

ADPA.EU

Public consultation on the future of the European automotive industry

ADPA contribution

SAFETY - SUSTAINABILITY - AFF ORDABILITY

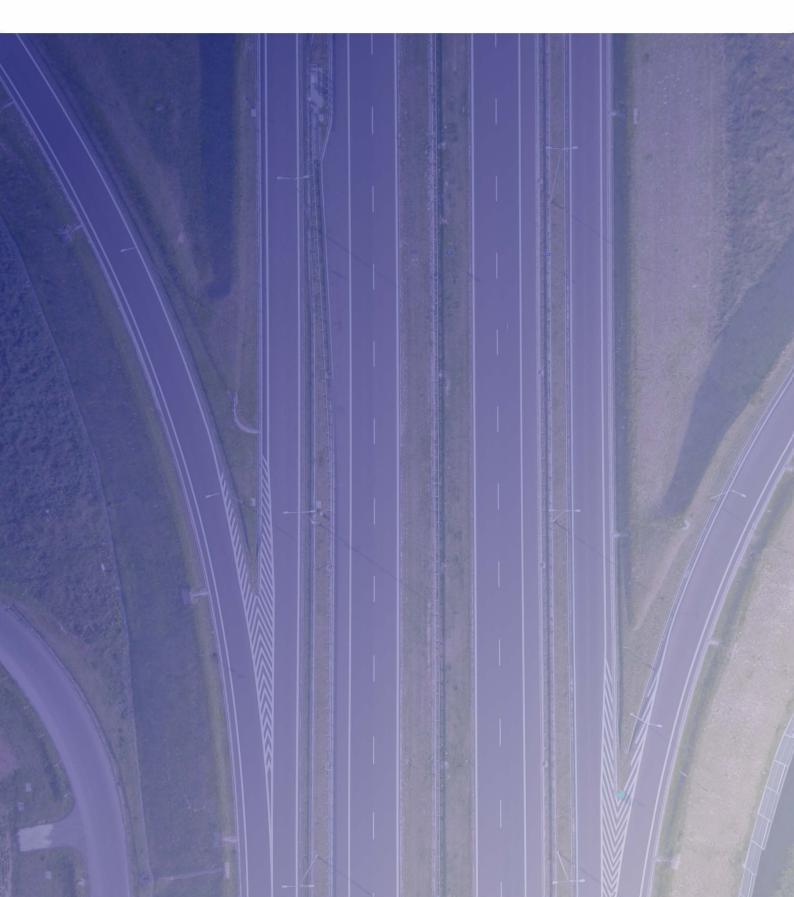


Table of contents

Table of contents	2
Notice	2
Contact	2
1. The aftermarket is the most important component of the automotive sector	3
The IAM has a key role in and makes an unparalleled contribution to road mobility	3
The IAM is the main provider of jobs in the automotive sector	4
The IAM is responsible for most of the lifecycle of vehicles	4
2. A properly functioning aftermarket would support the sales of new cars	6
Several concomitant factors explain customers' reluctance to purchase new cars	6
Structural issues in the aftermarket hinder IAM support for new vehicle sales	7
3. Considerations and recommendations for a holistic EU approach	8
Additional comments and explanations regarding ADPA's input to the Public	8
consultation's questionnaire	
Innovation and leadership in future technologies and capabilities	8
Clean transition and decarbonisation	9
Competitiveness and resilience	10
Trade relations and "international level playing field"	11
Regulatory streamlining and process optimisation	11
Additional recommendations for the Strategic Dialogue and the Action Plan	13
Annex 1 - Used acronyms	14
Annex 2 - Selective bibliography	15

Notice

This document is the detailed contribution of ADPA to the European Commission's public consultation on the Future of the European automotive industry.

ADPA remains of course available to discuss it further with relevant institutions and fellow stakeholders.

Contact

Pierre THIBAUDAT

Director General

pierre.thibaudat@adpa.eu

1. The aftermarket is the most important component of the automotive sector

The European automotive ecosystem is a complex one, and the lifecycle of vehicles is a long one. The multi-brand, independent automotive aftermarket (IAM) plays a crucial role in both, providing jobs for a vast majority of the automotive sector and handling vehicles over the vast majority of their lifetime.

The IAM has a key role in and makes an unparalleled contribution to road mobility

The IAM is a complex ecosystem responsible for the handling and servicing of vehicles (and of their parts and components) once they are put on the roads. It provides a competitive alternative to vehicle manufacturers and their partners, preventing the establishment of brand-specific monopolies which would severely increase costs and limit innovation.

