



Compliance & Risks

Webinar

# Prepare to Repair: *2025 Right-to-Repair Requirements in the EU, US and Beyond*

9 April, 2025



→ | [complianceandrisks.com](https://complianceandrisks.com)



Q&A  
Session

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# Webinar Platform Tips

# Meet the Team



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# Mission Statement

**Ensure global companies have the tools & information to build safe, sustainable, products in a world full of change**

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WHAT WE DO

# Unlocking Market Access

Keep on top of regulatory changes and their impact worldwide. Early warning alerts, impact probability, productivity workflow tools and so much more.



# EU Right to Repair





# EU Right to Repair (R2R) Directive 2024/1799

- **In force: 20 July 2024 - Transposition Deadline: 31 July 2026**
- Amends: Sale of Goods Directive (EU) 2019/771
  - = Allows additional 1-year extension of legal guarantee
  - if consumer chooses repair over replacement.
  - **(within guarantee)**
- Applies to Consumer Goods bought after 31 July 2026
- Seller must **inform** the consumer about their right to
  - choose between repair and replacement and the extension
  - of their guarantee.
- Choose Replacement = no extension.



# EU Right to Repair (R2R) Directive 2024/1799

Repair of products covered by certain **ecodesign Regulations or Batteries Regulation (Annex II - Household fridges, household dishwashers, displays, mobile phones etc.)**

**Manufacturer**, authorised rep, importer/distributor must (upon consumer request) repair product incl o/s **guarantee** unless impossible.

- Free of charge/at **reasonable** price.
- Within **reasonable** time.
- Replacement may be provided free of charge during repair.
- Refurbished product if repair impossible.

# EU Right to Repair (R2R) Directive

## Obligations of Manufacturers

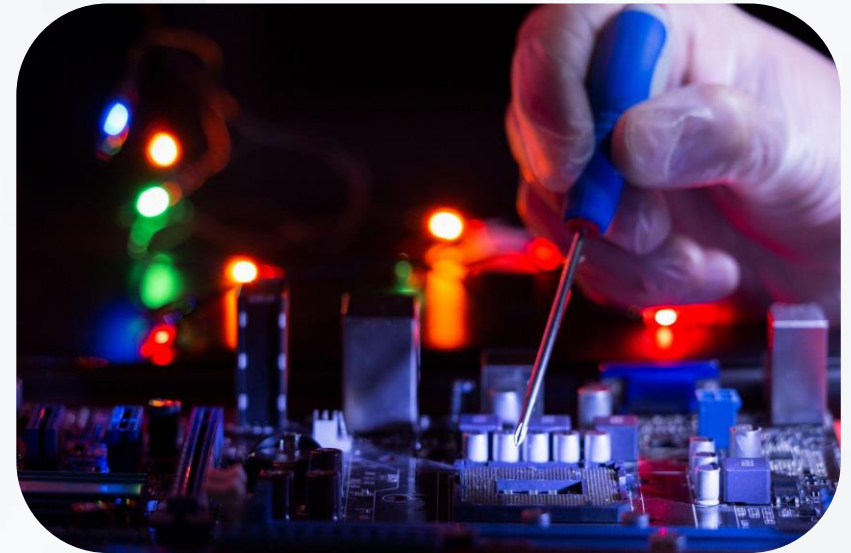
1. Consumer access to **list of prices** charged for typical repair of goods on a free access website
2. Spare parts must be offered at a **reasonable** price
3. **Cannot use any practices that hinder repair** - such as contractual clauses, hardware or software techniques that impede repair unless justified (for example reasons such as protection of IP - loophole?)
4. **Cannot refuse repair** for sole reason that previous repair was performed by another repairer



# EU Right to Repair (R2R) Directive

## European Online Platform for Repair

- Allow consumers to find repairers and/or sellers of refurbished goods, purchasers of defective goods
- One **single platform** with a common online interface that will include links to EU MS **National Online Platforms** for repair
- Accessible for **free** for consumers in all languages
- **Voluntary registration** for repairers
- Expected to be fully operational by **2028**



