FEEDBACK

Preparatory Study for the Setting of Horizontal Ecodesign Requirements on Repairability – 2nd version

Brussels, May 2026

The Right to Repair Europe coalition represents over 190 organisations from 30 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.

Introduction

The Ecodesign for Sustainable Products Regulation (ESPR)[1] and the Directive on Common Rules Promoting the Repair of Goods (Right to Repair Directive)[2] have paved the way for so-called horizontal requirements (i.e. applying across a wide range of products) regulating the repairability of products.

[1] Regulation (EU) 2024/1781 of the European Parliament and of the Council of 13 June 2024 establishing a framework for the setting of ecodesign requirements for sustainable products, amending Directive (EU) 2020/1828 and Regulation (EU) 2023/1542 and repealing Directive 2009/125/EC (https://eur-lex.europa.eu/eli/reg/2024/1781/oj).

[2] 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 (https://eur-lex.europa.eu/eli/dir/2024/1799/oj).

We provided feedback[3] on the first version of the preparatory study in December 2025. This is our feedback for the second version of the study[4], submitted in May 2026.

This second version represents a clear improvement on the initial draft, in particular through the clearer explanation of the three-tier horizontality structure and the broader reach of the horizontal requirements, including on spare parts price caps and anti-part-pairing. We also welcome the more coherent framing of the B2B/B2C scope, the inclusion of additional product groups, the explicit recognition that there are no meaningful trade-offs between reliability and repairability, and the removal of the market-relevance quick-scan criterion.

At the same time, we identify a number of issues that still need to be addressed to ensure an ambitious and internally coherent horizontal framework, including the treatment of product scope and screening criteria, the duration and affordability of spare parts and software updates, equal access to repair resources for all repair actors, and robust verification methods for price caps and software-based barriers to repair.

[3] R2R Feedback on the Preparatory Study for the Setting of Horizontal Ecodesign Requirements on Repairability (https://repair.eu/wp-content/uploads/2026/03/Feedback-on-on-horizontal-repair-requirements-draft-preparatory-study.pdf)

[4] Preparatory Study for the Setting of Horizontal Ecodesign Requirements on Repairability - Draft version 2 https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/2026-04/ESPR%20Repairability%20-%20PrepStudy%20-%202nd%20stkh%20meeting_2026.04.09.pdf

Right to Repair Europe Feedback

Our feedback on the Preparatory Study for the Setting of Horizontal Ecodesign Requirements on Repairability can be found on the following pages, in the table format requested by the Joint Research Center

	Comment scope (Section/ page)	Comment description	Rationale/Supporting data
1	General	Support for study improvements: We welcome the improvements made in this updated draft, including the clearer explanation of the three-tier horizontality structure, and the reach of the horizontality requirements, including spare parts price cap and anti-part-pairing. We also support the more coherent B2B/B2C scope framing, improvements made to include additional products in scope, the direct description of the lack of trade-offs between reliability and repairability, and the removal of the market relevance quickscan criteria.	
2	General	Part vs component terminology corrections: As raised in our comments on the previous draft, we recommend reviewing the terms used to ensure consistent use of 'parts' and 'components' in accordance with EN 4555X definitions.	TR 45550 containing definitions to support the EN 4555X series standards defines 'part' as a hardware, firmware or software constituent of a product (e.g. synonymous with the concept of a spare part), while the term 'component' refers to hardware constituents of a product that cannot be taken apart without destruction or impairment of its intended use (e.g. the lower

