RIGHT TO REPAIR

White Paper

Ecodesign Information Requirements on Original Spare Parts Prices

Brussels, February 2025
(updated March 2025)

thuiswinkel
.org

All you need. **With love.**

Et ça répare

White Paper

Ecodesign Information Requirements on Original Spare Parts Prices

Brussels, February 2025
(updated March 2025)

Key Actions

- **Adopt Ecodesign information requirements on spare parts prices,** requiring manufacturers, importers or authorised representatives not to overshoot declared pre-tax prices of original spare parts
- **Binding information requirements on the maximum price of spare parts** should be **applied horizontally** to all the products covered by Ecodesign resource efficiency requirements at once
- **Include the price of spare parts in all repairability scores** for the Energy Labelling regulations in progress or to come, including a **limiting factors approach**

The Right to Repair Europe coalition represents over 180 organisations from 30 European countries. It represents repair actors such as repair and refurbishing businesses, spare parts distributors, community repair groups, social economy actors, self-repairers, environmental NGOs and any citizen who would like to advocate for their right to repair. This is a rapidly growing movement with the objective to make repair affordable, accessible and mainstream. Browse member organisations by country here.

This position paper was also signed by a number of additional stakeholders including manufacturers, retailers, designers, repairers, refurbishers, training centers, rental companies and insurers. The list of signatories can be found on the last page of this paper.

Introduction

Repairability of products is crucial to reduce resource consumption whilst also decreasing the financial burden of having access to functioning products for consumers. The Common Rules Promoting the Repair of Goods[1] represent an important step in this direction and complement the repairability requirements previously developed for certain types of products through Ecodesign and Energy Labelling regulations. However, these fall short of properly addressing aspects related to the affordability of repairs, notably regarding the price of spare parts.

The crucial role of the price of spare parts in overall product reparability is already widely recognised. **Price is currently the main barrier to repair** as cited by consumers and independent repairers.[2] Research shows that most consumers will only consider a repair if its total cost is less than 30% of the cost of the new product (or product equivalent).[3] Nine out of ten consumers, therefore, expect a repairability score to include this price criterion.[4] The French and Belgian repair indexes do

[1] Directive (EU) 2024/1799 of the European Parliament and of the Council of 13 June 2024 on common rules promoting the repair of goods and amending Regulation (EU) 2017/2394 and Directives (EU) 2019/771 and (EU) 2020/1828, available here.
[2] It was the most frequently cited barrier in a 2019 study by ADEME, with 68% of French consumers mentioning this. The repair price was also identified as the most decisive factor influencing consumer's decisions to repair in Fnac's Baromètre SAV (2022). 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 more: see Right to Repair Coalition, Investigation of Barriers to Appliance Service Information Access (2023), p. 64.
[3] In its 2025 study "Etude sur les pièces détachées pour la réparation", ADEME finds that for a product to be repaired, the cost of repair must not exceed 30% of the product's purchase price. Their survey from 2019 (see previous note) showed that when the repair cost exceeds 25%, half of the respondents will opt for replacement instead. The Impact Assessment Study for the Common Rules Promoting the Repair of Goods found that the limit of an acceptable repair price is on average around 20% of the purchase price (see Impact Assessment Report, p. 17). Given that the cost of repair is usually composed of labour cost and spare parts cost (assuming there is no transportation cost for the repairer), in order for the repair to stay below the critical threshold, it is reasonable to estimate that the price of spare parts should stay below 15-20% of the product price, as proposed by Florent Curel et al. (2023).
[4] According to a 2021 survey conducted by Kantar for VZBV, 88% of German consumers expect a product with a high repair score to be economically repairable.

include the price of spare parts, which is one of the most differentiating criteria in the French *Indice de Reparabilité*.[5]

The EU Commission Joint Research Centre (JRC) investigated the **potential to address repairability - including scoring - horizontally** across product categories under a single regulation, in accordance with the Ecodesign for Sustainable Products Regulation (ESPR).[6] We welcome the approach presented in their study, which shows the potential of establishing overarching repairability criteria and scoring methodology.[7] However, the **repairability scoring system proposed in the JRC study does not include the crucial aspect of the price of spare parts** as a criterion. We believe that this is a missed opportunity.

