

Final response to EC consultation on the future of the automotive industry

(1) To what extent do you agree that the themes as identified in the [concept paper](#) for the Automotive Strategic Dialogue should figure in the EU industrial action plan for the automotive sector?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	No opinion
*Innovation and leadership in future technologies and capabilities	X					
*Clean transition and decarbonisation	X					
*Competitiveness and resilience	X					
*Trade relations and "international level playing field"		X				
*Regulatory streamlining and process optimisation	X					

(2) Are there additional themes that should be added to the upcoming EU industrial action plan for the automotive sector? If so, please list them with a short explanation why. 3000-character(s) maximum

Innovation and fair competition in data-driven services

Access to in-vehicle data, functions and resources for third-party service providers can support innovation and enable the aftermarket to develop new, competitive services that benefit consumers and drive progress in the sector. As such, sector-specific legislation on access to in-vehicle data, functions and resources could help promote a more dynamic and competitive ecosystem.

From an insurance industry perspective, direct access in real-time to vehicle data, functions and resources would enable insurers to promote safer and more sustainable driving through tailored insurance solutions like "pay-how-you-drive" policies, which reward responsible driving and reduce accidents. It would also help advance sustainability goals by encouraging lower-emission driving behaviour.

Furthermore, the rise of autonomous and connected vehicles presents new risks that insurers need to understand to develop effective coverage. Without access to in-vehicle data, assessing liability, accurately pricing risk and insuring next-generation vehicles will be significantly more challenging.

Data transparency and consumer rights

Access to in-vehicle data, functions and resources for third-party service providers is equally important to ensure that consumers are aware of how their data is used. Clear transparency measures could give



consumers greater control over their data. This includes the ability to opt-in or opt-out of data sharing and to choose which third parties can access their data.

Cross-sector collaboration and standards

A focus on cross-sector collaboration could be a theme, notably to address how different industries, including insurance, repair services, fleet management and OEMs, can work together to create common standards for data access. These standards would reduce barriers to entry for new services and increase interoperability.

Cybersecurity standards

With the increasing digitalisation of vehicles, it is paramount that any new legislation also focuses on robust cybersecurity standards and data protection frameworks. Sector-specific legislation should mandate strong security protocols when accessing or sharing data to avoid compromising consumer safety. Manufacturers should be required to meet these standards to ensure a safe environment for data-sharing and innovation.

(3) Do you have any other comments or remarks as regards the EU industrial action plan for the automotive sector? 3000-character(s) maximum

In line with the theme "Regulatory streamlining and process optimisation", sector-specific legislation (SSL) on access to in-vehicle data, functions and resources could ensure that all relevant provisions are included within one initiative, which is tailored to the automotive sector's needs. Such an approach would enhance clarity, make compliance simpler and support innovation and competition in the automotive sector.