			level elements that may form a part like capacitors or resistors). Conflating spare parts and components should be avoided.
3	2.1 Description, pg.8	Ambition in high- and medium-level horizontality: we welcome the possibility of defining specific thresholds/limit values in medium horizontality requirements as was outlined on slide 32 during the stakeholder meeting. High-level horizontality should serve as an ambitious baseline, with medium-level horizontality used to set more stringent requirements when applicable.	To be effective, high-horizontality requirements have to set an ambitious baseline and be complemented with more ambitious medium-level requirements to account for product group-specific differences.
4	3.1.4. Spare part availability – Price and price information, pg.13	Spare parts affordability is a feasible horizontal scoring criterion.	The LONGTIME® label has integrated a maximum spare parts price ratio criterion since its inception, seven years ago. This criterion has proven particularly effective in practice: it is concrete, easily verifiable, and has created a strong incentive for manufacturers to review and improve their spare parts policies, including by selling parts individually rather than only as larger assemblies and by reducing spare parts prices to improve their repairability performance. LONGTIME follows a sector-based methodology: a substantial share of its criteria is horizontal across product categories, while product-specific criteria or

			threshold adjustments can be introduced where necessary. In practice, however, the spare parts price criterion has proven highly compatible with a horizontal approach. Across almost all LONGTIME product-specific frameworks, the same maximum price ratio threshold has been maintained, with only limited adjustments in exceptional cases. This experience shows that integrating spare parts affordability into a horizontal requirements and horizontal repairability scoring system is both feasible and relevant. It should therefore be considered not as a product-specific exception, but as a core horizontal criterion to ensure that repairability scores reflect the real economic accessibility of repair
5	3.1.14. Software barriers (pairing), pg.18	Software notification restrictions: The allowance of software notifications to the end-user informing that a non-original spare part is in use (as long as such notifications do not affect any functionality of the device or the user experience or impede replacement) should be tightened to: "Software shall not be used to impede the replacement of a spare part, or of their key components, with another compatible part or key components. Recurring software notifications to the end user informing that a non-original spare part is in use are not permitted, and neither is any software-based	While it is useful for a user to be informed of the use of non-original parts after a repair, a recurring notification that a non-OEM part is installed creates a lasting impression of sub-optimal performance post repair, regardless of whether the replacement part performs identically to the original. This is damaging to consumer confidence (a key barrier to repair). The condition that notifications must not "affect the user experience" is also

		reduction in the performance or functionality of the device or of the replacement part following installation of a non-original spare part."	likely to be difficult to verify as a degraded experience is subjective. Further, Article 11(8) of the Battery Regulation, on which this proposal is modelled, does not include an equivalent permission for non-OEM notifications.
6	3.2 Possible trade-offs, pg.19	Consumers' affordability of relevant products: It is stated that "In general, as indicated in the ESPR, ecodesign requirements should not have adverse effect on products' safety nor on consumers' affordability of relevant products". This quote from the ESPR leaves out the following clarification: "..., also taking into account access to second-hand products, durability and the life cycle cost of products". This clarification should also appear in the preparatory study.	If a product sold new ends up being more expensive because of repairability requirements, but maximises its chances to be resold on the second-hand market (benefiting both the 1st end-user who minimises the overall cost of its product by eventually selling it, and the second buyer who can buy a quality repairable product at a lower price). In many other contexts, repairability can actually reduce the costs associated with the usage of a product, even though the upfront purchasing cost might be higher than for a non-repairable product.
7	3.2 Possible trade-offs, pg.19	Benefits of lifetime extension between high and low energy consumption products: The statement that extending the lifetime of high energy-consuming products "may not deliver the same savings as for products with lower energy consumption in the use phase" is misleading, and the text should be rewritten to be more accurate, e.g: "Extending the lifetime of high energy-consuming products may deliver smaller relative energy savings than extending the lifetime of products with lower use-phase energy consumption,	The statement compares relative energy savings while ignoring absolute material savings. A repaired oven or washing machine may deliver a smaller proportional energy benefit than a repaired earbud, but the absolute environmental saving from avoiding the manufacture of a new large, materials-intensive product is greater. This is supported by the fact that Ecodesign regulations already