The IAM plays a crucial role for three key pillars of road mobility: safety, sustainability, and affordability.

Better road mobility

Safety

Affordable repair & maintenance means more regular servicing and early detection of problems.

Repair and replacement are key against faulty safety components.



Sustainability

Regular maintenance can limit energy consumption.

By extending vehicle lifespans, the overall environmental impact is lowered, delaying premature scrapping and reducing carbon footprints.



Affordability

Competition keeps repair and maintenance costs lower, making vehicle ownership more accessible to a wider range of consumers.

By ensuring that older vehicles remain roadworthy at a lower cost, individuals and businesses alike can benefit from affordable mobility.



The independent automotive aftermarket,

its 500.000 companies and 4.000.000 workers

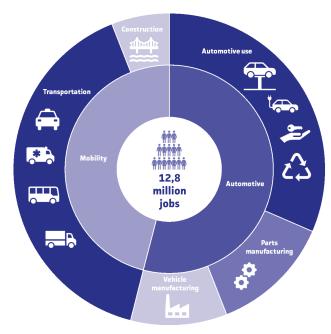
In this context, ADPA members play an essential role, and without them, most of the value chain would be paralysed. ADPA Members are indeed worldwide pioneers and leaders for the handling of increasingly complex vehicles, as they provide aggregated, harmonised, intelligible and ready-to-use technical information and data. This input is used for the repair, maintenance and servicing of over 280 million vehicles from more than 40 different manufacturers on European roads. By doing so, ADPA members ensure that the roadworthiness, safety and environmental performance of vehicles is maintained over their lifetime in a reliable, timely and affordable way, and that other operators can work in a safe and efficient way, in line with end-customers' expectations.



For more facts and figures on our sector and its economic footprint, and on its contribution to the safety, the sustainability and the affordability of road mobility, scan this QR code or visit our dedicated webpage https://www.adpa.eu/facts-figures/

The IAM is the main provider of jobs in the automotive sector

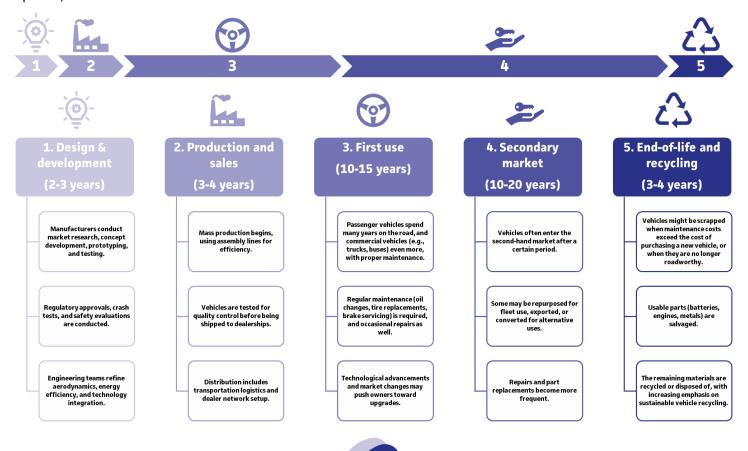
Out of the 12.8 million jobs related to road transport, 5.9 million are linked to infrastructure (e.g. construction of roads, bridges, tunnels...) and mobility (e.g. professional drivers of people and of goods). The 6.9 remaining jobs are truly the automotive sector, covering the entire lifecycle of vehicles: their production, their sale, their use and maintenance and repair, their resale, their scrapping and recycling. Out of these 6.9 million jobs, 1.3 million only are with vehicle manufacturers (only 10% of the jobs related to road mobility) and 1.6 million with parts manufacturers. 4.0 million – the vast majority (58%) of the 6.9 million automotive jobs, and nearly a third of the jobs in road transport – are related to the "use" of the vehicle. This concept covers sales of cars and light motor vehicles, the repair and maintenance of vehicles (and the complex value chain of providers of technical information, tools and spare parts behind), the resale of energy, road patrols, IT services... Publishers of technical information and data, such as ADPA Members, fall within this category.



