

A fair and relevant comparison for consumers on repair indexes: one common methodology for all

APPLiA calls for a common Reparability Scoring Methodology developed product-by-product. APPLiA, representing home appliance manufacturers, expresses concern over the emergence of national reparability indexes in various EU member states, which pose a threat to the free movement of goods within the EU Internal Market. The organisation supports the European Commission's initiative to establish a unified European reparability index and offers a detailed, product-specific methodology for its development. APPLiA emphasises the need for a comprehensive lifecycle analysis, tailored product-specific measures, and alignment with existing regulations to ensure fairness, practicality, and consumer clarity across the EU.

Main messages

- Protect the **European internal market** and ensure the free movement of goods and services - we urge Member States to stop any ongoing initiative at the national level.
- A dedicated **Consultation forum/Ecodesign Forum** on reparability is necessary.
- A horizontal framework for common principles should be combined with **product-specific acts**. Horizontal measures grouping together different products shall **not** be used.
- **Product-specific considerations** must be evaluated when addressing the parameters for the index.
- **Safety** must always prevail.
- All aspects of reparability must be **verifiable and enforceable** on the market.
- The reparability index should be integrated into either the **energy label or if such a label is not available, in another labelling scheme**. Nevertheless, APPLiA is against introducing a repair index as amendments to existing energy labelling acts.
- Considerations need to be made about different **trade-offs**: a very repairable product that breaks down very often or a non-repairable product that lasts for a very long time without breaking down.
- The **benefits for end-users** of having reparability classes must be assessed in terms of **consumer and environmental impact**.



1. Protect the internal market

Home appliance manufacturers are highly concerned about the upcoming national repairability indexes in different member states. **APPLiA members believe that these initiatives will create, and have already created, obstacles and burdens that endanger the free movement of goods within the EU Internal Market.**

Our sector strongly benefits from the free movement of goods and the possibility of exchanging commodities across EU member states, ensuring minimum common requirements that apply in all 27 member states. In particular, we are **highly concerned** about both Belgium and France, as their initiatives on repairability impact the **free movement of goods** on a European level and hamper the common market.

Therefore, following the latest information from the 12th of July 2024¹, we urge the French government to halt any initiatives related to products that are already under revision or will shortly start the revision of ED&EL regulations (such as **refrigerators, freezers, cooking appliances, vacuum cleaners, dishwashers, airco and heat pumps**). Additionally, we invite French authorities and the EU Commission to discuss the deliverables of the JRC report at EU level before adopting national repairability indexes on small appliances.

Finally, we welcome the initiative from the European Commission to establish European repairability indexes, and we are willing to contribute to the proposal and the impact assessments conducted for each product group.

¹ Reference to the presentation made by the *Commissariat général au développement durable* on 12th of July 2024 names "PPT COSUI indices de réparabilité et de durabilité - 12.07.2024.pptx".



2. Proposed methodology

2.1. Lifecycle Impact Analysis

APPLiA advocates for a reparability scoring methodology rooted in a comprehensive lifecycle approach. This analysis should encompass:

- **Environmental Impacts:** Assessing the impact on the ecological footprint by introducing a reparability scoring for a certain product category.
- **Economic Impacts:** Evaluating the cost-effectiveness of a repair scoring for both consumers and manufacturers.
- **Consumer Impacts:** Considering the practical implications of such a repair scoring for consumers, including ease and convenience of repair.

This proposed approach aligns with APPLiA's proposal to use the preparatory/review study to run a life cycle assessment (using the new [EcoReport Tool](#)) of relevant parameters for the appliances in scope. The study team should also consider the different trade-offs before proposing policy options. Furthermore, this methodology can be seamlessly integrated into preparatory studies conducted under the Ecodesign for Sustainable Products Regulation (ESPR). Additionally, this approach can be applied to other products than household appliances where reparability scoring might still be relevant.

2.2. General method/approach on reparability index and Product-by-Product requirements through delegated acts

A dual approach is recommended, combining a horizontal framework that establishes a uniform reparability framework across all product categories (akin to the JRC method / EN45554 setting out the key parameters) **with specific product delegated acts tailored to individual products** (e.g. how the priority spare parts, the corresponding disassembly steps, and the sub-category of products are defined and weighed to be product-specific).

