

The Consumer Voice in Europe

A REPAIR SCORE THAT WORKS FOR CONSUMERS

Recommendations for an effective tool for consumers to make more sustainable choices



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Why it matters to consumers

Many consumer products today fail too quickly, become obsolete and cannot be easily repaired. This takes a toll both on consumers' pockets and our natural resources. Giving clear, trustworthy and comparable information to consumers can facilitate identifying the most durable and repairable products on the market. A repair score, if designed and implemented appropriately, can be a good step in this direction, always in combination with strengthened product design and consumer rights.

Summary

An EU repair score¹ is an important information tool to introduce for consumers, who currently lack any adequate means to compare the repairability of products at purchase. Such tool could be very influential on consumers' purchase decisions, and it could also create the conditions for companies to compete on more repairable products by design. In this paper, we detail **recommendations for the European Commission to design an effective, mandatory EU-wide repair score that works for consumers:**

- 1) Building on the lessons learnt from the French repair index**, addressing shortcomings on methodology, display to consumers and market surveillance.
- 2) Designing a repair score on top of Ecodesign repairability requirements**, ensuring it only rewards manufacturers going beyond complying with the law. Important criteria for the score include:
 - Ease of disassembly, repair information or availability of spare parts;
 - **Price of spare parts**, which should be examined further to identify a suitable methodology.
- 3) Point-of-sale display** of the repair score should always be clear both **online and offline**.
- 4) Market surveillance** authorities must have the necessary resources to verify the scores declared by manufacturers and prevent misleading information to consumers. A strong sanction regime should also be put in place.
- 5) Consumers' expectations and repair experiences:** correlations with the repair score should be monitored to assess any potential revision needed.
- 6) Durability information** must complement an EU repair score. We also recommend introducing a new mandatory "guaranteed lifespan" label, which would inform consumers for how long products are covered by a guarantee.

¹ We understand 'repair index' and 'repair score' could be used interchangeably. When discussing an EU-wide tool, we have chosen 'repair score' in this document given that this is the term used by the European Commission's Joint Research Centre in [their work](#).

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1. Introduction

The EU is currently preparing various initiatives aiming at **greening consumption**,² as part of the European Commission's second Circular Economy Action Plan³ and New Consumer Agenda.⁴ One important part of this shift to a more sustainable consumption model is the **need for better consumer information**, including on the reparability of products.

For many consumer products, a key aspect of sustainability is how long the product will last and whether it will be easy to repair. From an environmental perspective, manufacturing products can generate high emissions that fuel climate change – in the case of smartphones for example, manufacturing can account for more than 80% of the product emissions during its lifetime.⁵ Therefore, extending the lifetime of products can significantly reduce the overall environmental impact of products.

As part of our work within the PROMPT project,⁶ we found that many consumers report products that fail too soon for their expectations and that are too difficult or costly to repair.⁷ Various changes are needed for a transition towards more durable and repairable products. In terms of repair, these include advances in product design, consumer rights and repair services, improving overall the repair experience and ecosystem for consumers.⁸ Progress is also needed on consumer information, which is the focus of this paper.

An EU repair score is an important information tool to introduce for consumers, who currently lack any adequate means **to compare the reparability of products at purchase**. This information asymmetry was highlighted by a European Commission's 2018 behavioural study,⁹ which also found that such point-of-sale information could be very influential on consumers' purchase decisions. A repair score could also create the conditions for companies to compete on more repairable products by design.

The **European Parliament** has sent strong signals for the introduction of mandatory reparability information as well as for the development of an EU repair score, which could protect consumers while reducing the environmental impact of products.^{10,11} **France** has introduced a national repair index¹² on its market in 2021 and the **European Commission** is now assessing the introduction of a repair score in the context of Ecodesign measures for smartphones and tablets.¹³

² These initiatives include more ambitious sustainable product policies through the revision of the Ecodesign Directive, the substantiation of green claims or strengthening consumer rights through the empowering consumers for the green transition and 'right to repair' initiatives.