		but the absolute environmental savings from avoiding the manufacture of a replacement product may still be considerable, particularly for large, material-intensive products."	require 7 to 10 years of spare part availability for washing machines, tumble dryers, refrigerators, and space heaters because their absolute embodied material impacts make repair environmentally beneficial even where in-use energy consumption is high.
8	4.1. Initial product scope, Table 3, pg.20-21	We strongly support the shift from a positive list to product families in setting the scope. However, the scoping process is not clearly applied to products such as HVAC, medical devices, electronic sports equipment, garden equipment, power tools, electric and electronic toys, drones, electrical musical instruments, smart textiles, and electronic textiles. Either 1) The methodological approach should be applied evenly across all products that could be considered, including listing in table 3 and screening against Criteria 1, 2, and 3. If some products get through the screening but need to be postponed for a future review due to the limitations of the current study, that should be stated clearly, or 2) The product groups not included in table 3 and the justification for not including them should be clearly stated below the table in section 4.1.	The methodological approach to determine which products are in scope and not, is overridden with some sweeping and unjustified exclusions and oversights. Excluding products without analysis is inconsistent with the rigour applied elsewhere and risks creating arbitrary gaps in the scope of a significant horizontal regulation. Many of the omitted products are typically powered by a plug or a battery and have largely the same or similar parts as other products within the scope. They contain significant electronic and mechanical parts, and are frequently discarded when relatively minor faults occur, often due to lack of spare parts, repair information or reasonable repair costs. Very relevant products either arbitrarily declared out of scope or simply not mentioned include:

			• Small HVAC (portable fans, portable air conditioners, dehumidifiers and humidifiers): these are repair-relevant and widely sold consumer products that contain motors, electronics, and [in the case of air conditioners] compressor systems for which spare parts are rarely available and which are inadequately addressed by existing ecodesign repairability requirements. • Medical devices (electric wheelchairs, mobility scooters, consumer health monitoring and therapeutic devices e.g. blood pressure monitors, TENS machines, nebulisers, hearing aids): although historically excluded from Ecodesign due to Regulation (EU) 2017/745, many devices sit below the boundary of that regulation and are similar to in-scope product groups. The repair case is strong because i) affordability is key for vulnerable user groups ii) Embodied material impacts are significant, particularly for powered mobility devices. The medical device exemption was designed to avoid compromising safety-critical devices, not to exempt from basic repair obligations

			consumer health products which have no safety risk. iii) failure rates are high e.g. battery degradation, sensor wear, electrode failure, and motor faults. (Sources on failure rates: BP monitor 15% failure rate, accuracy degrades after 4 yrs https://bjgp.org/content/70/697/e548 Mobility scooter/wheelchair batteries last 1 to 3 yrs vs 5 to 10+ yr device life (https://mobilitynest.com/blogs/journal/mobility-scooter-battery-died) Hearing aid mics/receivers need replacement before 5 year lifespan https://www.aarp.org/health/conditions-treatments/when-to-replace-hearing-aids/) • Smart home devices (smart thermostats, video doorbells, smart cameras, smart speakers and displays, smart plugs, smart locks, smart air quality monitors, smart home hubs, and smart mesh WiFi systems): this is a fast-growing product category which is particularly relevant for repair as i) Software obsolescence (discontinued platform support) is the primary driver of premature replacement ii) the impact of embodied material impacts (PCBs, sensors, batteries, displays and

			connectivity modules) can be significant relative to product size and lifetime. • Power tools and garden equipment: These are complex products with established independent repair markets. They contain several parts with a significant material impact, such as powerful brushless motors using rare earth magnets. ORA data from over 1150 community repair groups shows that power tools, including gardening tools, are the third most frequent product category brought in for repair, highlighting the need to set repairability requirements for this category. (https://openrepair.org/open-data/insights/2024-report/) • Miscellaneous product groups (electronic sports equipment, electric and electronic toys, drones, electrical musical instruments, smart textiles, electronic textiles): several have an obvious case for inclusion. Drones contain electronics and battery systems, yet are frequently discarded following minor damage.
9	4.3.1 Criterion 1: Product group	We propose to remove criterion 1 as a screening criterion. For products with delegated acts already in force, we propose transitioning to horizontal	Existing repairability requirements only cover some of the parameters relevant for repair which are outlined in

