

Implementing the Repairability Index for Household Tumble Dryers

Summary: This document provides guidance for implementing the repairability index for household tumble dryers, as outlined in the [Commission Delegated Regulation \(EU\) .../... amending Commission Delegated Regulation \(EU\) 2023/2534](#). This guidance addresses specific clarifications and interpretations of the legal text, aiming to ensure consistent application by manufacturers.

DISCLAIMER

This document is intended as a non-binding industry guidance developed within APPLiA to support manufacturers in the practical implementation of the repairability index for household tumble dryers under the applicable EU legal framework [[Commission Delegated Regulation \(EU\)2025/1353](#)]

Its purpose is to promote a consistent understanding of certain technical aspects of the regulatory provisions in areas where the legal text may be open to interpretation. By contributing to a more uniform application, the guidance seeks to enhance the comparability of repairability scores across products from different manufacturers and, thereby, to enhance consumer understanding and trust in the repairability index as a meaningful information tool.

The content of this document does not have any legally binding effect nor can it be considered legal advice. Each manufacturer will have to self-assess compliance of its commercial practices, having also the benefit of this document. A binding interpretation of European Union law remains the exclusive competence of the Court of Justice of the European Union and, where applicable, the European Commission and national authorities.

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1. Initial position of the dryer

Question: The legal text provides few details on how the product should be positioned and prepared for the assessment. Nevertheless, a few aspects were not included in the legal text and, if clarified, would help in ensuring an appropriate and harmonised assessment when verification takes place.

Guidance: In addition to the content of the legal text¹, the following should be complemented. The assessment of the reparability index, specifically the disassembly score, fastener score and tool score, shall start on an appliance:

- Maintained by the customer as requested in the user manual for daily use (e.g. condensate box emptied, filter cleaned).
- Fully assembled.
- Standing freely accessible from all sides (The appliance must be set up free-standing, with all side panels and the appliance cover accessible).
- Disconnected from any supply and disposal (The appliance must be unplugged from the mains, and any water drainage or vent hoses must be disconnected).

The assessment of the reparability index, specifically the disassembly score, fastener score, and tool score, shall end when the part or each part of a subset is separate and thus individually accessible.

For the purpose of this paragraph, the hand shall not be considered a tool.

2. Definition of "Step" and Partial Unplugging

Question: The definition of "step" in the legal text, particularly "*any placement of a part away from its initial location where the removal entails partial disconnection or unplugging*", requires further clarification regarding the counting of connector unplugging.

(36) "step" means an operation that finishes with the removal of a part (or bundle) or with a change of tool, including any placement of a part away from its initial location where the removal entails partial disconnection or unplugging;

¹ Annex II (1) C) amending Annex IV Section 5:

The assessment of the reparability index, specifically SDD, SF and ST shall start on a product that is:

- *maintained as required in the user manual for daily use;*
- *fully assembled;*
- *standing, all side panels and the appliance cover freely accessible;*
- *disconnected from any supply and disposal.*

After the assessment the product shall be fully reassembled.



Guidance:

- Use the **diagram** from the French Index [public guidance](#) (see also below).
- The removal of **connectors** should be considered **a fastener** and, therefore, should **not** be counted as a separate step in the disassembly process. This aligns with the French guidance document.
- The manufacturer's disassembly guidelines provided in the technical documentation must clearly define tool usage to avoid ambiguity in step counting.
- **Adhesives** are to be considered resupplied fasteners if provided with the spare part in sufficient quantity for reassembly.

