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Apply AI Strategy

ADPA position paper

SAFETY - SUSTAINABILITY - AFFORDABILITY



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Notice

This document is the detailed position from ADPA with a view to the public consultation on the Apply AI Strategy – strengthening the AI continent.

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

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Executive summary

- ADPA supports any measure which can help the European Union to be truly a leader in Artificial Intelligence (AI). In this regard, the ambitions of the European Commission, as recently outlined, are a welcomed signal.
- ADPA considers that the automotive aftermarket, which is in charge of the roadworthiness of vehicles over their lifetime, can be a key enabler of AI-driven solutions, with a concrete and direct impact on the affordability, the safety and the sustainability of road mobility.
- However, several commercial and/or technical practices can hinder the deployment of AI solutions, or can turn AI into a problem rather than a solution.
 - Al is dependent on the availability of data, and in particular their latency, their granularity, their cost. However, in the automotive sector, vehicle manufacturers benefit from their gatekeeper position and can restrict competition.
 - Similarly, for the deployment of AI-based solutions, access to in-vehicle functions and resources is crucial. There is currently no direct and clear regulatory requirement for such access.
 - Al systems based on the free pillage of other creators' content lead to unfair competition and endanger innovation.
- For AI to truly and fully materialise and have a positive impact on European consumers and businesses, the European Union must strengthen its regulatory framework, and enforce it.
 - IPRs should be duly protected to ensure fair remuneration and accountability.
 - Access to in-vehicle data, functions and resources should be granted through different, complementary legislative instruments: the Data Act, the Motor Vehicle Block Exemption Regulation, and a sector-specific legislation.



The importance of AI for the automotive aftermarket

Al is transforming the automotive aftermarket by streamlining operations, enhancing diagnostics, and enabling smarter decision-making across the supply chain. Al therefore is rapidly becoming a cornerstone technology in the automotive aftermarket, driving innovation, efficiency, and competitiveness. Traditionally reliant on human expertise and manual diagnostics, the sector is now embracing digital transformation to keep pace with the growing complexity and connectivity of vehicles¹, tighter regulatory standards, and heightened consumer expectations. Al indeed offers new ways to manage information, anticipate needs, and deliver high-value services across the entire value chain.



Volume of connected vehicles in the European Union

Modern vehicles are increasingly data-driven, equipped with a multitude of sensors, telematics systems, and advanced driver-assistance systems (ADAS). These generate enormous volumes of data, from engine diagnostics to real-time driving behavior. AI tools can process and interpret this data far beyond human capabilities, identifying patterns and anomalies that enable faster, more accurate fault detection, preventive maintenance alerts, and real-time decision-making. For workshops and their value chain, such as publishers of technical information, providers of tools, parts suppliers and distributors, this means being proactive rather than reactive - anticipating failures before they occur and optimising service delivery. For independent operators, this levels the playing field with vehicle manufacturers who typically control proprietary data streams, putting them in a gatekeeper position and granting them a competitive advantage.

Another crucial role of AI lies in enhancing operational efficiency across the aftermarket ecosystem. Predictive algorithms can forecast demand for spare parts, schedule technician availability, and automate logistics operations. This helps reduce waste, minimize inventory costs, and ensure that the right components are available at the right time. AI can even assess external variables—such as seasonal trends, vehicle usage profiles, or regional driving conditions—to refine these forecasts further. These capabilities lead to a more responsive and resilient supply chain.

Al also supports a better customer experience, which is increasingly a competitive differentiator. Al-driven chatbots and virtual assistants can guide vehicle owners or drivers through basic diagnostics, appointment scheduling, and service updates - offering 24/7 support and reducing administrative workload on staff. Similarly, Al helps personalise customer engagement, suggesting specific maintenance actions or parts based on driving habits, previous service history, or real-time diagnostics. This fosters loyalty and trust while enhancing service quality.

