



**NGĀ ARA WHETŪ**  
CENTRE FOR CLIMATE,  
BIODIVERSITY & SOCIETY

## **Ngā Ara Whetū and CIRCUIT Submission for the Consumer Guarantees (Right to Repair) Amendment Bill 2024 (39-1)**

### **2 April 2025**

#### **About Ngā Ara Whetū**

*Ngā Ara Whetū* is a Research Centre on Climate, Biodiversity and Society at the University of Auckland. *Ngā Ara Whetū* (“Star Paths”) highlights the ethos of the Centre, named for the inspiration that guided the journeys of our collective ancestors to the shores of Aotearoa New Zealand. Ngā Ara Whetū enables and enhances collaborative research and training.

Ngā Ara Whetū’s network of more than 150 affiliated researchers draws on transdisciplinary scholarship at the University of Auckland in the fields of natural sciences, social and health sciences, Māori studies, law, engineering, and economics. It strives to connect this work to policymakers and the public, engaging Aotearoa New Zealand in environmental action.

#### **About CIRCUIT**

CIRCUIT is a research centre based in the Faculty of Engineering and Design at the University of Auckland, affiliated with Ngā Ara Whetū. It consists of more than 60 academic affiliates from different disciplines working closely with leaders from industry, community, and government, seeking real solutions to waste surpluses and resource scarcity. CIRCUIT has a particular interest in developing and implementing high-tech, customised solutions for a low-carbon circular economy as a durable model of prosperity for Aotearoa New Zealand.

#### **General Impressions:**

Ngā Ara Whetū and CIRCUIT support passage of the Consumer Guarantees (Right to Repair) Amendment Bill (the Bill). The Centre considers the Bill an important step forward for developing sustainable and equitable economic practices. We think the Bill will both extend the lifespan of our consumer durables (especially important for large appliances) and support the long-term circulation of resources, reducing the strain of extraction and production on our natural environment and the communities in proximity to those activities. It will also curtail landfilling and other unsustainable waste practices.

This will be crucial for protecting our natural resources for years to come. We also think the Bill supports New Zealand citizens’ and the country’s long-term economic positions:

- The right to repair has already been successfully introduced in France and the United Kingdom, where it has supported consumers and the environment without leading to increased costs or safety issues. Introduced in 2021, the UK’s Right to Repair legislation aims to extend the lifespan of products, saving costs in repair, replacement, and energy bills. France introduced a mandatory ‘repairability index’ in 2021, requiring certain manufacturers

to label products with a score indicating their ease of repair, thereby encouraging sustainable consumer choices and promoting product longevity. Failure to pass similar legislation in Aotearoa New Zealand will put our citizens at an economic disadvantage.

- The Bill will especially help mitigate Aotearoa New Zealand’s waste issues by enabling repair rather than discarding and replacing electronics. In 2024, the Global E-waste Monitor identified New Zealand citizens as some of the biggest e-waste generators in the world, generating 20 kg of e-waste per capita each year. By one estimate, around 80,000 tonnes of e-waste are produced in New Zealand each year, with less than 1% being sent for recycling and the remainder going into landfills (<https://api.globalewaste.org/publications/file/297/Global-E-waste-Monitor-2024.pdf>).<sup>1</sup> In comparison to other OECD countries, New Zealand’s e-waste recycling rate is among the lowest, highlighting the urgent need for legislative action.<sup>2</sup>
- While repairable commodities have emerged in other markets, New Zealand’s domestic market needs to promulgate appropriate standards for their entry here. This Bill will support the growth of new sustainably inclined markets. Without passing such legislation, the country risks receipt of inferior products, rejected from other markets as unsustainable and consumer-unfriendly (<https://newsroom.co.nz/2023/11/03/we-need-to-change-the-law-just-to-let-us-fix-things/>).<sup>3</sup>
- New Zealand already has established manufacturers who embrace repair as part of their business models:
  - Wishbone bikes: <https://nz.wishbonedesign.com/collections/parts>
  - Cactus Outdoor: <https://cactusoutdoor.co.nz/pages/cactus-lab>
  - Blunt umbrellas: <https://bluntumbrellas.co.nz/pages/repairs>
  - Nudie Jeans: <https://www.nudiejeans.com/stores/nudie-jeans-repair-shop-ponsonby>
- Indeed, a recent publication in *NZ Manufacturer* argues that the right to repair will benefit New Zealand’s manufacturers, by strengthening the domestic economy, supporting customer loyalty, and encouraging innovation (<https://nzmanufacturer.co.nz/2025/03/why-the-right-to-repair-will-benefit-new-zealand-manufacturers/>).<sup>4</sup>
- The Bill represents a smart economic and environmental intervention. Specifically, it will create jobs and strengthen local economies by (1) supporting the growth of a repair and refurbishment sector, (2) encouraging skills development in technical trades, and (3) fostering small repair businesses and social enterprise. While some raise concerns that right to repair legislation could lead to increased upfront costs for products, international experience suggests such increases are minimal and are offset by long-term savings for consumers through extended product life and reduced replacement costs.
- The Bill aligns with Aotearoa New Zealand’s unique cultural values and responsibilities. It supports the principles of kaitiakitanga by promoting stewardship of natural resources and

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1 Cornelius Baldé et al., *The Global E-waste Monitor 2024*, (Geneva/Bonn: International Telecommunication Union (ITU) and United Nations Institute for Training and Research (UNITAR), 2024), 100-102.