	repairability already covered by EU regulations, Table 5 / Table 6, pg.24-26	repairability requirements by the date of the review scheduled for late 2027 (pursuant to Article 8 of Regulation 2023/1669). For pending products (notably computers), we propose an immediate transition to horizontal repairability requirements for the sake of consistency, clarity, and simplification of the European Commission's work. Horizontal requirements should be considered as the baseline, and supplemented by vertical requirements, which take precedence where they are more ambitious than the horizontal ones. Products covered by voluntary agreements should also not be excluded from the scope for horizontal requirements. Specifically, horizontal repairability requirements should be applied to game consoles in full.	this study. Specifically, they don't include requirements as regards e.g., software updates and the price of repair, which - as highlighted by this study - is a crucial element for repairability. Thus, products already covered by vertical repairability requirements should not be excluded from the scope, but instead, horizontal requirements should apply to them as well where these address parameters that are not covered in the vertical requirements, or where horizontal requirements provide a higher level of ambition. This is in line with the provisions in Regulation (EU) 2024/1781, where Article 5(7) reads: "The Commission may supplement the horizontal ecodesign requirements through the setting of ecodesign requirements for a specific product group [emphasis added]". Similarly, horizontal requirements should apply to product groups covered by voluntary agreements, to avoid voluntary agreements becoming a loophole for lowering the ambition of requirements.

			Specifically, the GCVA cannot be treated as equivalent to Ecodesign legislation for the purpose of this study, and therefore exclusion of games consoles under Criterion 1 is not justified. The VA is less ambitious and less binding than Ecodesign regulations and has notable weaknesses such as failing to address parts pairing. Therefore the study should apply horizontal repairability requirements to game consoles in full (not just to portable games consoles).
10	4.3.3 Criterion 3, pg.27	Retention of Quickscan criterion 3 (repair relevance/service business model): This criterion should be removed. Consumer and mixed-use ICT network products (set-top boxes, home network equipment, home NAS) should remain in scope for horizontal repair provisions.	Criterion 3 uses the current absence of independent repair as justification for excluding products from requirements that would create the conditions for independent repair to exist - thereby reinforcing the status quo rather than challenging it. CSTBs, home network equipment including routers, home NAS, and office network equipment such as servers are excluded. However, not all these products are sold/used exclusively via service models. Home routers, NAS devices and even CSTBs are now often sold as consumer products with no service contract. Moreover, service models in reality often rely on replacement, rather than repair of devices, which reflects barriers to repair that

			could be targeted by horizontal requirements on software and firmware updates, security and compatibility support periods, and access to repair information, diagnostics and spare parts. Devices in this category are frequently replaced for commercial or software/protocol reasons (contract changes, platform migrations, loss of software support, etc.) rather than because of hardware failure. Horizontal requirements can directly target these dominant drivers of premature replacement and significantly extend service life, even where physical repair is carried out mainly by professional or OEM networks rather than by end-users themselves. Lastly, after a service lifecycle, a significant second-life refurbishment market could exist for many products but is undermined e.g. by software locking and limited repair information.
11	5.1. Spare part availability – Target group, pg.30	Target group distinctions: The barrier introduced in existing Ecodesign repair requirements due to target-group differentiated access to spare parts and repair information (with professional repairer access being conditional on registration) should not be replicated in a horizontal repair measure. Spare parts and repair information should be made available to all target groups as default, including end users,	The distinction between professional repairers and end users severely reduces the number of available repair scenarios, and needlessly so. For many in-scope products, any repair scenario that entails labour cost may not be economically feasible even taking into account a potential

