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Keeping EU moving!

Manifesto for Mobility 2024-2029

SAFETY - SUSTAINABILITY - AFFORDABILITY



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Foreword

by ADPA President & Vice-President

A crucial vote ahead as our mobility is at the crossroads

Why the European election matters for the automotive aftermarket &
What we hope from the upcoming European term

As the automotive industry continues to evolve amidst rapid technological advancements and shifting consumer demands, the upcoming European election holds significant importance for the automotive aftermarket. With policymakers shaping the regulatory landscape that governs vehicles and subsequently their maintenance and repair, the decisions made in the election will have far-reaching implications for businesses and consumers alike.

The safety, the sustainability and the affordability of road mobility are interlinked and benefit everyone everywhere: consumers, companies, public authorities... Yet, the reparability of vehicles, and therefore their roadworthiness, is becoming unnecessarily challenging and costly. Solving commercial and technical barriers to competition in the automotive aftermarket, to ensure that consumers continue to have a true choice and to benefit from the best road mobility in the world, is our priority, and should be too for the upcoming European lawmakers.

We hope the new European Parliament and European Commission will build upon their legacy to continue improving road mobility. Pieces of legislation on competition, on emissions, on cybersecurity, on access to vehicle data, and their provisions securing effective competition for the repair and maintenance of vehicles, will play a key role. So will their implementation and their enforcement.

We, as stakeholders in the automotive aftermarket without which the repair and maintenance of increasingly complex vehicles would be more time-consuming, more costly and less efficient, commit to participate actively in the democratic process and to cooperate closely with the upcoming lawmakers to ensure that our voices are heard and our concerns are addressed. Together, we can build a future where the automotive aftermarket thrives as a vibrant and essential component of the European automotive industry, driving innovation, supporting economic growth, and delivering value to customers across the continent.



