

How good is ‘as good as new’?

Making the case for empowered consumers in an improved refurbished goods market



Empower people, improve the market for a sustainable future

The rapid turnaround needed to shore up climate systems and replenish natural resources comes with an exciting opportunity to rethink the way we produce and consume. The good news is that this matches consumers' expectations and intentions — three-quarters of people say sustainability is an important factor in their choices. The bad news is that despite good intentions, cost barriers to becoming more environmentally friendly remain and many people are often 'priced out' of sustainable alternatives.



Enter refurbished goods.

Choosing a refurbished product means keeping products in use for longer, which keeps demand for newly made goods in check and means less energy, resources and waste. And it should save consumers money too.

A perfect match or too good to be true?

Refurbished goods can offer the solution as the sustainable, affordable alternative for consumers yet right now it is poised to create new headaches for consumers instead. Refurbished goods are booming business. Shops and online marketplaces promise new smartphones or laptops that are 'as good as new' and big brands are taking back old stock to recondition it and resell.

But what does 'refurbished' actually mean and what can consumers expect when buying refurbished products?

What appears to be the 'best of both worlds' unfortunately **often reminds us of the 'wild west'**. To empower people to embrace the refurbished and adopt sustainable consumption habits, we need to improve the refurbished goods market.

We must transform it into a solid, vibrant and accessible market, one that offers a sustainable and affordable win for consumers.

Why do we need refurbished?

Sustainable dreaming

Sustainability has become both a top priority and a hot political topic. Following Europe's headline goal to transform the European Union into the first 'climate-neutral bloc' by 2050, the 'European Green Deal' sought to reach this objective through a range of cross-sectoral legislative initiatives, with a circular approach to production and consumption being a major flagship.¹

With e-waste (one of the most polluting waste streams) still on the rise, the need for a more circular economy tops indeed many priority lists.² Next to ecological considerations, the aim for a climate-neutral continent by 2050 is now also bolstered by geo-political considerations around the supply of critical raw materials from outside the EU as those raw materials are essential for some much-needed and innovative technical developments. Both Mario Draghi and Enrico Letta underlined in their economic outlook reports the importance of a Circular Single Market to reduce our dependency on critical raw materials and save the planet at the same time.³

Consumers are on the same page. A vast majority feel that our disposable-society, which causes overconsumption, is one of the main points for them to tackle and believe a strong circular economy is an appropriate solution.

Although most find it interesting, few consumers really know how to engage with it, naming the lack of trustworthy information and the lack of long-lasting, repairable and re-usable products as concrete barriers to more sustainable consumption.⁴ Refurbishment holds all characteristics to jump into that void and offer a concrete circular alternative to consumers.

Call for affordable sustainability

Citizens understand the importance of adopting greener living. **77% of surveyed consumers in Belgium, Italy, Spain and Portugal indicate sustainability is important** when buying a product and actively pays attention to it.⁵

However, 'sustainable' is often believed to be synonymous with 'expensive'.

As consumer spending power decreases, the focus is shifting from 'sustainability' to 'affordable sustainability'. Not surprisingly respondents of Euroconsumers' European election survey selected **"the rising cost of living as number one concern"** and put **"access to affordable sustainable food, heating and mobility"** on top of their wish list.⁶



Citizen's call for affordable sustainability is confirmed by Euroconsumers' 2024 Consumer Affordability Barometer that unveiled many consumers are maxing out their budgets trying to meet basic bills and are not able to save anymore on top.

At best they 'survive', but very few are able to 'thrive'. Needless to say there is little left at the end of the month for (costly) sustainable alternatives.⁷

With the cost of sustainable products already being the main barrier for consumers, one can imagine how price is an even bigger source of frustration when on a tight budget. Refurbished goods could offer an affordable alternative to a full-price model, particularly when considering expensive purchases like smartphones, laptops and household white goods.

And these savings matter: 88% of respondents in a recent Euroconsumers' survey said they bought a refurbished product because it was cheaper.⁸



Our Spanish member OCU found that buying a refurbished model offers savings of between 20-60%. In their study, they found that a refurbished iPhone 8 64GB could save consumers up to 60% compared to the new model.¹⁰



In a 2022 study, Euroconsumers' Italian organisation Altroconsumo found that i.e. buying a refurbished smartphone could deliver savings. A refurbished iPhone 11 was found to be up to 33% cheaper than the new model, while a refurbished Samsung Galaxy S20 could save you up to 10% on the price of a new model.⁹

Focus on Gen Z

The younger generation seems to be ahead of the curve with refurbished goods. Recent Euroconsumers data show that almost 1 in 4 respondents who had bought a refurbished device was aged between 25-44 years old.¹¹ Young people seem to like refurbished goods as they tend to offer a good quality, affordable and sustainable alternative.¹²

Although these motivations are not unique to younger generations (the need for affordable sustainable products transcends all age groups) refurbished goods do offer a unique opportunity to address young citizen's concrete concerns and tangible needs, as they tend to rank the importance of sustainability and the need for access to affordable alternatives slightly higher than other age groups.¹³ Refurbished holds the opportunity to empower younger generations to embrace sustainability and lead the way for the future.