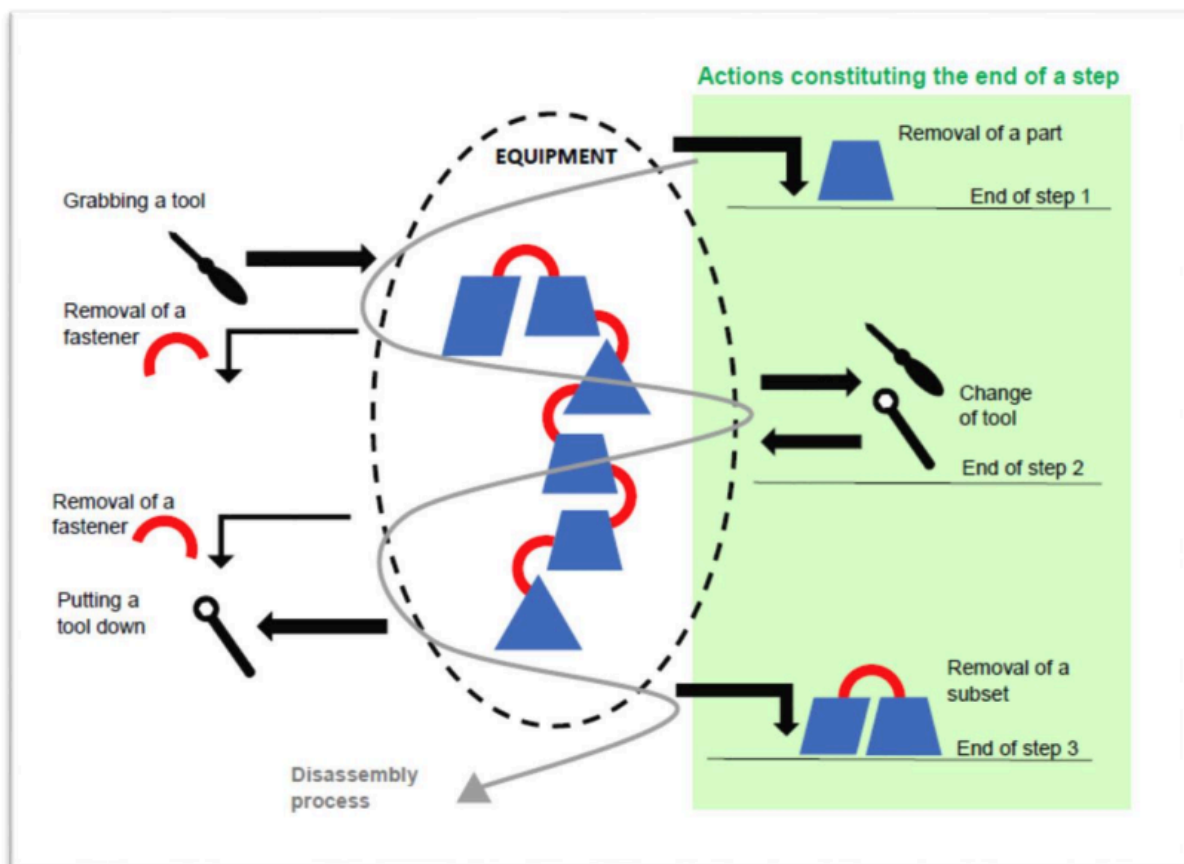


Figure 1 - Example of a disassembly process



3. Identifying the "Priority Part" and Step Counting End

Question: When a spare part is provided in different configurations, it is important to clarify which configuration constitutes the "priority part" for step counting.

Guidance:

- The "priority part" should be considered the **core functional component itself** as declared by the manufacturer.
- The step count for the disassembly of each priority part is complete when the target priority part is separated and can be accessed individually.

4. Complete reassembly to have the unit functionally working

Question: In addition to "*After the assessment, the product shall be fully reassembled*", a clarification is needed that it is important to check that the machine is working properly once it is reassembled.

Guidance: After the assessment of each priority part, the product shall be fully reassembled and checked to ensure that it is working properly.

5. Washers as Fasteners

Question: It needs to be clarified whether washers are considered fasteners or separate parts.

Guidance: Washers should be considered as a **fastener**. Fasteners are not considered as a part (see rules for step counting in (EU) 2023/2534 Annex IV point 5.1).



6. Multiple Instances of Priority Parts (Lowest Score Interpretation)

Question: The regulation states that when any priority part is present more than once, "*only the one which delivers the lowest score shall be considered in the calculation of the disassembly depth, fastener, and tools type score*". This requires clarification on how to interpret "lowest score."

Guidance: When multiple instances of a priority part exist within a product, the component that provides the **overall lowest repairability index** (calculated across its disassembly depth, fastener, and tools scores for that specific component) should be considered for the calculation, rather than selecting the lowest individual score for each category from different components.

7. Priority Parts Definitions

Question: While some priority parts are clearly defined, others require a detailed explanation.

Guidance: The following clarification should be considered for the water pump, motor, fan and motor capacitor:

- Water pump (WP): *only for condensate*
- Drum bearing (B)
- Drum belt (DB)
- Door (D)
- Motor (M): *only drum movement (no fan, no compressor, ...)*
- Main printed circuit board (MB)
- Fan (F) - *only air circulation (not fan for compressor cooling)*
- Motor capacitor (MC) - *only for motor (not for compressor)*



8. Product Information Sheet

Question: The meaning and application of footnotes (a) and (c) on the product information sheet, particularly concerning the reparability index.

Guidance:

Footnote (a) refers to Article 2.6 of the Energy Labelling Framework Regulation (EU) 2017/1369, which defines the concept of equivalent models.

'equivalent model' means a model which has the same technical characteristics relevant for the label and the same product information sheet, but which is placed on the market or put into service by the same supplier as another model with a different model identifier;

Footnote (a) exempts the four specific parameters of the reparability index (disassembly depth, fastener type, fastener type score, and repair information), as well as the reparability index itself, from this concept:

(a) This item shall not be considered relevant for the purpose of Article 2(6) of Regulation (EU) 2017/1369.

This means that a variation in these specific scores between models won't break the equivalence of models as long as they share the same reparability class.

Example: two models can have the same internal components and software for drying, but have a different door design. Most declared values are identical, but one door is mounted differently which leads to a different disassembly depth score and consequently a slightly different reparability index. However, both reparability indexes fall into the same reparability class. The declared values on the label are thus identical and the declared values on the product information sheet only vary in those characteristics marked with footnote (a). Then, the models can still be treated as equivalent models since the variation only occurs in characteristics exempt from the criteria relevant for the concept of 'equivalent models'.

Footnote (c) refers to Article 4.4 of (EU) 2017/1369, which states that any changes relevant to the label or product information sheet require the product to be considered a new model:



4. A product for which changes are made that are relevant for the label or the product information sheet shall be considered to be a new model.

Footnote (c) exempts all parameters marked with it from this concept:

(c) Changes to those items shall not be considered relevant for the purpose of Article 4(4) of Regulation (EU) 2017/1369.

Therefore, the following conclusion on footnote (c) can be drawn:

- Changes to the four specific parameters (disassembly depth, fastener type, tool type, and repair information) are permissible without creating a new model.
- On the contrary, any change made to the repair index (on the PIS) or the class (on the PIS and the EL) would require the registration of a new model.
- Even if the repairability class remains the same, the manufacturer is still required to update the product information sheet in the EPREL database to reflect the changes in these four parameters.

This approach allows for minor design or production changes without the burden of a new model registration, which was a point of compromise with Member states.

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