



Euroconsumers Response to the Call for Evidence on the Circular Economy Act

November 2025



Introduction – Consumers as drivers of a competitive and circular Europe

Euroconsumers¹ and its member organisations in Spain (OCU), Italy (Altroconsumo), Belgium (Testachats/Testaankoop) and Portugal (DECO PROteste) welcome the European Commission's ambition to build a competitive, innovative and resource-efficient European economy through the Circular Economy Act (CEA).

A thriving circular economy depends as much on **confident, informed consumers** as it does on **innovative and competitive businesses**. When consumers understand the benefits of choosing circular products and services and trust them, they create demand that rewards fair competition, drives sustainable innovation and reduces dependency on scarce resources. In this way, valuable materials continue circulating within the EU economy instead of being lost to waste or exports.

A competitive circular Europe, therefore, cannot be built without involving empowered consumers. It must be built **with** them and **for** them. By combining effective enforcement of existing consumer law with clear, future-proof circular economy rules, the EU can ensure a transparent, reliable and fair system for both consumers and innovators.

The Circular Economy Act is an opportunity to move beyond fragmented national initiatives and establish a **Single Market for Circular Goods and Materials** – one which empowers consumers and businesses alike, and which supports Europe's wider goals of resource security, secondary raw material (SRM) uptake and industrial resilience. The Circular Economy Act should not only close material loops but also close the gap between consumer trust and circular market reality.

Connecting consumers to the circular materials loop

Consumers play a decisive role in closing material loops. Every time a consumer repairs a product or buys refurbished instead of new, valuable components and secondary raw materials are preserved within the EU economy. Yet this potential remains underused due to low trust, inconsistent quality, and fragmented legal frameworks.

Euroconsumers' surveys show that while consumers are open to circular choices, they need specific conditions to make those choices easy, credible and affordable. When asked what would encourage them to buy refurbished goods more often, consumers highlighted:²

¹ **About Euroconsumers:** Gathering five national consumer organisations and giving voice to a total of more than 6 million people in Italy (Altroconsumo), Belgium (Testachats/Testaankoop), Spain (OCU), Portugal (DECO PROteste) and Brazil (Proteste), Euroconsumers is the world's leading consumer group in innovative information, personalised services and defence of consumer rights. Our European member organisations are part of the umbrella network of BEUC, the European Consumer Organisation. Together we advocate for EU policies that benefit consumers in their daily lives.

² **Euroconsumers (2025),** *How Good is As Good as New? Making the case for empowered consumers in an improved refurbished goods market.* <https://www.euroconsumers.org/wp-content/uploads/2025/01/How-good-is-as-good-as-new.pdf>;

- Longer warranty periods (37%)
- Better controls on product repairs (37%)
- Clear legal frameworks for refurbished goods (32%)
- Standardised grading systems for terms such as ‘as good as new’ (32%)
- Better return and exchange options (33%)

While affordability matters, cost savings alone do not create circularity: trust and quality are essential.

By building consumer trust, the EU can stimulate sustained demand for circular goods, which in turn increases the circulation of SRMs, strengthens refurbishment and repair markets, and reduces dependency on virgin resources.

Consumer Circular Business Models – consumers as enablers of resource retention

Consumer confidence in refurbished and repaired products is a prerequisite for stable demand in secondary raw materials. Without reliable consumer markets for circular goods, SRM flows remain weak, fragmented, and unprofitable.

Euroconsumers’ position is clear: **policy must make circular choices the easy choice**. Cost, accessibility, trust and clear information remain the decisive factors. Our initiatives across Italy, Spain, Belgium and Portugal provide evidence of what works — and where barriers persist.

1. Repair: the frontline of circular markets

Repair is the most direct and visible form of circularity for consumers. It saves resources, prevents waste and sustains local jobs — yet consumers still face multiple barriers:

- **High costs:** Repair often costs more than replacement.
- **Limited access:** Spare parts, repair manuals, and qualified services are frequently unavailable.
- **Low visibility:** Consumers lack information about repair options or product repairability.