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The Pitfalls of the Refurbished Goods Market

For many, refurbished can seem like a ready-made solution to address both the need for more sustainability and the need for affordable alternatives.

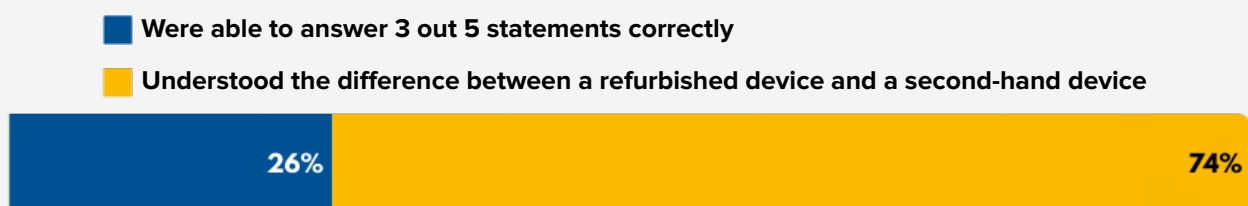
But is it really?

How good are these products and what happens if something goes wrong?

The route to refurbished is paved with pitfalls.

Refurbished versus Second-Hand

As a base level consumers should understand what they are getting when they buy a refurbished product. A Euroconsumers survey delving into refurbishment found that consumers' understanding of the differences between refurbished and second-hand products is blurry at best.¹⁴



Generally, it is understood that a second-hand device has been used and is resold in the condition it was left in. In other words, there are little or no repairs to the item and the quality can vary. A “refurbished” device, on the other hand, has been checked and repaired, if necessary, before being resold. However, these terms are not always legally defined and open the door for potential misuse.

“As good as new”?

In April 2022 Euroconsumers' Belgian member Testachats conducted a study on **44 refurbished iPhone X and 11 models**. The models were purchased from 11 different sellers and compared with a new model.

- ✓ All of the phones tested were sold **“as good as new”** meaning the devices should be **almost perfect**, with some minor cosmetic marks.
 - ✓ From the outside, most products matched the description and only showed minor issues. **Only 6 out of the 44 tested products were deemed too damaged to be sold “as new”**.
 - ✓ A further investigation, in collaboration with an independent repair centre, found that **8 of the products tested, had serious problems**, including oxidation inside the device, touch-screen defects and the use of cheap counterfeit housing cases.
 - ✓ **1 device stopped working after only a few hours of use.**
- ➔ Following the internal analysis, only 2 of the models tested obtained an overall score above 70/100 – a score that all products sold “as good as new” should reach.¹⁵

Testachats' investigation echoes the experiences outlined in a recent Euroconsumers survey which found that **1 out of 3 respondents who purchased a refurbished smartphone had at least one problem**. The most common being: battery underperformance, slow responses and screen freezes.¹⁵

The Wild West of Refurbished Goods Sellers

But problems didn't stop at the devices alone. The same Testachats study also found that sellers can take a run at actual price savings. What is advertised does not always match with reality.

The tested refurbished iPhone X' smartphones were sold on average at 46% less compared to the original retail price suggested by manufacturer (MSRP) from a few years before. For the iPhone 11 there was an average 13% reduction to the MSRP.

In other words, the price comparison did not use the current price of the models, but the original listing price instead, with misleading presentation of actual cost savings as a result.

The Belgian Ministry for Economy (FPS Economy) also investigated unfair commercial practices in the repair sector. Traders selling second-hand or refurbished products, as well as those making repairs, were checked for misrepresenting the legal warranty, misleading price discounts or non-disclosure of invisible defects like internal water damage.

✔ 101 ICT and smartphone repairers were checked, 65 violations were found, and 227 warnings were issued.¹⁷

Refurbished goods sellers going rogue have a real-world impact on consumers. Take the case of Refurbished, a Dutch online marketplace specialising in reconditioning and reselling electrical goods that also operates in Belgium under Refurbished.be.

- ✔ Since January 2024 Testaankoop/Testachats has received 145 complaints against Refurbished.be, some concerning orders that date back as far as 2023.
- ✔ While the majority of complaints relate to items that were never delivered or were not refunded, several also concerned the seller's failure to meet its warranty obligations if the device breaks down.



Software Scaries

Another headache to consider when buying refurbished is the software that comes with the device. Many popular refurbished products such as smartphones, tablets or laptops are nearly useless without access to the latest software updates. As the security and functionality of devices largely depends on regular software updates, a lack of it condemns a product to the realm of obsolescence.

The period for which the product is supported with these essential updates can vary significantly between producers and product types. Although European regulation has taken steps to combat this, by compelling manufacturers to be transparent about how long updates will be provided and obliging updates to cover the 'expected lifespan' of devices¹⁸, it is still unsure whether this will impact the effective and safe lifespan of refurbished products.

What can be considered as 'expected lifespan' and does this take into account the re-use of a device thanks to refurbishment?

And what good is it to know how long software updates are available for if it is not long enough to cover eventual refurbishment?

