



Ursula von der Leyen
President of the European Commission
Rue de la Loi - 1049 Brussels

Brussels, 11th of October 2024

Dear President von der Leyen,

On behalf of the consumers and businesses represented in our Independent Service Providers (ISPs) group, we extend our warm congratulations on your new term as President of the European Commission. We wish you every success over the next five years, which will be a critical time for Europe's citizens, its economy, and collective security.

You have set out a clear and compelling mission for your Commission: doing everything possible to enhance EU competitiveness. We fully support this focus. It is vital that the EU leverages every available tool to strengthen the competitive position of European businesses, both large and small, as they navigate the twin transition of digital and green economies, and face increasing competition from outside the EU.

As you may recall from our previous correspondence, a persistent barrier to competitiveness continues to exist in the European data-driven vehicle services market. Despite promising projections from several respected forecasters, including the Commission's own Impact Assessment, this market has underperformed in recent years. Fundamentally, competitiveness in this sector hinges on fair access to vehicle-generated data. The companies represented by the 10 ISP associations cannot compete effectively without access to this critical raw material – vehicle generated data.

This is a systemic issue, long recognised and evidenced by the Commission's Services. In your letter from 5 April 2023, you confirmed that the Commission would propose legislation to address this issue by the end of the year. The proposal was drafted following extensive consultation with relevant stakeholders and was backed by fact-based evidence from several studies led by various DGs, including the JRC. It even received a positive opinion issued by the Regulatory Scrutiny Board on its impact assessment. However, we understand that the timing of the European elections prevented the previous Commission from adopting this proposal. **We now urge you to bring forward the already-prepared proposal on access to in-vehicle data, functions, and resources as part of your first 100 days' plan. We are ready to collaborate**

with you and your Services to support this critical initiative for competitiveness in the European automotive and mobility sectors.

It is essential to promote competition for all stakeholders in the automotive and mobility services market. However, it must be emphasised that the Data Act does not resolve the specific issues related to vehicle architecture, which is governed by the Type Approval Regulation. It neither resolves the systemic competition problem in our sector, nor provides the legal basis for economic investments in data-based services using in-vehicle generated data. The Data Act itself envisages complementary sector-specific legislation to allow fair access to vehicle-generated data and to unlock the full potential of the data-driven economy in support of the automotive sector's competitiveness.

While we appreciate your Commission's efforts to reduce and simplify regulation where possible, this must not lead to deregulation. In this case, complementary regulation is indispensable to remove barriers to competition and foster investment in services that utilise in-vehicle data. History has shown that enabling regulation – such as in aviation, rail, telecommunications, and energy – has brought significant benefits to European consumers and businesses alike.

With unfettered access to vehicle-generated data, our member companies are poised to invest in innovative services, create new jobs, and enable European citizens and businesses to benefit from safer, smarter, more sustainable, and affordable mobility solutions. In short, they will drive competitiveness, economic growth, and employment. The daily movement of people, goods, and services is, after all, a vital enabler of the European economy.

Your sincerely,

The Undersigning Associations and Company

ADPA – AIRC - CECRA - CLEPA – EGEA – ETRMA – FIA Region I – FIGIEFA – Insurance Europe – Leaseurope

Cc. Kerstin Jorna, Director-General of Directorate-General for Internal Market, Industry, Entrepreneurship and SMEs