# Interplay with Other EU Laws



# EU Ecodesign Requirements for Sustainable Products Regulation 2024/1781 (ESPR)

## R2R: Applies to Certain Ecodesign Regulations that have Repairability Requirements

- ESPR - Framework law on how to design sustainable products for the EU market. (Applies from 18 July 2026)
- **Priority products** will be set out in 1st ESPR working plan
  - (adopted by **19 April 2025**):
  - Iron, steel, textiles, chemicals, furniture, paints etc.
  - energy related products new/revised
    - (commercial dishwashers + commercial laundry)

**Recital 15:** Importance of Horizontal Requirements for Repair and Durability

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# Draft Regulation for Eco-design for Servers and Data Storage Products

Discussed at Ecodesign and Energy Labelling Consultation Forum: 10 March 2025

## Spare Parts

- Available for at least 5 years - Delivered within 10 days
- List of pre-tax prices (including fasteners or tools) on the free access website

## Parts Pairing

- Replacement of serialized parts (unique codes paired to specific devices - replacement only through using correct software code)
- Provide access to professional repairs to software (within 10 days) to ensure the full functionality of the spare parts in the device installed

# EU Batteries Regulation 2023/1542

**R2R Directive:** LMT batteries under new Batteries Regulation (E-Bikes and E-Scooters)

- LMT batteries **must be removable and replaceable** by an independent professional repairer
- Spare parts for  $\geq 5$  years after placing the last unit of equipment model on the market
- **R2R** = Manufacturers of E-Bikes and E-Scooters must offer repair of LMT batteries (on request) on reasonable terms for the 5 years the spare parts must be available
- **New Guidelines**: 10 Jan. 2025: Removability and replaceability of LMT batteries



# EU Greenwashing Directive 2024/825

Prohibits generic environmental claims which are not based on recognised environmental performance.

## Unfair Commercial Practices Amendment - Blacklist

- Ban on Presenting a good as allowing ***repair when it does not***.
- Ban on ***falsely claiming*** that under normal conditions of use a good has a certain durability in terms of usage time or intensity.

## Consumer Rights Directive Amendment

Before the consumer is bound the contract must include:

- ***Reparability score*** for the product (if available), OR
- Info on availability and estimated cost of spare parts, how to order, repair and maintenance instructions, and any repair restrictions.

# EU Repair Labels



# France Repairability Index

## AGEC 2020-105 plus Decree No. 2020-1757 on generic requirements for EEE

- Display in shops near the product, online, on product packaging ]
- **1 January 2021:** Smart Phones; Computers; Electronic displays; Front Loading Household Washing Machine; Lawn mowers (Robotic, Corded Electric and Electric Battery)
- **4 November 2022** Top-loading Household Washing Machines; Cordless Vacuum Cleaners; High-Pressure Cleaners; Household Dishwashers; Vacuum Cleaners
- Criteria: 1. Documentation 2. Disassembly 3. Availability of spare parts .4. Price of spare parts 5 Product-specific aspects

# France Sustainability Index

## Article L541-9-2 Envir. Code + Decree No. 2024-316

*(terms and conditions for application of sustainability index)*

- Covers reliability and durability information

**Order on Sustainability Index of EEE, April 2024** (score out of ten/ displayed at the time of purchase to inform consumers of the **lifetime** of EEE)

- Two implementing orders approved - (apply from **7 January 2025**)
  - Televisions
  - Household washing machines

## Adds 3 more criteria

- Resistance to stress and/or wear
- Maintenance and upkeep criterion
- Guarantee and quality approach



# Belgium Repairability Index

**Law of 17 March 2024 + implementing Decrees: 2 May 2025**

Mandatory display of repairability index

- Household dishwashers
- Household vacuum cleaners, wired, cordless and robots
- High pressure cleaners
- Wired electric lawn mowers, with batteries and robots
- Laptops excluding digital tablets
- Bicycles
- Electrically assisted pedal cycles and
- Electric scooters

Sellers must display the repairability index, free of charge, near the price, in a visible manner

Représentation graphique en langue française :