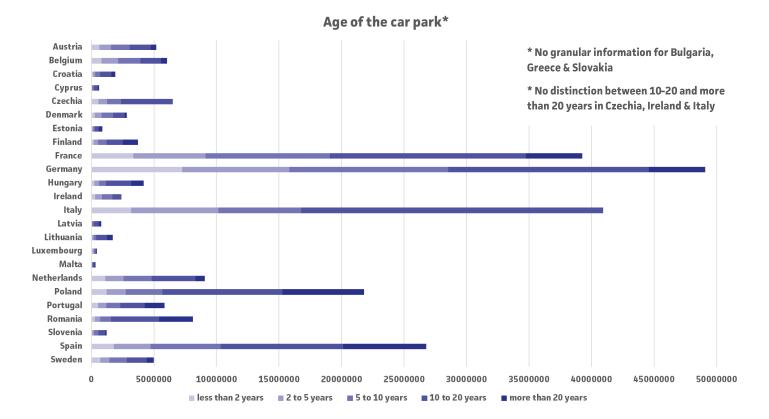
Source for the figures: Eurostat, Roland Berger

The IAM is responsible for most of the lifecycle of vehicles

The lifecycle of vehicles goes much beyond the few years necessary for the conception and the production of vehicles — a timeframe regularly decreasing. Once vehicles are sold, they are used for an increasing number of years, enter the secondary market, and at some point end up in treatment facilities for their dismantling and recycling. In other words, while automotive legislations have a short-term impact on vehicle manufacturers due to their short conception and production phases, they have a very long lasting impact on consumers and on the economic operators enabling an optimal, safe and sustainable use of the vehicle over its life time.



This is becoming increasingly important, as the average age of the car fleet is regularly increasing — and is expected to continue doing so. The vast majority of the EU car park is older than 10 years. This ageing of the car park comes with specific challenges in terms of safety and sustainability, that the IAM can address. The fact that most vehicles are no longer covered by the initial warranty from the vehicle manufacturers also results in them being largely serviced within the independent automotive aftermarket, rather than by repairers associated to vehicle manufacturers.



Source for the figures: Eurostat

2. A properly functioning aftermarket would support the sales of new cars

Several concomitant factors explain customers' reluctance to purchase new cars

Concerns about the economic situation and the purchasing cost

The overall economic situation of the European Union keeps consumers worried about the future, in particular the increase of the cost of living (in particular uncertainties around energy costs), combined with the announcement of job destruction (in particular in the manufacturing sector, including the automotive sector, despite an increase in turnovers and profit margins). In this context, important purchases, such as the one of a vehicle, are usually postponed.

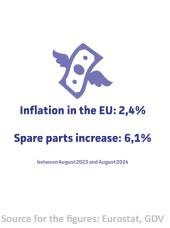
The hesitation to purchase new vehicles because of the overall economic situation is reinforced by the fact that the purchasing prices of new models have significantly increased over the recent years. Even smaller models are much more expensive than they used to be.

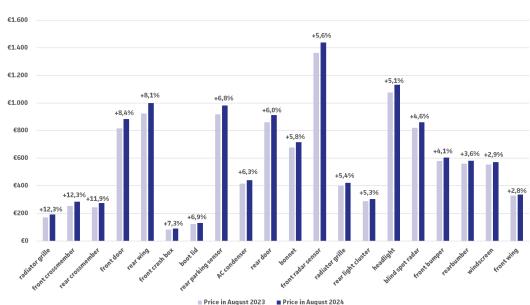
Concerns about the reliability of vehicles, and the induced high cost for repair and maintenance and low resale value

Several important scandals have severely damaged the reputation of some vehicle manufacturers, casting a shadow on the entire market. Among others, frauds related to emissions, lack of measures to ensure data privacy, and mismanagement of essential but faulty safety features, have brought bad fame to all vehicle manufacturers, instilling doubts regarding their choice between profitability and safety. Legitimate concerns for their physical safety, the safety of their data and the safety of their environment are increasingly important for consumers and can explain their hesitation as to whether they will purchase a vehicle.

Concerns have also emerged regarding the overall quality of vehicles, and the reliability of their technical promises. Important recall campaigns and doubts on the actual range of hybrid and electric vehicles, for example, have fuelled such concerns.

The issue of having to face frequent repair and maintenance operations is combined with an increasing cost of such operations. Over the last years, the prices of vehicle manufacturers' banded replacement parts for example have constantly increased faster than inflation. The price of some of these replacement spare parts have doubled over a decade, and last year alone, their price have increased by 6%. The cost and waiting period for the replacement of a full traction battery (due to its relative sensitivity to minor shocks and the current impossibility to repair its individual components) is also raising serious concerns among consumers. Also contributing to the rising cost of repair and maintenance, some vehicle manufacturers have increased the cost to access their technical information by 4.400% over five years.







