



RIGHT TO

REPAIR

FEEDBACK

On the Consumer Agenda 2025–2030 and action plan on consumers in the Single Market

Brussels, August 2025

The [Right to Repair Europe](#) coalition brings together over 180 organisations from 30 European countries. Our members include community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, environmental NGOs and citizens advocating for their right to repair. This rapidly growing movement aims to make repair affordable, accessible and mainstream. Browse member organisations by country [here](#).

The European Union's efforts to transition to a circular economy are undermined by business practices that not only reduce the durability of products but also encourage overconsumption and waste. While repairing broken devices saves resources and cuts environmental impacts, repairing is often more expensive than replacing. The Right to Repair Directive was a step in the right direction, but the ambition of its measures and its scope remains limited to only a few product groups.

This is why the Consumer Agenda must focus on sustainable consumption and prioritise:

- Promoting an open repair market and stronger protection against early obsolescence practices. Introducing binding information requirements on the price of spare parts, banning all forms of early obsolescence and fully implementing the Ecodesign for Sustainable Products Regulation (ESPR), expanding the Right to Repair to more product groups (alongside a ban on the destruction of any unsold goods).
- Banning unsustainable business practices that encourage overconsumption of new products, such as marketing-driven obsolescence, dark patterns and addictive designs.
- Promoting information and consumer awareness on the environmental impact of products and of overconsumption.
- Reviewing the potential of Extended Producer Responsibility (EPR) schemes across categories in order to create stronger financial disincentives against overconsumption and wasteful business models.

Promoting an open repair market and stronger protection against early obsolescence practices

The European Commission must adopt binding rules to tackle unfair pricing of spare parts, which remains the most significant barrier to affordable repairs and refurbishment. As outlined in Right to Repair Europe's [White Paper on Price of Spare Parts](#), the cost of spare parts often makes repairs economically unviable for consumers, with manufacturers bundling parts unnecessarily to inflate costs. Research shows that consumers are only willing to repair if costs remain below 30% of the price of a new product, yet many repairs exceed this because spare parts alone push costs beyond this threshold. This practice fuels early obsolescence, burdens households financially and undermines Europe's efforts to build a circular economy. It is essential that the declared price of spare parts become a binding commitment, incorporated into repairability scoring, and enforced consistently across Ecodesign and Energy Labelling rules. Only then can consumers make informed choices and trust that repair and refurbishment are genuinely affordable options.

The EU must act decisively to end the widespread practice of forced software obsolescence, which forces millions of functional devices into premature waste. The looming end of Windows 10 support, as highlighted in the [International Repair Day 2025 statement](#), is set to create up to 700 million kilograms of avoidable e-waste, since many devices can technically run well but will become insecure and non-compliant overnight. This pattern is not unique to computers — it affects smartphones, smart home devices and potentially any digital product. Article 13.8 of the Regulation (EU) 2024/2847 on horizontal cybersecurity requirements for products with digital elements provides a good basis for addressing software obsolescence and ensuring product safety. However, the support period during which manufacturers must provide security updates remains too vague. It is therefore essential that the “relevant Union law determining the lifetime of products with digital elements” be clarified and updated to define product lifetimes more precisely.

The regulation states that “the support period shall be at least five years,” yet it exempts products “expected to be in use for less than five years,” creating a serious loophole. Without clear obligations for long-term software and security updates matching the technical lifespan of devices, consumers are left with no safe or practical option other than premature replacement.

For the vast majority of digital products, software and security updates should be provided for at least 10 years (and 15 years for laptops and computers). To protect consumers and the planet, the next Consumer Agenda must embed strong rules against software obsolescence, ensuring long-lasting support, fair upgrade paths and real incentives for manufacturers to design products that stay in use as long as possible.

Considering the limited scope and ambition of the ‘Right to Repair Directive’, we believe the initiative fell short of its potential. In practice, it functions more as an annex to existing Ecodesign rules than as a standalone “Right to Repair.” Its main effect will be limited to modestly increasing the likelihood that the few product groups already subject to repairability requirements will in fact be repaired.

However, we welcome the EU Commission’s launch of work on horizontal Ecodesign repairability requirements covering a wider range of products, which should automatically fall under the scope of the Repair of Goods Directive once regulated. We look forward to cooperating with DG ENV on this initiative, and urge that these ecodesign requirements be applied to as many product categories as possible.

