

Raising the bar: how Bill 29's next phase redefines warranty standards in Québec

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On July 16, 2025, the Québec government published a draft of the *Regulation to amend the Regulation respecting the application of the Consumer Protection Act* (the draft Regulation), introducing amendments to the *Regulation respecting the application of the Consumer Protection Act* (Regulation) to implement the new statutory "warranty of good working order" provided for in recent amendments to the Québec *Consumer Protection Act* (QC CPA).

These amendments, entering into force on October 5, 2026, introduce new disclosure obligations with respect to this new form of statutory warranty, which is part of the second phase of implementation of Bill 29 – *Act to protect consumers from planned obsolescence and to promote the durability, repairability and maintenance of goods* (Bill 29). As discussed in a prior Update, Bill 29 is designed to prohibit planned obsolescence and to strengthen consumer rights regarding the durability, repairability and maintenance of certain goods.

This second phase establishes fixed durations for the warranty of good working order for specific product categories, sets out how merchants and manufacturers must disclose this warranty and imposes additional pre-contractual obligations on merchants offering paid "additional" warranties for goods already covered by the statutory warranty.

Key legislative and regulatory changes

1. Warranty of good working order for enumerated categories of new goods

Section 38.1 of the QC CPA introduces a warranty of good working order for specified categories of new goods that are the subject of a contract of sale or a long-term lease — namely, refrigerators, freezers, dishwashers, washing machines, dryers, television sets, desktop computers, laptop computers, electronic tablets, cellular telephones, video-game consoles, air conditioners, heat pumps and any other goods designated by future regulations. The draft Regulation does not add any products to the list already set forth in the QC CPA further to the adoption of Bill 29.

The draft Regulation proposes to set the warranty durations as follows:

- **Six years:** stoves, refrigerators, freezers, air conditioners and heat pumps
- **Five years:** dishwashers, washing machines and dryers

- **Four years:** television sets
- **Three years:** desktop computers, laptop computers, electronic tablets, cellular telephones and video-game consoles

2. New merchant disclosure obligations

Merchants must indicate the duration of the warranty of good working order near the advertised price of applicable goods, or where the goods are offered for lease, near their retail value, in a prominent manner.

After the contract is concluded, the draft Regulation would require merchants to provide consumers with a written document prominently displaying the following compulsory provision:

LEGAL WARRANTY OF GOOD WORKING ORDER

The good working order of certain new goods is guaranteed for a number of years from the delivery of the goods (sections 38.1 and following of the Consumer Protection Act):

Goods	Duration of the legal warranty of good working order
Range – Refrigerator – Freezer – Air conditioner – Heat pump	6 years
Washing machine – Dryer – Dishwasher	5 years
Television set	4 years
Desktop or laptop computer – Video game console – Cellular telephone – Electronic pad	3 years

In the event of malfunction of the goods under warranty, contact the manufacturer and/or the merchant. They are under an obligation to repair the goods free of charge.

The legal warranty of good working order is in addition to other legal warranties free of charge. They allow you to require that the goods be fit for the purposes for which goods of that kind are ordinarily used (section 37 of the Act) and durable in normal use for a reasonable length of time (section 38 of the Act).

For more information on the warranties, go to the website of the Office de la protection du consommateur at Québec.ca/garanties-consommateur.

If a merchant proposes to sell to a consumer an additional warranty in respect of a good that is covered by the new warranty of good working order, the merchant also has disclosure obligations in respect of the new warranty of good working order in the context of the sale of that additional warranty. Most notably, the merchant must provide the following notice (mostly in type of at least 14 points, as reproduced below) to the consumer, in paper form or, if the warranty is being offered online, in a form that is easy for the consumer to retain and print:

NOTICE CONCERNING LEGAL WARRANTIES

The Act requires the manufacturer and the merchant to warrant the good working order of the goods for [3/4/5/6, depending on the nature of good] years from the delivery of the goods. The warranty is free of charge.

The merchant is required to read you the above text [this disclosure is not required for contracts concluded online].

In the event of malfunction of the goods during the warranty, contact the manufacturer and/or the merchant. They are required to repair the goods free of charge.

Goods	Duration of the legal warranty of good working order
Range – Refrigerator – Freezer – Air conditioner – Heat pump	6 years
Washing machine – Dryer – Dishwasher	5 years
Television set	4 years
Desktop or laptop computer – Video game console – Cellular telephone – Electronic pad	3 years

The warranty is automatically granted by the Consumer Protection Act.

Other warranties are also granted by that Act free of charge. They allow you, among other things, to require that the goods be durable in normal use for a reasonable length of time. They may apply during and after the expiry of the legal warranty of good working order.

For more information on the warranties, go to the website of the Office de la protection du consommateur at Québec.ca/garanties-consommateur.

Except where the warranty is being offered online, the merchant must also disclose the following orally to the consumer: "The Act requires the manufacturer and the merchant to warrant the good working order of the goods for [3/4/5/6, depending on the nature of good] years from the delivery of the goods. The warranty is free of charge."

3. New manufacturer disclosure obligations

Manufacturers will be obliged to disclose online, in a prominent and comprehensible manner, the duration of the warranty of good working order.

Practical implications and next steps

The provisions and amendments will take effect on October 5, 2026. Merchants and manufacturers are advised to proactively review and update their sales practices, remote-contract procedures and consumer-facing materials to ensure full compliance with the new requirements before they come into force.

We are here to help you navigate the changes brought by the amendments discussed above and support you in keeping your business compliant with Québec consumer protection laws.

Please do not hesitate to contact us if we can provide any assistance or guidance on your operations in Québec.