Finally, AI is transforming how technical knowledge is created, accessed, and used. Repair professionals face growing pressure to stay up to date with ever-changing vehicle technologies. AI-powered training systems can deliver tailored educational content, simulate complex repairs, and adapt to a technician's skill level or prior experience. Natural language processing (NLP) allows users to search extensive documentation databases using conversational language—cutting down on time spent searching manuals and improving first-time-fix rates. For technical publishers, this means delivering information in smarter, more dynamic formats².

In short, AI is not just a tool but a strategic enabler for the automotive aftermarket. It empowers every stakeholder from technicians and parts suppliers to publishers and customers—by making complex data more actionable, operations more efficient, and information more accessible. As the industry continues to evolve, the integration of AI will be essential for long-term competitiveness and innovation.

¹ BCG, CLEPA, Wolk, At the Crossroads: The European Aftermarket in 2030, 03.2021

² More details on page 5



Opportunities and challenges for publishers of technical information

Publishers of technical information play an unknown, yet crucial role for the maintenance, repair and service of road vehicles over their lifetime. Indeed, they provide aggregated, harmonised, intelligible and ready-to-use technical information for over 280 million vehicles from more than 40 different manufacturers in a reliable, timely and affordable way. By doing so, they directly contribute to the roadworthiness, safety and sustainability of road mobility³.

For them, AI offers specific and impactful applications, such as:

- Automated content structuring and tagging: AI can categorize and structure technical documents (e.g. service manuals, wiring diagrams) automatically, making them easier to navigate and search;
- Natural language search engines: Using AI-powered search, technicians can enter everyday language queries (e.g., "Why won't my ABS light turn off?") and receive relevant technical documents or repair procedures;
- Multilingual translation and localisation: Neural machine translation allows real-time, context-sensitive translation of technical content, helping publishers localise documentation for global markets with high accuracy;
- Intelligent content summarisation: Long documents can be condensed automatically to highlight critical procedures or common fault patterns, aiding quicker decision-making on the shop floor;
- Predictive content recommendations: Based on vehicle data, past usage, or common repair patterns, AI can suggest the most relevant documents or updates before technicians even search for them;
- Voice-activated assistants for documentation access: Technicians can retrieve repair instructions hands-free through voice commands, improving efficiency and safety during vehicle servicing;
- Enhanced search and accessibility: AI-powered search engines using semantic understanding allow technicians to find repair procedures or wiring diagrams using conversational language or voice input, removing friction and boosting first-time-fix rates;
- Error detection and consistency checks: AI tools can scan large sets of technical data to find inconsistencies, outdated procedures, or errors in technical documentation

However, in order to fully benefit from the potential of AI, a number of challenges must be addressed:

Data quantity and quality: Al's effectiveness depends on high-volume, high-quality data. However, vehicle manufacturers have put in place proprietary telematics systems, putting them in a gatekeeper position and enabling them to effectively control competition by setting the technical and commercial conditions for third-parties to have access to in-vehicle data (eventhough these vehicles don't belong to them anymore). This can impact the granularity, the latency and the cost, among other parameters, of available data, with a dramatic financial impact not only on the ecosystem of the independent automotive aftermarket, but also on end-consumers⁴.



 Intellectual property rights (IPRs): As AI ingests and processes large volumes of technical data, questions arise about IPRs ownership - especially when content is not clearly

licensed back to the producer of the technical data, be it the vehicle manufacturers or the data publishers. There is a serious risk that content creators can be deprived of the just remuneration they deserve, with AI-based systems potentially impairing fair competition.

- Bias and hallucination risks: Al-generated content, especially when produced with large models, can sometimes be incorrect or misleading ("hallucinations"). For safety-critical information, this presents legal and operational risks that require rigorous human validation.
- Deployment: Deploying AI tools into existing content management systems (CMS), databases, or publishing
 platforms may require significant investment and technical adaptation. Similarly, training staff (on both ends: within
 the data publishers, and within their customers) is crucial to adoption and trust. An efficient deployment of AI tools
 will therefore require significant investments in infrastructures and in upskilling or reskilling the workforce.