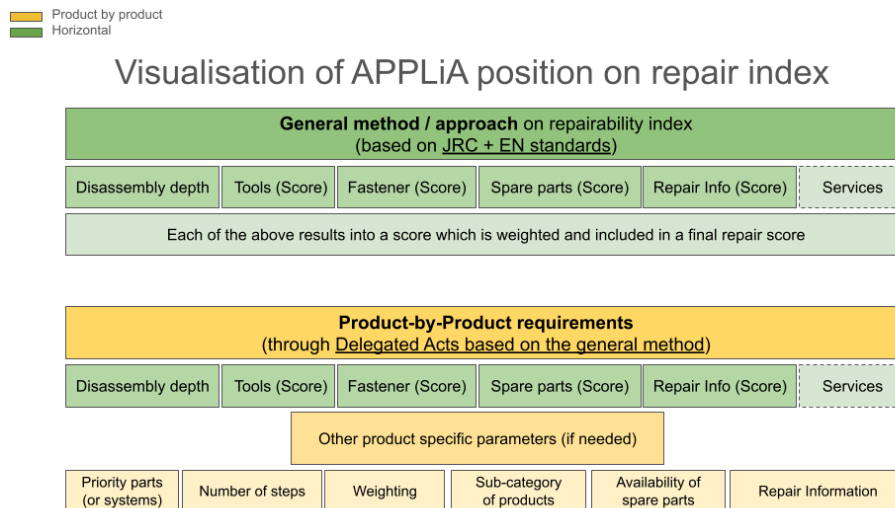
For example, concerning household appliances in the list of priority products: the product category "coffee machines" covers a very wide spectrum of appliances: drip filter coffee machines, fully automatic espresso machines, pad/cup machines, manual espresso machines, etc. All these types cannot be covered by one single reparability scoring as they are technically too different (see paragraph 4 below).

With this strategy, implementing reparability scoring across different product categories becomes more straightforward. The main requirements would



involve defining priority spare parts, the corresponding disassembly steps and the weighting.

2.3. Visualisation of the concept set above



3. Repairability parameters

3.1. Disassembly depth, tools (type) and fastener (type) scores

APPLiA welcomes these three parameters for the calculation of the repairability index. The decision related to the list of priority parts should be based on reliable failing rate data and after consultation of the concerned industry sector.

On the disassembly score, APPLiA supports the approach of using disassembly steps. Therefore, we propose to use the number of steps necessary to disassemble the respective part for the assessment instead of the 'time'. This is in line with both the French Repair Index and the regulation for smartphones and tablets. Although the eDIM method provides the result of the time required to dismantle a component, it is also much more time-consuming and complex than the step method. EN 45554 states: "The eDiM is a comprehensive method, although it comes with a significant computational effort. The eDiM method, ideally with the same database, would have to be used by the manufacturers of the devices as well as by all MSAs for verification". Furthermore, clarification is needed regarding whether the criterion applies specifically to the priority part itself or to all parts in the process. In the latter case, there is a risk of double-counting if multiple priority parts are accessed in the same way. Finally, determining the time



required for a full repair can be subjective, depending on the skills of the repairer.

3.2. Spare parts score

APPLiA welcomes the approach set by the Ecodesign to ensure a minimum availability of spare parts in years for several product categories. The distinction in the ecodesign between spare parts available to end-users and professional repairers ensures that **safety** of consumers remains the first priority. Therefore, when discussing the repairability index, we stress the importance to keep consistency with what is included already in the ecodesign regulation which provides a clear distinction on what it is safe to share with end-users and what should be given only to professional repairers.

For the repairability index, APPLiA recommends distinguishing between the actual availability of spare parts on the market and the access of repair information on how to use these spare parts for repair. This point is also linked to our request to include a definition of 'professional repairers' in each different product regulation and horizontal initiative as in the framework.

3.3. Spare parts (*in years*) score

APPLiA strongly supports the current approach in the ecodesign regulations that includes as a minimum requirement the availability of spare parts for several household products (e.g. 7 years for fridges, 10 years for washing machines/washer-dryers/dishwashers/tumble dryers). This requirement provides accessibility to spare parts to ensure that products can be repaired throughout its lifetime.

Including the spare part availability *in years* in the repairability index is a concept worth considering. APPLiA is in principle not against the idea, it is however essential to thoroughly assess and address several concerns.

These concerns primarily revolve around the **verification of spare part availability claims, appropriate weighting, prevention of unfair practices, alignment with ecodesign requirements, potential impacts on product efficiency, and the overall feasibility of implementation**. In particular:

1. a clear guidance and assessment on how market surveillance would be carried out should be provided, considering that the actual verification would only take place several years after the product was placed on the market.
2. linked to the previous point, it should be ensured that the lack of surveillance would not open the possibility to unfair practices turning the parameter into a tool to get a higher index without concrete substantiating proof.



3. a clear assessment is needed on the alignment to the ecodesign requirements and the implication on unintended generation of waste.

We recommend the EU Commission to carefully assess the concerns set out above before considering including this parameter.