	<p>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 millions vehicles on European roads, contributing to their continuous roadworthiness over their lifetime and ensuring road mobility remains safe, sustainable and affordable. Its members design and provide competitive, innovative and multibrand solutions to operators of the automotive aftermarket. Contact: Pierre Thibaudat - Director General - pierre.thibaudat@adpa.eu- tel: +32 2 761 95 18.</p>
	<p>AIRC - stands for Association Internationale des Réparateurs en Carrosserie. Formed in 1970, the AIRC is the global federation of leading national organisations in the area of vehicle repairs. These member organisations together represent more than 50,000 vehicle repair and vehicle builder companies in many countries. Contact: Thomas Aukamm - Managing Director - aukamm@z kf.de - tel: +49 6031 79479-0.</p>
	<p>CECRA- the European Council for Motor Trades and Repairs- is the European Federation representing the interests of the motor trade and repair businesses and European Dealer Councils on behalf of vehicle dealers for specific makes. Its aim is to maintain a favourable European regulatory framework for the enterprises of motor trade and repair businesses it represents. Contact: Bernard Lycke- Director General- Bernard.lycke@cecra.eu- tel: +32 2 771 96 56.</p>
	<p>CLEPA- the European Association of Automotive Suppliers, represents over 3,000 companies supplying state-of-the-art components and innovative technologies for safe, smart, and sustainable mobility. CLEPA brings together over 120 global suppliers of car parts, systems, and modules and more than 20 national trade associations and European sector associations. CLEPA is the voice of the EU automotive supplier industry linking the sector to policy makers. The automotive sector accounts for 30% of R&D in the EU, making it the number one investor. European automotive suppliers invest over 30 billion euros yearly in research and development. Automotive suppliers register over 9,000 new patents each year. Automotive suppliers in Europe generate 1.7 million direct jobs. Contact: Benjamin Krieger - Secretary General - b.krieger@clepa.be- tel: +32 2 743 91 30.</p>
	<p>EGEA- the European Garage and Test Equipment Association represents both manufacturers and importers of tools and equipment for the repair, servicing and technical inspection of vehicles, as an integral part of supporting the automotive industrial value chain. Its role is to ensure that its associations' members can provide the best equipment and service to the automotive aftermarket by striving to keep members up-to-date concerning new vehicle technologies and legislative and standardisation requirements and thus be competitive in the garage and test equipment supply, service and calibration industry. Contact: Marcin Barankiewicz - Secretary General - sg@egea-association.eu - tel: + 32 499 39 04 59</p>
	<p>ETRMA is the voice of tyre and rubber goods producers to various European institutions. ETRMA activities focus on the following key interdependent areas: representation, co-ordination, communication, promotion and technical liaison. The primary objective of ETRMA is to represent the regulatory and related interests of the European tyre and rubber manufacturers at both European and international levels. ETRMA is the sole interlocutor, specifically designated by the European tyre and rubber producers to carry out this critical</p>

	<p>task. Contact: Adam McCarthy- Secretary General- a.mccarthy@etrma.org - tel: + 32 2 218 49 40.</p>
	<p>FIA Region I Founded in 1904, the Fédération Internationale de l'Automobile (FIA) brings together leading national motoring organisations from 146 countries worldwide and is the governing body for world motor sport. The FIA Region I office, based in Brussels, is a consumer body comprising 100 Mobility Clubs that represent over 36 million members from across Europe, the Middle East and Africa. Contact: Laurianne Krid- Director General- lkrid@fia.com- tel: +32 (2) 282 08 18.</p>
	<p>FIGIEFA is the international federation of independent automotive aftermarket distributors. Its members represent independent distributors and wholesalers of automotive replacement parts and components and their associated repair chains. The 30,000 companies represented employ over 375,000 people in Europe in their 46,000 outlets, spread across Europe. Many of these companies are SMEs. FIGIEFA's aim is to maintain free and effective competition in the market for vehicle replacement parts, servicing and repair. Contact: Sylvia Gotzen- CEO- sylvia.gotzen@figiefa.eu- tel: +32 2 761 9510.</p>
	<p>Insurance Europe is the European insurance and reinsurance federation. Through its 37 member bodies — the national insurance associations — it represents all types and sizes of insurance and reinsurance undertakings. Insurance Europe, which is based in Brussels, represents undertakings that account for around 95% of total European premium income. Insurance makes a major contribution to Europe's economic growth and development. European insurers pay out over €1 000bn annually — or €2.8bn a day — in claims, directly employ more than 920 000 people and invest over €10.6trn in the economy. Contact: Nicolas Jeanmart- jeanmart@insuranceeurope.eu - +32 485 893031.</p>
	<p>Leaseurope - the European Federation of Leasing Company Associations- represents both the leasing and automotive rental industries in Europe. The scope of products covered by Leaseurope members' ranges from hire purchase and finance leases to operating leases of all asset categories (automotive, equipment and real estate). It also includes the short-term rental of cars, vans and trucks. Contact: Richard Knubben - Director-General - r.knubben@leaseurope.com- tel: +32 2 778 05 68.</p>