³ European Commission's [second Circular Economy Action Plan](#)

⁴ European Commission's [New Consumer Agenda](#)

⁵ See Table 15 of the PROMPT project's report on [Environmental evaluation of current and future design rules](#)

⁶ PROMPT Projects' website: <https://prompt-project.eu/>

⁷ From consumers in ES, FR, IT, BE, PT, DE and NL. This was possible through surveys and a dedicated online webtool '[trop vite use](#)' where consumers can directly report this data. This is a bottom-up approach that provides valuable insights into consumers' frustrations when products break down as well as whether they attempted repair and how their experience went.

⁸ For all our recommendations on durable and repairable products, please check our dedicated [paper](#).

⁹ [EC \(DG JUST\) 2018 Behavioural study](#)

¹⁰ https://www.europarl.europa.eu/doceo/document/A-9-2021-0008_EN.html

¹¹ https://www.europarl.europa.eu/doceo/document/TA-9-2020-0318_EN.html

¹² <https://www.ecologie.gouv.fr/indice-reparabilite>

¹³ <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/447/documents>

In this paper, we develop **recommendations to design an effective EU-wide repair score for consumers to make more sustainable choices**. Building on lessons learnt from the French precedent, we identify the need for a mandatory repair score that works on top of design requirements and that accounts for central criteria to repairability in a product-specific way. A score that is always clearly displayed to consumers, online and offline, and monitored appropriately by market surveillance authorities.

2. Learning lessons from the French repair index

Introduced in January 2021, the French repair index presents a great opportunity to learn from and inspire an EU repair score. France has been the first country to implement a repair index on five product categories of electrical and electronic devices. These include washing machines, televisions, laptops, smartphones as well as lawn mowers. The index gives these products a 0-10 rating based on five repairability criteria:

1. Ease of disassembly
2. Repair documentation
3. Availability of spare parts and delivery time
4. Price of spare parts
5. Product-specific aspects

The French repair index has gradually appeared in shops, offline and online. The visual appearance of the index is shown below. It combines a numerical rating with a five-grade colour coding ranging from red (lowest performing) to dark green (best performing).



Image from French Ministry of the Ecological Transition¹⁴

Beyond informing consumers, could an index also drive change in manufacturers' practices? With the launch of the French index, some manufacturers published repair guides, and several announced they would facilitate access to spare parts or speed up their delivery time.¹⁵ While a good step for consumers, there is room for improvement.

2.1. Consumers' take on the French index

Almost a year after its launch, our French member UFC-Que Choisir (UFC-QC) published in December 2021 a report¹⁶ analysing the index on 330 products and nine online sales sites. While they recognise the potential of this tool for consumers and the environment, their analysis highlights the following limitations:

¹⁴ <https://www.ecologie.gouv.fr/indice-reparabilite>

¹⁵ https://www.lemonde.fr/pixels/article/2021/02/01/droit-a-la-reparation-des-appareils-electroniques-remiers-succes-pour-l-indice-de-reparabilite_6068400_4408996.html

¹⁶ <https://www.quechoisir.org/action-ufc-que-choisir-indice-de-reparabilite-le-consommateur-bien-mal-eclairer-96968/>

- **Weighting of the reparability criteria must be improved:** The current calculation method leads to unreasonably high scores. First, manufacturers can score points based on simply meeting their legal obligations. This is the case of washing machines, where there is already a legal requirement to ensure the availability of spare parts for at least 10 years. The score also attributes the same weight to each of the five criteria of the score and has no baseline or minimum criteria that manufacturers must exceed to have a good repair score. As a result, while smartphones and televisions score below average on availability of spare parts, these product categories then show great reparability indexes.¹⁷
- **The index is not always available, especially online.** The study showed that only 42% of products have the index visible online next to the price and only 28% easily provide the extended table with information on the criteria.
- **Self-declaration by manufacturers must be checked:** The index is based on an assessment by manufacturers (or importers) filling in a calculation grid for each of the index criteria. It is important that market surveillance authorities verify the information provided by the manufacturers and that there is a strong sanction regime in place.
- **Need to monitor correlation with consumers' experience.** It will be important to ensure that the scores obtained match what consumers will experience in practice.