INDICE DE REPARABILITE

Représentation graphique en langue néerlandaise :



HERSTELBAARHEIDSINDEX

Représentation graphique en langue allemande :



REPARATURFÄHIGKEIT

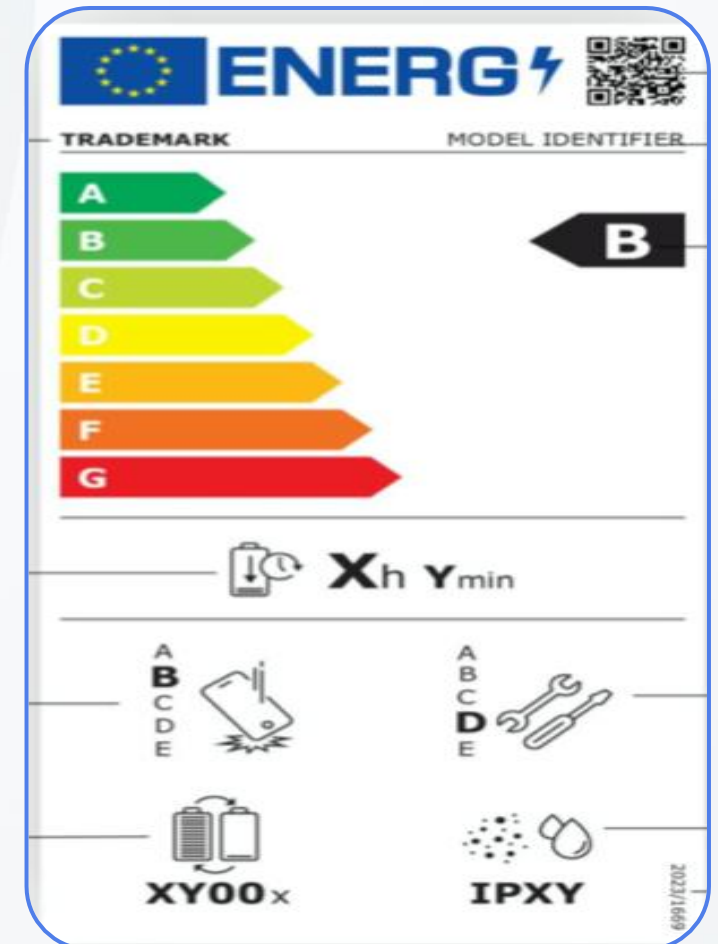
# EU Energy Label Smartphones and Tablets Regulation No. 2023/1669

New EU Energy Label from 20 June 2025

## Repairability Index calculated based on:

1. Disassembly Depth (how many steps to remove)
2. Fasteners Type (removability)
3. Tools (availability)
4. Spare Parts (availability)
5. Software Updates (duration)

Harmonised Standard EN 45554 General methods for the assessment of the ability to repair, reuse and upgrade energy-related products



# USA Right to Repair



# US Right to Repair: State Level - Enacted

**Oregon:** Right to Repair Consumer Electronic Equipment Act, Senate Bill 1596, 2024

(EIF 1 Jan 2025)

**California:** Right to Repair Act, Senate Bill 244, 2023

(EIF 1 Jan 2024)