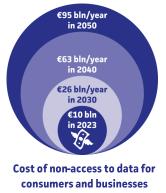
This apprehension towards numerous and costly repair and maintenance operations due to a lack of reliability of the vehicles also has a negative impact on the resale value of recent vehicles, constraining the purchase of new vehicles. While leasing and rental companies have become, by far, the main purchasers of new vehicles in the European Union, they are now revising their buying strategy. Indeed, historically, they kept their vehicles for a few years only, before selling them on the secondary market and renewing their fleet. However, the demand for relatively recent vehicles on the secondary market is plummeting (and therefore the resale value of such vehicles as well) due to the concerns mentioned here above on the frequent and expensive repair and maintenance operations required by such vehicles. By consequence, fleet operators have incurred significant losses with much lower than anticipated resale values which leads to longer vehicle holding times and more expensive vehicle financing terms for primary market purchases. Longer holding times slow the recycling rate of vehicles into the secondary market, while more expensive vehicle financing further depresses primary market demand. This creates a negative feedback loop of weakening primary and secondary market demand for EVs.

Structural issues in the aftermarket hinder IAM support for new vehicle sales

The IAM could contribute to significantly increase the confidence of consumers in new cars, if it could propose competitive, innovative and comprehensive solutions. However, IAM operators often rely on the vehicle manufacturers, which are also their competitors for the provision of aftermarket services, to get access to essential inputs enabling them to do their job. Such essential inputs include in particular granular technical information for the repair and maintenance of vehicles and of their individual components, access to in-vehicle generated technical data and functions for the provision of services such as remote diagnostics and predictive maintenance, and activation codes necessary for the correct installation of replacement parts. This dependency of IAM operators towards vehicle manufacturers fundamentally creates an unbalance of powers for the negotiation of fair deals, as vehicle manufacturers might want to keep their consumers captive, to limit competition from their competitors, or to significantly increase their profits through the provision of these essential inputs to the IAM.

Digitalisation and restricted access to vehicle data and functions

Modern vehicles rely heavily on electronic control units (ECUs), telematics, and software-driven diagnostics. Vehicle manufacturers often restrict independent access to real-time vehicle data, limiting IAM businesses' ability to conduct repairs, diagnostics, and predictive maintenance. Proprietary software, remote updates, and encryption techniques (such as secure gateways and extended vehicle concepts) further hinder competition, making it difficult for independent workshops to service newer vehicles effectively.



Source for the figures: Quantalyse

Repairability and constraints on parts availability and alternatives

Vehicle manufacturers may design vehicles with exclusive repair procedures and proprietary components, reducing the availability of compatible replacement parts for IAM suppliers. Many parts are labelled as non-serviceable or require vehicle manufacturer-specific tools and training, limiting independent workshops' ability to perform repairs. Additionally, design-for-repair restrictions, such as glued-in batteries in electric vehicles (EVs) or inaccessible electronic modules, increase dependency on vehicle manufacturer-controlled service networks. The same applies with regards to activation codes needed to perform the installation of replacement spare parts.

Market concentration and vertical integration

Vehicle manufacturers have a dominant position in the automotive sector, often leveraging their integrated supply chains, dealer networks, and authorised service centers to retain customers. Many manufacturers offer extended warranties, free servicing packages, and software-dependent features that discourage consumers from using IAM alternatives. This vertical integration limits price competition and innovation in the aftermarket sector.

3. Considerations and recommendations for a holistic EU approach

Additional comments and explanations regarding ADPA's input to the Public consultation's questionnaire

Innovation and leadership in future technologies and capabilities

The European IAM plays an important role in automotive innovation

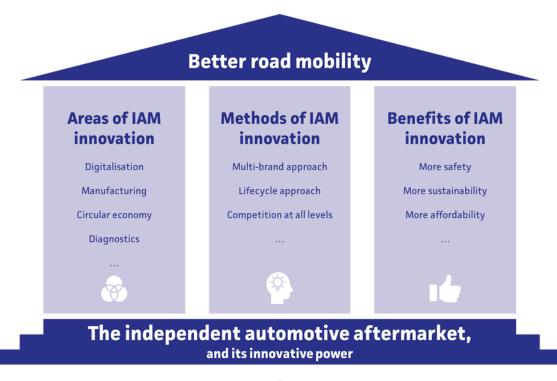
The European IAM plays a crucial role in driving innovation within the automotive sector by developing advanced repair technologies, sustainable solutions, and digital services that enhance vehicle performance, longevity, and affordability. Its contributions span across technological advancements, sustainability initiatives, and digital transformation, ensuring that independent service providers remain competitive in an evolving market.