The methodology for building a repair score needs careful consideration to ensure the tool brings relevant information to consumers and that its criteria only reward those manufacturers going beyond their legal obligations.

BEUC recommends developing a repair score taking inspiration from the French repair index and addressing its major shortcomings through building a score with

- i) relevant reparability criteria and weighting.
- ii) appropriate point-of-sale display to consumers.
- ii) ensuring market surveillance can verify manufacturers' self-declaration.
- iv) monitoring the correlation of the score with consumer experience.

3. Methodology for a meaningful EU repair score

How should a score measure reparability? In this section we look at relevant criteria to product reparability and aspects to consider when building an EU repair score.

3.1. Mandatory, not voluntary

As it is the case in France, an EU repair score must be **mandatory**, to truly enable consumers to compare products on the market.

BEUC highlights that an EU repair score must be mandatory.

¹⁷ With average scores for availability of spare parts in smartphones and televisions being respectively 4.8/10 and 3.1/10, these product categories then show much higher reparability indexes of 7.2/10 and 6.6/10.

3.2. The need for harmonisation

Following France, other Member States have announced plans to develop national scores, notably Spain and Belgium. This is a clear sign of governments' interest in this instrument. However, rather than having different Member States developing their own repair indexes separately, we think it is more effective for the **EU to develop a harmonised and strengthened repair score**. This is crucial to avoid confusion among consumers, as well as facilitate compliance for manufacturers.

BEUC recommends introducing an EU repair score for a harmonised provision of repair information across the EU market.

3.3. Ecodesign as a starting point

Sustainable products must become the norm on the EU market,¹⁸ benefitting consumers while managing the Earth's natural resources more wisely. First and foremost, this requires **products to become more sustainable**. While reliability is the consumers' prime focus, it is central to make products **more repairable from the design stage**, for instance through stronger Ecodesign repairability requirements.

For a repair score to work for consumers, it should **reward manufacturers only in case they go beyond their minimum legal obligations**. As the Ecodesign Directive sets minimum legal requirements for products to be placed on the market¹⁹, such measures can help establish the starting point for a repair score. Ecodesign repairability requirements should establish the minimum for a product to be considered somewhat repairable and such products would have the lowest repair score. Performers going beyond Ecodesign requirements could then be identified by consumers by achieving a higher repair score.

This approach would also be in line with the dedicated European Commission's Joint Research Centre report,²⁰ supporting a possible introduction of a repair score at EU level. The study identified the importance of 'pass/fail' criteria or 'the absolute minimum requirements for a product to be considered repairable', which BEUC recommends would be set through Ecodesign repairability requirements.

BEUC recommends designing a repair score on top of Ecodesign repairability requirements, ensuring it only rewards manufacturers going beyond complying with the law.

¹⁸ ANEC/BEUC's position paper '[Making more sustainable products the new normal](#)'

¹⁹ It is critical to ensure that products that do not comply with Ecodesign requirements are banned from the market. For more detail on this challenge, please see section 6 'Compliance and enforcement' from ANEC/BEUC's position paper '[Making more sustainable products the new normal](#)' (p. 20-21). Consumer organisations play a key role in testing real market performance.