We insist that **the price of spare parts should be tackled comprehensively and horizontally**. As EU legislation currently mandates but does not define "reasonable prices" for spare parts,[8] a unified approach is crucial to avoid fragmentation in the EU market due to potentially non-harmonised guidelines and criteria. We would, once again, like to stress the importance of the price of spare parts for repair and the need to include this criterion in repairability scores to improve its relevance and correspond to consumer's expectations. Ambitious provisions on the price of spare parts should be integrated **horizontally across all existing and upcoming Ecodesign and Energy Labelling regulations**, notably for printers, computers, electronic displays, vacuum cleaners, tumble dryers, servers and data storage products, and in the first ESPR Working Plan.

Binding Information Requirements on the Price of Original Spare Parts

We insist that simply requiring manufacturers, importers or authorised representatives (hereafter "manufacturers") to provide information on the *indicative* pre-tax prices of spare parts on a free-access website is not enough to tackle this issue. We argue that at the very least, the **announced pre-tax price should not simply be indicative information but a binding commitment**. With merely indicative pricing at the time of sale, and no incentive for manufacturers to ensure spare parts price stability, there is a significant risk that consumers base their choice on spare parts

[5] For washing machines, the parts price scores range from 2,5/10 to 10/10; for TV's, they range from 0/10 to 7,5/10. See https://www.indicereparabilite.fr/appareils/electromenager/lave-linge-hubot/ and https://www.indicereparabilite.fr/appareils/multimedia/televiseur/.
[6] See Spiliotopoulos C., Bernad Beltrán D., Alfieri F., Repairability Scoring System: Product relevance scoping study (2025), EU Commission Joint Research Centre, Publications Office of the European Union, Luxembourg. https://publications.jrc.ec.europa.eu/repository/handle/JRC139725
[7] This horizontal approach was also confirmed in the discussion document shared by the Commission with members of the Ecodesign Forum ahead of its first meeting, where the first ESPR Working Plan was discussed. See our feedback here.
[8] The obligation to provide spare parts at a reasonable price will be applicable from July 2026 onwards for products covered by repairability requirements under Ecodesign (by virtue of Directive (EU) 2024/1799 on common rules promoting the repair of goods) and from February 2027 onwards for products containing portable batteries (by virtue of Regulation (EU) 2023/1542 concerning batteries and waste batteries), available respectively here and here.

price information that will turn out to be outdated at the time when they would actually need the repair. Therefore, in order for consumers to be able to make an informed choice at the time of purchase, taking into account future repair options, it is vital that **manufacturers commit to the announced pre-tax prices (transport costs excluded) of original spare parts**.

We therefore suggest that the **manufacturer declares, in the product documentation as well as on their publicly accessible website, the maximum pre-tax price (without shipping costs) for each spare part they make available**, in a list that is searchable by product model. The list shall remain available for the total duration of part availability as declared by the manufacturer for the calculation of the score. The **declared values shall act as a ceiling**, i.e. manufacturers will be free to declare a price that is higher than the actual or anticipated spare parts price level when a product is launched, however they will need to ensure that the actual sales price remains below the declared maximum value. The price list can be updated annually to account for inflation based on the Euro Area Consumer Price Index. Penalties for non-compliant companies should be enforced, either directly through a fine, or through a right to redress for consumers.

On behalf of the manufacturer, this does not require a crystal ball; each manufacturer could make their own estimate and risk assessment regarding the evolution of spare parts production cost just as they do with the production variables of the complete product. They would be **free to declare a price bracket** that leaves sufficient margin for a reasonable level of price increase - however once they declare a given price, **they would be required to stick to it just as they do for other declared values.**[9]

In recent policy discussions, price fluctuations have been used as evidence of the impossibility for manufacturers to commit to a certain price for their spare parts, and hence as a justification for the absence of policy measures on the issue. This strikes us as a circular argument that presents the problem itself as a justification for not solving it.