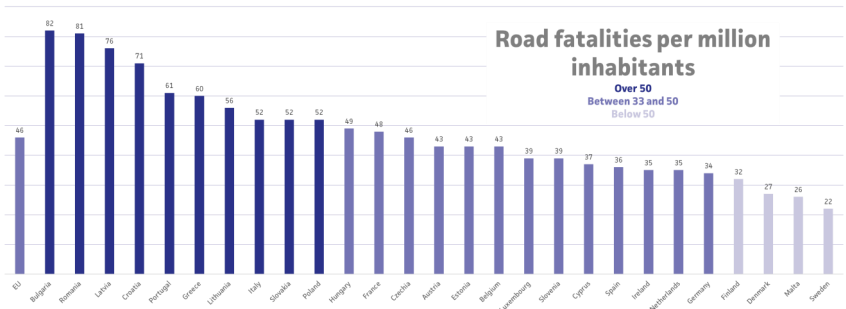
Ralf Pelkmann
ADPA President



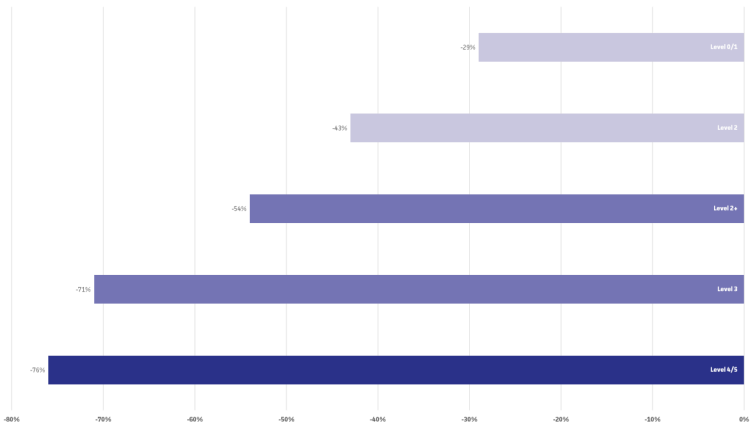
Michael Pedersen
ADPA Vice-President



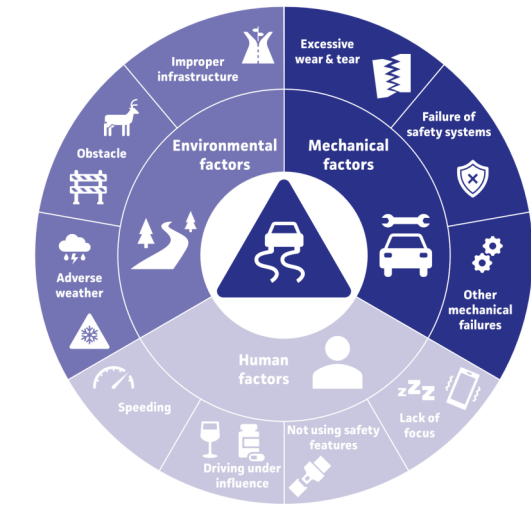
Mobility should be SAFE



Over 20.000 people lost their lives on European roads in 2023.

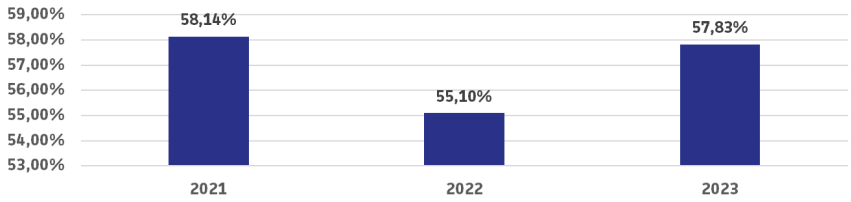


The higher the level of ADAS in a vehicle, the lower the risk of crash, especially if such systems are regularly and accurately maintained.

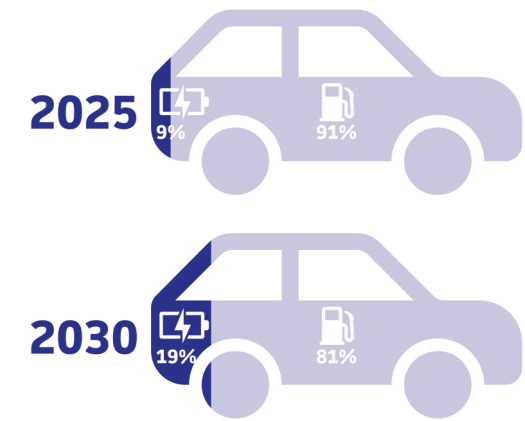


Accidents are often caused by a combination of various factors, among which the poor state of the vehicle itself and of its components is the most avoidable risk.

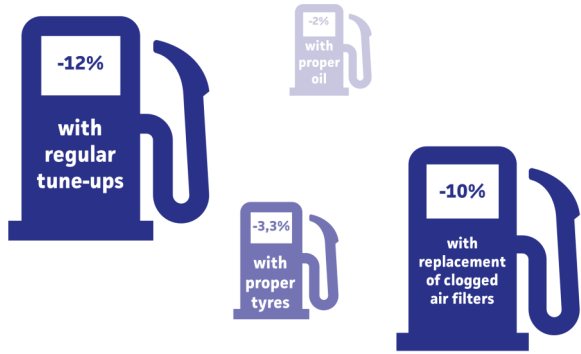
Mobility should be SUSTAINABLE



The rating of the environmental performance of new cars shows stagnation over the last years.

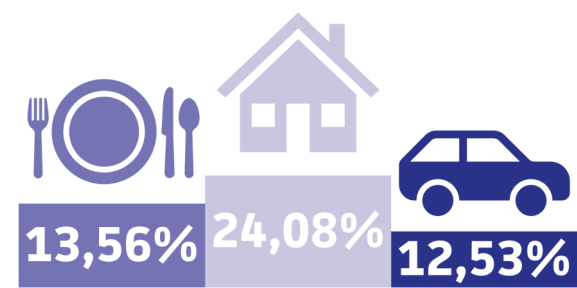


The share of electric vehicles in the existing car park will slowly but surely increase in the upcoming years.