		independent repairers, and community repair actors. If it is decided to retain this barrier to repair, at the very least, non-profit and community repair organisations should be exempted from the liability insurance requirement, and the competence demonstration should be broadened to include repair network membership as an alternative to formal qualifications. Further, a minimum registration validity period of [e.g. 3] years should be introduced to prevent manufacturers from requiring annual re-registration. Registration criteria could be refined as follows: a) The professional repairer has the technical competence to repair products in the relevant product category, as demonstrated by one of the following: - registration as a professional repairer under an official national registration system, where such a system exists in the Member State concerned; - relevant professional qualifications or training records; or - membership of a recognised repair network or community repair organisation. b) Where the professional repairer is a commercial entity, they are covered by insurance covering liabilities resulting from their activity, regardless of whether this is required by the Member State. Where the repairer is a non-profit organisation or community repair entity, this condition shall not apply.	cap on spare parts prices, leaving only the options of self-repair or community repair. Any restriction in access to spare parts and information would make repair less accessible and less likely. For small independent repairers, non-profit repair cafes, and other community repair organisations, the burden of registering with each individual manufacturer may represent an insurmountable hurdle, and commercial liability insurance may not be an available or affordable option. While safety arguments are often put forward in order to justify a supposed need for certain repairs to be restricted to professional repairers with insurance, it should be noted that there isn't any evidence of any actual safety incidents linked to repair activities. Rather, empirical evidence suggests that the supposed risks are systematically overstated. During a stakeholder meeting organised by the European Commission on September 12th 2024 on the subject of Product safety in circular economy, over 50 on-person participants were asked about concrete cases of safety

			incidents, and none of the participants could cite a single actual incident. In its report Nixing the Fix, the American Federal Trade Commission similarly concluded that manufacturers had provided no data to support their argument that injuries are tied to repairs performed by consumers or independent repair shops, despite the fact that their call for empirical research specifically asked for data concerning the risks posed by repairs made by consumers or independent repair shops, and several manufacturers and their associations submitted comments and were provided the opportunity to participate in a workshop on the subject. In spite of commonly referring to safety risks when policy options to foster repair are discussed, a host of manufacturers including Bosch, Siemens, Gaggenau, Neff, Electrolux, AEG, Zanussi, Samsung and Miele actually enable self-repair - including for components connected to mains power - by selling these parts to consumers, leading independent researchers to point out the inconsistency of the safety argument used by manufacturers.

			Requiring any interested party to have insurance in order to have access to repair information and spare parts would be grossly disproportionate, as can be inferred from the fact that hundreds of thousands of repairs at German repair cafés didn't lead to a single repair-related insurance claim, the only injury-related claim involving a person falling down stairs. iFixit has similarly facilitated an estimated one billion self-repairs over the course of 20 years through its online repair guides and sales of repair parts and tools, without ever facing insurance claims related to safety incidents. These repairs include all types of parts including voltage carrying components. (For a more detailed discussion on this topic as well as references to the sources quoted above, we refer to our feedback on the Discussion Paper on Product Safety in the Circular Economy (https://repair.eu/wp-content/uploads/2024/11/Feedback-to-discussion-paper-on-product-safety.pdf), pp. 5-6. A more detailed case study on this subject can be found in our feedback on a Repairability Score for