**Colorado:** Consumer Right to Repair Digital Electronic Equipment, House Bill 1121, 2024

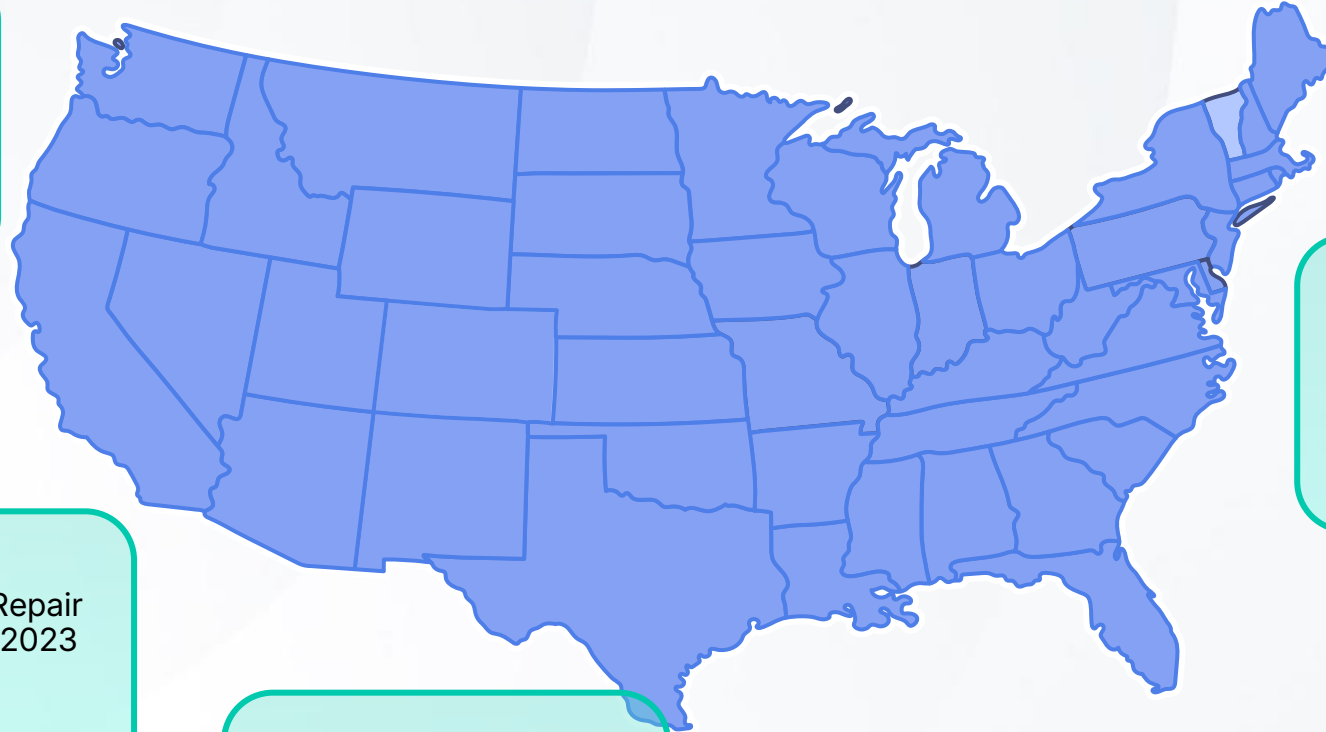
(EIF 1 Jan 2026)

**Minnesota:** Digital Fair Repair Act, Senate Bill 2744, 2023

(EIF 1 July 2024)

**New York:** Digital Fair Repair Act, Senate Bill 4104, 2022

(EIF 28 Dec 2023)





# New York: Digital Fair Repair Act

**Senate Bill 4104 Enacted - In Force: 28 December 2023**

**Original Equipment Manufacturer (OEM)** must make available to independent repair providers & consumers, the documentation, parts & tools needed to **diagnose, maintain, or repair digital electronics**

- Fair and **reasonable** terms
- **Digital Electronic Equipment:** Any hardware products dependent on digital electronics embedded in/attached to product sold after 1 July 2023
- Excluding products sold under business-to-government or B2B contracts not sold at retail



# California: Right to Repair Act

**Senate Bill 244 - In Force 1 Jan 2024**

- **Manufacturers selling electronic/appliances to retailers/others in CA** to provide to product owners, service & repair facilities & service dealers, **documentation, functional parts & tools to diagnose, maintain, or repair product:**
  - Products \$50 - \$99.99 (wholesale) - Min 3 years after last date of manufacture
  - Products \$100 or more (wholesale) - Min 7 yrs after last date of manufacture
- B2B: including products sold to schools, businesses, local government - or other means outside of retail sale
- **Includes Appliances:** refrigerators, freezers, microwaves for personal, family, household, or home office use, **or in private motor vehicles**