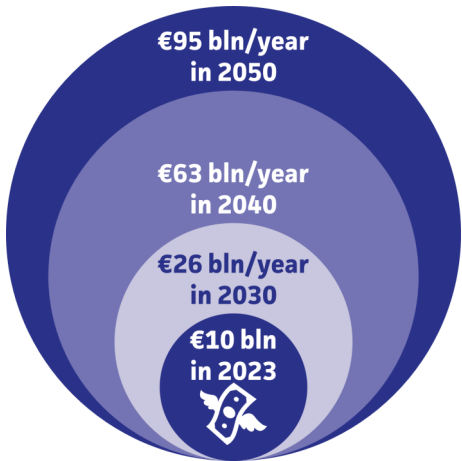


Proper servicing and maintenance of vehicles can significantly reduce their fuel consumption.

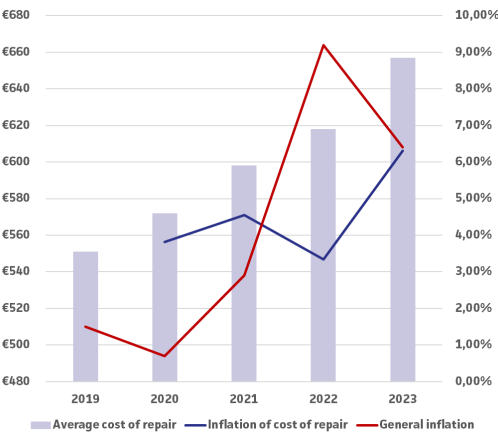
Mobility should be AFFORDABLE



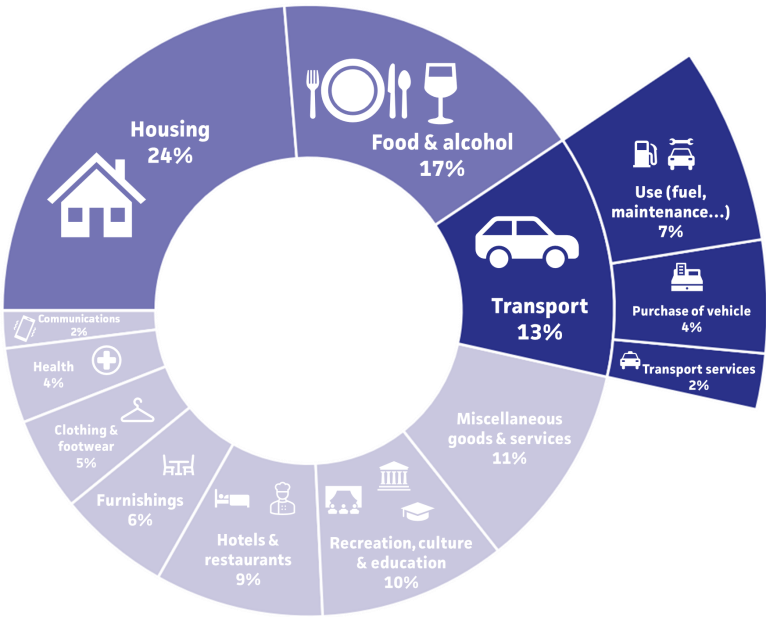
Mobility is the third most important source of expenses for European households in 2023.



Undue monopolies on vehicle data would result in dramatic losses for consumers and the multi-brand aftermarket.

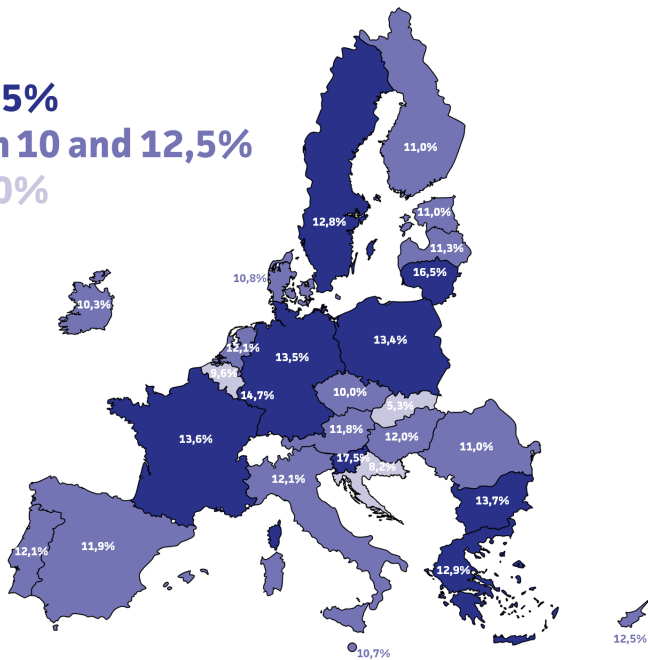


Except in 2022 due to extraordinary circumstances, cost of automotive repair increases much faster than inflation.