The real impact is demonstrated by Microsoft's plan to end free security updates for Windows 10 as from October 2025 on. Afterwards consumers will either have to pay for extended security support for Windows 10, either they will need to switch to Windows 11 (which in some cases implies just buying a new device), that is if they want to stay safe and secure.¹⁹

As such none of this is illegal, yet it does imply that none of these devices can ever be eligible for an extended lifespan thanks to refurbishment without consumers incurring additional risks or costs.



Untangling the maze of refurbished goods

Navigating the maze of refurbished goods, consumers face some key questions that require solid answers.

1. What is a refurbished good?

'Refurbishment', what does it mean? What kind of good can call itself 'refurbished'? Is there even a legal definition?

The answer to that is not a straightforward nor a uniform one. A quick look across the four European Euroconsumers countries already unveils a striking divergence.



In Portugal, "refurbished goods" are an independent product category, separate from new or second-hand goods. They are defined as "goods that have been previously used or returned and that, after inspection, preparation, verification and testing by a professional, are once again placed on the market for sale in that capacity".²⁰



In Belgium, Italy and Spain on the other hand, the notion of "refurbished" products does not legally exist. As a result, these products are considered 'second-hand', even when advertised as 'as good as new'.



These national differences might seem trivial at first glance, the reality is that it confuses consumers about their rights and undermines the functioning of Europe's internal market.

At European level, there is no legal definition either:

- ✓ **The General Product Safety Regulation (GPSR)** makes reference to refurbishment, stating "all products made available on the EU market, without sector-specific legislation, including used, repaired or reconditioned products need to be safe". However, it does not define what constitutes a "reconditioned" product.
- ✓ **Several EU initiatives (i.e. Right to Repair)** have been put forward to encourage consumers to repair goods instead of buying a new one, yet here as well these texts fail to acknowledge the specifics of a refurbished goods market.
- ✓ The closest we have to some kind of a description is in the **Ecodesign for Sustainable Products Regulation (ESPR)**. It defines refurbishment as "actions carried out to prepare, clean, test, service and, where necessary, repair a product or a discarded product in order to restore its performance or functionality within the intended use and range of performance originally conceived at the design stage at the time of the placing of the product on the market".

Although this is a first indication that refurbishment should make a product 'like new', it's unclear what the impact of the definition is beyond ESPR nor does it address all issues consumers experience when buying refurbished.

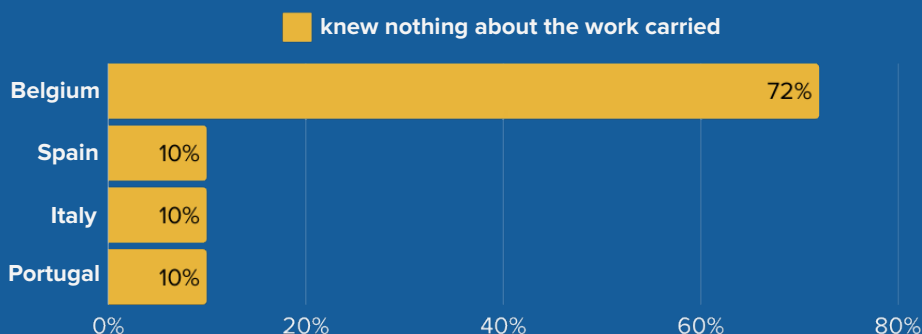
However maybe unintended, this is an unfortunate missed opportunity to clear any confusion, secure trust and help European consumers embrace refurbishment.

2. Who did what to make it refurbished?

The tests carried out by **Euroconsumers' Belgian organisation Testachats** made it very clear: a refurbished device might look ok on the outside but have major issues on the inside that impact the product's performance.

If you don't know what repairs were carried out on the device and who did them, how can you trust you are getting a good deal?²¹

A recent Euroconsumers survey found that 58% of consumers who purchased a refurbished product were not informed about the checks or repairs carried out.




Respondents who bought a refurbished household appliance were better informed than those who bought a smartphone or laptop.²²

3. How good is as good as new?

The condition of refurbished goods can vary greatly. For example, both new devices, i.e. shop models, and used devices can be sold as 'refurbished'.

To give some kind of indication of the state of the good, sellers list them using indicators like "as good as new" or "with visible signs of use", or with categories 'A', 'B', 'C' etc. However, these rankings are designed by the seller and methods can vary greatly from one seller to another, making it not only highly subjective but also difficult to compare and assess the best deal. Imagine the confusion with consumers if their laptop gets an 'A' ranking but fails to operate like a new device.

 *Euroconsumers' Portuguese organisation Deco Proteste found that most problems with refurbished mobile phones were linked to the category (or grade) advertised. Overall, the advertised category proved to be more optimistic than the condition of the device.*²³

This underlines the need for a standardised grading system. It also underlines the need to develop it for all of Europe. If member states would pursue this merely at country level this would cause major divergence and disrupt the functioning of EU's internal market at a time when we are pushing for more sustainable options across Europe.

4. Am I covered by a legal guarantee?

Consumers opt to buy refurbished goods instead of a new model expecting it will work like new. But what if something goes wrong and it fails? Are consumers covered by any legal guarantee?

Well, it depends. It depends on what country you are in. And it depends on how the seller advertises the product.