<https://api.globalewaste.org/publications/file/297/Global-E-waste-Monitor-2024.pdf>

2 Rashmi Anoop Patil, Seeram Ramakrishna. “A comprehensive analysis of e-waste legislation worldwide.” *Environmental Science and Pollution Research* 27, (2020): 14412-14431. <https://doi.org/10.1007/s11356-020-07992-1>.

3 Alex Sims (with Trish O’Sullivan), “NZ needs to avoid becoming dumping ground of world's inferior products,” *Newsroom*, 2 November, 2023. <https://newsroom.co.nz/2023/11/03/we-need-to-change-the-law-just-to-let-us-fix-things/>.

4 Jim Goddin, “Why the Right to Repair will benefit New Zealand manufacturers,” *NZ Manufacturer*, 25 March, 2025. <https://nzmanufacturer.co.nz/2025/03/why-the-right-to-repair-will-benefit-new-zealand-manufacturers/>

reducing waste through repair and reuse. The Bill reinforces aspirations for intergenerational wellbeing (oranga tonutanga) and responsible resource management.

### Further Comments:

- Ngā Ara Whetū and CIRCUIT support and urge passage of the Bill. We also support some amendments. For example, we recommend setting a minimum value (\$50) and specifying categories for the goods for which the legislation would apply.
- Future iterations of legislation could further refine the right to repair. For example, following the UK model, future legislation could set a minimum period of seven years for essential components and ten years for less critical parts.
- While New Zealand tends to import a lot of goods, a developed right to repair can support more sustainable practices among manufacturers. On all levels of the production process, from the design process to the supply of spare parts, there are opportunities to later legislate the sale of goods in New Zealand that conform with global circular economy practices.
  - For example, legislating that new consumer goods be repairable by design: repairability from the design stage of production has been established in the recent Eco-design law in the European Union (<http://data.europa.eu/eli/reg/2024/1781/oj>).<sup>5</sup>

There are a range of companies that are already engaged in this trend, including:

- Miele W1 Series Washing machines (Germany), which feature:
  - Long-lasting components, designed to last 20+ years.
  - Easily replaceable drum bearings – unlike most sealed units.
  - A diagnostic system for troubleshooting issues.
  - Modular component design for easy part replacement.
  - Spare parts provisions for up to 20 years.
- Patagonia utilises durable materials that are designed for easy patching. With their Worn Wear initiative, the company provides DIY repair guides and services, and lifetime repair programmes for many items.
- Further Right to Repair legislation would provide solutions to the problem of obsolescence. Support for a local market in repairable goods on one sphere can help develop more durable products in other spheres.
  - France has introduced one possible measure for supporting repairability and consumer goods durability. French legislators have developed a “repair index” for the consumer’s information, which is communicated with labels placed on packaging, quite similar to the energy efficiency labels that we have in New Zealand. There is good reason to think that this has already influenced more sustainable business practices in the production of goods for the French market (<https://www.rfi.fr/en/france/20210211-france-launches-worlds-first-repair-index-for-smartphones-laptops-consumer-products-environment-waste-durability-europe>).<sup>6</sup>

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5 Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC. <http://data.europa.eu/eli/reg/2024/1781/oj>

- Additionally, adopting a government policy of purchasing repairable commodities for departments, ministries, and state-owned enterprises could provide support for establishing a repairables market.
- Future iterations could offer repair processes and end of life options for waste.
- A right to repair for additional products beyond what is covered in the current legislation may offer further economic and environmental benefits. For example, farmers could benefit from the right to repair farm equipment, like tractors, simultaneously protecting our economic staples and our natural environment.

Passing this Bill will demonstrate New Zealand’s commitment to sustainable economic practices and environmental stewardship. We urge the Government to seize this opportunity to lead the way in circular economy innovation and consumer rights, positioning New Zealand as a global leader in sustainable product management.

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6 Mike Woods, “France launches anti-waste 'repairability' rating for smartphones, laptops,” *RFI*, 11 February, 2021. <https://www.rfi.fr/en/france/20210211-france-launches-worlds-first-repair-index-for-smartphones-laptops-consumer-products-environment-waste-durability-europe>.