			Household Tumble Dryers, (https://repair.eu/resources/feedback-on-the-staff-working-document-on-a-repaircability-score-for-household-tumble-dryers/), pp. 7-9.)
12	5.1. Spare part availability – Target group, pg.30	Missing spare parts from list: Revise the parts listing to include batteries and battery packs, fasteners, and seals.	These parts are likely to be commonly replaced parts across in-scope products. The rationale section suggests that the intention was to list battery packs at least in the professional repairers list, yet they do not appear there. Even though partly tackled through the Battery Regulation, the replaceability of batteries could be made easier through the horizontal repair requirements than through the provisions of the Battery Regulation. For example, the requirements on the price of spare parts and on part-pairing would not apply to batteries if they are out of the scope.
13	5.2. Spare part availability – Duration, pg.31	Spare part availability duration: This should be increased from 5 years to at least 7 years in line with the existing precedent in Ecodesign regulations, with medium horizontality requirements for longer durations (e.g. 10 years) for specific products (where appropriate).	A 5-year threshold is lower than the established EU precedents for non-battery products. Some manufacturers already offer 10 or even 15 years of spare parts availability. For instance, Groupe SEB, Europe's largest manufacturer of small household appliances, has been able to ensure not only parts availability but even 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 East and Africa (see https://www.groupeseb.com/en/reparability). At the same time, there is a demand for repair during a significantly longer period. ORA data from over 1150 community repair groups shows that the average age of products brought in for repair was 5 to 10 years for products such as headphones, kettles and coffee machines, 10 to 15 years for hair dryers, power tools and game consoles, and 15 to 20 years for portable radios and other audio equipment. (https://openrepair.org/open-data/insights/2024-report/) Setting availability to expire at 5 years means that for many products, spare parts will become unavailable exactly when they are most likely to be needed (toward the end of

			average lifetime).
14	5.4. Spare part availability – Price and Price Info, pg.35	Spare part price cap: We strongly support the principle of a price cap on spare parts. However we recommend that: i) the declared indicative product price should be required to correspond to the manufacturer suggested retail price (MSRP) as in Blue Angel. ii) The proposed maximum spare part price cap of 30% [of product purchase price] for the most expensive spare part should be reduced to 15% of product purchase price. Should the threshold not be lowered from 30% to 15%, it is all the more crucial to remove barriers to self-repair by eliminating the distinction between professional repairers and end-users. See comment on "5.1. Spare part availability – Target group, pg.30". Information on the spare parts price should be declared by manufacturers, importers or authorised representatives in the product documentation as well as on their publicly accessible website, in a list that is searchable by product model. Penalties for non-compliant companies should be enforced, either directly through a fine, or through a right to redress for consumers. In the whole section, the word “indicative” should be replaced by “maximum”.	Table 15 (p. 38) of the study mentions various thresholds for the willingness to repair various products, as reported in literature. All of these are equal to or below 35% of the product price. The Impact Assessment Study for the Common Rules Promoting the Repair of Goods found that the limit of an acceptable repair price is between 17% and 27% depending on the product. As mentioned in the study, the spare parts price is only a part of the repair price. For small home appliances (which is the category that best matches the products under consideration), the parts price represents 42% of the repair price. Therefore, in order for repairs to be economically viable, the spare parts price should not exceed 42% x 35% = 15% of the product price. This is in line with the 15-20% threshold as proposed by the Club de la Durabilité based on a market analysis by spare parts retailers (Florent Curel et al., Guide pratique: rendre la réparation accessible (2023), p. 4). The reference to MSRP is necessary because the current formulation allows manufacturers to control both sides of the ratio by declaring their own indicative product

			price. The word “indicative” brings nothing relevant to the requirement but a potential loophole, inviting manufacturers to actually overshoot the communcated price of spare parts at the point of sale. The word “maximum” could ensure that manufacturers do not allow themselves to price their spare parts higher than communicated upon sale.
15	5.6. Software/ Firmware updates availability, pg.39	Software/firmware update availability: We strongly support the requirements on update availability in principle. However, the duration should be increased from 5 years to at least 7 years, with medium horizontality requirements for longer durations (e.g. 10 years) for specific products (where appropriate).	The proposed 5-year minimum for software, firmware and OS update availability is inconsistent with existing ecodesign legislation and insufficient to prevent software-driven obsolescence across the product groups addressed. The 5-year proposal aligns only with the lowest existing precedent (smartphones/tablets), which we already considered insufficient. For product groups with longer average lifetimes (speakers, coffee machines, light means of transport), and for products where software obsolescence is a primary driver of premature replacement (smart home devices, audio/video equipment), a minimum of 7 years is more appropriate, in line with our proposal for spare parts availability. See

