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'I/A' ITEM NOTE

From:	General Secretariat of the Council
To:	Permanent Representatives Committee/Council
Subject:	Draft DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828 (**first reading**) - Adoption of the legislative act = Statement

Joint statement of Estonia and Latvia

Estonia and Latvia support the main objectives of the Directive to promote sustainable consumption and improve the functioning of the internal market, thus promoting circular economy and environmental protection. At the same time, we believe that the measures adopted in pursuit of these goals should offer sufficient added value and be effective in practice.

Even though the initial proposal has improved to some extent (including during the trilogues), we are still not entirely convinced that all the measures introduced are appropriate and necessary for achieving the objectives of the Directive (i.e. the manufacturer's obligation to repair and amendments to the recently transposed Sale of Goods Directive). But what it does achieve – **additional administrative burden** for businesses and Member States, and information overload for consumers.

In particular, our main concern from the start has been and still is the online platform.

Firstly, we are not persuaded that the average consumer would use it to look for information on repair service providers. In today's technology-driven society, consumers already have access to different search engines and social media, which makes it convenient to find necessary information quickly and efficiently.

Secondly, although we find the single European Platform to be a better option compared to 27 national platforms, we are concerned about the administrative burden that managing of national sections brings to the Member States. Therefore, we are not in favour of placing the responsibility for ensuring the functioning of the national sections of an EU-wide platform on the Member States due to different costs related to administration, registration and user service. This is especially onerous for smaller Member States, such as Estonia and Latvia. Moreover, fragmentation of the internal market may occur amongst the EU, if each Member State has the possibility to impose conditions for registering and accessing the platform. Imposing additional conditions would be especially burdensome for small repairers, who would therefore not use the platform, reducing the competitiveness and visibility of small entrepreneurs.

In conclusion, we are of the opinion that ensuring the functioning of the national section of the European Platform is disproportionately burdensome and leads to unreasonable costs for the Member States. We still strongly doubt whether an online platform provides sufficient added value to justify imposing such an obligation on the Member States. We would be able to support the introduction of the European platform only on the condition that the Commission would be solely responsible for the development, management and ensuring the functioning of the platform (including the national sections).

In light of the above, Estonia and Latvia regrettably cannot endorse the final text.