

# whitepaper

## 1/2025

### Promoting the repair of goods

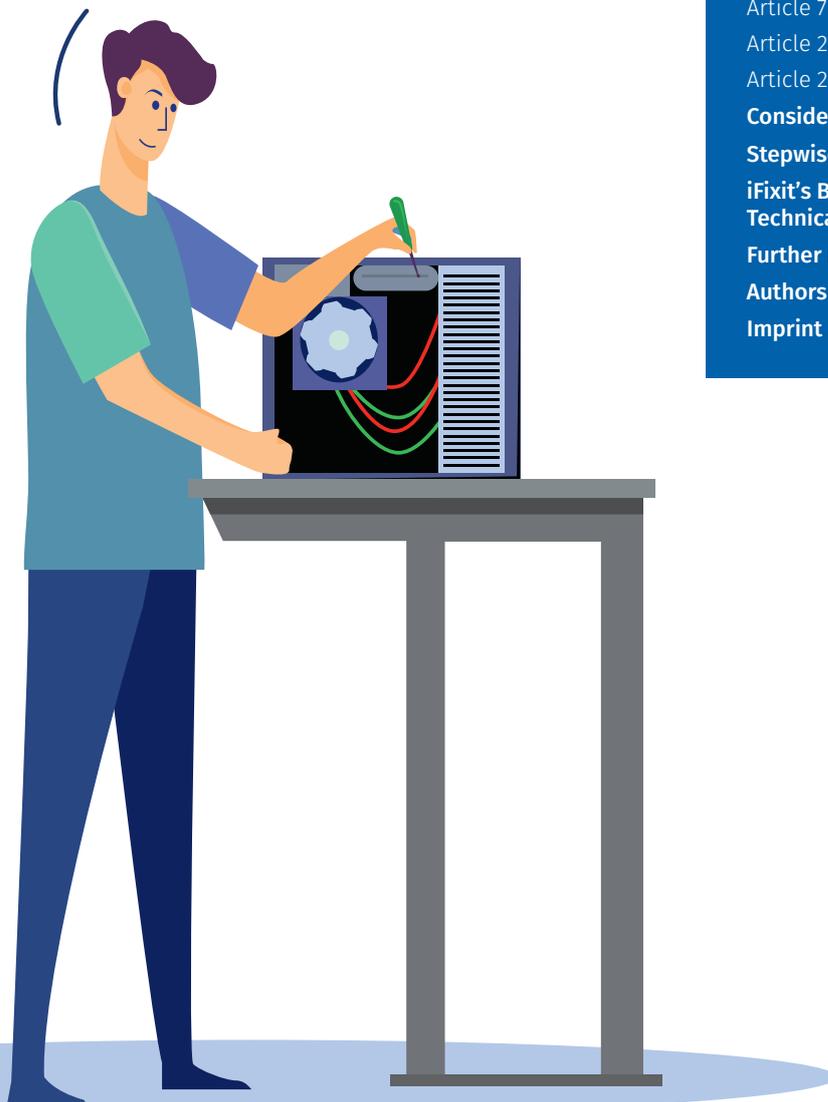
What technical writers and managers should know  
about the European Directive (EU) 2024/1799

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# Promoting the repair of goods

European Directive (EU) 2024/1799 on common rules to promote repair introduces a so-called right to repair for products in the European Union’s internal market.

tekem Europe and iFixit have joined forces to explain the Directive and its background and implications for managers and technical writers. The whitepaper also includes considerations for preparing repair information.



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# What can we do for you?

## Brief introduction of the organizations and what we want to achieve with our cooperation on the whitepaper

### **tekom Europe**

is the largest professional association for technical communication in Europe. Our mission is to promote the professional and business interests of all parties involved in and responsible for technical communication. We have been consistently committed to underline the importance of technical communication and the development of the related professions, thus contributing to the success of our industries. As an association, we offer a platform for the exchange of information and experience, promote education and training, support the professional development of our members, contribute to international standardization and address the parties involved with position papers, whitepapers and other publications.

### **iFixit**

is the world's largest online repair community, dedicated to making repair accessible for everyone. With thousands of free, step-by-step repair guides and a global community of do it yourself (DIY) repair enthusiasts, we empower people to fix their own devices. iFixit provides high-quality replacement parts, precision tools, and repair knowledge. Beyond hands-on repair, iFixit is also a leading advocate for the right to repair, working with policymakers and organizations to ensure access to repair information and promote more repairable product designs.

### **tekom and iFixit**

have agreed to collaborate on this whitepaper to pool their expertise on this important topic. In the European Union, Directive (EU) 2024/1799<sup>1</sup> promotes the repair of products. But even outside the European framework, repair has long been practiced as a measure to promote resource conservation and is becoming increasingly important. Repair information is an important part of putting the right to repair into practice – repairs are not feasible without proper repair information. The whitepaper brings together tekom's many years of experience in technical communication and iFixit's many years of experience in the repair of consumer products.



<sup>1</sup> The title of Directive (EU) 2024/1799 is Directive (EU) 2024/1799 of the European Parliament and of the Council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828. In this whitepaper the title of this Directive is shortened to Directive (EU) 2024/1799.

# Executive Summary of Directive (EU) 2024/1799

**Purpose and Scope:** Directive (EU) 2024/1799 aims at general rules that enhance the repair of goods, thus contributing to the internal market's proper functioning while ensuring high levels of consumer and environmental protection

**Only** repair is covered for **goods purchased by consumers**

Directive (EU) 2024/1799 introduces what it calls “rights of consumers”. These rights aim at **the obligations of manufacturers: manufacturers need to make repair possible**, in case consumers request repair of defective goods **outside the seller's liability**. Manufacturers have to comply unless repair is impossible. And **manufacturers must inform on their repair services** in an easily accessible, clear and comprehensible manner. Technical writers might step in here to prepare the appropriate information about repairability of the respective product group.

**Not every good/product to be repaired:** Directive (EU) 2024/1799 is only **applicable to goods for which repairability requirements are stipulated by Union legal acts**. These acts are listed in Annex II of the Directive. These legal acts are mainly based on the eco-design framework. They are **product-specific** regulations, e.g. the regulation with eco-design requirements for household washing machines and dryers.

Up to date, **10 product groups** are listed in Annex II however **other product groups are expected to be added in the near future**.

These product-specific regulations are already applicable, but the manufacturer's obligation to facilitate repair is new.