²⁰ '[Analysis and development of a scoring system for repair and upgrade of products](https://publications.jrc.ec.europa.eu/repository/handle/JRC114337)'

3.4. Product-specific scoring criteria and weighting

A repair score must be built on key criteria determining whether a product is easily and safely repairable or not. In this line, a repair score should incorporate scoring on the following criteria:²¹

- **Ease of disassembly.** A product designed for easy repair e.g. without glued parts or hard-to-access components and which can be dismantled (and reassembled following the repair) with no **tools** or the use of commonly available ones. The easier a product can be disassembled and repaired could lower the labour cost, therefore measuring the disassembly time, and not just the common measure of number of steps, could be more meaningful.
- **Ease of access to repair manuals and instructions from manufacturers.** To ensure repair is done appropriately and safely: i) consumers must have access to good quality and easily understandable manuals with essential maintenance and information for repairing small defects; ii) independent professional repairers should also have access to technical information needed for complex repairs, promoting a competitive repair ecosystem that gives more repair options to consumers.
- **Availability of spare parts and their delivery time.** In many cases, a repair requires replacing some parts critical to the functioning of the product. It is crucial that manufacturers make these parts available and fast, in no more than 10 days.
- **Spare parts must be affordable** for consumers to repair (see section 4). The price factor is usually an important component of the overall repair cost.

The repair score criteria must work in synergy with Ecodesign requirements (section 3.2). This can be illustrated with the draft repair score that the European Commission is developing for smartphones and tablets.²² In the case of repair information for example, draft Ecodesign measures establish the technical information that must be provided to professional repairers for a fee. For the development of the repair score for these products, the European Commission has suggested there is enough room for more ambition, assigning a higher repair score to products if the information is rather provided for free or also directly to consumers. When provided to consumers, we highlight that this information must be in the appropriate format.

Following JRC's report '*Analysis and development of a scoring system for repair and upgrade of products*'²³, the repair score criteria should apply to the 'priority parts' of the product, that is, those most likely to fail and with most functional relevance to the product. Criteria should also be reviewed periodically due to possible changes in the market or product characteristics. Identifying relevant repairability criteria^{24,25} – and how to test for them – is also central to the development of PROMPT's testing programme²⁶.

²¹ This list does not intend to be comprehensive. There could be more criteria relevant to the repairability of a product and these could be identified on a product per product basis. A possible criterion to include on a repair score could be also the availability of software updates, however we find this aspect might be more suitable for an assessment of reliability or the broader durability of the product, rather than strictly on repairability. Other possible criteria to examine could be the standardisation of parts.

²² [JRC Repair Score Study: Product specific application to Smartphones and Tablets](#)

²³ <https://publications.jrc.ec.europa.eu/repository/handle/JRC114337>

²⁴ See PROMPT's report on [Design for physical durability, diagnosis, maintenance and repair](#)

²⁵ Draft research paper which can be found in the annexes (page 58) of PROMPT's report on [Design for physical durability, diagnosis, maintenance and repair](#)

²⁶ The [PROMPT project](#) is a H2020 project which is developing a testing programme to assess the longevity of products based on three pillars: durability, repairability as well as user and market aspects.

Such findings can also provide relevant input when determining how repairability criteria could be specified and verified within an EU repair score.

When designing a repair score, each criterion will need to be given a specific weighting depending on its relevance to the success of repair. We suggest that more weight is given to aspects such as the ease of disassembly compared to access to repair manuals.

BEUC recommends that the repair score integrates criteria central to repairability including ease of disassembly, access to repair information as well as availability and price of spare parts.

3.5. What about products not (yet) under Ecodesign?

There may be value for consumers in introducing a repair score for products not yet under the Ecodesign Directive or for which similar product-specific requirements are unlikely to be developed soon.

For instance, some widely spread small cooking appliances, such as kettles, toasters or coffee machines, or micro-mobility appliances, such as e-bikes or e-scooters, are not (yet) covered by specific Ecodesign requirements. Still, consumers would likely be very interested in having comparable information on repairability when choosing one brand/model over another in a shop. Beyond ICT and electrical products, product groups for which a repair score could be explored in the long term include textiles and furniture, which have been identified as key product groups within the European Commission's Second Circular Economy Action Plan²⁷.