This can all feed into consumer scepticism towards repair services, as consumers struggle to understand and compare their options. Euroconsumers’ members OCU, Altroconsumo and DECOPROteste are members of the **REPPER (Repair Perspective)**³ project, which promotes repair as a default choice. Through stakeholder roundtables, several key needs have been identified:

³ <https://repper.interreg-euro-med.eu/>

1. Financial and policy incentives

- Clearer VAT rules for spare parts and repair services to encourage uptake.
- Promote repair-by-design requirements so that repair becomes the default, not the exception.

2. Skills, infrastructure, and accessibility

- Establish regional repair hubs to address technician shortages, particularly outside urban areas.
- Support technical training and trustworthy certification to boost consumer confidence.

3. Consumer engagement and responsible market practices

- Ensure transparent repair pricing and durability information.
- Encourage responsible innovation that makes circularity part of core business models.
- Challenge the “upgrade culture” in tech sectors where replacement is marketed as progress.

Euroconsumers’ members have launched several initiatives addressing these needs, including online repair hubs⁴ and repair-skills training kits⁵.

2. Refurbishment – trust and quality as enablers of circular consumption

Refurbishment offers huge potential for consumers, the economy and the environment: it keeps products in use longer, meets growing consumer demand for affordable alternatives, and generates business opportunities across multiple sectors. But its success depends on **trust, quality and transparency**.

Euroconsumers’ report “*How Good is ‘As Good as New’?*” found that while over half of consumers are open to buying refurbished goods, inconsistent definitions and variable quality undermine confidence.⁶ In a 2022 study, Testachats examined 44 refurbished iPhone X and 11 models sold as “as good as new.” While most appeared acceptable externally, 6 devices were too damaged to be sold as new, and 8 had serious internal issues such as oxidation or counterfeit components. One completely stopped working after a few hours of use. Only two achieved a score above 70/100 — the expected minimum for “as good as new” products.⁷

Euroconsumers’ evidence shows that clear standards and reliable information are essential for a thriving refurbishment market. Addressing these factors through legislative initiatives would build consumer confidence in refurbished products and stimulate demand for SRMs.

4 <https://www.impegnatiacambiare.org/riparare> ; <https://www.ocu.org/repara> ; <https://www.deco.proteste.pt/reparacoes>

5 <https://www.impegnatiacambiare.org/riparare/come-riparare> ; <https://www.ocu.org/repara/yo-lo-arreglo> ; <https://www.deco.proteste.pt/reparacoes/como-reparar>

6 Euroconsumers (2025), *How Good is As Good as New? Making the case for empowered consumers in an improved refurbished goods market*. <https://www.euroconsumers.org/wp-content/uploads/2025/01/How-good-is-as-good-as-new.pdf>;

7 Testachats/Testaankoop (2022), “*Pourquoi un iPhone reconditionné peut être intéressant pour vous*”: <https://www.testachats.be/hightech/gsm/news/iphone-reconditionne>

To enable cross-border confidence in refurbished products, consumers need:

- A harmonised definition of “refurbished” goods, distinct from second-hand.
- An EU-wide grading system (A/B/C) with clear disclosure of refurbishment actions via DPPs.
- A minimum two-year warranty for refurbished products.
- Consistent DPP information on replaced parts and refurbishment history.

3. Software-driven obsolescence – enabling a fully functioning circular market

While the Circular Economy Act will focus on design, repairability and material durability, **software obsolescence** threatens to undermine these goals. Increasingly, products that are physically sound become unusable when software support or compatibility is withdrawn.

As outlined in Euroconsumers’ position paper “*Software Obsolescence as a Business Model?*”, this emerging trend risks turning digital dependence into a structural barrier to circularity.⁸ When updates end prematurely, consumers must replace otherwise functional devices — eroding trust in refurbished goods and generating unnecessary e-waste. This challenge is particularly acute for connected products such as smartphones, TVs and smart appliances, which rely on digital services to operate.

To ensure a truly circular market, **clear, product-specific minimum durations for software updates should be introduced**. Predictable update periods and interoperability standards are essential. Without them, products will continue to fail digitally long before they fail physically — undermining sustainability, consumer protection and innovation alike.