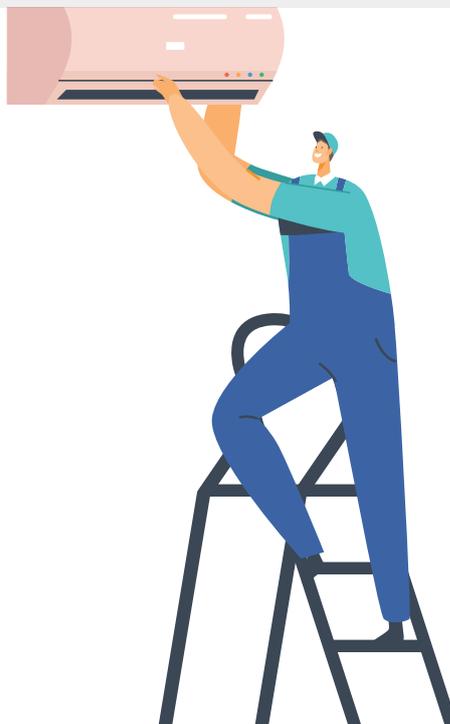
Standardized Repair Information: A **European Repair Information Form** is introduced to standardize the details provided about repair services, including the nature of the defect, suggested repair options, pricing, and timelines. This aims **to facilitate easier comparison and choice for consumers**. Manufacturers should use this form after consumers request repair.

**European Online Platform for repair:** An online platform will be established **to help consumers locate available repair services and access information** e.g. about refurbished goods etc.

**Implementation Timeline:** Member States are required to transpose the Directive into national law by **July 31, 2026**, ensuring compliance with its provisions.

## Preparatory action points for technical writers and other creators of repair-specific information

- Make yourself familiar with the **purpose of Directive (EU) 2024/1799**.
- Check if Directive (EU) 2024/1799 is already **transposed into national law** of the European member state (Deadline 2026-07-31) where you want to put the product on the internal market. Compare deviations between Directive (EU) 2024/1799 and national law.
- Check if the product in focus is covered by one of the regulations listed in Annex II List of Union legal acts, laying down reparability requirements of Directive (EU) 2024/1799. **If the product in focus is not listed in Annex II, Directive (EU) 2024/1799 is not applicable.**
- If the product in focus is listed in Annex II, get access to the **product specific regulations** to scrutinize the reparability requirements provided in this Union legal act. Repair and maintenance information are addressed in some of these regulations and economic operators shall provide them already now, according to the deadlines set in these product specific regulations.
- If the product in focus is addressed in Annex II, the manufacturer (or other economic operator listed in Article 5) is obliged to facilitate repair of the product and **you might be involved** in creating the necessary repair information required by Article 6.
- If consumers demand repair of the product you might establish the **European Repair Information Form** in your company.
- If the product in focus is addressed in Annex II, the **European online platform for repair and its national sections** might be a **valuable source of information**.



# Introduction

## The situation as of now

With the publication of Directive (EU) 2024/1799 the “right to repair” is experiencing an upswing and “repair” is becoming more and more mainstream in society. Repair is being strengthened from various sides and repair information is essential to put in reality the right to repair.

The repair of consumer products has a long history rooted in resourcefulness and practicality. However, in the latter half of the 20<sup>th</sup> century a “throwaway culture,” was established, where replacing products became more common than repairing them. This shift occurred due to several factors, among them decreasing relative costs of new products, increasing complexity and computerization of devices, and business models that prioritized new sales over extended product lifespans through repair.

To counteract the culture to throw away defective products and make room for repairs, especially of consumer products, repair communities and professional repair networks have developed globally. Organizations like iFixit have created extensive libraries of repair guides, while community initiatives such as Repair Cafés have established local workshops where people can bring broken items to be fixed with the help of volunteer experts. Additionally, environmental concerns have increasingly highlighted the importance of extending product lifespans.

Against this backdrop, several European countries began implementing “repair bonus” programs in recent years — financial incentives to make repair more economically attractive to end users<sup>2</sup>.

As of now, six states in the USA have successfully enacted right to repair laws, which include California (requires manufacturers to provide tools and information for repairs), New York (mandates manufacturers supply parts and tools for specific electronics sold in the state), Minnesota (implemented the Digital Fair Repair Act), Colorado and Oregon (passed legislation requiring manufacturers to support repair access, specifically for agricultural equipment and digital devices). Recent legislative sessions have seen 33 states reviewing various forms of right to repair bills.

**This whitepaper aims to illuminate how to navigate the changing regulatory environment in Europe and to create repair information that serves both regulatory compliance and needs of the target audience for whom the repair information is prepared.**

<sup>2</sup> For more information see Right to Repair Europe Coalition: “A comprehensive overview of the current repair incentive systems: repair funds and vouchers”, URL: <https://repair.eu/news/a-comprehensive-overview-of-the-current-repair-incentive-systems-repair-funds-and-vouchers/>, Last accessed 20 August, 2025.

# The European and international context

The European Union has developed a multi-faceted approach to extending product lifespans and reducing waste, significantly impacting how products must be designed, supported, and documented. For technical writers and documentation specialists, this represents a substantial shift in documentation requirements.

One milestone of “The European Green deal” is the “New Circular Economy Action Plan For a cleaner and more competitive Europe”<sup>3</sup> package. “The European Green Deal” was presented as Communication COM(2019) 640 final<sup>4</sup> by President von der Leyen on 11 December 2019.

To pursue the European Green Deal objective of sustainable consumption, and especially to promote repair several regulations and directives need to be highlighted:

- **Ecodesign Directive 2009/125/EC**, which established a framework for the setting of ecodesign requirements for energy-related products. Based on this Directive product-specific regulations have been adopted for several products/product groups. These product-specific regulations establish detailed reparability requirements, including specific content requirements for repair information. These regulations are the primary source of obligations for repair information.
- The **Ecodesign for Sustainable Products Regulation (EU) 2024/1781** has repealed, the Ecodesign Directive and will be the basis for future product-specific regulations.
- **Directive on Empowering Consumers in the Green Transition (EU) 2024/825** through better protection against unfair practices and through better information, which aims to provide better information on reparability at the point of sale.
- **Directive (EU) 2024/1799 on common rules for repair**, which is also called **right to repair Directive**. This Directive focuses on establishing repair as a consumer right, requiring manufacturers to provide repair services, and standardizing repair service information through the European Repair Information Form.

Together, these initiatives cover important stages of product lifespans regarding repair, complementing and reinforcing each other. The Ecodesign for Sustainable Products Regulation (EU) 2024/1781 promotes technical reparability of products in the production phase. Directive (EU) 2024/825 empowering consumers for the green transition enables consumers to make informed purchasing decisions for repairable products at the point of sale. Directive (EU) 2024/1799 strengthens the demand side by promoting repair in the after-sales phase.