The IAM continuously innovates by developing cutting-edge diagnostic tools, predictive maintenance systems, and even works on artificial intelligence (AI)-powered repair solutions. Independent workshops and their upstream supply chain invest in smart diagnostics, telematics, and remote vehicle monitoring, allowing for efficient troubleshooting and preventive maintenance. These advancements reduce downtime, improve vehicle reliability, and lower overall ownership costs.

A major area of IAM innovation is in remanufacturing, recycling, and eco-friendly automotive solutions. European IAM businesses lead the way in remanufacturing parts such as engines, significantly reducing waste and conserving raw materials. The sector also promotes the use of energy-efficient tires, low-emission filters, and biodegradable lubricants, contributing to the EU's decarbonisation and clean mobility goals.

The European IAM is also intending to be at the forefront of digital transformation, leveraging big data, AI, and cloud-based platforms to optimise vehicle maintenance and fleet management. Independent businesses are integrating connected vehicle services, over-the-air (OTA) updates, and telematics-based diagnostics, ensuring that they remain competitive in a software-driven automotive landscape. These innovations help customers reduce costs, improve vehicle efficiency, and enhance safety.

More generally, by exerting competitive pressure on the vehicle manufacturers and their networks, they create the right conditions for a healthy competition leading to both incremental and disruptive innovation for the servicing of vehicles over their lifetime.

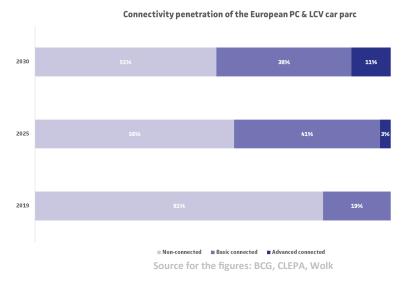




Closed systems impair the ability of the IAM to innovate

The increasing connectivity of vehicles is opening new opportunities. By 2030, around half of the car park will have some level of connectivity that includes direct data streaming, processing, and communication with outside parties. This is key to new essential services such as remote diagnostics and predictive maintenance, which are crucial to improve the safety and the sustainability of road mobility.

However, the vehicle manufacturers, even with the Data Act, still act as gatekeepers, deciding who can access which data, and under which conditions (including for which prices, and with which latency).



The incentive for them to give a fair access to such data to their competitors from the IAM is very low, and the unbalance in negotiation powers makes it difficult for the IAM to get access to what the need (a large scope of data, without undue delay, at a fair cost, without business monitoring by the vehicle manufacturers, and with the possibility to interact directly with the willing consumers). It prevents the IAM from developing and marketing innovative solutions which would improve road mobility as a whole.

Example of a use case of digital innovation currently hampered

Data publishers are currently providing "static" information on the maintenance intervals for essential components such as tyres and brake pads and disks. This static information states that these components have to be replaced after a certain mileage and/or time. But with access to the technical data generated by the vehicle, they could develop algorithms to tailormade this information for each individual vehicles, depending on its driving conditions. It means that they might advise to replace them earlier than foreseen (if the wear and tear is more excessive than theoretically planned), thereby improving the safety of road mobility. Or on the contrary, they might advise to replace them later than foreseen (if the wear and tear is less important than theoretically foreseen), thereby reducing the footprint and improving the sustainability of road mobility.

More generally, the difficulty of accessing relevant technical information (whether in-vehicle generated technical data, repair and maintenance information, diagnostic information, spare parts identification information...) makes it increasingly complex for the IAM to continue to develop multi-brand solutions addressing new technical trends, such as electric vehicles.

Clean transition and decarbonisation

The IAM plays a crucial and diverse role in the clean transition and decarbonisation of road transport

By maintaining and upgrading the existing car park, still largely composed of internal combustion engines, the IAM helps to significantly reduce emissions. Properly and regularly maintained internal combustion engines (ICEs) emit less and even require less fuel. Other anti-emission systems also perform at best only if they are regularly maintained, such as diesel particle filters, which can capture up to 95% of particles if properly cleaned. Similarly, NOx emissions from a defective selective catalyst reduction (SCR) system in a diesel passenger car are 8 to 28 times higher compared to those obtained with a functioning SCR system.



Second, the IAM supports the circular economy by extending vehicles' lifespans (through targeted repair and replacement of components) and by reducing waste (through the refurbishing and recycling of components). The IAM can also provide eco-friendly replacement parts, such as remanufactured or energy-efficient parts. This significantly helps to reduce the footprint (in terms of carbon emissions and of raw materials) of vehicles and of their components.





