RIGHT TO REPAIR

FEEDBACK

Towards a Repairable Europe: Right to Repair Europe's Input on the Circular Economy Act

Brussels, November 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 citizens advocating for their right to repair. Browse member organisations by country here.

1. A Circular Economy Act Built on the Waste Hierarchy

A truly circular economy starts long before recycling, it begins by keeping products in use for as long as possible. The European Commission must ensure that the Circular Economy Act is fully aligned with the waste hierarchy, prioritising waste prevention over waste management:

- Harmonise and reshape Extended Producer Responsibility (EPR) schemes through revisions of the Waste Framework Directive and WEEE Directive to focus on reuse and repair before recycling.
- Set binding reuse and repair targets, ensuring that EU policies deliver tangible waste prevention outcomes.
- Require Member States to integrate repair and reuse infrastructure and services into national waste prevention plans.
- Mandate sorting by a qualified professional to assess reusability before recycling for every collected used device or e-waste item.
- Rely on a legal basis covering not only article 114 (internal market) but also an appropriate environmental article.

In addition, product repairability requirements must advance further by ensuring legal coherence and broader scope. The Right to Repair directive's core reparability provisions should be integrated into the Ecodesign framework and extended to more categories, such as laptops. Critical reparability gaps for smartphones, tablets, and laptops should be closed by mandating long-term security updates; ensuring easy removability of parts and banning unnecessary bundling; and prohibiting part pairing and recognising compatible parts that meet equivalent technical and safety standards. For a full assessment of all the current loopholes still enabling anti-repair practices across product categories see our "What's my Right to Repair?" webpage and our paper "The Current State of Right to Repair in the EU".

2. Reuse and repair targets to boost job creation, competitiveness and supply chain resilience

While some progress was achieved through the ESPR and Right to Repair Directive, major gaps still need to be closed through clear reuse and repair targets, for the economy as a whole as well as specifically for WEEE.

To foster reuse and repair, we recommend to define dedicated repair and reuse targets on used products and waste, distinct from recycling ones, and assign them to Member States, not to PROs, so that all relevant policy levers for sector development—taxation, legal frameworks, skills and training, innovation, and consumer protection—can be leveraged, which cannot be mandated at the PRO level. PRO should only contribute in financing and implementing part of this strategy.

The additional benefits are clear, as a stronger repair economy can simultaneously advance industrial competitiveness, job creation and strategic autonomy:

- In France, products displaying the LONGTIME® repair label on Cdiscount saw a 20% increase in consumer clicks, clear evidence of consumer demand for reliability and repairability.
- A major international manufacturer found a 3.7:1 return on investment from adopting repairability labelling, demonstrating consumer interest and that sustainable design and communication can effectively boost both reputation and revenue[1].
- A 2025 study by the German Environment Agency[2] shows that a "Right to Repair" scenario could create around 60,000 additional jobs, particularly in higher-productivity and better-paid sectors such as ICT, textiles, and electrical engineering.
- These shifts would generate overall higher wages than those in traditional retail and stimulate local economic activity through new business models and self-employment opportunities.

3. Reforming Extended Producer Responsibility (EPR) for a Circular Transition

After 30 years of EPR implementation, the evidence is clear: existing systems have not delivered on waste prevention or eco-design incentives:

- Waste generation in EPR-covered sectors has continued to increase.
- EPR fees are too low to drive design changes.
- Reuse and repair activities remain chronically underfunded.
- Producer Responsibility Organisations (PROs) lack transparency and often exclude civil society and circular economic actors such as repairers or refurbishers from governance.

A Double-Fee, Harmonised EPR System

Right to Repair Europe supports Zero Waste Europe's proposal for a double-fee structure where a nationally set component would cover waste management and collection costs,

[1] Source: https://longtimelabel.com/en/, member of Right to Repair Europe
[2] https://www.umweltbundesamt.de/publikationen/wenn-private-haushalte-mehr-reparieren

while an harmonised EU-level component finances the transition to a circular economy (waste prevention).

The EU-level variable should:

- Be eco-modulated based on durability, repairability, and reuse potential.
- Reward best-performing products and business models while penalising unsustainable ones.
- Finance reuse and repair infrastructure, consumer campaigns, and data collection.

4. Eco-Modulation: Incentivising Design for Longevity

To be effective, eco-modulation must move beyond recycling metrics and focus on repairability, durability, and reuse:

- Reward circular business models: incentivise secondhand, refurbished, and remanufactured products.
- Link to repairability indexes: expand and improve the EU methodology to cover more product groups.
- Clarity and ambition: criteria must be robust, transparent, and easy to apply. Overly complex systems dilute impact.

Suggested Criteria

- Fee reductions for products that guarantee:
    - Spare parts and software support for at least 15 years after market withdrawal;
    - Use of refurbished or salvaged components;
    - Extended durability warranties.
- Bonus–malus system aligned with enhanced EU repairability scores.
- Mandatory earmarking of EPR revenues for reuse and repair initiatives, at least equal to the ones allocated for recycling.
- Full EPR fee exemption for secondhand and EU-refurbished products.

5. Fair Governance of Producer Responsibility Organisations (PROs)

The management of EPR funds must reflect the full value chain, not only producer interests. The EU Commission should:

- Require multi-stakeholder governance of PROs, with representation from repairers, refurbishers, NGOs, social enterprises, local authorities, and public agencies. Especially economic operators involved in circular economy, such as repairers and refurbishers, should have co-decision power alongside producers for any strategy, funding or PRO decision impacting their business or sector.
- Ensure public access to financial and operational data for accountability.
- Harmonise governance rules across Member States to avoid disparities.

Public authorities should have a clear oversight role to guarantee that EPR funds genuinely serve the objectives of resource efficiency and waste prevention.

6. Financial Incentives: Making Repair and Reuse the Easy Choice

The EU should require Member States to introduce national financial incentives for repair, take-back schemes and reuse building on successful pilots across Europe. These mechanisms:

- Make repairs more affordable.
- Improve collection rate of used products, spare parts and e-waste, for example through monetary compensation or vouchers when returning a used device or e-waste item.
- Channel EPR funds into concrete prevention actions.
- Strengthen local repair and reuse businesses.

Scaling this model across the EU could deliver immediate circular economy benefits:

- France's Bonus Réparation, financed through EPR, directly subsidises consumer repair costs. Over 50% of consumers using the Bonus Réparation said it directly influenced their repair decision[3]. 40% of repairers reported higher turnover after joining the repair bonus scheme[4].
- In Thuringia, Germany: 42% of consumers reported their repairs would not have occurred without a repair voucher; 35% said they repaired only because of the voucher[5].

[3] https://aide.spareka.fr/limpact-positif-du-bonus-reparation-et-des-reparations-a-distance-un-succes-au-dela-des-attentes/
[4] https://www.halteobsolescence.org/rapport-hop-bonus-reparation/
[5] https://www.emerald.com/jrpc/article/2/1/193/1267552/Supporting-consumer-engagement-in-electronics