

**Proposal for a regulation on End-of-Life Vehicles**  
**Stakeholders roundtable**  
**organised by MEP Pierfrancesco Maran**

Statement

**SAFETY - SUSTAINABILITY - AFFORDABILITY**

**Patrick Lo Pinto (ADPA Board Member), Milan, 3 February 2025** - I would like to warmly thank you, MEP Pierfrancesco Maran, and your team, for inviting us today. My company, Tekné Consulting is part of a larger group, the independent automotive aftermarket (IAM), bringing together different actors of the automotive value chain, including workshops, parts distributors and parts remanufacturers: as such we have a real experience of the lifecycle of vehicles. I am also a Board Member of ADPA, the European association of the publishers of technical information and digital data needed for the repair and maintenance of vehicles over their lifetime.

First, I would like to briefly present on the importance of the IAM and the role of publishers. Road mobility is central to the daily life of citizens, to the economic activity of businesses and to the missions of public service. Road mobility is also an important expenditure for Europeans: they spend one euro out of eight on it, according to Eurostat. The car park is ageing (around 60% of the Italian car park is 10 years old or older according to Eurostat), creating specific challenges in terms of safety and sustainability. There are two solutions: either replacing the car park (but new cars are more and more expensive and/or put us in a dependency position vis-à-vis external superpowers) or ensuring that the existing car park can continue to work in optimal conditions, through reliable and affordable repair and maintenance.

It is the role of the independent aftermarket: to ensure that the safety and the sustainability of road mobility remains affordable and possible. Many actors compose this IAM: workshops and dismantling centres of course, but also all the hidden value chain enabling them to perform their job by providing them with much needed inputs. Publishers in particular play a key role. ADPA Members provide the technical information and the digital data needed for the repair, the removal, the replacement of automotive parts. We are worldwide leaders in our field, because so far we had the right legislative framework in the EU to develop our services. This regulatory framework is envied by our counterparts in other parts of the world, and often is copy-pasted, for example in Australia. We need to ensure that European legislation continues to support our ability to innovate, our competitiveness, and our worldwide leadership.

As for the ELV proposal, here is ADPA position. Our overall assessment is very positive. All in all, we very warmly welcome the proposition of the European Commission. It fully aligns with our objective to ensure the safety, the sustainability and the affordability of road mobility, benefiting consumers, businesses and society. The legislation however could be further strengthened by closing gaps with other existing legislations and by ensuring that as many operators as possible can properly contribute to the handling of end-of-life vehicles.

We have identified five main areas of improvement: strengthening access to and content of technical information; widening the range of actors contributing to the circularity of vehicles; supporting and not underestimating the role of repair and maintenance in the circularity of vehicles; accompanying the uptake of electric mobility; and reducing unnecessary delays.

Now, I would like to present some concrete examples of potential improvements.

The proposal differs in its definition of repair and maintenance operators in article 3.1.18 from other European legislations. We would highly recommend, to avoid any confusion, to stick to the latest definition from 2023, in the Motor Vehicle Block Exemption Regulation: it is very complete and covers a large spectrum of operators, making sure no one is left behind and all can contribute to the servicing of end-of-life vehicles.

We also believe that the delay for vehicle manufacturers to provide relevant technical information in article 11.1 is way too long. In the proposal, it takes 36 months from the entry into force of the legislation. But vehicle manufacturers are already supposed to have in place mechanisms to share technical information 6 months after the type-approval of their vehicle, under the Type Approval Regulation. So this delay seems unnecessary and will just hamper the provision of ELV services for 3 years.

Very often, the scope of the proposal seems to be narrowed down to the servicing of the end-of-life vehicle as a whole. In order to support other business cases and a better re-use of the components of end-of-life vehicles, we would recommend to include a reference to parts and components, wherever it is appropriate.

The provisions around electric vehicles could be reinforced to ensure that it is possible for us to work, in a safe and precise manner, not only on the battery as a whole, but also on its individual components. Access to parameters such as the state of health, the state of certified range and the state of certified energy could truly improve the reparability of the batteries, often the most fragile and the most expensive components of electric vehicles. If electric vehicles would be more repairable, consumers' confidence and demand for them could also increase.

These were just some important examples of ways the legislation could be reinforced. We are happy to discuss it further with the Members of the European Parliament, the European Commission and all relevant stakeholders.

#### **For more information**

ADPA position paper on the [proposal for an ELV regulation](#)

ADPA webpage on [sustainability](#)

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ADPA, the European Automotive Data Publishers Association, aims to ensure fair access to automotive data and information needed for the repair and maintenance of the 280 millions vehicles on European roads, contributing to their continuous roadworthiness over their lifetime. Its members design and provide competitive, innovative and multibrand solutions to operators of the automotive aftermarket. 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 for Automotive Aftermarket Sustainability.