# Minnesota: Digital Fair Repair Act

**Senate File 2744 Enacted - In Force: 1 July 2024**

**Original Equipment Manufacturer (OEM)** to make available to independent repair providers & consumers, documentation, parts & tools to diagnose, maintain, or repair **digital electronic equipment**

- **Digital Electronic Equipment:** hardware product dependent, in whole or in part, on digital electronics embedded in/attached to product in order to function
- **OEM** - individual or **business**, selling/leasing to any individual or business, new digital electronic equipment manufactured by, or on behalf of the OEM (**Includes B2B**)
- Necessary parts/tools/documentation shall be available w/in **60 days** after first sale in MN, including updates and software



# Oregon: Right to Repair Consumer Electronic Equipment

## Senate Bill 1596 - In Force: 1 Jan 2025

- **OEM** to make available to owner (consumer) or an independent repair provider any documentation, tool, part or other device or implement that the OEM makes available to an authorized service provider for use in **diagnosing, maintaining, repairing or updating consumer electronic equipment**
- First US state to ban: **“parts pairing”** - software barriers or locks used to prevent consumers or repairers from replacing parts that are not “paired” or specifically authorised by the manufacturer of their device
- Prohibition on **parts pairing** is intended to encourage harvesting of spare parts from defunct devices for use in other, salvageable devices - **crucial aspect of repairability**

# Colorado: Right to Repair DEE

**House Bill 1121 - In Force: 1 Jan 2026**

- **Current law:** Repair of Agricultural Equipment and Powered Electric Wheelchairs
- **Expanded:** Digital Electronic Equipment (DEE) - hardware products that depend on digital electronics embedded in/attached to the product to function as intended

Bans Manufacturer from using **"parts pairing"** for DEE sold or used after 1 January 2026 *to:*

- Stop independent repair provider or owner installing a replacement part
- Reduce functionality or performance of DEE
- Cause DEE to display misleading alerts/warnings about unidentified parts



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# Trending Topics in New 2025 US Bills

## Key Topics:

- **Electric Wheelchairs**
  - Examples include: Rhode Island HB 5017 and SB 884, Washington SB 5680
- **Electronics and appliances**
  - Examples include: New York A 3058, Vermont HB 161, Rhode Island HB 5246
- **Automotive Parts**
  - Examples include: Hawaii SB 795, Wisconsin SB 129
- **Trend towards more regulation:**
  - Bills targeting products that directly affect consumers' daily lives
  - Push for "repair" as a sustainable long-term solution

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# US Federal Level: Proposed Bill

House Bill 1566 - Proposed on February 25, 2025

**"Right to Equitable and Professional Auto Industry Repair Act" or "REPAIR Act"**

- **Purpose:**
  - To ensure consumers have access to data relating to their motor vehicles, as well as critical repair information/tools for such vehicles
  - To provide consumers with choices for maintenance/service/repair of vehicles
- **Manufacturers would be required to:**
  - provide vehicle owners (or designees) access to vehicle-generated data, incl. through interface ports/wireless technology
  - make critical repair information/tools available to owners, aftermarket parts manufacturers, and motor vehicle repair facilities
- In 2023, similar Bill was introduced (HB 906) - this Bill did not advance

# US State Level: Proposed Bills

## Washington State - Senate Bill 5423 - Proposed on January 22, 2025

- **Scope:** Electrical/electronic equipment, computers, mobile/cell phones, spare parts
- As of *January 1, 2026* an original manufacturer would need to make available to independent repair providers/owners, parts/tools/documentation for diagnosis, maintenance, repair of covered goods
- Probability of approval (71%)

## Texas - House Bill 2963 (February 18, 2025) and House Bill 3682 (March 4, 2025)

- **Scope for Both:** Electrical/electronic equipment - Probability of approval (69%)
- *House Bill 2963:* OEMs must make available documentation/parts/tools for maintenance, diagnosis, repair
- *House Bill 3682:* If express warranty for goods of specified value, documentation/tools/parts for repair must be provided



# US State Level: Proposed Amendments to Existing Law

## Oregon - Senate Bill 550 - Proposed on January 13, 2025

- Proposes to amend **SB 1596**
- Expanding list of covered equipment to include:
  - electric wheelchairs
  - complex rehabilitation technology