3.4. Repair Information score

APPLiA would like to stress the importance to keep consistency with what is already included in the ecodesign regulation which provides clear guidance on how to provide information to professional repairers. For this reason, to preserve the spirit of the ecodesign and the safety of end-users, we recommend including in the score only information available to professional repairers..

Finally, we recommend including only repair information and not maintenance information. These are different types of information, and the maintenance ones are already included in the user manual.

3.5. Price of spare parts

APPLiA majority position² is to exclude the price of spare parts from the score as done already for the smartphones and tablets. APPLiA acknowledges the importance that price plays in the theoretical reparability of a product, but there are many challenges and concerns when trying to add this parameter in the reparability index. Among others:

- how to consider inflation and other market forces when including a "price" in the Index;
- how to ensure transparency towards consumers if the "price" was hidden in a formula;
- how to ensure that the "price" reflects the 10 years availability of spare parts obligation set in certain ecodesign measures;
- how would manufacturers be able to update the Product Information Sheet every time the "price" changed and the related consequences on EPREL;
- how to handle the role played in that "price" by 'consumable' parts.

We also recommend caution when requiring **indicative pre-tax pricing of spare parts** to be available on a free access website as an information requirement. In particular, we recommend the Commission to run a in-depth assessment of this requirement and its coexistence with consumer legislation at national level.

The following aspects need also to be taken into account:

²Please note that this paragraph reflects the majority position as one APPLiA member, Groupe SEB, cannot support it in its entirety.



- It needs to be clearly defined at which time the spare part prices shall be defined, as spare part prices are defined before the products are placed on the market.
- It shall be clearly described on how to handle spare part price evolution.

Clear requirements are needed for price indication in member states where the original equipment manufacturer or the importer do not actively sell spare parts, but where the selling of spare parts is done by (independent) service partners.

At the same time, we believe it's important to **consider the cost of the repair vs the cost of the appliance**. For small domestic appliances with a low market price, the repair cost can often exceed the price of a new appliance. Therefore, an economic analysis should be carried for each product category.

Spare part prices shall be excluded from the calculation of the reparability index.

3.6. Service network

Finally, APPLiA suggests evaluating the inclusion of the available service network with professional repairers in the reparability scoring or as a separate indicator. A wide service network increases the likelihood of a product being repaired.

4. Comments to JRC report & specific products

4.1. Coffee machines

4.1.1. Paragraph 5.1.2.7 and tables 7 and 11

Household coffee machines are a wide category, with very different characteristics in terms of sale price, expected lifetime and technical complexity. This also appears in the Annex of the study, even if the differences are not considered in the rest of the study. A **non-exhaustive** list of sub-categories is:

- drip coffee machines;
- capsule/pod/pad coffee machines;
- standard espresso machines;
- fully automatic coffee machines.



The values of the parameters C_i used in the assessment and summarised in tables 7 and 11 shall be evaluated for each single coffee machine sub-category, otherwise the conclusion will be misleading. We suggest the following values:

- Parameter C4 (expected vs actual lifetime): should be rated "LOW" for drip coffee machines, capsule/pod coffee machines and simple manual espresso coffee machines. These are cheap products; as explained in the report (chapter 4, criterion 4): "if the purchasing price of the product is low, consumers are likely to have low expectations about the product lifetime".
- Parameter C5 (software) should be rated "LOW" for all coffee machines. Software-related obsolescence is not an issue for this category as all the main functions of the products are always ensured even without any software upgrade.
- Parameter C7 (complexity): should be rated "LOW" for drip coffee machines and "MEDIUM" for capsule/pod coffee machines and simple manual espresso coffee machines.

The overall results would be heavily impacted by such revised assumptions.

4.1.2. Paragraph 6

Considering that, even for one very specific product category (example: coffee machines) there are sub-categories with very different characteristics and would be very difficult, if not impossible, to create a unique scoring system, we believe that requirements grouping together different products shall not be used. On the contrary, we support a common methodology setting out the parameters that should be considered for repairability (disassembly, repair information etc.), but to include specific requirements (list of priority parts, disassembly steps and weighting, etc.) product-by-product.

The measures shall be granular enough to allow the comparison of similar products only.

5. Conclusion

APPLiA's proposed methodology offers a nuanced and practical approach to reparability scoring, ensuring that it is both product-specific and comprehensive. By integrating environmental, economic, and consumer impacts into the scoring process and considering the variability within product categories, this methodology promises a fair and effective system.



Finally, APPLiA is against the approach of setting horizontal measures grouping together different products. As many other horizontal measures before have proved, for instance the standby, this adds complexity without necessarily addressing the correct aspects of each product, especially, when trying to establish a label that should inform correctly consumer and not mislead them.

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