The introduction of a repair score could therefore be considered for these products as well. Such possibility could be assessed under the new proposed Ecodesign for Sustainable Products Regulation²⁸.

The development of a repair score should not however be an *alternative* or delay actual Ecodesign requirements for products that would benefit from minimum repairability by design requirements.

BEUC recommends exploring the introduction of a repair score for products not yet covered by specific Ecodesign requirements, offering consumers comparable repairability information for such products.

4. Price of spare parts, an important criterion

The cost of repair is often the main driver influencing whether consumers choose to replace or repair their products, as highlighted by our members' research and findings of the PROMPT project.⁷ According to a survey²⁹ conducted by our German member consumer organisation vzbv, a large majority of consumers (88%) expect that a repair score with a high rating would mean that the cost of repair of a product would be significantly lower than buying a new product altogether. It is therefore crucial to examine integrating the cost of repair into the score. It should be noted that ease of repair is also key for the increased sale of used products in the second-hand market.

²⁷ [European Commission's 2020 Circular Economy Action Plan](#)

²⁸ https://ec.europa.eu/info/energy-climate-change-environment/standards-tools-and-labels/products-labelling-rules-and-requirements/sustainable-products/ecodesign-sustainable-products_en

²⁹ <https://www.vzbv.de/meldungen/recht-auf-reparatur-umsetzen>

A high repair score must translate into an easy, affordable repair for consumers. Products should not obtain a very high score if repair is in practice unavailable due to excessive repair costs.

To account for price, **a repair score could include information on price of spare parts as a criterion central to repairability**. Learning from the French repair index, which already includes such criterion,³⁰ a finetuned methodology suitable for an EU-wide repair score should be tested to identify the best approach. Such an indication of price should not harm competition in the aftermarket, e.g., the price declared by the manufacturers should not set the price in the whole market. In fact, additional measures should be explored, such as standardisation of parts or interoperability of non-Original Equipment Manufacturer spare parts, to stimulate competition and lower the price of repair.

BEUC recommends examining the introduction of information on price of spare parts as a criterion to the repair score.

5. A clear point-of-sale display, both online and offline

An EU repair score must be **clear, prominent, and easy to distinguish by consumers, both online and offline**.

As highlighted already in this paper, the recent study³¹ by French consumer organisation UFC-Que Choisir identified inappropriate or inexistent display of the index online.

UFC's analysis showed that only 42% of products displayed the index visibly online and only 28% easily provided the extended table with information on the criteria. This is an important shortcoming which gives consumers uneven access to the repair score depending on the dealer they choose.

The repair score should be visible prominently on the packaging or, for products sold online, on the webpage. To respect consumers' right to information, the size of the index should be at least the same used for the price and displayed in proximity to the latter. For products with an Energy Label, the repair score should be displayed close to this label.

BEUC recommends ensuring that the repair score is always displayed clearly for consumers when comparing products both online and offline, and close to the price.

³⁰ The French repair index contains a criterion on price of spare parts. Such criterion is calculated based on a ratio of the pre-tax price of spare parts (for each product, a list of the most relevant parts is identified, including those which are most likely to fail) and the pre-tax price of the product.

³¹ <https://www.quechoisir.org/action-ufc-que-choisir-indice-de-reparabilite-le-consommateur-bien-mal-eclairer-96968/>

6. Market surveillance and enforcement

Manufacturers are meant to self-declare their scores, overall and per criteria, in both the case of the French repair index and the so far proposed EU repair score for smartphones and tablets. There is a risk that such process could lead to misleading declarations by which manufacturers overestimate the reparability of a product, affecting the reliability of the score for consumers.

It is therefore **crucial that market surveillance authorities have the necessary resources to fully verify that each of the scoring parameters are correctly assessed** by the Original Equipment Manufacturers (OEMs). This should be done both on ratings available online as well as in brick-and-mortar shops.

