



**RIGHT TO
REPAIR**



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FEEDBACK

On the Working Draft Document on Ecodesign and Energy Labelling for Cooking Appliances

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The [Right to Repair Europe](#) coalition represents over 140 organisations from 23 European countries. It represents environmental NGOs and repair actors such as community repair groups, social economy actors, spare parts distributors, self-repairers, repair and refurbishing businesses, and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement, and its objective to make repair affordable, accessible and mainstream is aligned with the objectives of the European Green Deal and the Circular Economy Action Plan. Browse member organisations by country [here](#).



The European Right to Repair coalition welcomes the opportunity to comment on the upcoming ecodesign regulation for cooking appliances, following the Ecodesign and Energy labelling Consultation Forum held on March 18th, 2024.

Summary

We welcome the introduction of requirements for the availability of spare parts to promote the reparability of cooking appliances. However, we would like to highlight that 10 years is not long enough compared to the life expectancy of cooking appliances and that certain parts should also be made available to end-users when there are no safety risks.

We would also like to highlight some points of attention regarding the energy labelling, and voice our preference for not developing a repair score at this stage if it does not take into account the price of spare parts.

Ecodesign requirements

Availability of spare parts

The text proposed by the commission includes a requirement for spare parts to be made available by the manufacturer for at least 10 years. This applies both to spare parts for professional repairers, and for end users. We welcome this provision as the availability of parts is an essential element in ensuring the longevity of products over time. However, we are concerned about the duration, as recent data show that cooking appliances can last longer than 10 years.

While the lack of data as well as the differences in life spans between products render it difficult, the Fnac Darty's Service Barometer¹ does enable us to identify the average of periods of use of cooking appliances in 2023, 2022 and partially 2021 (see the table in annex). This barometer carries out an in-depth analysis of the Fnac Darty after-sales service data, and thus of breakdowns occurring within 2 years of the product's sale. In addition, it reports on post-purchase consumer surveys, which highlights the reasons for purchase and the number of years the previous equipment has been in use.

First of all, the various editions of the barometer reveal a decline in the service life of cooking appliances, and more frequent replacement: whereas in 2022 these appliances had a useful life of over 10 years (11.1 years on average), in 2023 the average is 8.8 years.

According to the barometer, in 2023, 48% of cooking appliances were purchased to replace a product that had broken down. Moreover, 48% of breakdowns identified by after-sales service required parts replacement or product replacement. Even if this data is based on breakdowns during the warranty period, it gives an important indication of the need for spare parts in the event of a breakdown, and therefore the importance of making parts available over time to ensure a product's longevity. In fact, the barometer

¹ <https://www.darty.com/achat/services/barometre-sav/barometre.html> : the online version shows data for 2023. Thanks to the compilation of barometer data for previous years that we made, we were able to make a comparison between 2022, and sometimes 2021. We have extracted data related to : all types of stoves, hobs, microwaves, ovens and cooking fume extractors.

shows that the availability of spare parts is one of the top 3 incentives to repair².

The case of ovens is interesting: the service life is reduced by 2 years each year (13 years in 2021, 11 years in 2022 and 9 years in 2023). In 50% of cases, the reason for replacement is a broken-down appliance.

The barometer shows that spare parts of cooking appliances were made available for an average of 9 years in 2023 (except for mini ovens, for which the average is significantly lower : 5 years).

This data shows that it is (or was) possible to use those devices for more than 10 years. We call on the Commission to take this data into account and to establish an ambitious spare parts requirement. This should be based on the number of years that cooking appliances can be expected to last. We call for ambitious requirements to reverse the current trend of declining product lifetime. While there might be other reasons for this decline (price of parts compared to new, marketing obsolescence, etc.), making parts available for longer could play a key role in extending the lifetime. In this way, we can ensure that availability of parts is not an obstacle. **This is why we strongly recommend that parts be made for professional repairers and end-users for at least 13 years.**

Spare parts and repair information for end users

We believe that the list of parts to be made available to repairers and consumers is too restrictive.

Self-repair is becoming increasingly popular.³ For example, there are about 13 million annual visits⁴ to the self-repair pages on the Spareka website. (spare parts sales, self-repair guide and remote repair appointments). Only few parts are made available to end users, even though some other repairs could be carried out by consumers themselves.

² The repair price is the most decisive criterion and a fast repair time comes in second. See <https://leclaireur.fnac.com/barometre-sav/infographie2>.

³ For an in-depth analysis of current self-repair practices related to electric parts and the way in which they are already enabled by manufacturers, we refer to our comments on the Staff Working Document on a reparability score for household tumble dryers, which can be found on <https://repair.eu/resources/>.

⁴ Data provided by Spareka (spare parts sales, repair tutorials and remote assisted repair).

Even though many manufacturers actually enable self-repair of electric parts, we understand the reluctance of stakeholders to implement legal requirements to this effect, which would limit the manufacturers' freedom to control liability and other risks associated with this practice. However, there is no evidence to justify not making non-electrical parts available to consumers.

Moreover, as for ovens and combi microwaves ovens, professional repairers and consumers must be able to benefit from the availability of essential parts of solo microwave ovens. The commission's proposal does not take into account the availability of the following parts for solo microwaves: door hinges, door springs, door glass and door seals. While the glass is rarely exchanged separately and may pose specific risks due to the containment of radiation, we feel that at least door hinges and door springs are relevant both for professional repairers and consumers.