Source for the figures: APRA Europe

The ability of the IAM to support decarbonisation is endangered

The growing dominance of EVs and advanced powertrains requires IAM businesses to heavily invest in new skills, tools, and infrastructure. But beyond the high investment and time needed to install dedicated stations where electric vehicles would be handled, and to hire and train a workforce qualified to work on these electric vehicles, the IAM is facing specific challenges artificially restricting its ability to service EVs.

Limited access to proprietary EV battery diagnostics and software-controlled systems further complicates repairs and maintenance of EVs by the IAM. Vehicle manufacturers are not sharing essential information which would allow the repair of individual components of batteries (rather than the full replacement of batteries, which is neither economical nor ecological). They should also provide access for the IAM to the battery management system parameters to assess the battery state of health (SoH), including access to state of certified energy (SOCE) and state of certified range (SOCR) parameters.

Independent, multi-brand workshops have also legitimate concerns about the specific risks associated with electric vehicles. Electric vehicles come with specific thermic (including fire), electric and chemical hazards. Lack of precise information on the safe handling of electric vehicles and of their batteries is a major issue preventing the IAM to perform the same level of servicing for EVs as for ICEs.

By restricting competition, this lack of information – which could be easily lifted through targeted legal provisions – results in higher costs for the repair and maintenance of electric vehicles, contributing to individual and professional customers' reluctance to shift to electromobility.

Competitiveness and resilience

The IAM is a major contributor of competitiveness for the European economy, and of resilience for European society

The IAM significantly contributes to competitiveness by offering consumers and businesses an alternative to vehicle manufacturers' services. It fosters competition by providing cost-effective repair and maintenance solutions, ensuring a wider choice of parts and services. This competition drives innovation, improves service quality, and prevents monopolistic control by vehicle manufacturers. Additionally, independent repair shops and their upstream value chain contribute to market diversity and local economies.

The IAM is also an important contributor to the competitiveness of the parts manufacturers, at a time where they are facing structural challenges. While parts manufacturers sell 20% of their products to the IAM, they make 40% of their profit with it.



Source for the figures: Roland Berger

Also important, the IAM directly contributes to the resilience of local communities. Its widespread coverage of the European territory and its strong local basis allows the repair and maintenance of vehicles to be done locally and rapidly, without being too dependent on external factors, nor on remote, more centralised providers.

In terms of resilience still, the IAM's decentralised nature allows it to adapt to economic shifts, technological advancements, value chain disruption, and regulatory changes. It leverages digitalisation, such as online parts sales and remote diagnostics, to stay relevant in an evolving industry.

Commercial and technical changes have an adverse impact on the competitiveness and resilience of the IAM

However, the IAM faces key challenges that impact its competitiveness. Commercial and technical changes, either driven by consumer demand or regulatory requirement, require constant adaptation.

The resilience of the IAM itself is challenged by the rapid transition to electric and connected vehicles, requiring significant investment in new skills, tools, and infrastructure. In particular, ensuring fair access to vehicle data and repair information will be crucial for the IAM to remain a competitive and sustainable part of the automotive ecosystem. Indeed, vehicle manufacturers increasingly integrate proprietary technology, such as encrypted vehicle data and software locks, making it harder for independent providers to access necessary diagnostics and repairs.

Beyond, supply chain disruptions, rising raw material costs, and consolidation trends also pose risks to smaller IAM businesses, potentially limiting market diversity.

Trade relations and "international level playing field"

The European IAM is at the frontline of European automotive presence worldwide, much more than European vehicle manufacturers who are facing declining sales in third countries due in particular to the emergence of local competitors. The European IAM is indeed for the moment world leader for the provisions of goods and services around the repair and maintenance of road vehicles, because it benefitted until now from the appropriate regulatory framework to thrive by developing reliable, affordable and convenient multi-brand solutions.

The European IAM is particularly efficient thanks to its historic strong interdependencies and cooperations between its various components. For example, Europe-based major parts wholesalers enable European parts manufacturers to access global markets. Similarly, publishers of technical information and tools producers propose integrated solutions based on their expertise gained in the EU from a rich market of more than 40 brands of vehicle manufacturers.

Besides, by favouring repairing of components over the replacement of entire vehicles, the European IAM limits the need to import manufactured products as well as natural resources needed to manufacture them. This is a strategic benefit for the EU in these times of high dependency on a well-functioning international trade coupled with major geopolitical challenges and rapid structural changes, e.g. when it comes to access to rare earths.

To make sure that imported cars do not unduly compete with the ones produced in the EU, policymakers need to make sure that they also abide by the same rules as locally produced vehicles. A strong, pro-active enforcement of the said rules by the various relevant authorities at national and EU level is key.