## New York - Senate Bill 4655 - Proposed on February 10, 2025

- Proposes to amend **SB 4104**
- Modifying definitions, excluded products and compliance dates:
  - modify what qualifies as an original equipment manufacturer (OEM)
  - backdate manufacture date when hardware must comply with law by two more years (1 July 2021 instead of 1 July 2023)
- Repeal some product exclusions in order to include home appliances

# Canada and Quebec



# Canada: Right to Repair

## Two Laws Amending Copyright Act

- **Bill C-244**
- **Bill C-294**

**In Force: 7 November 2024**

Modernize copyright policy w/ regard to digital technologies that had blocked repairability

- **Bill C-244** - allows the circumvention of a technological protection measure (TPM) if the action is solely for diagnosis, maintenance or repair of certain products
- **Bill C-294** - allows the circumvention a TPM to make a computer program, or device in which it is embedded, interoperable w/ other computer program, device or component



# Quebec: Right to Repair

## Bill 29 to Amend Consumer Protection Act

*In Force: 5 October 2023 (Amendments currently proposed to provide clarity)*

- **Ban on Manufacture of Goods with Planned Obsolescence:** cannot intentionally design products with a limited lifespan
- **Warranty of Availability of Replacement Parts and Repair Services** for a reasonable time and at a reasonable price (From **5 October 2025**)
- **Warranty of Good Working Order** = Legal Right to Durability for refrigerators, freezers, dishwashers, washing machines, TVs, etc. - upon delivery of goods (From **5 October 2026**)
  - During warranty period, retailer/manufacturer must cover cost of repair (including shipping/handling) - they may perform repair or pay another party
  - Display the warranty period near the advertised sale price

# The Rest of the World



# Brazil

## Bill PL 805/2024 - Am. Consumer Protection Law (Proposed May 2024)

- Ban on Planned Obsolescence for Consumer Products
- Supplier is obliged to provide access to tools, spare parts and instructions.
- Consumers have access to at least one digital platform.
- Cannot refuse repair solely on fact repair was performed by an independent repair shop (unless compromised safety of the product).
- Penalties 10,000 reais to 50 million reais



# New Zealand

## Consumer Guarantees (Right to Repair) Amendment Bill (Proposed April 2024)

Manufacturer (upon consumers' request) must provide the information, spare parts, and tools necessary to diagnose, maintain, or repair goods

- Empowers consumers to request that suppliers repair goods rather than replacing them
- **Deletion of S.42** - Once a consumer is notified at the time the product is supplied then repair facilities and parts do not have to be made available.



## Key Takeaways - Trends

- **EU R2R Directive** - Product List will continue to expand so manufacturers will be required to repair products o/s guarantee= > Product Lifespan
- **Legal Guarantee** can no longer act as a barrier to repair
- Manufacturers will need to design better products to remove cost of repair
- **EU ESPR** - will introduce Delegated Acts to include repair - Horizontal Regulations may apply and Product Specific, Interplay with other laws important
- **US** - Without strong Federal Legislation in US - differences in US States will continue to be a challenge for manufacturers to manage
- **Canada** - Although some Federal law, Provinces are enacting strong laws
- **As Circular Economy continues to grow**, right to repair laws will appear in more jurisdictions (New Zealand, Brazil etc.)





