

Québec's first consumer right-to-repair law in Canada: What every manufacturer and merchant needs to do now

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On June 25, 2025, the Québec government adopted the final version of the regulation related to the right-to-repair provisions introduced by [Bill 29: An Act to protect consumers from planned obsolescence and promote the durability, repair and maintenance of goods](#) (the Regulation). [This Regulation provides the long-awaited details on how manufacturers and merchants must comply](#) with Québec's new consumer protection rules.

Starting Oct. 5, 2025, all manufacturers and merchants selling goods of a nature that requires maintenance in Québec — whether online or in physical stores — will be required to disclose, prior to sale, whether they guarantee the availability of replacement parts, repair services, and maintenance information. These new pre-sale disclosure obligations apply broadly and are mandatory whether or not a business intends to provide repair support or claim an exemption.

Expanded obligations: Repair, parts, and maintenance support

As of Oct. 5, 2025, all manufacturers and merchants operating in Québec will be subject to expanded obligations under the *Consumer Protection Act* (CPA), as amended by Bill 29 and its accompanying Regulation. These obligations apply to all goods “of a nature that requires maintenance work” — a category that Québec courts have interpreted broadly to include a wide variety of consumer products.

Manufacturers and merchants must ensure that, for such goods, replacement parts, repair services, and maintenance information are available to consumers for a reasonable period following the sale.

In addition, if a manufacturer makes replacement parts available, it must also ensure that those parts can be installed:

- Using commonly available tools; and

- Without causing irreversible damage to the product.

Disclosure obligation and possible exemption

It is possible for a manufacturer or a merchant to be exempt from the availability obligations, but only if the appropriate disclosures are made before the sale.

In addition, the Regulation introduces a standalone obligation to disclose, even when no exemption is sought.

Indeed, manufacturers must disclose whether the availability of each of the following is fully, partially, or not at all guaranteed:

- Replacement parts;
- Repair services;
- Maintenance or repair information.

When only partially guaranteed, the manufacturer must disclose the information making it possible to easily identify the replacement parts, repair services, or information necessary to maintain or repair the goods, as the case may be, but whose availability he does not guarantee.

This information must be:

- Published online, in French, in a clear and printable format;
- Included by the manufacturer in the user or maintenance manual, if one exists.

Merchants must provide the same information in writing and prior to the sale, whether the transaction is online or in-store. However, they may be exempt from this written disclosure if they publish the information online, in a clear and printable manner.

There are currently no guidelines from the *Office de la protection du consommateur* (that is, Québec's consumer protection agency) as to the format or structure of these disclosures. These pre-sale disclosures are now a core element of Québec's new right-to-repair regime.

What's next for your business?

Québec's right-to-repair regime introduces new legal, operational, and commercial realities. Achieving compliance will require coordination across legal, product, marketing, customer service, and distribution teams. With the Oct. 5, 2025, deadline approaching, preparation should begin now.

To prepare effectively, consider the following:

- **Is your company subject to the Regulation?** There are different requirements for manufacturers and merchants.
- **Do your products fall within scope?** Are they "goods of a nature that requires maintenance work" under Québec law?

- **Are your products already on shelves, or still in production?** This may affect your disclosing strategy.
- **What must be updated to ensure compliance?** Consider packaging inserts, manuals, websites, and online listings.
- **How will you coordinate disclosures across your ecosystem?** Distributors, merchants, and manufacturers will need to align to avoid gaps or inconsistencies.
- **Are your internal teams prepared?** Sales, and especially after-sales support teams, must be trained on the new requirements.

We can help

The new Regulation and CPA amendments change how consumer goods are sold and supported in Québec. With the Oct. 5, 2025, compliance deadline fast approaching, preparation should begin now.

BLG lawyers can assist you in assessing your obligations, refining your disclosure strategy, and implementing practical, Québec-specific solutions tailored to your products and distribution model. Don't hesitate to reach out to the key contacts below.

By

[Stéphane Pitre](#), [Laurence McCaughan](#)

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BLG Offices

Calgary

Centennial Place, East Tower
520 3rd Avenue S.W.
Calgary, AB, Canada
T2P 0R3

T 403.232.9500
F 403.266.1395

Ottawa

World Exchange Plaza
100 Queen Street
Ottawa, ON, Canada
K1P 1J9

T 613.237.5160
F 613.230.8842

Vancouver

1200 Waterfront Centre
200 Burrard Street
Vancouver, BC, Canada
V7X 1T2

T 604.687.5744
F 604.687.1415

Montréal

1000 De La Gauchetière Street West
Suite 900
Montréal, QC, Canada
H3B 5H4

T 514.954.2555
F 514.879.9015

Toronto

Bay Adelaide Centre, East Tower
22 Adelaide Street West
Toronto, ON, Canada
M5H 4E3

T 416.367.6000
F 416.367.6749

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