Europeans spend more to use their car than to purchase it, or than they do on health.

Over 12,5%
Between 10 and 12,5%
Below 10%



Most Europeans spend over 1 out of 8€ on transport.



For more facts & figure on road mobility, its safety, its sustainability and its affordability

Yes, the independent, multi-brand aftermarket can contribute to better mobility!

What's that?

It encompasses all the companies which are involved in **testing, maintaining, diagnosing and repairing your vehicle**. It includes your local do-it-all garage, but also speciality **workshops, energy providers** and of course the entire ecosystem which, quietly but surely, provides them with the **tools, the parts, the information** and the **skills** they need. It employs more than **3 million people: three times as many jobs as the automotive manufacturers** - nothing less! - distributed between more than **500.000 companies**, many of them SMEs, located all over Europe. They are essential for the mobility of every European citizen, business and public authority, in particular the **5.000.000 Europeans** contributing to the road transportation of people and goods. We are talking about some **world pioneers** creating **local jobs, in local companies, for local communities, enabling everyone's everyday life**.



3.000.000
people



500.000
companies

What's its plus?

With an ageing car park of around **280 million vehicles**, preserving their roadworthiness over their lifetime is essential to mitigate **safety issues** and **environmental hazards**. This can be achieved only if the cost of repair and maintenance of vehicles remains **affordable**, whether you are an individual or a fleet owner. The independent, multi-brand aftermarket offers an **alternative** to vehicle manufacturers. By doing so, we ensure that **consumers** can access **competitive and innovative services and solutions**. By maintaining the car park in optimal conditions, we limit pressure on natural resources (often located outside of Europe), **improving Europe's environmental footprint, trade balance and sovereignty**. And unlike others, the independent aftermarket is **not begging for public subsidies and less protective legislations for consumers and society**, and **doesn't relocate jobs outside of Europe**. Not bad, right?

KEEPING
MOBILITY

SAFE

SUSTAINABLE

AFFORDABLE

What's its issue?

The automotive aftermarket is a huge market - we are talking about more than **€220 billion** for replacement parts alone! Most of it is paid by consumers, either directly or indirectly (e.g. through insurance or leasing contracts), so maintaining a fair level of competition for such services is essential. However, vehicle manufacturers too often prevent the independent, multi-brand aftermarket from being able to fully compete with them by **imposing commercial practices or technical means which maintain consumers captive** of their brand-specific aftermarket. Several European legislations aim at preventing such undue limitations to competition, but their **enforcement is currently insufficient** and they are **not addressing new trends**. It **restricts the ability of consumers** to choose their preferred workshop, making it **unnecessarily complicated and expensive** for them to regularly and properly get their vehicles serviced in the way they deserve.



Publishers of technical information are essential enablers without which not much happens



ADPA Members are **worldwide pioneers** and **leaders** for the reparability of increasingly complex goods



providing **aggregated**, **harmonised**, **intelligible** and **ready-to-use** technical information



for the **reparation**, **maintenance** and **servicing**



of over **280 million vehicles** from more than **40 different manufacturers** on European roads,



ensuring their **roadworthiness**, **safety** and **environmental performance** over their lifetime



in a **reliable**, **timely** and **affordable** way.

Concretely, they provide:

CALIBRATION & TARGET
VALUES

DIAGNOSTIC INFORMATION

HARDWARE & SOFTWARE
INFORMATION

LABOUR TIMES

MAINTENANCE INTERVALS

SAFETY INSTRUCTIONS

SERVICE & MAINTENANCE
RECORDS

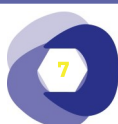
SPARE PARTS IDENTIFICATION

TECHNICAL MANUALS

VEHICLE IDENTIFICATION

WIRING DIAGRAMS

AND SO MUCH MORE...