In **Portugal**, refurbished goods enjoy a three-year legal guarantee protection, but this can be reduced to 18 months in an agreement between the buyer and the seller.



In **Spain**, 'like new' refurbished goods are sold and advertised as a new product, meaning they are entitled to the minimum three-year warranty which applies to all new products. However, all other types of refurbished goods are treated as second-hand, they are merely covered by a minimum guarantee of 1 year.



In **Belgium**, refurbished goods are considered second-hand and therefore have a 1-year warranty. Some sellers provide additional warranties, but this is merely on a voluntary basis, not the standard.²⁴ Moreover, Testachats found that these warranties may just apply to certain parts of the device (e.g. screen or the battery) without this limited scope being clearly communicated.



In **Italy**, as there is no legal definition for refurbished goods, the warranty for these products depends on the declaration made by the seller at the time of sale. If they declare that they are 'as good as new', then the two-year warranty applies. In all other cases, they are considered as remanufactured second-hand goods for which the seller can define himself the duration of the warranty, as long as it is no less than one year.

Simple, right?

And this is without asking about coverage when buying from a non-trader (i.e. another consumer).

5. Is refurbished also the best deal?

The Testachats' study highlighted the misleading pricing tactics employed by some refurbished traders. By calculating the potential savings of the refurbished model compared to the original price of a new model, right after its release it is misleading the real savings on offer. When a product is released, the price tends to be at its highest, which gives the impression of a better deal for consumers when buying refurbished.²⁶ **In reality, the savings might not be that great.**

All the while, the warranty for your refurbished device is unclear, the ranking scores are indistinguishable, and some manufacturers can limit the security software updates to your device.

So, you might think you are getting a good deal on a refurbished device, but is it really?



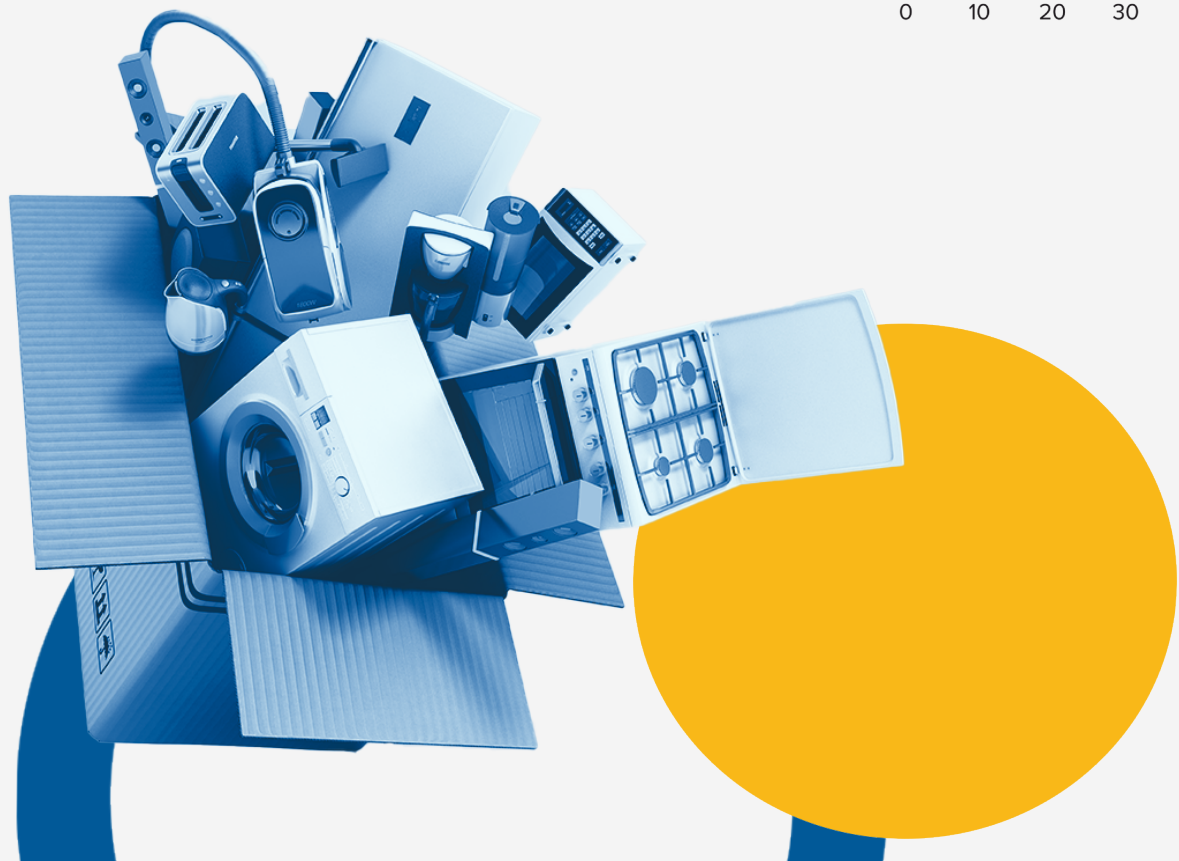
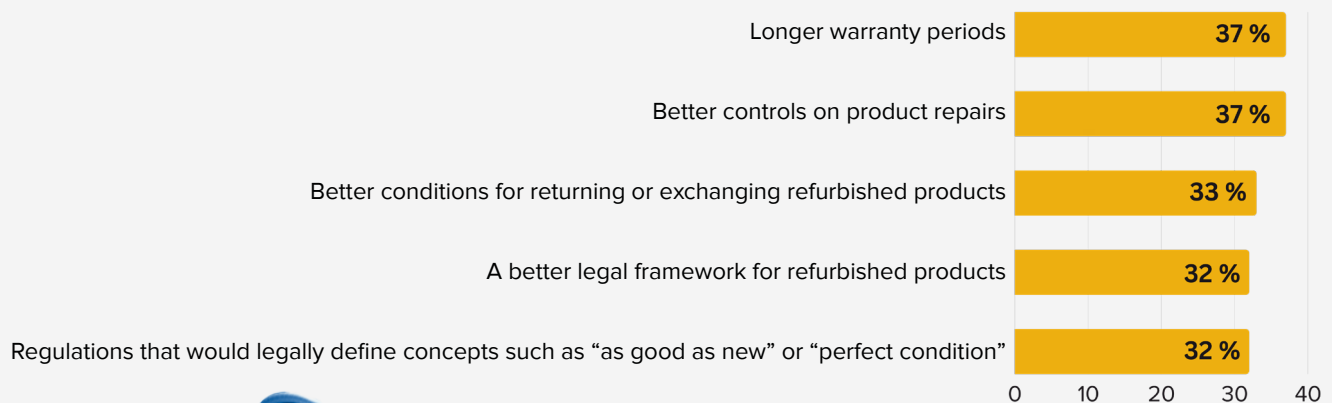
The consumer voice: what consumers want and expect