Repair with a solid repair infrastructure is also a piece of the puzzle to feed in the 2030 Agenda for Sustainable Development<sup>5</sup> of the United Nations and its Sustainable Development Goals (SDG). Repair can save resources and contributes to achieve SDG 12 Ensure sustainable consumption and production patterns.<sup>6</sup>

<sup>3</sup> <https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=COM%3A2020%3A98%3AFIN>

<sup>4</sup> <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52019DC0640>

<sup>5</sup> <https://sdgs.un.org/2030agenda>

<sup>6</sup> <https://sdgs.un.org/partnerships/repairs-future-creating-solid-repair-infrastructure-europe-save-fossil-resources-our>

## Directive (EU) 2024/1799

Directive (EU) 2024/1799 defines common rules promoting the repair of goods and is a vital document for technical writers as it shapes the way repair information is communicated. As already mentioned, Directive (EU) 2024/1799 does not specify product-specific content, as we will show later, e.g. what type of repair information is required for mobile phones and washing machines. Instead, Directive (EU) 2024/1799 lists product-specific regulations in Annex II, which contain detailed requirements for repair information for the respective product. These product-specific regulations were mainly developed on the basis of the Ecodesign Directive 2009/125/EC, future product-specific requirements for repair information will be set under the Ecodesign for Sustainable Product Regulation (EU) 2024/1781.

For a better understanding of Directive (EU) 2024/1799 in the following subclauses the relevant articles of the Directive are presented and categorised in terms of their implications and significance for technical communication. You will find quoted extracts from the articles in light blue highlighted boxes. For Article 2, the quoted extracts with references to definitions in other Union legal acts are supplemented by the respective text so that the necessary information is available.

### Article 1 Subject matter, purpose and scope

Article 1 about “subject matter, purpose and scope” gives answers to several questions regarding Directive (EU) 2024/1799 on common rules promoting the repair of goods:

- Which products are/will be regulated by the Directive promoting rules for repair?
- What is the Directive aiming for?



#### Article 1 Subject matter, purpose and scope

1. This Directive lays down common rules strengthening the provisions related to the repair of goods, with a view to contributing to the proper functioning of the internal market, while providing for a high level of consumer and environmental protection.
2. This Directive shall apply to the repair of goods purchased by consumers in the event of a defect of the goods that occurs or becomes apparent outside the liability of the seller pursuant to Article 10 of Directive (EU) 2019/771.
3. Articles 5 and 6 shall only apply to goods for which and to the extent that repairability requirements are provided for by Union legal acts listed in Annex II.

Directive (EU) 2024/1799 is an internal market legal act applicable to products in the single market.

Article 1 (1) highlights among others, that repair is not a goal on its own. Its purpose is environmental protection. While this may seem obvious, it's an important point to remember. This idea is also stated in Directive (EU) 2024/1799, particularly in recital (3) which says “This Directive promotes sustainable consumption with a view to achieving benefits for the environment, by promoting a life cycle of goods which includes re-use, repair and refurbishment, while also producing benefits for consumers by avoiding costs associated with new purchases in the short term.” Recital (5) clarifies that the aim is to promote repair and reuse in the after-sales phase outside the liability of the seller.

Article 1 paragraph (2) specifies that Directive (EU) 2024/1799 applies to goods bought by consumers, meaning, business-to-business products are not affected.

In paragraph (2) the sentence section “in the event of a defect of the goods that occurs or becomes apparent outside the liability of the seller pursuant to Article 10 of Directive (EU) 2019/771” supplements repair requirements for goods after purchase for the time period that follows the liability of the seller. However, with Article 16 Amendment to Directive (EU) 2019/711 also the liability the seller is affected with this Directive e.g. by changes in the liability period.

Paragraph (3) outlines the extent of repair and refers to so-called “Union legal acts” that specify product or product group specific repairability requirements. These Union legal acts listed in Annex II cover so far the following product groups respectively regulations:

1. For household washing machines and household washer-dryers, Regulation (EU) 2019/2023
2. For household dishwashers, Regulation (EU) 2019/2022
3. For refrigerating appliances, Regulation (EU) 2019/2019
4. For electronic displays, Regulation (EU) 2019/2021
5. For welding equipment, Regulation (EU) 2019/1784
6. For vacuum cleaners, Regulation (EU) No 666/2013
7. For servers and data storage products, Regulation (EU) 2019/424
8. For mobile phones, cordless phones and slate tablets, Regulation (EU) 2023/1670
9. For household tumble dryers, Regulation (EU) 2023/2533
10. For batteries and waste batteries, Regulation (EU) 2023/1542

These regulations are already in force however with Directive (EU) 2024/1799 additional obligations are set for these product groups e.g. regarding repair by manufacturers (see Article 5) or information about repair (Article 6).

9 out of 10 of these regulations are based on the European ecodesign framework – Directive 2009/125/EC establishing a framework for the setting of ecodesign requirements for energy-related products, respectively Ecodesign for Sustainable Product Regulation (EU) 2024/1781<sup>7</sup> that repealed Directive 2009/125/EC in July 2024. This shows that there is a strong link between the repairability requirements and European ecodesign framework.

This link emphasizes the importance of repairability by design. The Ecodesign for Sustainable Product Regulation (EU) 2024/1781 applies to “any physical goods that are placed on the market or put into service, including components and intermediate products”, with some exceptions as e.g. food, feed, medical products. Therefore, it can be assumed that repairability requirements will be set for a broad range of different products in future. Only the regulation listed under 10 on batteries and waste batteries is not linked to the ecodesign framework. It regulates to remove and replace portable batteries and light means of transport (LMT) batteries by end-users and covers a broader range of products.

Each of the regulations addresses and covers repairability requirements. Examples of how the repairability requirements are phrased are given in Article 5 Obligation to repair in this whitepaper. The list in Annex II will be updated annually when new repairability requirements are established for new product groups.

<sup>7</sup> <https://eur-lex.europa.eu/eli/reg/2024/1781/oj>



The Right to Repair Europe Coalition, which is already mentioned in the introduction, has published online a very useful overview table stating the right to repair for different products/product groups and relevant regulations.

[< Click to get table](#)

Source: Right to Repair Europe Coalition

It can be concluded that a limitation of obligations to repair exists and only products addressed by the listed regulations are covered. For other products, Directive (EU) 2024/1799 has not yet been applied. However, future Union legal acts covering repairability requirements for other products will be added to Annex II later. Horizontal repairability requirements for products such as consumer electronics and small household appliances are already under scrutiny.<sup>8</sup>

## Article 2 Definitions

Definitions are a key concept for technical communicators and managing them can create a common dictionary with our stakeholders. Here please find a collection of some definitions included in Directive (EU) 2024/1799. Some potentially new concepts are defined, like digital goods (9) or durable medium (12). Some of these definitions refer to other Union legal acts. For your convenience, the definitions from the referenced Union legal acts have been included.