We strongly recommend to make the following parts available to professional repairers and end-users :

Appliance	List of spare parts for professional repairers and end users
Electric ovens	Cooking racks, side racks, pans, light bulbs, knobs, door handles, door hinges, door springs, door glass, door seals
Gas ovens	Cooking racks, side racks, pans, light bulbs, knobs, door handles, door hinges, door springs, door glass, door seals
Steam ovens (solo & combi)	Cooking racks, side racks, pans, light bulbs, knobs, door handles, door hinges, door springs, door glass, door seals, water tanks, water pipes & hoses
Combi MW ovens	Cooking racks, side racks, pans, light bulbs, knobs, door handles, door hinges, door springs, door glass, door seals
Solo MW ovens	Knobs, door handles, turntable couplers, glass turntables, turntable roller rings, lamps, feet, waveguide covers, door hinges, door springs
Hobs	Switches, grill pans, pan support, burner caps, burners
Cooking fume extractors	Speed switches, on/off switches, filters, light sources, plastic peripherals

In red : spare parts we propose to transfer from the list “availability for professional repairers” to “availability for professional repairers and end-users”

In blue : spare parts not included in any list and that we propose to include in the professional and end-users list.

The availability of parts to end users also plays a role in the price of spare parts. According to Spareka, the average price of parts increases by 40-50% when they are sold as part of an at-home repair service⁵. De facto, a manufacturer who does not sell parts to consumers increases the cost of access to its parts for the end consumer by 40-50%. Since we know that in 68% of cases in France the primary obstacle to repair is the price⁶, it seems essential to increase the affordability of repair to encourage as many people as possible to repair.

Energy labelling requirements

Visual aspects of the label

Since the energy label is made to compare one product with another, we have to make sure that consumers will understand the icons easily. We recommend testing the effectiveness of the design on a representative sample of consumers before the entry into force of the regulation (e.g., the icon about grease filtering efficiency does not seem so easy to understand).

Development of a potential repair score

During the consultation forum, some stakeholders indicated their interest in creating a repair score for cooking appliances in a very short timeframe.

After following the work on smartphones, we are currently involved in the policy process for creating repair scores for other products (such as computers and tumble dryers). We are concerned about the methodology developed so far, since it does not include the price of spare parts. In fact, we alert the Commission at every opportunity to the need to include this criterion. The pivotal role of spare parts prices in product reparability is widely recognised. The **price is currently the main barrier to repair** as cited by consumers⁷. According to a 2021 survey conducted by Kantar for VZBV, 88% of German consumers expect a product with a high repair score to be

⁵ Data transmitted by Spareka for all product types.

⁶ It was the most frequently cited barrier in a 2019 study by ADEME, with 68% of French consumers mentioning this. See

<https://bibliothèque.ademe.fr/consommer-autrement/248-francais-et-la-reparation.htm>

⁷ Op. cit. Ademe

economically repairable⁸. Independent appliance repair technicians have reported that repair part prices have made many appliances “too expensive to fix,” with some mentioning manufacturers marking up parts prices by 3x or more⁹:

We are not in favour of the hasty development of a repair score for cooking appliances not including this pivotal criterion.

Annex: Compilation of data from “Le Baromètre du SAV” by Fnac Darty (2021, 2022 and 2023 Editions)¹⁰ :

Appliances	Service life of the replaced appliance (years)			Availability of spare parts (years)		Reason for purchase: broken product (%)	Failure requiring a part or replacement (%)	
	2021	2022	2023	2022	2023	2023	2022	2023
Induction cooker	Unknown	11	8	10	10	45	36	39
Mixed-fuel cooker	Unknown	11	9	9	9	45	33	35
Ceramic glass cooker	Unknown	11	8	9	10	45	33	42
Gas cooker	Unknown	Unknown	8	Unknown	9	45	Unknown	32
Cooking fume extractors	Unknown	12	10	9	10	36	49	51
Microwave	Unknown	11	9	7	8	57	69	63
Microwave and grill	Unknown	11	9	8	9	57	64	59
Gas hob	Unknown	11	9	11	10	45	41	39
Induction hob	Unknown	11	9	13	12	45	45	49
Ceramic hob	Unknown	11	9	10	11	45	37	42
Built-in oven	13	11	9	12	12	58	48	50
Mini oven	Unknown	Unknown	9	7	5	57	80	79
Average	/	11,1	8,8	9,5	9,6	48%	49%	48%

⁸ According to a 2021 survey by Kantar, 88% of German consumers expect a product with a high repair score to be economically repairable. See <https://www.vzbv.de/meldungen/recht-auf-reparatur-umsetzen>.

⁹ See Right to Repair Coalition, Investigation of Barriers to Appliance Service Information Access (2023), p. 64

<https://valkyrie.cdn.ifixit.com/media/2023/01/30193712/Repair-Coalition-Letter-for-FTC-Energy-Guide-Ruling-ANPR-R611004.pdf>

¹⁰ <https://www.darty.com/achat/services/barometre-sav/barometre.html>