For starters, **multiple manufacturers have already shown by their example that a commitment to spare parts price stability is quite feasible**. Fairphone has substantially kept the same spare parts prices for a decade.[10] Groupe SEB, Europe's largest manufacturer of small household appliances, has been able to ensure spare parts price stability worldwide since 2015 as part of their "10 years repairable" program, which was extended to 15 years in 2022. The label "repairable for 15 years for a fair price", which entails a commitment to repair any defect for less than 1/3 of the price of a new equivalent product, currently covers 90% of household appliances of the group's brands Tefal, Rowenta, Moulinex, and Krups in Europe, Asia, the Middle

[9] The calculation method could account for inflation, leaving only the actual variation in production cost as a variable. After all, the decisive issue is not the price of a spare part compared to the purchase price of the product in the past, but compared to the purchase of a new similar product at the time of repair.
[10] The only minor changes were that at some point, the price of the Fairphone 2 battery was halved due to overstock, and the price of some Fairphone 3 spare parts was rounded to the closest .95€ digit.

East and Africa.[11] The LONGTIME® Label is another example of how **several manufacturers are able to guarantee price stability below a certain part-to-product ratio**. For products to be certified, manufacturers have to ensure that spare parts prices remain under a certain percentage (on average 25%) of the price of the new product.[12] The label covers hundreds of products by dozens of manufacturers including Delonghi, Hotpoint / Indesit, Kenwood, Kitchenaid, Magimix, Santos, Whirlpool, and other brands.[13]

The position that manufacturers cannot be asked to commit to any sort of threshold since they may have no control at all over the prices of spare parts for their products - for instance because they have outsourced the production and distribution of spare parts to a third party - has become legally untenable given the **upcoming obligation for manufacturers to provide spare parts at a reasonable price**.[14] This requirement implies that those manufacturers that choose to outsource the provision of spare parts, are in fact outsourcing a legal obligation and will therefore need to ensure via contractual agreements that the party they entrust with this task will sufficiently fulfil this obligation, including charging a reasonable price for spare parts.

While the Common Rules Promoting the Repair of Goods and the Batteries Regulation both reference and mandate **"reasonable" and "non-discriminatory" spare part prices**,[15] these **lack clear criteria** for implementation. If the interpretation of what is a reasonable price is left to national courts, as would be the case if no guidelines are provided by the Commission, **risks of fragmentation** of the EU market are significant.[16] Heterogeneous interpretations might coexist in the internal market, and result in non-harmonised price criteria, increasing **complexity and legal risks** for manufacturers and retailers, inexorably leading to longer legal cases, ultimately leaving consumers unable to benefit from reasonable spare parts prices. Developing **harmonised binding information requirements on spare parts prices** would therefore be beneficial to the functioning of the EU internal market, and horizontal measures under ESPR are a unique opportunity to make this happen.

It is sometimes suggested that an obligation to commit to certain prices would be at odds with the basic principles of a free internal market. In this context, we would like to remind the Commission of the existence of article 6a of Regulation 2015/2120 on electronic communication networks[17] which **requires providers to offer the same rates for roaming customers across the EU as they charge locally**. Mobile

[11] See https://www.groupeseb.com/en/reparability.
[12] Depending on the product type, this threshold ranges from 10% to 40%, with an average of 25% across all labelled products. A few concrete examples of spare parts price threshold requirements: 10% for pellet stoves, 25% for fruit presses or hedge trimmers, 30% for coffee machines and 35% for ovens.
[13] See https://longtimelabel.com/en/find-a-labelled-product/.
[14] See note 8.
[15] See note 8.
[16] See also our proposal for a threshold for "reasonable" pricing of spare parts.
[17] Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union, available here.

providers are free to set their prices as they like, however are required to then stick to them and offer the same rates across the EU - **exactly the sort of commitment that we propose for spare parts prices** as well.

Inclusion of the Price of Spare Parts in Repairability Scores

We feel that the spare parts price criterion is too important to be dismissed without thorough investigation. Given that on the one hand, repairability is but one of the many aspects that consumers need to consider when purchasing a product, and on the other it is in itself a mix of several factors, it is not sufficient for consumers to be able to find and compare prices of spare parts on manufacturers' websites through active research. In order to avoid information overload and burdens for consumers wishing to take reparability into account in their purchasing choices, we feel that the best solution would be for the **price to be included in the repairability score with a weighting factor that suitably reflects its relevance**. We therefore urge the Commission to integrate the proposals formulated in this paper.