### §

#### Article 2 Definitions

For the purpose of this Directive, the following definitions apply:

- (1) 'consumer' means 'consumer' as defined in Article 2, point (2), of Directive (EU) 2019/771; which defines **'consumer' means any natural person who, in relation to contracts covered by this Directive, is acting for purposes which are outside that person's trade, business, craft or profession**
- (2) 'repairer' means any natural or legal person who, related to that person's trade, business, craft or profession, provides a repair service, including manufacturers and sellers that provide repair services and repair service providers whether independent or affiliated with such manufacturers or sellers;
- (3) 'repair' means 'repair' as defined in Article 2, point (20), of Regulation (EU) 2024/1781; which defines **'repair' means one or more actions carried out to return a defective product or waste to a condition where it fulfils its intended purpose;**
- (4) 'seller' means 'seller' as defined in Article 2, point (3), of Directive (EU) 2019/771; which defines **'seller' means any natural person or any legal person, irrespective of whether privately or publicly owned, that is acting, including through any other person acting in that natural or legal person's name or on that person's behalf, for purposes relating to that person's trade, business, craft or profession, in relation to contracts covered by this Directive;**

<sup>8</sup> Ecodesign for Sustainable Products and Energy Labelling Working Plan 2025-2030 COM(2025) 187 final

- (9) ‘goods’ means ‘goods’ as defined in Article 2, point (5), of Directive (EU) 2019/771 except water, gas and electricity; which defines **‘goods’ means:**
- (a) *any tangible movable items; water, gas and electricity are to be considered as goods within the meaning of this Directive where they are put up for sale in a limited volume or a set quantity;*
  - (b) *any tangible movable items that incorporate or are inter-connected with digital content or a digital service in such a way that the absence of that digital content or digital service would prevent the goods from performing their functions (‘goods with digital elements’);*
- (10) ‘refurbishment’ means ‘refurbishment’ as defined in Article 2, point (18), of Regulation (EU) 2024/1781; which defines **‘refurbishment’ means 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;**
- (11) ‘repairability requirements’ means requirements under the Union legal acts listed in Annex II which enable a good to be repaired, including requirements to improve ease of disassembly and requirements concerning access to spare parts, repair-related information and tools applicable to goods or specific components of goods;
- (12) ‘durable medium’ means ‘durable medium’ as defined in Article 2, point (11), of Directive (EU) 2019/771; which defines **‘durable medium’ means any instrument which enables the consumer or the seller to store information addressed personally to that person in a way that is accessible for future reference, for a period of time adequate for the purposes of the information, and which allows the unchanged reproduction of the information stored;**

Many definitions refer to the European Ecodesign Framework with its Regulation (EU) 2024/1781. With the terms ‘repair’ and ‘refurbishment’ two tasks in the use phase of products are defined. These definitions help to distinguish these tasks from each other and from other tasks such as maintenance.

The definition of ‘consumer’ of Regulation (EU) 2019/771 refers also to the European Commission’s ‘Blue Guide’ on the implementation of EU product rules 2022. The ‘Blue Guide’ describes actors in the product supply chain and ‘end-users’ as ‘consumer’ and the wording is similar.

With the definition of ‘repairability requirements’ manufacturers may be required to provide repair-related information if so, regulated by product/product group specific Union legal acts.

More definitions are in the product-specific regulations listed in Annex II. Be aware that these definitions are also relevant, for example “professional repairer” is defined in several of these regulations (see Article 5).

## Article 4

### European Repair Information Form

Article 4 outlines the requirements and suggestions for a standardized European Repair Information Form.

**This form is meant to help repair providers give clear and consistent information to consumers. While its use is voluntary, repairers are encouraged to adopt it. The goal is to make it easier for consumers to compare repair options and choose the best service for their needs.**



#### Article 4 European Repair Information Form

....

4. The European Repair Information Form shall specify the following conditions of repair in a clear and comprehensible manner:
  - (a) the identity of the repairer;
  - (b) the geographical address at which the repairer is established as well as the repairer's telephone number and email address and, if available, other means of online communication which enable the consumer to contact, and communicate with, the repairer in a quick, efficient and accessible manner;
  - (c) the good to be repaired;
  - (d) the nature of the defect and the type of repair suggested;
  - (e) the price or, if the price cannot reasonably be calculated in advance, the manner in which the price is to be calculated and the maximum price for the repair;
  - (f) the time needed to complete the repair;
  - (g) the availability of temporary replacement goods during the time of repair and the costs of temporary replacement, if any, for the consumer;
  - (h) the place where the consumer hands over the good for repair;
  - (i) where applicable, the availability of ancillary services, such as removal, installation and transportation, offered by the repairer, and the detailed costs of those services, if any, for the consumer;
  - (j) the period of validity of the European Repair Information Form;
  - (k) where applicable, additional information.

The European repair information form is attached as Annex I to the Directive. It collects information about the identity and contact details of the repairer and information on the repair service.

OJ L, 10.7.2024	EN
ANNEX I	
<b>EUROPEAN REPAIR INFORMATION FORM</b>	
Part I	
Identity and contact details of the repairer providing the repair service	
Repairer	[Identity]
Address	[Geographical address to be used by the consumer]
Telephone number	
Email address	
If provided by the repairer, other means of online communication, which enable the consumer to contact, and communicate with, the repairer quickly and efficiently	
Part II	
Information on the repair service	
Good to be repaired	[Identification of the good]
Nature of the defect	[Description of the defect]
Type of repair suggested	[What kind of measures will be taken to repair the defect]
Price for repair or, if it cannot be calculated, the applicable calculation method and maximum price of repair	[This means the total amount or, if not possible, the calculation method and the ceiling for the repair service, in EUR/national currency]
Time to complete repair	[Time by which the repairer undertakes to perform the service in days]
Availability of temporary replacement goods	[A temporary replacement good means that the consumer will receive an equivalent good for use during the time of repair, the repairer has to indicate 'Yes' or 'No']
If yes, indicate the corresponding costs, if any:	[In EUR/national currency]
Place to hand over the goods	[The place where the consumer hands over the goods for repair]
If applicable, the availability of ancillary services	[Indicate if and to which extent ancillary services such as removal, installation and transportation are offered, or 'None' if no ancillary service is offered for the repair concerned]
If yes, indicate the corresponding costs, if any:	[In EUR/national currency, per service offered]
The period of validity of the European Repair Information Form	[Period of validity of at least 30 days]
If applicable, additional information	
Indications between square brackets provide explanations for the repairer and must be replaced with the corresponding information.	
ELI: <a href="http://data.europa.eu/eli/dir/2024/1799/oj">http://data.europa.eu/eli/dir/2024/1799/oj</a>	19/20

## Article 5

### Obligation to repair

Article 5 is key for the right to repair and introduces the manufacturer's obligation to repair. It also addresses the repair conditions as well as the option to choose other repairers and its implications.