Digital Product Passports: Enabling Consumer Participation in Circular Value Chains

Digital Product Passports (DPPs) and long-term software support are key enablers of circular material flows. By providing clear, actionable information on repairability, spare parts availability, refurbishment history, software support, and recyclability, DPPs allow consumers to make informed choices that keep materials in circulation and support circular business models.

The CIRCTHREAD project, involving Euroconsumers’ members, Altroconsumo and OCU, surveyed nearly 6,000 consumers across multiple EU countries on DPPs. Around 80% of participants expressed willingness to use circular information to guide repair and

⁸ Euroconsumers (2025), “Software obsolescence as a business model?”, <https://www.euroconsumers.org/wp-content/uploads/2025/10/Software-obsolescence-as-a-business-model.pdf>

refurbishment, but less than 20% were willing to pay extra for it. This highlights that DPPs must deliver value at no additional cost to be effective.⁹

CIRCTHREAD findings show that accessible, item-level, verifiable data empowers consumers to select repairable or refurbishable products, return items for reuse, and contribute to proper recycling. Consumer engagement, in turn, complements the needs of manufacturers, repairers, refurbishers, and recyclers, reinforcing circular value chains.¹⁰

In short, DPPs should be consumer-centric, interoperable, and actionable. When implemented effectively, they enable consumers to participate in circular practices, facilitate sustainable business models, and keep valuable materials in circulation — supporting both industrial innovation and consumer empowerment.

Recommendations

A thriving circular economy begins with empowered consumers. Building a genuine Single Market for Circular Goods and Secondary Raw Materials requires policies that unite **consumer confidence, innovation and harmonised rules**. The following recommendations set out how to achieve this.

Establish a Single Market for Circular Consumer Goods

- Define “refurbished” separately from second-hand and harmonise **minimum warranty durations**.
- Adopt **EU-wide grading standards**, with transparent criteria for refurbished products.
- Make DPPs the core mechanism for **traceability, compliance, and consumer information**.
- Broaden the range of **product families subject to eco-design requirements**.

Empower consumers through Digital Product Passports

- Require DPPs to include refurbishment and repair history, spare-parts availability, repairability score, software support period, grade, warranty and recyclability information.
- Ensure DPPs are **accessible to consumers**, interoperable for SMEs, and available both online and offline.

Strengthen repair rights and affordability

- Guarantee opens access to spare parts, diagnostic tools and repair information.
- Reduce VAT or other favor incentives for permanent repairs.
- Promote **repair scoring and transparent pricing** across the Single Market.

⁹ Euroconsumers (2023), “Digital Product Passports: how information can power the circular economy”

<https://www.euroconsumers.org/digital-product-passports-how-information-can-power-the-circular-economy/>

¹⁰ See more: <https://circthread.com/publication-results/policy-briefs/>

Support SME repairers and refurbishers

- Provide simplified certification and registration schemes.
- Fund training and capacity building to help SMEs meet DPP and quality requirements.
- Ensure fair competition by enforcing compliance across large and small actors.

Address software obsolescence

- Require minimum free update periods for matching product durability.
- Oblige disclosure of software support and update status within the DPP.

Conclusion – integrating consumer goods into the Circular Economy Act

The Circular Economy Act represents a crucial opportunity to move from ambition to implementation — to make circularity not just a policy goal, but a living reality for European consumers and businesses alike. However, to achieve a truly competitive and resilient circular economy, the Commission must look beyond waste and secondary raw materials to the **consumers goods** that generate them.

Circularity starts at the point of purchase and continues through repair, refurbishment, and reuse. When consumers are informed, protected and empowered, they sustain demand for circular products and services — keeping materials in use, stimulating innovation, and strengthening Europe's strategic autonomy over critical resources.

To unlock this potential, the Circular Economy Act should explicitly recognise consumer markets as integral to the circular value chain. By creating consistent standards for refurbished goods, ensuring long-term software support, and embedding consumer-facing Digital Product Passports, the EU can foster a **Single Market for Circular Goods** that drives both material efficiency and consumer trust.

A coherent approach that integrates **material, product, and consumer policy** will deliver a stronger, fairer and more innovative European circular economy — one that works for people, businesses, and the planet alike.