Compliance & Risks

Holistic Market Access Solutions

# A Smarter Way to Manage Product Compliance



# Supporting Your Product Compliance Journey



Identify Relevant Regulations



Upcoming & Proposed Regulatory Changes



Communicate Compliance Requirements



Manage Evidence Documentation



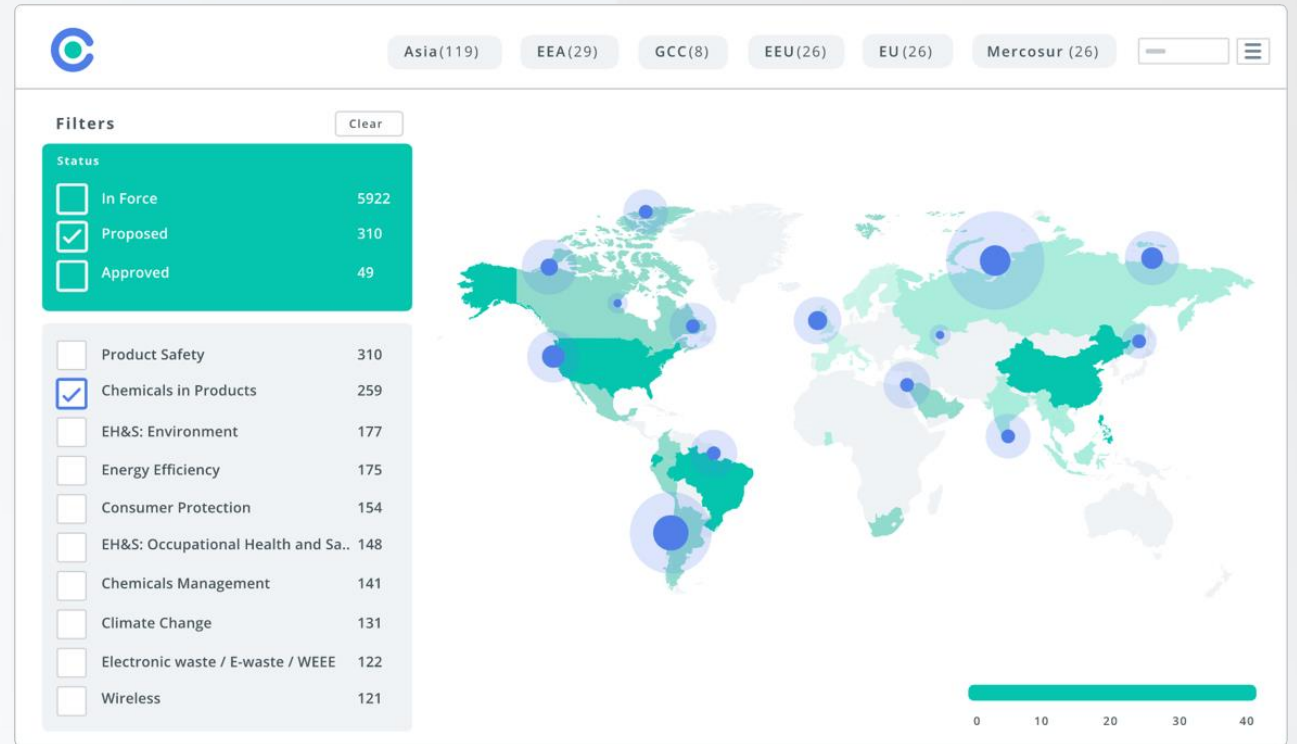
# Extensive Regulatory Content Coverage

With C2P you have access to **100,000+** regulations, Standards & Product Requirements that enable you to gain and maintain market access for all your products globally.

- Artificial Intelligence (AI)
- Batteries
- Brexit
- California Proposition 65
- Carbon Footprint
- Chemicals in Products
- Chemicals Management
- Circular Economy
- Climate Change
- Conflict Minerals
- Consumer Protection
- COVID-19
- Cybersecurity
- Data Protection
- Drinking Water
- Ecodesign
- Ecolabeling
- Electromagnetic Compatibility (EMC)
- Electronic Waste / E-Waste / WEEE
- Energy Efficiency
- Explosive Atmospheres / ATEX
- EU Reach
- Food Contact Materials and Articles
- Globally Harmonized System (GHS)
- Illegal Logging
- Nanotechnology
- Packaging
- Product Safety
- Single-use Plastics
- Transboundary Movement of Hazardous Waste
- Transport of Dangerous Goods
- Water Efficiency
- Wireless

# Manage all your Product Compliance in One Place...

- Design, build & collaborate on new products with confidence
- Keep all compliance evidence up to date & live linked back to their Regulations, Standards & Requirements
- Continually monitor regulatory changes & keep ahead of proposed changes before they happen