#### Article 5

##### Obligation to repair

1. Member States shall ensure that upon the consumer's request, the manufacturer shall repair goods for which, and to the extent that, repairability requirements are provided for by Union legal acts listed in Annex II. The manufacturer shall not be obliged to repair such goods where repair is impossible. The manufacturer may sub-contract repair in order to fulfil its obligation to repair.
2. The repair pursuant to paragraph 1 shall be carried out subject to the following conditions:
  - (a) it shall be carried out either free of charge or for a reasonable price;
  - (b) it shall be carried out within a reasonable period of time from the moment the manufacturer has physical possession of the good, has received the good or has been given access to the good by the consumer;
  - (c) the manufacturer may provide the consumer with the loan of a replacement good free of charge or for a reasonable fee for the duration of the repair; and
  - (d) in cases where the repair is impossible, the manufacturer may offer the consumer a refurbished good.
4. Manufacturers that make spare parts and tools available for goods covered by Union legal acts listed in Annex II shall offer these spare parts and tools at a reasonable price that does not deter repair.
5. Manufacturers, or, where applicable, authorised representatives, importers or distributors who have an obligation to repair pursuant to this Article shall ensure that consumers can access, via a free access website, information on the indicative prices that are charged for the typical repair of goods covered by Union legal acts listed in Annex II. ...
6. Manufacturers shall not use any contractual clauses, hardware or software techniques that impede the repair of goods covered by Union legal acts listed in Annex II unless justified by legitimate and objective factors including the protection of intellectual property rights under Union and national law. Manufacturers shall, in particular, not impede the use of original or second-hand spare parts, compatible spare parts and spare parts issued from 3D-printing, by independent repairers when those spare parts are in conformity with requirements under Union or national law such as requirements on product safety or in compliance with intellectual property. ...
7. Manufacturers shall not refuse to repair goods covered by Union legal acts listed in Annex II for the sole reason that a previous repair has been performed by other repairers or by other persons.
8. Without prejudice to the obligation to repair under this Article, consumers may seek repair from any repairer of their choice.

...

Member States are required to make sure that, if a consumer requests it, the manufacturer must repair a defective product. In other words, the repair process begins when the consumer asks for it, and the manufacturer is obligated to carry it out. However, consumers can also choose to use an independent repairer without losing their right to request a future repair from the manufacturer.

Article 5 also addresses the need for spare parts and tools, and prohibits manufacturers from taking actions that would make repairs more difficult.

Importantly, the repair obligations depend on product-specific Union legal acts that elaborate on reparability requirements for each product or product group. When combined with Article 5, these acts help determine exactly what kind of repairs the manufacturer must offer.

To get an idea, here are 2 examples included in the Directive's Annex II LIST OF UNION LEGAL ACTS LAYING DOWN REPAIRABILITY REQUIREMENTS.

These examples illustrate the extent of product/product group specific reparability requirements also with respect to repair information

- a) the regulation for household washing machines and household dryer and
- b) the regulation for mobile phones, cordless phones and slate tablets.

**a) For household washing machines and household washer-dryers Regulation (EU) 2019/2023 is referenced.** It requires for example **access to repair and maintenance information e.g. of technical manual of instructions for repair**; availability of specified spare parts including their maximum delivery time, implications of self-repair or non-professional repair for the safety of the end-user and for the guarantee and it specifies detailed information requirements. And it provides a definition for: 'professional repairer' means an operator or undertaking which provides services of repair and professional maintenance of household washing machines or of household washer-dryers.

## Commission Regulation (EU) 2019/2023 for household washing machines and household washer-dryers extract:



### ANNEX II Ecodesign requirement

#### 8. RESOURCE EFFICIENCY REQUIREMENTS

From 1 March 2021, household washing machines and household washer-dryers shall meet the following requirements:

(1) availability of spare parts:

(a) manufacturers, importers or authorised representatives of household washing machines and household washer-dryers shall make available to professional repairers at least the following spare parts, for a minimum period of 10 years after placing the last unit of the model on the market:

- motor and motor brushes;
- transmission between motor and drum;
- pumps;

- shock absorbers and springs;
  - washing drum, drum spider and related ball bearings (separately or bundled);
  - heaters and heating elements, including heat pumps (separately or bundled);
  - piping and related equipment including all hoses, valves, filters and aquastops (separately or bundled);
  - printed circuit boards;
  - electronic displays;
  - pressure switches;
  - thermostats and sensors;
  - software and firmware including reset software;
- (b) manufacturers, importers or authorised representatives of household washing machines and household washer-dryers shall make available to professional repairers and end-users at least the following spare parts: door, door hinge and seals, other seals, door locking assembly and plastic peripherals such as detergent dispensers, for a minimum period of 10 years after placing the last unit of the model on the market;
- ...
- (e) the list of spare parts concerned by point (b) and the procedure for ordering them and the repair instructions shall be publicly available on the free access website of the manufacturer, importer or authorised representative, when placing the first unit of a model on the market and until the end of the period of availability of these spare parts;
- ....
- (3) access to Repair and Maintenance Information:  
after a period of two years after the placing on the market of the first unit of a model and until the end of the period mentioned under (1), the manufacturer, importer or authorised representative shall provide access to the household washing machine or household washer-dryer repair and maintenance information to professional repairers in the following conditions:
- (a) the manufacturer's, importer's or authorised representative's website shall indicate the process for professional repairers to register for access to information; to accept such a request, the manufacturers, importers or authorised representatives may require the professional repairer to demonstrate that:
- (i) the professional repairer has the technical competence to repair household washing machines and household washer-dryers and complies with the applicable regulations for repairers of electrical equipment in the Member States where it operates. Reference to an official registration system as professional repairer, where such system exists in the Member States concerned, shall be accepted as proof of compliance with this point;
  - (ii) the professional repairer is covered by insurance covering liabilities resulting from its activity regardless of whether this is required by the Member State;
- (b) manufacturers, importers or authorised representatives shall accept or refuse the registration within 5 working days from the date of request;

- (c) manufacturers, importers or authorised representatives may charge reasonable and proportionate fees for access to the repair and maintenance information or for receiving regular updates. A fee is reasonable if it does not discourage access by failing to take into account the extent to which the professional repairer uses the information;
- (d) once registered, a professional repairer shall have access, within one working day after requesting it, to the requested repair and maintenance information. The information may be provided for an equivalent model or model of the same family, if relevant;
- (e) the household washing machine or household washer-dryer repair and maintenance information referred to in (a) shall include:
  - the unequivocal household washing machine or household washer-dryer identification;
  - a disassembly map or exploded view;
  - technical manual of instructions for repair;
  - list of necessary repair and test equipment;
  - component and diagnosis information (such as minimum and maximum theoretical values for measurements);
  - wiring and connection diagrams;
  - diagnostic fault and error codes (including manufacturer-specific codes, where applicable);
  - instructions for installation of relevant software and firmware including reset software; and
  - information on how to access data records of reported failure incidents stored on the household washing machine or washer-dryer (where applicable);
- (4) information requirements for refrigerant gases:

without prejudice to Regulation (EU) No 517/2014 of the European Parliament and of the Council (2), for household washing machines and household washer-dryers equipped with a heat pump, the chemical name of the refrigerant gas used, or equivalent reference such as a commonly used and understood symbol, label or logo, shall be displayed permanently and in a visible and readable way on the exterior of the household washing machines or household washer-dryers, for example on the back panel. More than one reference can be used for the same chemical name;
- (5) requirements for dismantling for material recovery and recycling while avoiding pollution:
  - manufacturers, importers or authorised representatives shall ensure that household washing machines and household washer-dryers are designed in such a way that the materials and components referred to in Annex VII to Directive 2012/19/EU can be removed with the use of commonly available tools;
  - manufacturers, importers or authorised representatives shall fulfil the obligations laid down in point 1 of Article 15 of Directive 2012/19/EU.