This is all the more important as repairability scores are now developed for more and more products. The score will become mandatory for smartphones in June 2025, and it is currently being developed for computers, printers, electronic displays, tumble dryers and vacuum cleaners. **Any such score that does not include the price of spare parts, is at risk of having a greenwashing effect**. If a consumer buys a product with an "A" repair score, they will expect it to be actually repairable once a failure occurs. If the failing part is too expensive to replace the product will be, de facto, non-repairable. Consumers then risk losing trust in the repairability score. Manufacturers could easily use this loophole to lure in consumers with products with a high score, while still keeping control of the repair rate - and hence the replacement rate - of their products by setting prohibitive spare part prices.

When discussing the draft repairability scores for computers during the stakeholder meeting held on March 19th 2024, **JRC staff explained their rationale for not including the price of spare parts in a repairability score**.[18] It was stated that the issue is neither the importance of the criterion (it was acknowledged that this is one of the most important factors affecting repairability), nor how to include it in the score, nor the verification by market surveillance authorities. Indeed the feasibility of the criterion has been demonstrated by the French *Indice de Réparabilité*, and since the prices of spare parts would be verifiable via publicly available information, their verification would be significantly less complex than is the case for other aspects of the proposed European scoring system.

[18] This reasoning was later also included in Spiliotopoulos C., Bernad Beltrán D., Alfieri F., Repairability Scoring System: Product relevance scoping study (2025), EU Commission Joint Research Centre, Publications Office of the European Union, Luxembourg. https://publications.jrc.ec.europa.eu/repository/handle/JRC139725

Stakeholders were informed that the main barrier to including price in the repair score is the static nature of the energy label and hence of the repairability score, whereas prices can change continuously. It was also stated that including the price would only change the score by 0,5 points, a small difference compared to the width of the score classes (A, B, C etc.).

As explained above, we question this view of price variation as an inevitable market dynamic. Moreover, this position ignores the fact that the **reality of original spare parts pricing represents a typical example of market failure** due to information asymmetry combined with the **monopolistic position of the manufacturer.**[19] In fact, in those spare parts markets where competition is at work, such as for aftermarket and used parts, prices are lower and more stable.[20] **A price commitment by manufacturers on original spare parts and their declared prices**, as discussed above, would prevent this issue and make the inclusion of price as a criterion feasible.

As for the latter argument, this is purely a matter of **adapting the weighting of the parameters to the importance of each criterion**. If it is recognized that the spare parts price is indeed one of the most decisive criteria, the aggregation formula could easily be adapted to increase the weight of the combined price criterion. We propose to assign a **weight of at least 20% of the total score to the spare parts price criterion** - enough to allow a product to move one score level up or down.

Repairability Scoring Methodology

We propose a **revised methodology** for the score calculation including **weighting of criteria** in accordance with the aforementioned proposals, and a **limiting factors approach** in order to avoid rewarding incongruous combinations of parameters.

Score calculation and weighting of criteria

As with the French *Indice de Réparabilité*, the score is calculated based on the price of spare parts to price of product ratio R_{price}, which is the ratio of the average of the price of the most expensive priority part P_{ex} and the sub-average of the prices of the other parts $P_{1\text{-}n}$ (limited to the list of parts listed in the Ecodesign regulation), divided by the product price P_{prod}.

[19] We have explained this in greater detail in our blogpost The price is not right: the unfair reality of spare part prices, expanding on how anti-repair design practices restrict the use of second-hand or third-party spare parts, thus reinforcing an effective monopoly of manufacturers on the market for spare parts of their products.

[20] The use of aftermarket and used parts is, however, unfortunately limited by practices such as parts-pairing, restricting the use of non-original parts. See more here.

$$R_{price} = \frac{(P_{ex} + ((P_1 + P_2 + P_3 + \ldots + P_n) / n)) / 2}{P_{prod}}$$

We propose to use a similar scoring grid as the French *Indice de Réparabilité*, with scores ranging from 0 to 10 points for price ratios R_{price} ranging from >28% to ≤10% of the product price P_{prod}, as illustrated in the following table:

