

To:  
Margrethe Vestager  
Commissioner for Competition

Karmenu Vella  
Commissioner for Environment

Cc:  
Peter Altmaier  
Bundeswirtschaftsminister

Svenja Schulze  
Bundesumweltministerin

Klaus Ernst  
Vorsitzender des Wirtschaftsausschusses im Deutschen Bundestag

Sylvia Kotting-Uhl  
Vorsitzende des Umweltausschusses im Deutschen Bundestag

Berlin, 21 June 2019

**Open letter: Google threatens existence of independent repair service providers**

Dear Commissioner for Competition,  
Dear Commissioner for Environment,

Several weeks ago, Google started blocking adverts from independent repairers. Thousands of independent repairers are affected and can no longer advertise their services. At the same time Google continues to allow adverts from manufacturers and their authorised repair shops.

**Runder Tisch Reparatur, together with repair initiatives, repair businesses, consumer and environmental organisations, scientific bodies and Vangerow, representing 700 additional repair businesses, calls on you to prohibit Google's infringements of competition law provisions in this case.**

In our opinion, Google is intervening massively and illegally into the market for repairs. Without repair, neither climate nor resource protection goals can be achieved. Surveys show that consumers want a right to repair and easy access to repair services, preferably through local repair shops.

**Independent repair shops have long been under threat.** Last year, the network Runder Tisch Reparatur supported a complaint by one of its members at the national competition regulator after it was able to prove that repair businesses do not receive spare parts at all or only at inflated prices. Google's approach towards independent repairers can be seen as a new attack on them in order to strengthen the monopoly of manufacturers and their li-

censed repairers. If Google only allows adverts from manufacturers and their partner companies, or from those who regain access to Google's ads via personal contacts, the help of big advertising agencies and significant persistence, then fair competition for independent repairers will be massively hindered. This can neither be in the interest of consumers, nor the environment. And it is, in our opinion, another clear violation of competition law.

**Google's behaviour is hardly new. Only recently the company was heavily fined by the Commission**, to the tune of 1.49 billion Euros, for abusing its overwhelming advertising advantage to cement its own position as a dominant advertising platform. The Commission has found that a dominant position is not prohibited under EU antitrust rules but that such a position brings with it a special responsibility. We agree with you that Google should not abuse its strong market position by restricting competition in the market it dominates, or in any other markets. Google is also obliged to pay damages to persons and companies affected by its anti-competitive behaviour.

**Google's dominant position in the placement of online adverts for repair service providers is now excluding independent repairers as advertisers and having serious negative impact on these companies.**

Yours sincerely,

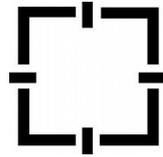
Runder Tisch Reparatur

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