

# RREUSE feedback on Empowering the consumer for the green transition

RREUSE welcomes the release of the inception impact assessment “[Empowering the consumer for the green transition](#)”. Tackling greenwashing and premature obsolescence is essential to improve the quality of products placed on the EU market and, in the long run, of second-hand products. This initiative is also highly anticipated by consumers who, in the aftermath of Covid-19, wish to possess durable and repairable goods on which they can rely in times of crisis. However, RREUSE insists that access to information will not suffice in tackling overconsumption. Tools to simply remove unsustainable products from the EU market will also have to be developed. This will hopefully take place through the “Legislative proposal for a sustainable product policy initiative” also suggested by the Circular Economy Action Plan.

The following points consist of recommendations on how to empower consumers, as well as independent repairers, refurbishers, second-hand operators and repair cafés:

## Easy access to information:

- RREUSE strongly encourages the Commission to focus on the suggested Option 2 and create a new stand-alone consumer protection instrument that will guarantee access to information at the point of sale and ultimately define and prohibit greenwashing and early product failure.
- To facilitate access for everyone (including independent repairers, refurbishers, second-hand operators and repair cafés), information on product sustainability should be attached to products themselves and not to packaging.
- Having access to information will encourage consumers to buy more sustainable products, but might also encourage them to replace already functioning products or products that could be repaired with new ones. Information on product sustainability should go hand in hand with information on impact of buying new and advantages to maintain, repair or buy used products.
- Product-as-services models should also be covered by sustainability information in order to promote models which are based on durable products and maintenance instead of those based on regular replacement and unnecessary upgrades.

## Implementation of legal and commercial warranties:

- Beyond information on product sustainability, clarity is needed on consumer’s prerogatives within legal and commercial warranties, especially concerning the time during which the burden of proof lies on the manufacturer.
- In order to allow owners of second-hand products to use them, legal and commercial warranties should be attached to products, not to buyers.
- When products fail within their warranty period, they must be repaired, or replaced by equivalent second-hand products. Extending warranty periods will be at the benefit of consumers, but should not encourage early replacement with new products.

### Tackling planned obsolescence and improving reparability of products:

- RREUSE welcomes the reference to the “Analysis and development of a scoring system for repair and upgrade of products” drafted by the JRC. It is essential that information on product sustainability includes a repair scoring system and clear information on access to repair manuals, availability and delivery time of spare parts, as well as on the possibility to repair the product yourself or with the help of independent repairers.
- Bearing in mind that such practices should simply be banned, if a product can only be repaired by operators authorised by manufacturers, this should be displayed negatively on the information on product’s sustainability (e.g. “The repair of this product is restricted to the manufacturer’s repair services” on a red background).
- Free access to repair manuals for independent repairers, refurbishing operators, consumers and repair cafés is always a good idea. The easier access to repair information is, the safer the repair operation will be.
- Consumers, repairers, refurbishers and repair cafés should have access to software updates during the whole expected lifetime of a product.

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**RREUSE** is an international network representing **social enterprises active in re-use, repair and recycling**. RREUSE members divert around **1 million tonnes of goods and materials** on an annual basis from landfill.

In 2018, RREUSE members active in re-use **extended the lifespan of 214 500 tonnes of products**, counterbalancing the average CO2 emissions of approximately 108 000 EU citizens.

Environmental services, including those of re-use and repair, enabled **850 social enterprises** federated by RREUSE’s wider network to fulfil their social mission, which for the most part includes the provision of work opportunities, training and support services for disadvantaged individuals. There are approximately **95,000 employees, volunteers and trainees** engaged in the activities of RREUSE members.