

Proposal for a regulation on End-of-Life Vehicles
Hearing with stakeholders
organised by MEP Pierfrancesco Maran

Statement

SAFETY - SUSTAINABILITY - AFFORDABILITY

Pierre Thibaudat (ADPA Director General), Brussels, 19 March 2025 - ADPA is the association of publishers of automotive technical information and data used for the repair and maintenance of vehicles, the removal and replacement of parts, and the recycling of end-of-life vehicles. We would therefore like to warmly thank Member of the European Parliament Pierfrancesco Maran for adopting a comprehensive overview and giving the floor to the very crucial, yet largely unknown, stakeholders active in the automotive aftermarket, and which are responsible for the vast majority of automotive jobs and the vast majority of the lifecycle of vehicles.

All in all, ADPA warmly welcomes the proposition of the European Commission and the draft report of the European Parliament. It fully aligns with ADPA's 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 avoiding legal uncertainties. There are three main practical ways to secure the objectives of the ELV regulation while avoiding legal discrepancy with other European pieces of legislation.

The first easy fix is the scope and definition of relevant operators. The proposal differs in its definition of repair and maintenance operators in article 3.1.18 from other European legislations. ADP highly recommends, 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.

The second easy fix is about the delays. ADPA considers 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 under the Type Approval Regulation, vehicle manufacturers are already supposed to have in place mechanisms to share technical information 6 months after the type-approval of their vehicle. So this delay seems unnecessary and will just hamper the provision of ELV services for 3 years.

The third crucial fix is about the notion of fees contained in article 13.2. ADPA considers it is legitimate for vehicle manufacturers to be compensated against the cost occurring from a legal obligation that is placed on them against their interests. While they can be put under an obligation to share their information, they should not be asked to do so at a financial loss, either. This would be the case if access would be entirely for free. At the same time, ADPA also considers that they shouldn't unduly profit from this obligation, nor be in a position to distort competition by imposing untransparent fees. This indemnification principle, preserving everyone's interest, has been a constant and balanced principle of European legislation. ADPA therefore strongly supports the definition of a fee which would cover the sheer cost of granting access to the information – not of building this information database.

Those were just some high-level elements. One could also mention the necessity to provide additional information on batteries, and the necessity to make sure that the legislation doesn't only address the vehicle as a whole, but allows additional use cases by referring to parts and components. ADPA of course remains available to discuss it further with any interested party.

For more information

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