			also comment on "5.2. Spare part availability – Duration, pg.31". This lack of ambition is regrettable and does not contribute to reducing electronic waste in the European Union.
16	5.6. Software/ Firmware updates availability, pg.39	Software update degradation consent: The final clause of the performance degradation provision "except if the end-user has given explicit consent for the negative impact prior to the update" should be removed. If it is retained, it should at the very least better defined by the following addition: "Explicit consent means: a) before the update is applied, the manufacturer, importer or authorised representative has provided the end-user with a plain language description of the nature and degree of the performance impact, b) the end-user has been given the option to decline the update responsible for the performance impact while continuing to receive security and corrective updates, c) the consent is specific rather than included within general acceptance of update terms and conditions."	This final “except if” clause effectively cancels the consent requirement. Manufacturers present software updates as a choice between accepting the update or losing continued functionality so consumers have no choice, and consent can be achieved by burying a notice in update terms and conditions which scarcely anyone takes the time to read in full. Consent obtained as a condition of receiving security updates is not freely given.
17	5.1. Spare part availability – Target group, pg.30, and 5.7. Access to repair and maintena	Professional repairer registration process: If professional repairer registration is retained as a requirement (which we recommend against in comment on "5.1. Spare part availability – Target group, pg.30"), the approval model must be replaced. Repairers meeting the stated criteria should be entitled to access spare parts as default (not based on manufacturer decisions) and within one day, rather	The ability of manufacturers to refuse professional repairer registration with a 5-day window is inappropriate and reinforces barriers to repair. Manufacturers wishing to compete against independent repairer services have an incentive to refuse, delay or impose onerous documentation requirements.

	nce information/instructions, pg.41	than giving manufacturers the ability to delay for 5 working days before providing a response.	
18	5.15. Software barriers (pairing), pg.46	Anti-part pairing requirements: We strongly support the principle of including anti-part-pairing requirements. However, the wording is over- simplified and should be extended to cover software restrictions on diagnostic/calibration tools, software-imposed performance degradation of replacement parts, and the display of unjustified alerts or warnings following non-OEM part replacement. Text improvements: "Software shall not: - be used to impede the replacement of a spare part, or of its key components, with another compatible part or key component, regardless of its origin. - impose any reduction in the functionality or performance of the product or of the replacement part on the basis of its origin. - display recurring notifications to the end-user on the basis of part origin. Manufacturers, importers or authorised representatives shall provide non-discriminatory access to any software, firmware, diagnostic tools or calibration tools necessary to complete the replacement of a listed spare part and to return the product to full working condition following part replacement. This access shall be provided within the same timeframe as spare part delivery and shall remain available for the duration of the spare part availability period."	Current market practice reflects additional pairing-related barriers not clearly covered by the original wording: i) After replacement with a non-OEM part, some devices display persistent and repeating warning messages even where the replacement part functions correctly, discouraging consumer acceptance of repaired products. See also comment on "3.1.14. Software barriers (pairing), pg.18". ii) Some devices use software to limit the performance of non-OEM parts (e.g. limiting charging speed to 50% with a third-party battery). iii) diagnostic tools and test software are sometimes withheld from independent repairers as a method of limiting non-OEM repair.