## 9. INFORMATION REQUIREMENTS

From 1 March 2021, household washing machines and household washer-dryers shall meet the following requirements:

user and installer instructions shall be provided in the form of a user manual on a free access website of the manufacturer, importer or authorised representative, and shall include:

- (1) the following general information:
  - (a) information that the eco 40-60 programme is able to clean normally soiled cotton laundry declared to be wash able at 40 °C or 60 °C, together in the same cycle, and that this programme is used to assess the compliance with the EU ecodesign legislation;
  - (b) information that the most efficient programmes in terms of energy consumption are generally those that perform at lower temperatures and longer duration;
  - (c) for household washer-dryers: information that the wash and dry cycle is able to clean normally soiled cotton laundry declared to be washable at 40 °C or 60 °C, together in the same cycle, and to dry it in such a way that it can be immediately stored in a cupboard, and that this programme is used to assess the compliance with the EU ecodesign legislation;
  - (d) information that loading the household washing machine or the household washer-dryer up to the capacity indicated by the manufacturer for the respective programmes will contribute to energy and water savings;
  - (e) recommendations on the type of detergents suitable for the various washing temperatures and washing programmes;
  - (f) information that noise and remaining moisture content are influenced by the spinning speed: the higher the spinning speed in the spinning phase, the higher the noise and the lower the remaining moisture content;
  - (g) information on how to activate and deactivate the network connection (if applicable) and impact on energy consumption;
  - (h) instruction on how to find the model information stored in the product database, as defined in Regulation (EU) 2019/2014 by means of a weblink that links to the model information as stored in the product database or a link to the product database and information on how to find the model identifier on the product;
  - ...
- (3) the user instructions shall also include instructions for the user to perform maintenance operations. Such instructions shall as a minimum include instructions for:
  - (a) correct installation (including level positioning, connection to mains, connection to water inlets, cold and/or hot if appropriate);
  - (b) correct use of detergent, softeners and other additives, and main consequences of incorrect dosage;
  - (c) foreign object removal from the household washing machine or household washer-dryer;

- (d) periodic cleaning, including optimal frequency, and limescale prevention and procedure;
- (e) door opening between cycles, if appropriate;
- (f) periodic checks of filters, including optimal frequency, and procedure;
- (g) identification of errors, the meaning of the errors, and the action required, including identification of errors requiring professional assistance;
- (h) how to access professional repair (internet webpages, addresses, contact details); such instructions shall also include information on:
  - (i) any implications of self-repair or non-professional repair for the safety of the end-user and for the guarantee;
  - (ii) the minimum period during which the spare parts for the household washing machine or the household washer-dryer are available.

**b) For mobile phones, cordless phones, and tablets, the relevant rules are set out in Regulation (EU) 2023/1670.** This regulation includes requirements to support repair and reuse — such as ensuring spare parts are available, giving **access to repair and maintenance information, and also specifies detailed information requirements.**

It also requires that professional repairers must have access to necessary repair and maintenance information. According to Annex I of the regulation, a “professional repairer” is anyone who professionally repairs or maintains these devices, either as a service or for resale after the repair.

## Commission Regulation (EU) 2023/1670

for mobile phones, cordless phones and slate tablets extract:



### ANNEX II Ecodesign requirements

...

#### B. SMARTPHONES

##### 1. RESOURCE EFFICIENCY REQUIREMENTS

###### 1.1. Design for repair and reuse

###### (1) Availability of spare parts

(a) From 20 June 2025 or from one month after the date of placement on the market, whichever is later, manufacturers, importers or authorised representatives shall make available to professional repairers at least the following spare parts, including required fasteners, if not reusable, until at least 7 years after the date of end of placement on the market, when present:

- (i) battery or batteries;
- (ii) front-facing camera assembly;
- (iii) rear-facing camera assembly;
- (iv) external audio connector(s);
- (v) external charging port(s);

- (vi) mechanical button(s);
- (vii) main microphone(s);
- (viii) speaker(s);
- (ix) hinge assembly;
- (x) mechanical display folding mechanism

...

(2) Access to repair and maintenance information

- (a) From 20 June 2025 or from one month after the date of placement on the market, whichever is later, manufacturers, importers or authorised representatives shall, at least until 7 years after the date of end of placement on the market, provide access to repair and maintenance information to professional repairers for parts covered by points 1 (a) and (c) in the following conditions, unless that information is made publicly available at the free access website of the manufacturer, importer or authorised representative:

....

- (e) The repair and maintenance information referred to in point (a) shall contain the level of detail needed to be able to replace parts covered by point 1 (a) and (c) and shall at least include:
- (i) the unequivocal product identification;
  - (ii) a disassembly map or exploded view;
  - (iii) wiring and connection diagrams, as required for failure analysis;
  - (iv) electronic board diagrams;
  - (v) a list of necessary repair and test equipment;
  - (vi) technical manual of instructions for repair, including marking of the individual steps;
  - (vii) diagnostic fault and error information (including manufacturer-specific codes, where applicable);
  - (viii) component and diagnosis information (such as minimum and maximum theoretical values for measurements);
  - (ix) instructions for software and firmware (including reset software);
  - (x) information on how to access data records of reported failure incidents stored on the device, where applicable, with the exception of personal identifiable information such as related to user behavior and location information;
  - (xi) information on how to access professional repair, including the internet webpages, addresses and contact details of professional repairers registered in accordance with points 2 (a) and (b);
- (f) Without prejudice to intellectual property rights, third parties shall be allowed to use and publish unaltered repair and maintenance information initially published by the manufacturer, importer or authorised representative and covered by point (e) once the manufacturer, importer or authorised representative terminates access to that information after the end of the period of access to repair and maintenance information.

