Dear [Name]

The Federation of German Consumer Organisations (Verbraucherzentrale Bundesverband e.V. – vzbv; www.vzbv.de) is the umbrella organisation for more than 40 consumer organisations throughout Germany and represents the interests of German consumers vis-à-vis policymakers, the private sector and in public. vzbv is also a founding member of BEUC, the European Consumer Organisation.

We write to you regarding the upcoming Commission proposal on “consumer empowerment in the green transition”, which will entail consumer information rights on durability of products, spare parts availability and a “right to repair”. These topics are very important to ensure that manufacturers offer durable and long-lasting products and to enable consumers to choose among a variety of high-quality and affordable products.

Lifespan and repairability have only recently begun to be factored into product policy. In 2019, for example, minimum requirements regarding reparability and the availability of spare parts were incorporated for the first time into the eco-design regulations for six product groups. The trend towards short-lived products harm the finances of many consumers who want to be able to use their products for a longer time.

Therefore, we would like to draw your attention to a study that vzbv published in December 2020. This study analyses the economic and ecological effects that products with a longer lifespan would entail. The study looked at the following product groups: washing machines, laptops, smartphones, televisions and electric bikes:

Key findings:

- Analysis of even a relatively small selection of products currently used by consumers shows that products with a longer lifespan and useful life are better for the environment and would make a considerable contribution to achieving the climate change targets that have been set.

- Moreover, a longer lifespan and useful life is usually financially acceptable to consumers. The aim should thus be to manufacture products that are as durable and easy to repair as possible, and for consumers to buy such products and have them repaired if they develop defects.

vzbv recommends that the European Commission in its upcoming proposals on a circular economy:

- Adapts legal guarantees: manufacturers with low-quality products benefit from the short legal guarantees and harm those that deliver durable products. The current two year minimum legal guarantee does not allow for nuancing and should be adapted to the expected lifespan of a product. The reversal of the burden of proof should be extended beyond six months as it disadvantages consumers.

- Introduces a „right to repair”: such a right needs to ensure that manufacturers design their products with repairability in mind, allowing for future repairs, providing spare parts and repair instructions and keep repair costs economically sensible and proportional to the product price. A repair index should indicate to consumers the repairability of a product before they purchase it.

Please find more detailed information in the study itself which you will find attached to this email. On pages 15-19 you will find an English summary of the key findings (the study itself is in German).

Should you have any questions, please do not hesitate to contact us.

Best regards
The Federation of German Consumer Organisations (Verbraucherzentrale Bundesverband e.V. – vzbv; www.vzbv.de) is the umbrella organisation for more than 40 consumer organisations throughout Germany and represents the interests of German consumers vis-à-vis policymakers, the private sector and in public. vzbv is also a founding member of BEUC, the European Consumer Organisation.

Büro Brüssel | Brussels Office
Geschäftsbereich Verbraucherpolitik | Division Consumer Policy

Verbraucherzentrale Bundesverband e.V. | Federation of German Consumer Organisations

Registered association at Amtsgericht Charlottenburg (Berlin) VR 20423 B
Steuer-Nr. | Tax reg. Nb. in Germany: 27/029/33162
Nummer im Transparenzregister der Europäischen Kommission | Identification number in the European Commission Transparency Register: 2893800753-48