In terms of ambition, the list of missed opportunities is long. The following provisions were agreed by the European Parliament after extensive negotiations, but were later removed during trilogues under time pressure. We urge the Commission to reconsider them in the next Consumer Agenda:

- The right for independent service providers to perform repairs under the legal guarantee;
- The right for the consumer to make a guarantee claim directly to the producer;
- The right for the consumer to choose for the producer to repair a good that is not in conformity, with any terms of a commercial guarantee that discourage the consumer from making use of this right being void;
- The right for the consumer to have a product repaired unless this is factually or legally impossible (with the producer not allowed to refuse the consumer’s request purely due to economic considerations such as the costs);
- The right for independent repairers, remanufacturers, refurbishers and end-users to have access to all spare parts and all repair-related information and tools, including diagnosis tools for a period corresponding to at least the expected lifespan of the product;
- The obligation for producers to publish all information related to repair (such as repair prices and prices of spare parts) on their websites;
- The possibility for legislators to add products to the list even if not already covered by Ecodesign or other requirements.

Ban unsustainable business practices that encourage overconsumption

In its last [report](#), the association HOP - Stop Planned obsolescence revealed that 66% of French citizens feel overexposed to ads¹. Although 90% of people claim to be aware of responsible consumption², they are constantly pressured to purchase new products, even when unnecessary. The overconsumption environment does not incentivise sustainable habits. Marketers have developed several techniques to make

¹ HOP, *Made to overconsume*. 2025

² Occurrence-Groupe Ifop 2025 survey for HOP, in France

people overconsume³. The EU must regulate marketing practices that push the overconsumption of new products.

Marketing-driven obsolescence leads to 64% of smartphones and 48% of TVs being changed even if they are perfectly or partly functional⁴. Consumers are exposed to more than 15,000 commercial stimuli daily⁵. Right from the product design stage, the renewal of product ranges and generations creates an artificial novelty that makes old products obsolete. Price is also a major incentive, with monetised trade-ins and sometimes misleading promotional offers. Finally, retailers exploit perception bias and use « dark patterns », which manipulate consumers into buying more new products.

71% of French people think that the use of terms such as « innovation » or « progress » should be controlled in advertising⁶. Consumers need a clear framework that distinguishes truly durable and necessary products from marketing-driven obsolescence.

In brief, the Consumer Agenda should:

Recognise marketing-driven obsolescence as an offence

Marketing practices that encourage unnecessary renewal must be defined and sanctioned as “marketing obsolescence” offences. This would set a clear boundary on practices that push overconsumption. While such practices are deeply entrenched and may not always warrant criminal sanctions, they must be identified, addressed systemically, and regulated due to their harmful impact on consumers and the environment.

Ensure better regulation of advertising and unfair commercial practices

European market surveillance authorities must be given the mandate and resources to sanction advertising that promotes overconsumption, encourages premature product disposal, or discredits circular practices such as repair. European authorities should also be able to sanction addictive gamification patterns that encourage overconsumption and rewards further/renewed purchases. Risks towards over-spending and overindebtedness are further heightened by the growing availability of “Buy Now Pay Later” products, which allow consumers to split or delay payments. These models should be discouraged, and regulators empowered to impose both financial and practical sanctions.

Introduce a roadmap for sustainable marketing and responsible consumption

This roadmap should address the allocation of advertising displays in public areas. These should be reserved for cultural communications, communications of general interest, and promotion of sustainable products and services, such as circular products and practices.

³Op. cit.

⁴Op. cit.

⁵ Joanna Yakin, « Les Français sont-ils vraiment exposés à 5 000 marques par jour comme l'affirme François Ruffin? », 2019

⁶Op. cit.

Better regulate dark patterns that lead to overconsumption of new products

The EU must protect consumers from aggressive marketing techniques and ban the injunction to overconsume. This must become one of the main priorities on the Consumer Agenda.

Avoid simplification efforts that reduce scope or ambition

Endeavours towards simplification must enhance rather than weaken environmental ambition and consumer protection. This means committing to a full and comprehensive implementation of the Ecodesign for Sustainable Products Regulation, the Right to Repair Directive, and the recent revisions of the Waste Framework Directive. These all provide foundational protections for consumers and incentives for producers to design products that remain in use longer.

More information and consumer awareness on the environmental impact of products and of overconsumption

A [report](#) for the Commission revealed that 80% of analyzed products and services were marketed as green. Over half of the green claims were found to be vague, misleading, or unfounded. This misleads consumers and disadvantages genuinely sustainable businesses, preventing them from competing fairly in the market.

In the context of the uncertain future of the Green Claims Directive we urge the EU Commission to uphold its commitment to fight greenwashing and to introduce a solid methodology to evaluate green claims. Furthermore, repairability indexes must integrate the cost of spare parts, since affordability is a critical element of true repairability.

Public awareness campaigns will also play a crucial role. As demonstrated by the ADEME campaign "[Poisons-nous les bonnes questions avant d'acheter](#)," creative and engaging communication can encourage consumers to reflect on their actual needs before making a purchase. Replicating such campaigns at EU level would help counter marketing pressures, normalise sustainable behaviours, and empower consumers to choose repair, reuse, and longer-lasting products.