Regulatory streamlining and process optimisation

European regulation is a source of unparalleled strength for the automotive sector

Legislations (and their enforcement) are key to improve consumers' confidence in increasingly complex and costly products such as vehicles, especially as safety and sustainability expectations have never been that high. The European Union has a long track record of such legislations. For example, rules on tyres and safety belts a long time ago, and more recently the Vehicle General Safety Regulation and its taking into account of the added value of advanced driver assistance systems (ADAS), have considerably improved the safety of road mobility. Similarly, the successive Euro rules (with Euro 7 as its latest form) have had a significant impact by reducing emissions of vehicles. Legislations are therefore paramount to the societal acceptance of road mobility by improving the confidence in its safety and sustainability.

Besides, European legislation has made possible for another crown jewel of the European automotive sector to shine, beside vehicle manufacturers: the independent automotive aftermarket. Rules enabling fair competition between the vehicle manufacturers and their networks on one side, and the multi-brand, independent automotive aftermarket on the other side, have enabled the emergence of worldwide champions. This is typically the case of the Members of ADPA: because there are clear provisions on access to technical information in the Motor Vehicle Block Exemption Regulation and in the Type Approval Regulation, they have been able to develop an innovative business model and are now worldwide leaders in this market with an increasing demand due to the growing complexity of vehicles. Similarly, other components of the automotive aftermarket have been able to thrive thanks to positive provisions in the existing legislation, such as parts distributors and tool producers.

European provisions on the matter are so important that they have a worldwide lighthouse effect, with many foreign operators envying their European counterparts for benefitting from such an essential regulatory support. In some cases, third countries have even adopted similar measures, re-using to a large extent the wording of the European legislation, e.g. Australia and South Africa most recently.

Enforcement, rather than deregulation, would support competitiveness

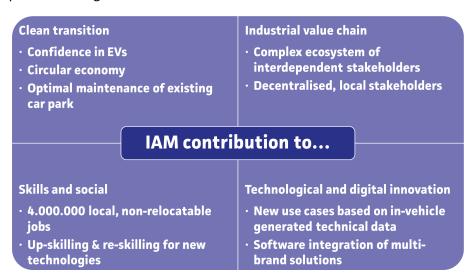
To sell in the European market, all vehicle manufacturers, whether producing their cars in the EU or importing them in the EU, have to comply with a coherent set of complementary EU legislations handling various aspects (in particular TAR, MVBER, Euro 7, ELV, Data Act...). Legislation as such has a neutral impact on competitiveness if all competitors abide by it. However, some might benefit from an undue competitive advantage if they don't follow the rules while others do. Such cases penalise the vehicle manufacturers respecting the rules as well as other stakeholders willing to develop businesses based on theoretical, legal potentialities which do not materialise in practice (with a particularly strong effect on the independent automotive aftermarket, where the ability to develop multi-brand solutions is key but is hampered if not all vehicle manufacturers follow the rules).

Enforcement, rather than deregulation, is therefore key. Public authorities, whether at EU or at national level, should forcefully use the different tools which are already available to them. Type-approval authorities, market surveillance authorities, competition authorities... all have theoretically strong investigation and correction powers under various legislations, in particular the Type Approval Regulation and the Motor Vehicle Block Exemption Regulation. When it comes to the automotive aftermarket, aftermarket provisions in the Type Approval Regulation are not details which could be overlooked. Similarly, individual infringements to the Motor Vehicle Block Exemption Regulation might have, when taken individually, a limited economic impact disqualifying them for further investigation, but put together they depict a large picture of systemic unbalance and limitation of competition, innovation and consumer choice. Enforcement mechanisms should be used in a strong, systemic and pro-active manner by the different authorities, which should impose the most deterrent possible corrective measures in case of non-compliance – including removal of type-approval and fines under competition law in the most extreme cases. Such behaviour would strongly incentivise all vehicle manufacturers to abide to the existing rules.

Additional recommendations for the Strategic Dialogue and the Action Plan

Representativity is key

The automotive aftermarket represents the immense majority of the jobs in the automotive sector and is responsible for the vast majority of the lifetime of the vehicle. Ignoring its expertise and its challenges cannot and will not result in positive developments and will not only hinder the competitiveness of our ecosystem, but also the prosperity of all those who rely on road mobility for their daily life and business. It will therefore also limit the demand for new vehicles, countering the objectives of the Strategic Dialogue and of the Action Plan. It is therefore imperative, for the Strategic Dialogue to be meaningful and for the Action Plan to be future-proof, that its representatives are rapidly, systematically and fully included in all ongoing and future discussions. Similarly, consumers and other relevant market operators (e.g. insurers) have a legitimate interest in these matters and should be duly taken into account as well. Whether it comes to clean transition, the industrial value chain, skills and social or technological and digital innovation, the four different work strands identified by the European Commission, the IAM in general, and ADPA Members in particular, have a strong expertise and specific challenges.