It's not just us. Consumers in Belgium, Italy, Spain and Portugal are equally calling to fix refurbished goods.

In a Euroconsumers survey respondents were asked what needs to be done for them to consider purchasing.²⁷ Turns out a combination of longer warranties, more controls on product repairs, better conditions for returning or exchanging refurbished goods, a better legal framework and clear definitions for concepts like 'as good as new' would already take them a long way.

- ✔ Almost 1 in 3 respondents said they wanted a **better legal framework for refurbished products**. 32% found **regulations to define rankings** such as "as good as new" or "perfect condition" were important.
- ✔ 37% listed **longer warranty periods** as an area for improvement would incentivise them to buy refurbished more.
- ✔ **More oversight on product repairs** was highlighted by 37%, demonstrating that consumers want to feel empowered when purchasing refurbished goods.

Which improvements could convince you to opt for refurbished devices (more frequently)?



Refurbished at EU Level: everywhere and nowhere

Consumers' expectations are clear. But are they covered by existing legislation? Does the current framework have their backs?

1. Green Deal initiatives

Given the importance of refurbishment for affordable sustainability, looking at the initiatives presented under the European Green Deal, you would expect to see a reference to refurbished goods. However, the concept is noticeably absent.

1.1. Right to Repair

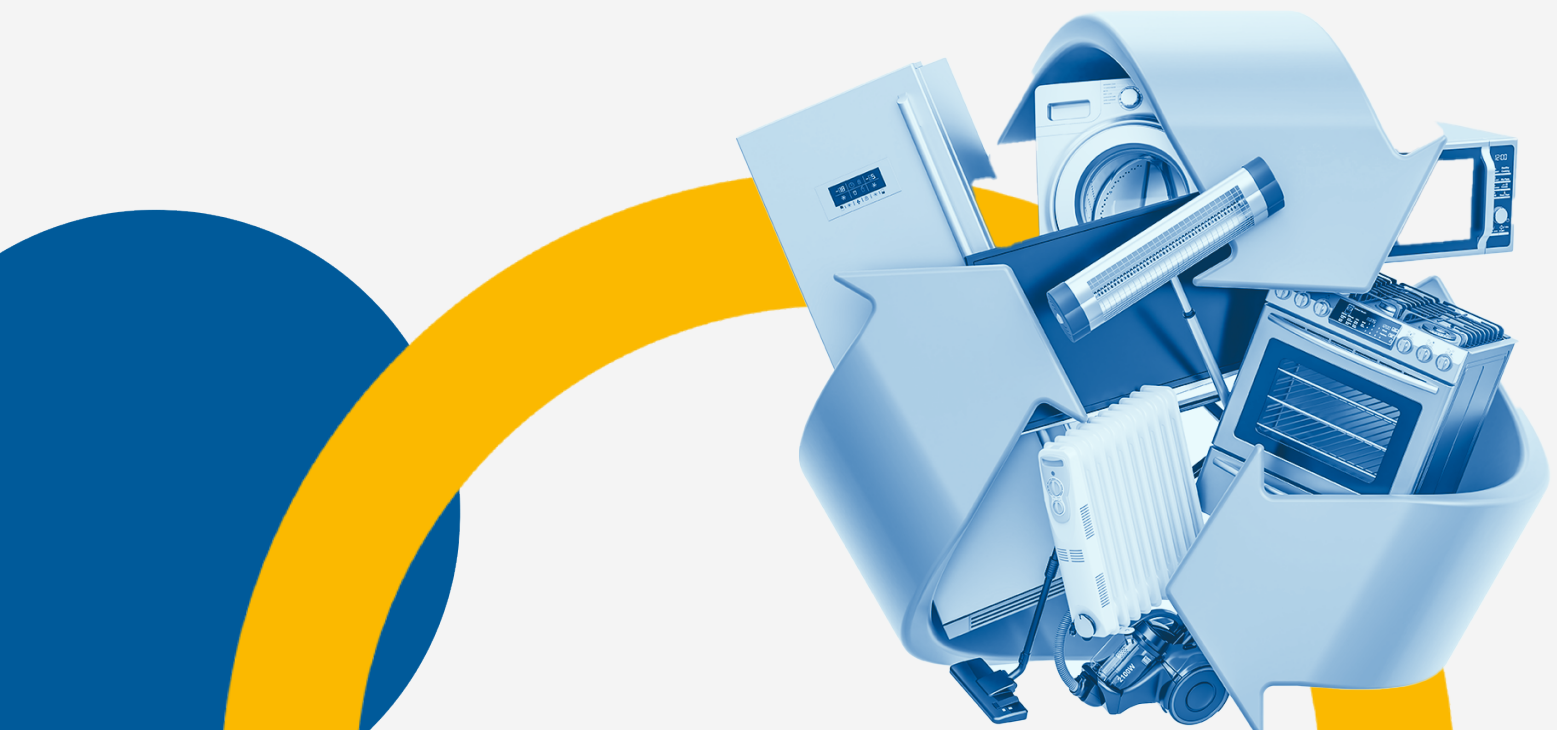
For example, the European Commission's '[Right to Repair Directive](#)', a key part of Europe's '[New Circular Economy Action Plan](#)', introduces the obligation for manufacturers to offer repair, tackles built-in obsolescence and aims to boost the EU repair market.

