



RIGHT TO REPAIR

FEEDBACK

On the Simplification of administrative burdens in environmental legislation

Brussels, September 2025

The [Right to Repair Europe](#) coalition represents over 180 organisations from 30 European countries. It includes 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 citizens advocating for their right to repair. This is a rapidly growing movement, and its objective is to make repair affordable, accessible and mainstream. Browse member organisations by country [here](#).

Simplifying Environmental Legislation Without Weakening Ambition

The Right to Repair Europe coalition welcomes the EU Commission's commitment to simplifying environmental legislation. To achieve EU circular economy goals, there is an urgent **need to streamline rules applying to circular businesses**, such as repairers and refurbishers. However, simplification must be carried out carefully and transparently, with the clear purpose of strengthening – not weakening – environmental and circular policies. Past omnibus packages, despite assurances of the contrary, did in fact lower environmental protection. The European Commission must ensure this does not happen again **in the context of products and waste regulation**, particularly given the **genuine opportunities to cut administrative burden while maintaining high environmental ambition**. Please find hereunder our input on: removing unnecessary administrative **barriers in Ecodesign regulation** to accelerate the Right to Repair; simplifying and **harmonising EPR systems** at EU level to reflect the waste hierarchy and promote reuse.

1. Simplifying Ecodesign to strengthen the Right to Repair

Simplification is an opportunity to **advance the Right to Repair** by removing unnecessary administrative barriers.

Currently, ecodesign rules restrict access to certain spare parts and repair information to “professional repairers”, with manufacturers controlling

authorisations. This adds complexity and disadvantages independent repairers, most of them SMEs, as well as consumers.

A **simpler and fairer system** would make all spare parts accessible to both professional repairers and consumers. This would:

- Remove bureaucracy linked to manufacturer-controlled authorisations.
- Empower consumers and SMEs in the repair sector.
- Support circular economy goals by making repair more accessible and affordable.

Broader **horizontal ecodesign requirements** covering more product categories would streamline rulemaking, reduce burdens for regulators and businesses, and ensure products are designed for durability, repairability, and resource efficiency – without lowering ambition.

2. Simplifying Extended Producer Responsibility (EPR) to boost reuse and repair

EPR systems must be simplified and **harmonised at EU level** to reflect the waste hierarchy and support reuse. Today's patchwork of national schemes creates complexity and hinders cross-border trade of second-hand and refurbished goods.

We recommend a **central EU EPR framework** with clear, straightforward eco-modulated criteria.

- Create an EU-wide one-stop portal for a single submission for all EPR declarations and obligations, cutting bureaucracy and cost while improving data sharing, compliance, transparency, and traceability across the value chain.
- Safeguard the Single Market for second-hand products and spare parts, and strengthen the application of the waste hierarchy in EPR:
 - **Earmark EPR revenues** to fund repair and reuse services
 - **Exempt second-hand and refurbished products** from EPR fees to foster a genuine EU single market for reuse.
 - Ensure that products and waste are collected, handled, and sorted so as to maximise its potential for reuse, through proper separation and protected storage.
 - Ensure EPR schemes do not misclassify second-hand products and spare parts as waste or restrict their cross-border movement.

Simplified and harmonised EPR rules would strengthen incentives for repair and reuse, support SMEs, and align economic signals with the Green Deal's objectives.

3. Concerns about the process and the risk of deregulation

The proposed “omnibus” could reopen and weaken important pieces of environmental legislation, creating legal uncertainty and undermining the EU's

obligations under agreements such as the Paris Agreement and the Kunming-Montreal Global Biodiversity Framework.

The Call for Evidence provides no data showing that this process would “increase the effectiveness of environmental policy”. In the absence of evidence, we cannot support fast-track reopening of legislation. Any changes must follow the **normal legislative process**, including full impact assessments, involvement of all three EU institutions, and proper stakeholder consultation.

As Commissioner Roswall has stated, *“Reducing the administrative burden of environmental laws should help make them more effective and ensure better environmental protection in the long run.”* Simplification should therefore **not** be used as a pretext to remove targets or obligations that have been proven effective through transparent Fitness Checks. Instead, it should focus on improving the capacity of Member States and the EU to implement, monitor, and enforce existing rules.

Robust baseline data must be generated before revising legislation. Without this, simplification risks weakening existing rules and jeopardising Green Deal progress.