5 years to act?



5 ways to act!





1. Why working on legislations if everyone ignores them?

Enforce existing legislations!

A lot of issues could be solved if provisions from already existing legislations were duly enforced. But consumers and the multi-brand aftermarket, mainly composed of small companies, don't have the time, the money and the legal resources to litigate each and every single time their rights are violated. Together with limited proactive enforcement by public authorities, and the lack of lighthouse effect of the few processed cases, this constitutes a call for bigger players to not comply with the legislation: the cost of non-compliance is not deterrent enough.

ADPA PROPOSALS

- The European Parliament should receive **yearly reports on enforcement activities of the European Commission**, e.g. for the Type Approval Regulation and the Motor Vehicle Block Exemption Regulations, and make them public.
- The European Commission should receive **yearly reports on enforcement activities from the national type approval authorities and competition authorities**, and make them public.
- The European Commission should work with national enforcement authorities on mechanisms aimed at **facilitating the submission, investigation and resolution of complaints**, in particular in case of imbalance of powers between opposite parties.
- The **Forum for Exchange of Information on Enforcement** and the **European Competition Network** should have regular exchanges dedicated to risks of monopolies in the automotive aftermarket, and highlight and share best practices.
- Enforcement authorities should always apply the **harshest possible sanctions** in case of non-compliance, and widely communicate on these.



2. Why starting from scratch if useful instruments are already in place?

Prolong and improve existing legislations!

There are already some pretty good European legislations out there, but some of them are due to expire soon, and some would need to be complemented to reflect the path of technological progress, in order to be future-proof. Also, lack of consistency or of precision creates sometimes ambiguities, leading to divergent interpretations and enabling powerful market players to ignore the spirit, if not the letter, of legislation. Maintaining and modernising the existing legislative framework would significantly improve legal certainty, without adding new pieces of legislation.

ADPA PROPOSALS

- The **Motor Vehicle Block Exemption Regulation** (MVBER) and its Supplementary Guidelines should be prolonged beyond 2028, and upgraded to take into consideration **new commercial and technical restraints to competition**. In particular, it should be made clear that information on **electric vehicles, calibration, safe handling** and **built-in features** of vehicles and components should be made available. The provisions protecting consumers' rights regarding **warranties** could also be improved. A quick and partial fix could be to integrate the content of the FAQ document of the European Commission in the legislation itself.
- The Security Related Repair and Maintenance Information (**SERMI**) legislation should be upgraded to make sure that publishers of technical information are duly and fully included; without which it opens the door to monopolies.
- The provisions on access to repair and maintenance information of the Type Approval Regulation should be reviewed to enable the integration of the independent, multi-brand aftermarket in the **cybersecurity** strategy of vehicle manufacturers and to fix **unequivocal requirements**.



3. Why enabling technology-based monopolies? Unleash the potential of data!

With connected cars, competition for the provision of aftermarket services starts in the vehicle where the ability to safely and securely access data, functions and resources is essential. However, through the design of their telematics systems, vehicle manufacturers are self-appointed gatekeepers of such access. It gives them full control to arbitrarily decide how, when, to whom and to what access will be granted, depriving consumers of their right to choose and limiting our ability to propose alternative, innovative and competitive solutions. The Data Act, while bringing some answers, doesn't reflect the reality and complexity of road vehicles. The European Commission has repeatedly promised, and delayed, a complementary legislation to address remaining issues.

ADPA PROPOSALS

- The European Commission, building upon the Type Approval Regulation and the Data Act, should finally put forward a proposal regulating remote access to vehicle-generated technical **data**.
- The European Parliament, together with national governments, should make sure that this legislation reflects the **concerns of consumers and of the independent aftermarket**, in particular in terms of data privacy and cybersecurity.
- Institutions should **swiftly adopt such a legislation**. Without it, our sector is prevented from offering competitive and innovative solutions to consumers, and **looses competitiveness**. The lack of competition has also an **increasing cost for consumers**.
- The **competition and proportionality principles** should guide any future legislation impacting the automotive aftermarket. Security concerns should not serve as a ground to unduly and unnecessarily restrict competition in the automotive aftermarket where alternative, less restrictive measures can be put in place to mitigate them.