While it encourages more sustainable consumption, making repair a viable option for consumers, little is done to also address the growing market where products are refurbished and resold to consumers by a third-party.

The directive does establish an online platform to help consumers find repairers and sellers of refurbished goods but, as registration is voluntary, the overall impact on refurbished goods is expected to be quite limited.

Alongside this, there are also intellectual property barriers to repair that remain largely unaddressed in the Right to Repair package and inhibit the refurbished goods market. Industrial design rights impact the market of spare parts, often limiting these to original components and blocking alternative designs. **Needless to say, this blocks a much-needed competition in the spare parts market, leading to a de facto monopoly for the holders of the design rights**, which in turn can lead to high prices for refurbishers and consumers alike.

However, good news is on the way: the Commission proposed a revision of the [EU's design legislation](#) to tackle this, introducing a repair clause and liberalising the spare parts sector. But before getting too excited, be warned, there will be an eight-year transitional period before these changes come into effect.²⁸



1.2. Ecodesign for Sustainable Products Regulation (ESPR)

Similarly, the Ecodesign for Sustainable Products Regulation (ESPR) builds on the current Ecodesign Framework Directive and expands its scope beyond energy-related products like household appliances and electronics. It seeks to improve their sustainability by design, prolong their durability and enable easier repairs. In other words, it seeks to make sustainable options the norm. This new piece of regulation also created a “**Digital Product Passport**” that can provide consumers with information about the durability, sustainability and traceability of certain parts.

The ESPR includes a definition for ‘refurbishment’ in Article 2 as it is included in the list of Ecodesign requirements introduced by the text. However, the legislation focuses on the process of refurbishing an item and does not address consumers’ rights and needs when it comes to buying refurbished products.

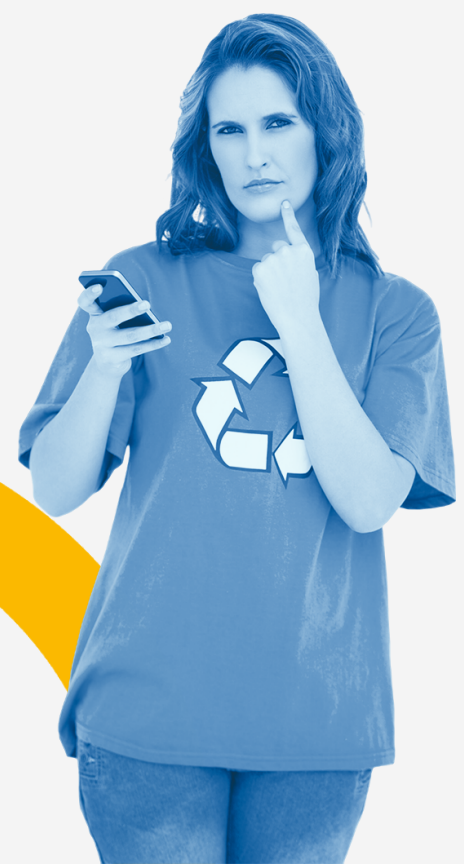
1.3. Empowering Consumers for the Green Transition Directive

The [Empowering Consumers for the Green Transition Directive \(ECGT\)](#) obliges manufacturers to provide consumers with pre-contractual information on the durability and reparability of goods. This is done via a reparability score or by indicating the availability and expected cost of repair components. Consumers must also be informed about the period during which free software updates will be offered for goods with digital elements. It also blacklists early obsolescence, if there is information available on the design features causing the obsolescence.