$R_{price} \leq 10\%$	10 points
$10\% < R_{price} \leq 12\%$	9 points
$12\% < R_{price} \leq 14\%$	8 points
$14\% < R_{price} \leq 16\%$	7 points
$16\% < R_{price} \leq 18\%$	6 points
$18\% < R_{price} \leq 20\%$	5 points
$20\% < R_{price} \leq 22\%$	4 points
$22\% < R_{price} \leq 24\%$	3 points
$24\% < R_{price} \leq 26\%$	2 points
$26\% < R_{price} \leq 28\%$	1 point
$28\% < R_{price}$	0 points

Limiting factors approach

We propose to introduce **limiting factors to prevent rewarding incongruous combinations of scoring parameters**, including the price of spare parts. This approach was also followed in the revision of the French *Indice de Réparabilité*. For instance, points should not be awarded for the availability of information on spare parts replacement to a certain target group, if the prices of spare parts for that target group are above a certain threshold, and vice versa. For instance, 10 points are awarded for the availability of information but only in the case where the spare parts are also affordable - their price is below the threshold - for that product group.

The issue of **parts bundling** - often an important factor in driving up spare parts prices[21] - could also conveniently be addressed by including the spare parts price in the score and by considering these individual parts as separate priority parts for the assessment of the price criterion, which would penalise the scenarios in which only expensive assemblies were available to replace these parts.

[21] We expanded on this issue in our blogpost The price is not right: the unfair reality of spare part prices.

Transparency on Price of Spare Parts

For consumers to be able to make informed decisions taking into account the criteria that are important to them, and in order to allow for verification of the declared scores, it is crucial that the record in the **EPREL (European Product Registry for Energy Labelling) database, to which the energy label will link, contains the full score sheet including all of the subscores**.

Specifically, the **information on the price of spare parts should be clearly visible at the point of purchase**. Information on the price of spare parts is essential for consumers to identify the most repairable products on the market. Consumer organisations should be consulted and an in-depth consumer study should be conducted on the **best way to make this information easily and clearly accessible to consumers**, whether it is to be made available through the EPREL platform, directly available on the product like a list of ingredients, or accessible through a link/QR code.

Conclusion

We urge the Commission to update, with a single **horizontal measure**, all existing Ecodesign and Energy Labelling requirements where lists of spare parts are detailed, and ensure that manufacturers don't overshoot their **announced maximum pre-tax price of the spare parts they make available**. We then urge the Commission to **integrate this declared maximum pre-tax price as a criterion for the determination of the repairability scores** when such tools are developed. This will provide consumers with the information they expect and need to choose and extend the lifetime of their products, whilst avoiding any risk of greenwashing.

This paper is supported by the following organisations:

Adopte un Bureau	www.adopteunbureau.fr
Boulanger	www.boulanger.com
BureauVallée	www.portail.bureau-vallee.fr
Circul'R	www.circul-r.com
Commown	www.commown.coop
Designers Éthiques	www.beta.designersethiques.org
ECOS	www.ecostandard.org
Electro Depot	www.electrodepot.fr
EuCER Council	www.eucercouncil.org
EverEver	www.everever.eu
Fairphone	www.fairphone.com
Fnac Darty	www.fnacdarty.com
Gouach	www.gouach.com
HiFi International	www.hifi.lu
HOP	www.halteobsolescence.org
iFixit	www.ifixit.com
Leroy Merlin	www.leroymerlin.fr
Longtime Label	www.longtimelabel.com
Lormauto	www.lormauto.eu
Manutan	www.manutan.com
Murfy	www.murfy.fr
Neat	www.neat.eu
Réseau Ducretet	www.ducretet.net
Revmobilities	www.revmobilities.lpages.co/rev-mobilities/
Rewake	www.rewake.fr
ReYou	www.re-you.fr
Right to Repair Europe	www.repair.eu
Shift	www.shift.eco
SOS Accessoire	www.sos-accessoire.com
Techniek Nederland	www.techniekNederland.nl
TeleCoop	www.telecoop.fr
The Repair Academy	www.therepairacademy.com
Thuiswinkel.org	www.thuiswinkel.org
United Retail	www.retail.nl
Vesto	www.vesto.fr
Why!	www.whyopencomputing.com

Contact:
Cristina Ganapini, Coordinator of Right to Repair Europe: info@repair.eu