(b) From 20 June 2025 or from one month after the date of placement on the market, whichever is later, repair instructions and maintenance information for parts concerned by point 1 (c) shall be publicly available at the free access website of the manufacturer, importer or authorised representative, until at least 7 years after the date of end of placement on the market. This information shall contain the level of detail needed to be able to replace parts covered by point 1 (c).

...

tekem and iFixit point out that the Union legal acts on reparability requirements introduce other economic operators as new target audiences for repair information. Under Regulation (EU) 2023/1670, manufacturers, importers, or authorized representatives must provide repair and maintenance information to independent professional repairers – even if those repairers are not affiliated with them.

To help address the needs of these different target audiences, the international standard IEC/IEEE 82079-1 Preparation of information for use (instructions for use) of products – Part 1: Principles and general requirements offers useful technical guidance for preparing effective repair information.

## Article 6

### Information on obligation to repair



#### Article 6 Information on obligation to repair

Member States shall ensure that the manufacturer or, where applicable, the authorised representative, importer or distributor make available free of charge, at least for the entire duration of their obligation to repair pursuant to Article 5, information on their repair services in an easily accessible, clear and comprehensible manner.

Article 5 requires manufacturers to offer repairs, and Article 6 supports this by an obligation to inform consumers about the obligation to repair and the repair service. A key issue is how clearly and specifically the required “repair service“ must be described for each product category listed in Annex II. This information should be easily accessible to the consumer and provided in a clear and comprehensible manner, without the need for the consumer to request. The manufacturer is free to decide how to inform consumers, e.g. via a website in a visible and prominent way, via the Digital Product Passport or at the point of sale.

To help with this, tekem and iFixit recommend using the international standard IEC/IEEE 82079-1, which guides technical writers on how to present information so it meets these legal clarity requirements. The standard helps ensure that vague legal terms are communicated in a way that is clear and useful to consumers.

## Article 7

### European online platform for repair



#### Article 7 European online platform for repair

1. A European online platform for repair ('European online platform') shall be established to allow consumers to find repairers and, where applicable, sellers of refurbished goods, purchasers of defective goods for refurbishment or community-led repair initiatives. The European online platform shall consist of the national sections that use the common online interface and shall include links to the national online platforms for repair referred to in paragraph 3 (the 'national online platforms').

....

**A new European online platform for repair will be created to help consumers find repair services, sellers of refurbished goods, buyers of defective products for refurbishment, and community repair initiatives. It will also connect to national platforms across EU countries.**

**According to the European Commission, this European Repair Platform will be part of the existing "Your Europe" portal. The Commission will build the platform, while Member States will manage repairer registrations in their own countries. The European online platform for repair is expected to launch in 2027.**

## Article 22

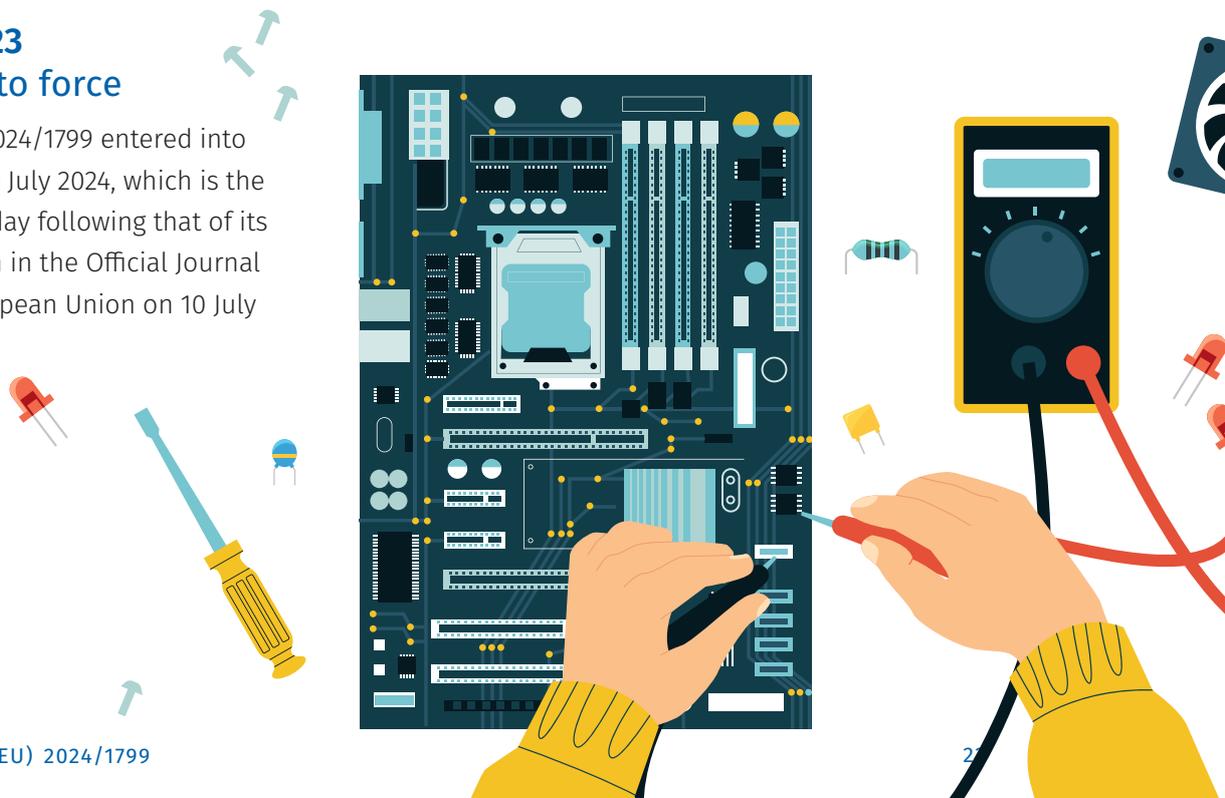
### Transposition

The Directive needs to be transposed by the Member States into national laws, regulations and administrative provisions necessary to comply with it by 31 July 2026 at the latest. These laws, regulations and administrative provisions shall be applied from 31 July 2026.

## Article 23

### Entry into force

Directive 2024/1799 entered into force on 30 July 2024, which is the twentieth day following that of its publication in the Official Journal of the European Union on 10 July 2024.



# Considerations

## Some considerations for managers, technical writers or other persons in charge of information for use

**When preparing repair information, there are several important points to consider. Since repair information is part of a product's information for use, we strongly recommend the consideration of principles and general requirements stipulated in IEC/IEEE 82079-1 Preparation of information for use (instructions for use) of products – Part 1: Principles and general requirements.**

**Moreover, repair information deserves specific considerations we want to address.**

Design requirements relate to how a product is built to meet specific needs and standards. Repairability requirements, on the other hand, focus on how easily a product can be maintained and repaired throughout its lifetime.

Both are important for ensuring product success, but they address different aspects of the product's use.