³ Ricardo, *The benefits of vehicle repair and maintenance on safety and sustainability*, 13.02.2025

⁴ Quantalyse & Schönenberger Advisory Services, *The automotive digital transformation and the economic impacts of existing data access models*, 03.2019



Key recommendations for AI to support European competitiveness

Protecting content creators

A well-designed public strategy on AI must strike a balance between enabling innovation and ensuring that creators are respected, credited, and fairly compensated. Protecting IPRs isn't just a legal formality - it is a foundation for building ethical, inclusive, and sustainable AI ecosystems that foster trust, innovation, and long-term value for all stakeholders. By protecting adequately content creators, European Union's AI strategy would:

- Encourage innovation and investment: Content creators including publishers, developers, and technical experts invest time, expertise, and resources in producing high-value content. Without strong IPR protection, there is little
 incentive for organisations to continue producing original, high-quality materials. If AI systems can freely use or
 replicate their work without compensation or attribution, it discourages future investment in content creation,
 undermining the very ecosystem that fuels AI development.
- Prevent uncompensated exploitation: AI models are often trained on vast corpora of text, images, code, and other media, much of which originates from copyrighted or proprietary sources. If public AI strategies allow unrestricted data scraping or derivative content generation without safeguarding the rights of original authors, this leads to uncompensated exploitation. Content creators are effectively subsidising AI development without benefit or control, which is both ethically and economically unfair.
- Maintain quality and accountability: Intellectual property protections are closely tied to accountability and traceability. When AI systems generate content derived from human-created sources, it becomes difficult to trace the origin of ideas, facts, or technical procedures, especially in regulated sectors like automotive repair. Upholding IPRs ensures that creators remain identifiable and responsible for their contributions, which helps preserve content quality, trust, and safety.
- Support economic equity: IPRs ensure that smaller players, such as SMEs, can benefit from their work and compete
 on more equitable terms. Without protections, large AI developers or platforms could monopolise the value chain by
 harvesting and monetising content created by others, reinforcing market imbalances and limiting diversity in content
 and perspectives.

Appropriate regulatory measures in relevant legal instruments, in particular on IPRs, must therefore be taken.

Grant access to data, functions and resources

European Union's strategy on AI should take into consideration the need to grant access to in-vehicle data, functions, and resources for independent operators in the automotive aftermarket. It is essential to create an open, fair, and dynamic mobility ecosystem. By accelerating the development and deployment of AI-driven solutions, it would empower consumers, support competition, and contribute to broader public policy goals, ranging from road safety and sustainability to digital innovation and industrial resilience. Without such access, the full potential of AI in mobility will remain constrained by structural gatekeeping and unequal power dynamics. By taking the need for an undistorted access to in-vehicle data, functions and resources, European Union's AI strategy would:

- Enable fair competition and innovation: Access to in-vehicle data is a prerequisite for independent operators, including AI developers to innovate. Without such access, vehicle manufacturers retain exclusive control over key vehicle functions, diagnostics, and user interfaces, creating a closed ecosystem. Granting equitable access ensures that third parties, such as repairers and their value chain, including operators providing AI-enabled services, can develop advanced tools, predictive maintenance solutions, and driver assistance applications. This spurs innovation, supports SMEs, and prevents monopolistic control over the connected car environment.
- Empower consumers with digital ownership: Vehicles increasingly rely on data to deliver services, from navigation
 and energy efficiency to safety and comfort. Yet consumers often lack control over this data, even though it
 originates from their own products, driving behavior and choices. The European Union should ensure consumer
 digital sovereignty, allowing vehicle users and/or owners to choose who can access their data, what services they
 want, and which providers they trust. This is consistent with fundamental principles such as data portability and user
 consent (e.g. under the GDPR and the Data Act).