4. Why pushing only for renewing fleets when additional sustainable options exist?

Improve the footprint of the existing car park!

Replacing the car park is sometimes presented as the only way to improve the environmental footprint of road mobility. Considering the pressure on natural resources it implies to build new vehicles, and the footprint of the international trade it generates, this is actually far from being an optimal solution, and shouldn't be considered as the only way forwards. With the rising costs of new vehicles, consumers tend to keep their vehicles longer, and to purchase second-hand vehicles: ensuring these ones also remain as clean as possible is at least as essential.

ADPA PROPOSALS

- The European Union should adopt an **incentivising VAT regime** to make it more affordable for consumers to opt for sustainable options such as repair, use of remanufactured parts, and retrofit of their vehicles.
- The European Union should encourage consumers to get their vehicles, in particular the older ones, **regularly checked and maintained** in optimal conditions through financial or non-financial incentivising mechanisms.
- **Scoring mechanisms** assessing the durability of a product, aimed for example at establishing financial bonus/malus incentives and at enabling consumers to make comparisons and informed choices, should also take into consideration whether consumers can choose independent, multi-brand repairers, i.e. whether these ones can access the parts, the tools, and the information they need to service, repair and maintain vehicles.
- The **downsides of publicly supported scrappage mechanisms** should be carefully and regularly assessed (footprint of new – often imported – vehicles, waste management, exportation of older cars to third countries with lower maintenance capabilities...).



5. Why working on an automotive legislation and ignoring half of the automotive sector? **Nothing about us without us!**

Even if the automotive aftermarket represents much more jobs than vehicle manufacturing, too many draft legislations are still largely ignoring the very basic needs and realities of the automotive aftermarket. Also, European institutions should not be misled by vehicle manufacturers: they often pretend to be entitled to speak on behalf of the entire road mobility sector and put forward 13 million jobs, while this figure includes jobs from other sectors, and in reality they only employ around 1 million people, much less than the independent, multi-brand aftermarket.

ADPA PROPOSALS

- The European Commission should set-up an **experts subgroup** of the Motor Vehicle Working Group, dedicated to aftermarket issues, which would be systematically and early involved in all legislative proposals impacting the automotive sector.
- The European Parliament should host **hearings on monopolistic risks** in the (automotive) aftermarket.
- When presented with the 13 million jobs figure by the vehicle manufacturers, European elected officials and public servants should remind them that their real employment is much lower, and regularly decreasing.



Are you campaigning to become a Member of the European Parliament in 2024?

Are you willing to concretely improve consumer protection, road safety and sustainability?

Are you convinced that the independent, multi-brand aftermarket can play a key role in this?

Are you ready to unleash its potential for a better today and tomorrow?

If YES, then sign the pledge!

I pledge, if elected to be a Member of the European Parliament, to promote consumer protection, road safety and sustainability, and help build a more competitive and innovative automotive aftermarket, benefitting individuals and businesses alike, across the European Union.

I commit to work together with the independent, multi-brand automotive aftermarket and its representatives to ensure that European legislation maintains and improves competition and consumers' choice in the automotive aftermarket, in particular by preventing or limiting the establishment of brand-specific monopolies through undue commercial and technical restrictions.

I commit to push for these issues by joining and contributing to the work of the relevant Committees and Intergroups of the European Parliament, and by regularly exchanging with the European Commission on these topics.

I also commit to help achieving the goals of the ADPA Manifesto for safe, sustainable and affordable mobility 2024-2029, notably, on the legislative side, by:

1. Asking for the prolongation and improvement of the Motor Vehicle Block Exemption Regulation;
2. Working on an upgrade of the aftermarket provisions in the Type Approval Regulation;
3. Adopting rapidly a comprehensive legislation securing access to in-vehicle technical data, in line with cybersecurity and data privacy requirements;
4. Supporting measures promoting the repair, reuse, recycling and retrofit of vehicles and their components.

To sign the pledge, scan the QR code below, enter your details, and confirm.



ADPA Members & Supporters

ADPA brings together companies and associations from different countries and of various sizes.



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