# Industry Coverage



**Consumer  
Electronics**



**Apparel**



**Household  
Appliances**



**Medical Devices**



**Home  
Furnishings**



**Automotive**



**Textile  
Manufacturing**



**Power Tools &  
Garden  
Machinery**



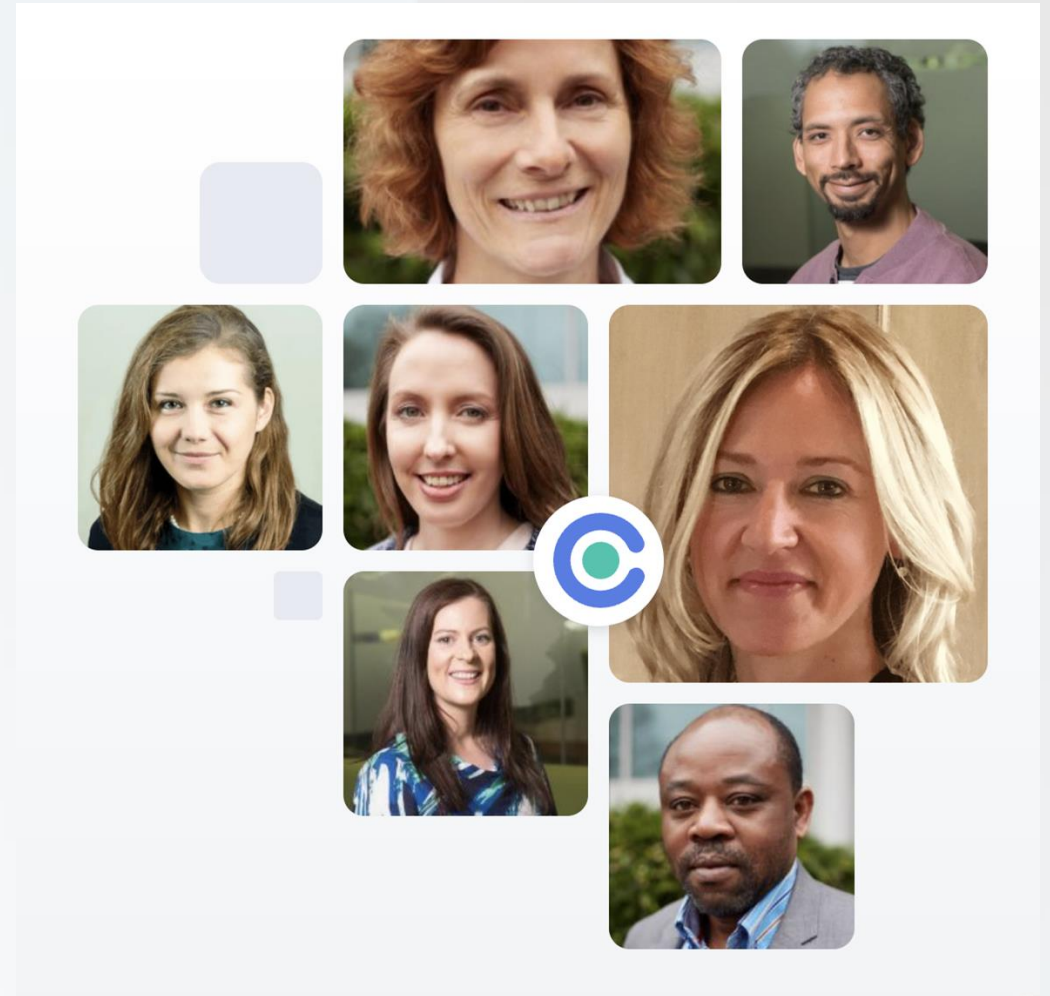
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# Ask our Experts at the click of a button...

- 40+ Subject Matter Experts
- Extensive Knowledge Partner network
- Expertise across products, geographies & policy areas
- Addressing questions on laws & regulations including purpose, applicability, requirements highlights & more.



# Questions?



# Lets Talk



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