19	5.18. Verification aspects, Table 20, row 29 Software barriers (pairing), pg.49-50	Software barrier verification: The approach for software barriers proposes only a physical test using replacement of a part with another original part, which fails to assess the ability to replace parts with third party parts. Compliance testing must use a non-OEM part where available, and as a fall back option (where no alternative is available) require replacement with a part recovered from an identical product model.	The three key issues that can be addressed by an anti-pairing requirement (part rejection, performance degradation, and post-repair notifications) are unlikely to be triggered by non-OEM parts. A verification methodology that does not use non-OEM parts is not likely to detect non-compliance.
20	5.18. Verification aspects, Table 20, row 30 (NEW) Spare parts price, pg.49-50	Verification of spare parts price: The verification approach for the spare part price cap is mentioned at the end of the section in an incomplete way (only to say "Compliance with the indicative pre-tax price ratio should also be checked"). It should be given its own row in the table, specifying at least the following: "Check that the indicative pre-tax price of the most expensive spare part, as published on the manufacturer free access website, does not exceed 30% (however, see comment on "5.4. Spare part availability – Price and Price Info, pg.35") of the indicative pre-tax price of the product as published on the same website, and that the indicative pre-tax price of the product matches the MSRP. Check that the published spare parts prices for procurement purposes are within 10% of the published spare parts price."	MSAs need a specific verification procedure for how to verify the reference price, the comparison methodology, and the tolerance on transaction prices. The reference to MSRP is necessary because the current formulation allows manufacturers to control both sides of the ratio by declaring their own indicative product price.
21	7.1. Candidate products for repairability	Influence of lifetime expectations on repair: The statement that alignment between expected and actual product lifetime implies low repair demand should be corrected and its influence on the analysis results presented in Table	If lifetime data are used to derive willingness to repair, the comparison should be between the actual lifetime and either the technically achievable lifetime or

	scoring index, pg.52	21 corrected. In addition, the paragraph containing this text is repeated twice. Text revision suggestion: "The gap between expected and actual product lifetime can sometimes be an indicator of the relevance of repair. Where consumers expect a product to last significantly longer than it typically does in practice, this suggests unmet demand for lifetime extension and (indirectly) a high willingness to repair. Conversely, where expected and actual lifetimes broadly coincide, this may indicate that consumers have already adjusted their expectations to reflect typical product durability. However, it does not indicate low repair demand during the product life, nor does it suggest that users would not be willing to repair if the product design and repair opportunities improved. Failure frequency and repair café data provide a more direct indicator of in-life repair demand and are important to consider alongside lifetime expectation data when assessing the relevance of repair."	consumer desired lifetime, but not the expected lifetime, which combines consumer aspirations with their acceptance of current market realities (e.g. capturing consumer resignation that a smartphone will only last 2 to 3 years rather than their desire that it can be more easily repaired to last longer).
22	7.1. Candidate products for repairability scoring index, Table 21, pg 53	We welcome the possibility of extending the repair index to some of the products covered by proposed horizontal requirements. However we would like to first highlight that the current visual implementation of the repair index for smartphones and tablets can be misleading for consumers: when accessing a product's information for example on websites, consumers are initially presented with the energy efficiency index of the product, while the repairability information is only shown when accessing the full label. Any future implementation, including	For games consoles, joystick drift is widely reported as a failure mode. See: Video Games Chronicle (2020). "A new Joy-Con drift lawsuit accuses Nintendo of 'creating a product designed to break': . https://www.videogameschronicle.com/news/a-new-joy-con-drift-lawsuit-accuses-nintendo-of-creating-a-product-designed-to-break/ For toasters and kettles, the primary failure modes are

		for products covered by horizontal ecodesign requirements, should remove this confusion . Medium horizontality candidate products: A special effort should be made to ensure that the products that have high failure rates but are not proposed to be taken forward through repair scorings are properly addressed by the high or medium horizontality measures. For example: Portable games consoles: include joystick/thumbstick assemblies in the horizontal spare parts list or a medium-horizontality parts availability requirement. ebikes: Retain as an index candidate. Beyond drive system architectures which are variable, the common parts across architectures could still be scored (displays, lights, braking systems, connectors). Toasters: Include heating elements in the horizontal spare parts list or a medium-horizontality parts availability requirement. Kettles: Include heating element, limescale filter, lid mechanism in the horizontal spare parts list or a medium-horizontality parts availability requirement.	well-documented.

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