In a more general manner, all policy initiatives and legislative proposals coming from the European Union's institutions should closely associate the IAM from their earliest stages. As the IAM is the main provider of jobs in the automotive sector, and is responsible for the handling of vehicles for the longest period of their lifetime, better regulation cannot be achieved without the IAM's contribution.

Action cannot be delayed

Ongoing discussions should not be used as a pretext to delay any further the publication of long expected legislative proposals (e.g. a sector-specific legislation on access to in-vehicle data and functions, called for by consumers and businesses alike and whose necessity has been amply demonstrated by the European Commission itself), nor delay the revision and improvement of existing legislations (in particular the Delegated Act for the Type Approval Regulation and the Motor Vehicle Block Exemption Regulation). Many market operators – the vast majority of them –, as well as their customers, are highly dependent on serious and rapid progresses to be made on these various files to have a better legal certainty and business clarity, before rolling out new services and solutions.

Annex 1 - Used acronyms

ADAS Advanced Driver Assistance Systems

ADPA Automotive Data Publishers' Association

Al Artificial Intelligence

BCG Boston Consulting Group

ECU Electronic Control Unit

ELV End-of-Life Vehicle

EU European Union

EV Electric Vehicle

IAM Independent Automotive Aftermarket

ICE Internal Combustion Engine

JRC Joint Research Centre

LCV Light Commercial Vehicle

MVBER Motor Vehicle Block Exemption Regulation

OTA Over-the-Air

PC Passenger Car

SCR Selective Catalyst Reduction

SOCE State of Certified Energy

SOCR State of Certified Range

SoH State of Health

TAR Type Approval Regulation

Annex 2 - Selective bibliography

- ADPA, Mobility transition pathway ADPA pledge, October 2024, https://www.adpa.eu/publication/adpa-pledge-to-the-mobility-transition-pathway/
- BCG, CLEPA, Wolk, At the Crossroads: The European Aftermarket in 2030, March 2021, https://web-assets.bcg.com/36/39/e80d073a4067bfe89c7482d6db69/the-european-aftermarket-in-2030.pdf
- GDV, Untersuchung der Versicherer: Autohersteller erhöhen Ersatzteilpreise weiter, 2024, https://www.gdv.de/gdv/medien/medieninformationen/untersuchung-der-versicherer-autohersteller-erhoehen-ersatzteilpreise-weiter-182466
- Eurostat, *Passenger cars in the EU*, December 2024, https://ec.europa.eu/eurostat/statistics-explained/index.php?
 title=Passenger cars in the EU
- JRC, Access to digital car data and competition in aftersales services, June 2018, https://publications.irc.ec.europa.eu/repository/html/
 handle/JRC112634
- Quantalyse, The automotive digital transformation and the economic impacts of existing data access models, March 2019, https://www.fiaregion1.com/wp-content/uploads/2019/03/The-Automotive-Digital-Transformation Full-study.pdf
- Ricardo, *The benefits of vehicle repair and maintenance on safety and sustainability*, February 2025, https://www.adpa.eu/publication/the-benefits-of-vehicle-repair-and-maintenance-on-safety-and-sustainability/
- Roland Berger, European Independent Automotive Aftermarket Panorama From automotive aftermarket to a vehicle
 lifecycle solutions industry, October 2024, https://content.rolandberger.com/hubfs/07 presse/European%20Independent%20Automotive%
 20Aftermarket%20Panorama final.pdf



About ADPA Members

ADPA Members are worldwide pioneers and leaders for the repairability of increasingly complex goods providing aggregated, harmonised, intelligible and ready-to-use technical information for the repair, 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.

About ADPA - Automotive Data Publishers' Association

ADPA, the Automotive Data Publishers' Association, aims to ensure fair access to automotive data and information needed for servicing, repairing and maintaining road vehicles.

It advocates for international, European and national legislations maintaining and improving competition and consumers' choice in the automotive aftermarket by preventing or limiting the establishment of brand-specific monopolies.

Founded in 2016 and based in Brussels, ADPA is a Member of AFCAR, the Alliance for the Freedom of Car Repair in the European Union, and FAAS, the Forum on Automotive Aftermarket Sustainability.