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 want, and which providers they trust. This is consistent with fundamental principles such as data portability and user
 consent (e.g. under the GDPR and the Data Act).
- Advance Al-driven mobility solutions: Al systems require large volumes of real-world data to train models, adapt to
 changing conditions, and deliver intelligent services. In-vehicle data, in particular performance and sensor
 information, provides a valuable source of insights for developing applications such as predictive diagnostics, driving
 behavior analysis, insurance risk modeling, and autonomous features. On the contrary, limiting access to this data
 restricts the development and deployment of Al-driven innovations, including those that could improve energy
 efficiency, sustainability, and urban mobility.
- Improve the safety and sustainability of road mobility: Granting access to real-time vehicle data and functions
 allows third parties to develop tools that improve safety and reduce the environmental footprint of vehicles. For
 example, AI-powered platforms can detect mechanical issues early, suggest safer driving practices, or optimise
 engine performance. With broader access, these tools can be integrated across a wide range of vehicles and service
 providers, enhancing road safety and contributing to environmental goals (in particular in terms of emissions and
 circular economy).
- Support Europe's technological sovereignty and leadership: From a strategic perspective, enabling regulated access
 to in-vehicle data and functions reduces dependency on proprietary systems controlled by a few global
 manufacturers. It allows European or national ecosystems to thrive by fostering local innovation, supporting tech
 startups, and building digital capabilities that align with public values and strategic autonomy—especially in critical
 areas like transport, AI, and cybersecurity.

For the European Union's AI strategy to be successful, it therefore means that adequate legislative measures must be taken. In particular:

- The Data Act must be accompanied by appropriate guidance ensuring that the independent aftermarket can access
 all relevant in-vehicle data points for performing their role, including for the development of AI solutions. Such
 guidance should also ensure that the latency, the granularity and the cost of these data points are not deterrent and
 making them irrelevant.
- The Motor Vehicle Block Exemption Regulation (MVBER) and its Supplementary Guidelines (SGL) should be
 maintained and modernised beyond 2028⁵ in order to give the right competition law instrument for independent
 aftermarket operators to compete with vehicle manufacturers, including for AI-based services and products. In
 particular, access to in-vehicle functions and resources should be granted to the independent aftermarket in order to
 be able to not only develop, but also deploy innovative, alternative and competitive offers.
- A sector-specific legislation on access to in-vehicle data, functions and resources should complement the Data Act (which can not address in-vehicle functions and resources) and the MVBER (which deals with the issue under a competition perspective but doesn't provide practical requirements). Such a legislation, called for by an overwhelming majority of businesses and consumers⁶, and whose needs has been acknowledeged by the Joint Research Centre⁷, has been repeatedly delayed by the European Commission. It is time to move forward with it.

Without such measures, the AI strategy of the European Union will not have a material, positive impact in the automotive aftermarket, despite it being one of the sectors where the potential of AI is the strongest and where it could have the most benefitial impact for innovation, competitiveness and consumers.

⁵ ADPA, *Position Paper on the MVBER*, 23.05.2025

⁷ Joint Research Centre, Access to digital car data and competition in aftersales services, 09.2018



⁶ ADPA & others, *Europe's Consumers, Independent Automotive Service and Mobility Providers rally for urgent Commission action on vehicle data legislation,* 01.2024

Annex 1 - Used acronyms

- ABS Anti-lock Braking System
- ADAS Advanced Driver Assistance System
- ADPA Automotive Data Publishers' Association
- AI Artificial Intelligence
- **CMS** Content Management System
- **GDPR** General Data Protection Regulation
- IPRs Intellectual Property Rights
- **MVBER** Motor Vehicle Block Exemption Regulation
- NLP Natural Language Processing
- SGL Supplementary Guidelines
- **SMEs** Small and Medium Enterprises



Annex 2 - References

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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.

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