

Feedback on the Consumer Agenda 2025-2030 and action plan on consumers in the Single Market

CALL FOR EVIDENCE

RREUSE welcomes the opportunity to contribute to the upcoming Consumer Agenda 2025–2030. Consumers across Europe increasingly wish to reflect their environmental concerns in their daily choices, yet structural barriers often prevent them from doing so. The new Agenda should therefore place circular practices at its core, by enshrining a genuine and universal right to repair and reuse. Social circular enterprises, which combine environmental ambition with strong social inclusion, are already demonstrating how sustainable consumption can be made both accessible and fair. Their role should be fully recognised and supported within the policy framework. Finally, to enable a true shift towards sustainable consumption, the Agenda must also address harmful commercial practices that drive premature obsolescence and overconsumption.

Promoting the right to repair and reuse

As highlighted by the European Parliament in its own-initiative report on product safety and regulatory compliance in e-commerce and non-EU imports, “*second-hand consumption [should be fostered] as a sustainable approach to addressing EU consumers’ need for affordable goods*”.¹

The Directive on common rules promoting the repair of goods represents a step forward in making repair and refurbishment more accessible for European consumers. However, inherent limitations reduce its potential impact and, consequently, European consumers’ right to repair. First, the Directive’s product scope is extremely narrow and must be further expanded through horizontal ecodesign legislation. Improvements should also include a comprehensive ban on anti-repair and anti-reuse practices, such as parts pairing (which restricts device functionality when third-party components are installed) and the use of glues or adhesives that prevent easy disassembly and replacement of parts. Independent repairers, refurbishers, remanufacturers and end-users should also have access to all spare parts, repair-related information, and tools (including diagnostic tools) for a period that reflects the expected lifespan of the product.

While reuse offers consumers an affordable alternative to buying new products, the cost of repair often remains prohibitive. According to a 2020 Eurobarometer survey, 77% of EU consumers would prefer to repair their products rather than replace them, yet many end up discarding or replacing items due to high repair costs and the limited availability of repair services. The Consumer Agenda should address this barrier by promoting measures that make repair more affordable. These should include the

¹ European Parliament (2025) Resolution of 9 July 2025 on product safety and regulatory compliance in e-commerce and non-EU imports (2025/2037(INI)). (Available [here](#)).

introduction of financial measures to promote repair and reuse, such as repair vouchers or bonuses, ideally funded through Extended Producer Responsibility (EPR) schemes.

The Agenda should also tackle the issue of unfair spare part pricing. Although spare parts must be made available at “reasonable prices,” clear and harmonised criteria for enforcement are needed to avoid fragmentation across Member States.² Producers are already required to declare indicative spare parts prices under ecodesign requirements. However, declared prices should not simply be indicative, but made into a binding commitment from producers. The price of original spare parts should also be integrated as a criterion into reparability scores under the Ecodesign for Sustainable Products Regulation.³ Furthermore, the Agenda must ensure fair competition by preventing manufacturers from monopolising spare parts markets, for example, by restricting or banning practices that block the use of non-original parts by independent repairers or end-users. This would help drive down costs and make repair more accessible.

Supporting social circular enterprises as key actors for sustainable consumption

Social circular enterprises’ activities are intrinsically aligned with the Consumer Agenda’s objectives. By reusing and repairing products locally, they contribute directly to waste prevention and the reduction of new goods production, delivering both environmental and social benefits. Many consumers are unable to afford expensive sustainable options, even if they are willing to make environmentally conscious choices. Reuse, therefore, provides both an affordable and sustainable alternative. Social enterprises are also pioneering new solutions to increase access to second-hand goods, such as Label Emmaüs⁴ and Widado⁵, online platforms that make affordable and sustainable alternatives widely available.

As employers, social enterprises play a critical role in digital inclusion. They provide training and employment opportunities for people distanced from the labour market, helping to bridge the digital divide, an explicit goal of this consultation.

RREUSE welcomes the specific attention to the inclusion of vulnerable consumer groups and calls on the European Commission to recognise social circular enterprises as essential stakeholders in shaping consumer policy, and to provide them with the necessary support to expand their impact.

Tackling commercial practices that drive overconsumption

Commercial practices that encourage premature obsolescence and excessive consumption undermine the transition to a circular economy. These include, for example, ultra-fast fashion, single-parcel

² Right to Repair Europe (2024). Towards a Threshold for “Reasonable Price” of Spare Parts. (Available [here](#)).

³ Right to Repair Europe (2025). White Paper on Ecodesign Information Requirements on Original Spare Parts Prices. (Available [here](#)).

⁴ Label Emmaüs. (Available [here](#)).

⁵ Widado. (Available [here](#)).

shipping models, aggressive marketing strategies that promote frequent and unnecessary product replacement, software obsolescence, and manipulative “dark patterns.”

The Consumer Agenda should introduce measures to address these harmful practices, including restrictions and fines on ultra-fast fashion, as well as bans on advertising practices that encourage wasteful consumption.

For more information, please contact:

info@rrreuse.org



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