Enforcement measures such as fining companies which mislead consumers should be available and used. As a self-declaration tool, it is hard to check by consumers and public authorities and therefore in addition there should be a strong sanction regime to outweigh potential benefits of misusing the score.

It is also important that criteria are clear to avoid ambiguous assessment. Some criteria may also need checks over time to ensure that manufacturers respect their commitments, such as delivery time or availability of information.

BEUC recommends the European Commission to ensure that market surveillance authorities have the necessary resources to verify the scores declared by manufacturers and avoid misleading information to consumers.

7. Monitoring correlation with consumers' experience

Finally, we find it crucial that the EU repair score is carefully monitored over time to fully understand its impacts on consumers and the market.

During a European Commission pilot study,³² different possible repair score formats were shown to consumers, and they were asked what they thought the score meant. The study found that consumers had different interpretations, with the most common including:

- Fast repair
- Low repair cost*
- Spare parts and/or software updates readily available
- Repair information is directly available for this product
- Easy to disassemble the product with commonly available tools
- Easily repairable by the consumer

³² DG ENV's [Consumer study on the impact of reparability information formats on consumer understanding and purchase decisions](#). The results discussed in this section are mostly linked to the study's Table 3.11 p. 43

*This finding is also in line with the consumer survey³³ conducted by our German member consumer organisation vzbv, where a large majority of consumers (88%) expect that a repair score with a high rating would also address repair cost.

As the repair score is placed on the market, **BEUC recommends monitoring the correlations of the score to consumers' expectations and repair experiences in practice.** This monitoring over time could help shape information campaigns to consumers as well as identify any needs for revision of the methodology should these products not be as repairable as expected.

BEUC recommends the European Commission to monitor and revise as needed the correlations of the score to consumers' expectations and repair experiences in practice.

8. Durability information – additional label needed to better guide consumers

Consumers lack information on both the durability and repairability of products. Longer lasting products are a strong need for consumers and therefore a repair score should be complemented with durability information.

In France, the current repair index may develop into a broader durability index,³⁴ which could also be an option to explore on the EU level. In France, such durability index aims to encompass repairability criteria as well as other durability criteria which could include wear-out resistance, maintenance or software and hardware improvements.

The European Commission wants to introduce, via its proposal on empowering consumers for the green transition through better protection against unfair practices and better information,³⁵ a new pre-contractual information obligation on the commercial guarantee of durability. According to this new initiative, traders will be obliged to inform consumers whether a product is covered by a commercial guarantee of durability of more than two years. The format in which this information needs to be provided is however not specified within this initiative.

BEUC recommends the European Commission to go a step further and introduce a mandatory EU label in this area. Moreover, we recommend that this label does not only inform consumers about the commercial (voluntary) guarantee periods but also about the legal (mandatory) guarantee periods, with the latter always being displayed as a minimum.

To make products more durable, BEUC is also recommending to the European Commission to expand the legal guarantee periods. Product-specific guarantee periods could be defined in the Ecodesign implementing measures based on their expected lifespans. Such longer guarantee periods should also be displayed as a minimum on the **new "guaranteed lifespan" label**, proposed by BEUC.³⁶

³³ <https://www.vzbv.de/meldungen/recht-auf-reparatur-umsetzen>

³⁴ ADEME's Preparatory [study](#) for the introduction of a durability index

³⁵ Proposal for a Directive amending Directives 2005/29/EC and 2011/83/EU as regards empowering consumers for the green transition through better protection against unfair practices and better information ([COM\(2022\) 143 final](#))

³⁶ More information about BEUC recommendations regarding the "guaranteed lifespan" label, which should accompany the EU repair score, can be found in BEUC's [paper on durable and repairable products](#)

BEUC recommends the European Commission to complement the repair score with a new mandatory “guaranteed lifespan” label, which would inform consumers on how long products are covered by a guarantee (both the commercial and legal guarantee, the latter always being displayed as a minimum).



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