Interestingly, the ECGT also introduces a label to indicate a commercial guarantee of durability that goes beyond the legal two years. This tool would also allow for refurbishers to extend the warranty on their products, however it remains merely voluntary, not structural.

All in all, the different Green Deal initiatives – Right to Repair, Ecodesign for Sustainable Products and Empowering Consumers for the Green Transition - do help consumers to engage in more sustainable consumption and it’s fair to say they hold different elements that can facilitate refurbishment. Despite that, we need to acknowledge it fails to address the specificities that arise with refurbished goods as set out in this paper nor does it provide sufficient answers to tackle them.

But what about other aspects of EU consumer legislation?



2. Other EU legislation

2.1. Sale of Goods

The [Sale of Goods Directive](#) introduced a 2-year guarantee for all tangible goods to protect consumers in cases of non-conformity. This can be reduced to 1-year for second hand goods, as is the case in i.e. Belgium. However, there is no specific regime for refurbished goods, nor is it clear whether under this directive they are to be considered second-hand or new.

Result: lots of questions arising as to what remedies are available to consumers when their product isn't in fact 'as good as new'.

This piece of EU regulation also states that for products with digital elements the seller must provide consumers with the necessary updates 'for the period of time the consumer can reasonably expect, given the type and purpose of the product'. It clarifies that the length of this obligation is linked to the legal guarantee period but can also go beyond it. But whether this will be enough to cover refurbished goods is doubtful.

It's important to note that this analysis only concerns cases where a consumer buys from a professional seller (B2C transactions). So, what about the repair enthusiasts, who occasionally sell refurbished products (C2C) and what about their customers who might not realize they are purchasing without being fully covered²⁹

2.2. Cyber Resilience Act

The **Cyber Resilience Act** obliges manufacturers to provide software updates to connected products 'for as long as they are expected to be used' or for at least a minimum of five years for long-lasting products³⁰



- ✔ What exactly does this mean for refurbished goods?
- ✔ How will this provision be interpreted and put into practice?
- ✔ Will the timespan during which digital products are 'expected to be used' take into account the possibility of refurbishment or only consider the first-time use of a device?
- ✔ If the latter, will the expected timespan for first-time use be enough to also cover the second life of a device as refurbished product?

It is unclear at best. At worst it is a serious obstacle to refurbishment as these devices will no longer enjoy sufficient cyber security protection to ensure a safe product.



2.3. General Product Safety Regulation (GPSR)

The [General Product Safety Regulation \(GPSR\)](#) applies to all products made available on the EU market, without sector-specific legislation, “including used, repaired or reconditioned products”. Despite this clear statement, it fails to provide a concrete definition of what should be understood as a “reconditioned” product.

Additionally, the obligations set out in the GPSR are aimed towards new products and as such do not comprehensively address the safety considerations for products that re-enter the market as refurbished goods. For example, Article 3(7) defines “placing on the market” as “the first making available of a product on the Union market”. This appears to inherently exclude products that re-enter the market through circular economy models from the same regulatory scrutiny.

2.4. Product Liability Directive (PLD)

It isn't all bad. The recent revision of the Directive on Liability for Defective Products (PLD) extends the liability rules to include persons who substantially modify a product that had already been placed on the market. At least this ensures consumers are not left uncompensated in case of damages causing material loss, however it does not protect consumers from being exposed to these risks in the first place.³¹

So are we covered?

On assessment, despite the clear potential for refurbishment to support the EU's circular economy goals, the concept appears still underdeveloped in current European legislation. Unclear definitions and limited regulatory focus jeopardize efficient consumer protection and undermine the sustainability benefits refurbishment has to offer.



Other countries leading the way

Awaiting an initiative at European level, some EU member states have started tackling this issue on their own. **While this proactiveness ensures consumers in selected countries can enjoy some level of protection, it also risks creating a fragmented regulatory patchwork in a European market without borders.** If member states continue to diverge on the topic, the impact on the internal market will be significant and hard to undo.

France

Between 2020 and 2021 the French Directorate-General for Competition, Consumer Affairs and Fraud Control conducted a large-scaled inspection of professionals offering refurbished devices.³² **They examined 84 online and physical establishments checking for misleading commercial practices, obligations (i.e. on the legal guarantee) and unfair contract terms.** The investigation paid particular attention to the tests and repairs carried out as part of the refurbishment process.

- ✓ Most of the sellers inspected sourced their products from suppliers, without really checking the condition of these devices.
- ✓ Some operators mention the carrying out of tests but very few of them were able to justify the nature of these tests
- ✓ None of them were able to provide results to support the qualitative claims made at the sale of the products.
- ✓ 62% of the sellers inspected were unable to provide information on the origin of the products.

Consequently, France has taken steps to protect consumers by introducing rules to govern the use of the terms **“refurbished”** and **“refurbished product”**.³³

The legislation specifies the conditions under which these terms can be used and prohibits any reference to a new product (i.e. “new condition” or “like new”).

