	WEEE	9405	no	
Knitting and weaving appliances	WEEE	8447, 8446	no	
Photovoltaic panels	WEEE	8541	no	
Clocks and watches	WEEE	9101, 9102, 9103	no	
Calculators	WEEE	8470	no	
Thermostats	WEEE	9032	no	

Table 2: Examples of relevant product categories for which we couldn't find a clear CN-Code

Product category (ie. computers)	Source (ie. JRC/ORA/etc)	CN-Code	Included in Annex II?	Notes
Tablets	ORA	?	no	Could tablets possibly be covered either under telephone sets (8517) or under computers (8471)?
Electric toothbrushes	JRC	?	no	Possibly covered under toothbrushes (9603)?
Fitness trackers, smartwatches	JRC	?	no	Possibly covered under watches (91)?
Servers and data storage	JRC	?	no	
Welding equipment	JRC	?	no	
Domestic cooking appliances	JRC	?	no	
Small home electrical e.g. baby monitor, doorbell, multimeter.	ORA	?	no	
Small kitchen item e.g. breadmaker, rice cooker, popcorn machine.	ORA	?	no	
Fitness equipment	ORA	?	no	
Paper shredder	ORA	?	no	
Circulators	JRC	?	no	
Steamers	JRC	?	no	
Slow cookers	JRC	?	no	

Rice cookers	JRC	?	no	
Pressure cookers	JRC	?	no	
Sous-vide	JRC	?	no	
Air fryers	JRC	?	no	
Kettles	JRC	?	no	
Kitchen robots	JRC	?	no	
Waffle and raclette makers	JRC	?	no	
Electric knives	JRC	?	no	
Signage	JRC	?	no	
Interactive whiteboards	JRC	?	no	
Video conferencing systems	JRC	?	no	
Set-top boxes	JRC	?	no	
3D printers	JRC	?	no	
VR machines	JRC	?	no	
Home NAS	JRC	?	no	
Local space heaters	JRC	?	no	