The product specific Union legal acts list specific repairability requirements, including:

- Design requirements enhancing the ability to disassemble the goods
- A range of spare parts and required tools to be made available for a minimum period
- Manufacturers provide repair-related information to facilitate repair

Designing for disassembly means making products easier to take apart for repair, recycling, or upgrades. It also includes providing clear, easy-to-follow instructions, with diagrams and step-by-step guidance, so users and other target audiences can safely disassemble devices without damaging parts.

While consumers/end-users are allowed to repair products under certain conditions, the Directive also ensures they have access to information about repair services — and they have the right to choose any repair provider.

Professional repairers are a key target audience. These repairers rely on detailed documentation to find the information they need quickly. They know how to use instructions and other information along with diagrams and schematics to perform repairs correctly.

Repairability requirements do not oblige manufacturers to repair defective goods, but ensure that goods are repairable.

# Stepwise approach for repair information

Technical writers and other persons who prepare information for use should follow a stepwise approach for repair information. You should consider adding safety related information upfront.

## **1. Fault detection**

Describe the event by which the presence of a problem becomes apparent.

## **2. Fault diagnosis:**

Identify, describe and explain the failure and the fault including fault signals. Characterize fault as repairable or non-repairable item. If it is non-repairable, give advice on how to facilitate further waste management. If a diagnostic service is needed to identify the defect, this part may need specific product-related information for use.

Both hardware and software issues, including error codes, technical bulletin locations, and clear symptoms of hardware malfunction should be included.

## **3. Fault localization**

Describe the action to identify the faulty sub item at the appropriate indenture level for maintenance.

## **4. Repair authorization**

Find out whether the manufacturer allows a repair of the identified fault.

## **5. Repair prerequisites**

Describe prerequisites of repair as e.g. level of skills required for the target audience, required tools, spare parts, consumables and environment for repair.

## **6. Fault correction/repair**

If previous steps are completed successfully repair description can start.

## **7. Functional check**

Describe the action(s) required to verify that the corrective action taken has been successful, without inducing new faults.

## **8. Actions to verify restoration**

If possible, describe actions to ensure that the product is repaired and functions as required.

## iFixit's Best Practices for Technical Writing for Repair

As the right to repair gains momentum in Europe, creating high-quality repair documentation is becoming increasingly important. iFixit, a leader in the DIY repair movement, has compiled this summary of best practices for creating effective repair documentation. tekcom sees these best practices in connection with principles and general requirements stated in the most important standard for technical communication IEC/IEEE 82079-1 to ensure in a bigger picture the safe, efficient, effective and sustainable use of products.

Repair information often needs to serve different target audiences with varying levels of expertise. Technical communicators should differentiate content for these distinct target audiences. Professional repairers require comprehensive technical information, including component and diagnosis information, wiring diagrams, and technical schematics. End-users, on the other hand, need clear, accessible information focused on user-serviceable parts with appropriate safety warnings and simplified procedures. This differentiation is essential for ensuring that repair information is clear and comprehensible for each target audience.

Effective repair documentation uses concise, direct language. Active voice instructions, such as "Remove the screw" rather than "The screw should be removed," create clear, actionable guidance. Technical terms should be clearly defined with appropriate glossaries when necessary. Content should be structured logically, mirroring the actual repair process to help users follow along naturally. These clarity principles help ensure that repair information is understandable and actionable for its intended audience.



Visual elements are crucial for creating comprehensible repair documentation from the perspective of the user. High-quality photographs showing components and step-by-step procedures provide a realistic representation of what users will encounter. Technical diagrams can effectively illustrate system relationships and circuit layouts. 3D visualizations are particularly valuable for disassembly sequences, especially when 3D-CAD data is already available<sup>9</sup>. Consistent visual marking of components using colors and patterns helps users identify specific parts accurately. For professional repair information, more detailed technical visuals can be provided, while consumer documentation should emphasize clarity and safety.

Maintaining accurate and up-to-date repair information requires robust documentation management. Technical communicators should implement systems to track repair information throughout product lifecycles, establishing version control and update processes for when product designs change. All repair procedures should be validated through thorough testing prior to publication. Digital delivery methods can allow for more efficient updates when needed, ensuring that users always have access to the most current information.

Technical communicators must also remain aware of applicable regulations for repair documentation, aligning their practices with relevant standards. Documentation should be structured to meet required formats and information requirements, ensuring compliance with product-specific regulations. This regulatory awareness becomes increasingly important as right to repair frameworks continue to evolve globally. iFixit Solutions offers specialized services in this area, helping manufacturers understand and prepare for emerging regulations through compliance guidance, repairability assessments, and support for creating documentation that meets regulatory requirements.

Content should be organized to mirror the actual repair process. Guides should begin with required tools and parts lists, followed by necessary safety precautions, with steps arranged in chronological order and related actions grouped together. For procedures common across multiple repairs, creating separate prerequisite guides enables consistency and simplifies updates. Accuracy in repair documentation is critical for both successful repairs and user safety. Technical writers should ideally perform repair procedures themselves or work closely with technicians who can verify each step, helping identify potential pitfalls requiring additional clarification.

By implementing these best practices, technical communicators can create repair documentation that not only meets regulatory requirements but also truly enables repair, supporting sustainability goals and the circular economy. Effective repair documentation empowers users to extend the lifespan of their products, reducing waste and resource consumption while providing valuable skills and satisfaction to those performing the repairs.

<sup>9</sup> ISO/IEEE 82079-2 Preparation of information for use (instructions for use) of products — Part 2: Assembly of self-assembly products (standard under development)

## Further information



For more information  
about iFixit see  
<https://about.ifixit.com>



### IEC/IEEE 82079-1:2019 Preparation of information for use (instructions for use) of products – Part 1: Principles and general requirements

#### Implementation of IEC/IEEE 82079-1 Ed. 2

Considering other Sector-Specific Standards

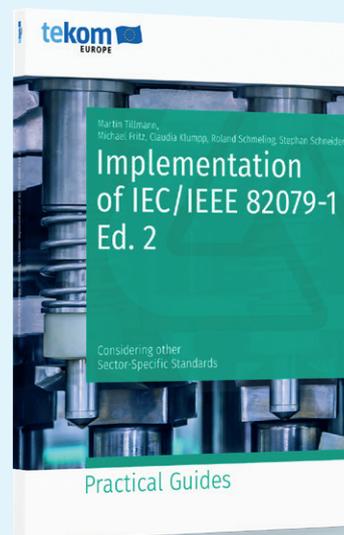
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## Promoting the repair of goods

European Directive (EU) 2024/1799 on common rules to promote repair introduces a so-called right to repair for products in the European Union's internal market. tekomp Europe and iFixit have joined forces to explain the Directive and its background and implications for managers and technical writers. The whitepaper also includes considerations for preparing repair information.