This decree, which came into force in January 2022, also applies to spare parts and grants a two-year legal warranty of conformity to new, second-hand and refurbished goods.³⁴

Netherlands

Since March 2019, the “Refurbished” quality label has been introduced by the professional association of entrepreneurs in the Dutch engineering sector Techniek Nederland.³⁵ It guarantees the quality of refurbished products and rigorously controls the reliability of suppliers. The value of this label is all the greater because it is guaranteed by the inspection body TÜV Nord, Techniek Nederland and the legal protection insurance DAS.

While this is a win for Dutch consumers, the proliferation of these national labels also painfully demonstrates how in the absence of an EU initiative this could lead to divergence and negatively impact EU’s internal market.



Time to refurbish “Refurbished”

Refurbishing a device means looking at its current condition and assess what needs changing to get it back up and running at the optimum level. This can include upgrading or merely reinforcing the existing components.

Like an old mobile phone, the current framework is not fully delivering for consumers buying these refurbished devices, nor does it encourage the uptake of refurbishment.

If we are to fully embrace a circular economy, reduce our critical raw material dependencies and emissions, and offer consumers an accessible avenue to affordable sustainable products, it's clear we need an upgrade.

A dynamic refurbished goods market will empower citizens to take matters in hand and do their part for a sustainable future. It will bolster a strong internal market. And it will help fight climate change. In short: a unique opportunity that cannot be left ignored.

So, what do we need to turn refurbished from Wild West to Best of the Test?



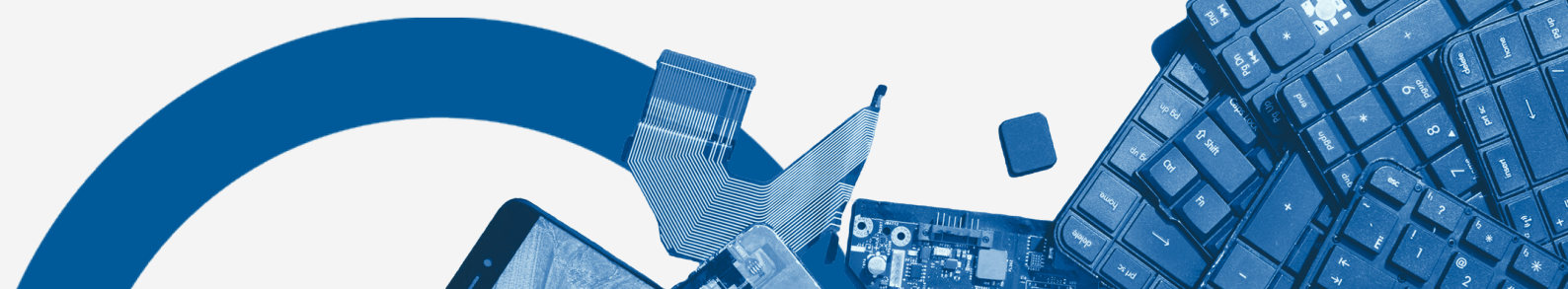
A common EU-wide definition for refurbished goods, covered by a legal guarantee of at least two years, putting a stop to endless discussions on whether refurbished is to be considered new or second-hand and confirming clear application of some of EU's major consumer legislation to the refurbishment category.



EU-wide standards for the use of descriptive ranking categories like ‘as good as new’. Such descriptive terms for classification must be backed up with clear markers. Likewise, the genuineness of the indicated rankings should be regularly checked by quality controls.



Clear information on repairs and any parts used during the refurbishment, along with the identification of the refurbisher, needs to be provided to the consumers both at the point of sale, whether online or in a shop, and in the Digital Product Passport. Failure to do so is deemed an unfair practice.





Refurbishers need to register with the national online platforms for repair, created under the Right to Repair Directive.³⁶ This would not only allow for consumers to check who is carrying out the refurbishment and whether he or she is trustworthy, it would also incite a healthy competitive refurbishment market.



Clear communication on the warranty, especially at the point of sale, so consumers know what they are getting into. This should cover two years at minimum³⁷, while refurbishers should be encouraged to extend beyond the legal warranty with additional free commercial ones ensuring a longer durability.



Software updates are key for lengthening the lifecycle of digital devices up until the stage of refurbishment. It needs to be monitored and evaluated whether newly approved obligations to provide updates during the 'expected lifespan' of products are applied in a way it allows for digital devices to have a safe second life as refurbished good. In the meantime, software-induced hardware obsolescence needs to be structurally tackled by including sufficient free security and functionality updates in upcoming Ecodesign legislations.



Enforcement of existing consumer protection and market regulation (UCPD, GPSR, etc) to tackle problems with sellers and platforms offering refurbished goods.



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About Euroconsumers

Gathering five national consumer organizations and giving voice to a total of more than 1.5 million people in Italy, Belgium, Spain, Portugal, and Brazil, Euroconsumers is the world's leading consumer cluster in innovative information, personalized services, and defense of consumer rights. Our European member organizations are part of the umbrella network of BEUC, the European Consumer Organization. Together, we advocate for EU policies that benefit consumers in their daily lives.

