

# FIGIEFA's Position on the European Commission's Initiative to Decarbonise Corporate Fleets

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FIGIEFA, the **European Federation of Automotive Aftermarket Distributors**, calls upon the European Commission to ensure that the upcoming legislative proposal to decarbonise corporate fleets, expected by the end of 2025, will be designed to reflect the existing business models and supply chains within the mobility ecosystem. While FIGIEFA and its members strongly support the EU's climate neutrality objectives, the accelerated uptake of zero-emissions vehicles (ZEVs) in corporate fleets could present an important challenge for our sector and the success of such a proposal will strongly depend upon establishing the necessary enabling conditions to preserve the competitiveness of the Automotive Aftermarket.

## 1. FIGIEFA's Role in the Mobility Ecosystem

As the united political voice of independent parts retailers, wholesalers, and their associated repair networks, FIGIEFA represents a vital sector in the **value chain of the automotive industry**. Our 20,000 wholesale companies, with 32,000 outlets and 330,000 employees, supply replacement parts, multi-brand tools, training and technical information to over 300,000 independent and authorised workshops across the EU every day.

Independent parts wholesalers operate **extensive sales and delivery fleets** as part of their services. These fleets ensure the rapid provision of spare parts to workshops multiple times a day based on customer demand for a rapid return of their vehicles after servicing or repair. This entails travelling per day hundreds, and yearly often up to thousands of kilometres, throughout a European supply network. These fleets form the backbone of the daily operations of FIGIEFA members and are key to enabling the rapid repair, maintenance, and safety of the 280 million vehicles on EU roads.

Independent parts distributors play an integral role in the automotive industry by sustaining road-based mobility and multi-brand services. Our sector acts as a key enabler for the **competitiveness of the European automotive industry**, by increasing, as an example, the uptime of 24 million vehicles in commercial fleets in the EU, saving them 230 million hours of service time per year.<sup>1</sup> Through fast, cost-effective repair and maintenance, we also contribute to more affordable and sustainable transport across the EU.<sup>2</sup>

## 2. Impact of Decarbonising Corporate Fleets on FIGIEFA Members

In this context, the Commission's initiative to green corporate fleets, and the proposed mandatory EV quotas suggested by some stakeholders, would have a significant impact on our members' business activities.

Our member's fleets typically include various vehicle types to meet different operational needs, such as passenger cars or light-duty vehicles (LDVs) for sales staff and both light- and heavy-duty vehicles (HDVs) for transport and logistics. For our sector's business models, **using ZEVs for long-distance, heavily loaded and high-frequency journeys is currently unfeasible**. Blanket quotas requiring a fixed percentage of electric vehicles would not account for these operational realities and could create unworkable constraints for businesses.

Any initiative undertaken by the Commission should therefore carefully consider and assess the variety of business models and vehicle types across different fleets. Applying uniform benchmarks could lead to disruption for the operations of specific businesses. We advocate for **targeted flexibility and an exemption for LDVs and HDVs** from mandatory ZEV uptake requirements, particularly given the limited availability of suitable vehicles that meet operational demands and the absence of the necessary enabling conditions. It is also important to highlight the significant additional capital expenditure required for investing both in more expensive vehicles (BEV vans and passenger cars) and in charging infrastructure, where feasible. As any private company, parts wholesalers must carefully consider the return on such investments, which is far too uncertain today.

For the wholesale and distribution sector, FIGIEFA members have expressed the following challenges in the transition to zero-emission fleets:

- **Lack of charging infrastructure:** For businesses in rural or semi-urban areas, charging points are scarce and make EVs impractical, especially for sales staff who take vehicles home. Some companies also lack space on their premises to install EV charging points.
- **Longer charging times and increased downtime:** Charging times of 2-3 hours can be a major contributor to operational inefficiencies. This limits the daily kilometres covered due to charging needs, and results in a loss of productivity for businesses.
- **Insufficient vehicle range and loading capacity:** Current EVs on the market, particularly electric LDVs, cannot meet the operational and payload demands of distributor's daily routes. Long shifts of up to 12 hours would require frequent recharges and route changes in rural areas.
- **High costs for SMEs:** The purchase price of EVs and cost of charging point installation is particularly burdensome for SMEs. Substantial upfront investment would be needed for infrastructure and fleet expansion, particularly at a time when businesses are already facing challenges regarding logistics costs.

To support a successful transition, addressing these challenges related to infrastructure, cost, and operational needs is therefore critical. Without these conditions in place, it is essential that the European Commission recognises how forced targets for ZEVs uptake in corporate fleets could cause **significant disruption to the entire mobility and transport ecosystem**. Ultimately, they could lead to severe repercussions for the automotive aftermarket value chain, for consumers, and the competitiveness of European businesses.

### 3. Unlocking EVs demand by ensuring repairability

In addition to ensuring enabling conditions, other key factors should be considered to accelerate the uptake of ZEVs, particularly in areas where the automotive aftermarket could **build consumer trust in EVs**. Today, purchasing decisions are influenced by a range of “confidence factors”. Both consumers and businesses need assurance that driving and maintaining an EV is as affordable and reliable as an internal combustion engine (ICE) vehicle.

However, the decline in residual values, consisting of the difference between a vehicle’s original purchase price and its resale value, is one of the factors discouraging consumers and businesses from buying EVs on the primary market. This is primarily due to concerns over significant depreciation and financial loss but also hinges on the **lack of confidence in the repairability and maintenance of EVs**. The repair of an EV is up to 25% more expensive than that of an ICE vehicle,<sup>3</sup> due to the replacing of batteries after accidents instead of repairing but also in light of the use in EVs of materials like aluminium and carbon fibre for vehicle light-weighting, which are more expensive and harder to repair. Another deterrent is the longer downtimes needed for EV repairs, requiring on average 3.04 hours compared with 1.66 hours for ICE vehicles.<sup>4</sup> This largely stems from the lack of adequate facilities<sup>5</sup>, skilled labour, access to spare parts and repair information for workshops.

**By enabling long-term and cost-effective repairability**, FIGIEFA argues that the automotive aftermarket value chain can mitigate the low residual values of EVs and make them a more attractive investment, while playing an essential role in the creation of a healthy second-hand market. This, in return, can stimulate demand on the primary market. However, the automotive aftermarket cannot currently deploy its full potential in the provision of EV parts or in the servicing, maintenance and repair of EVs due to the absence of clearly defined rules ensuring the repairability of EVs.

In light of the above, FIGIEFA believes that a crucial enabling condition for the uptake of EVs is to establish a **sound regulatory framework that ensures full repairability**. This includes access to technical information for the maintenance and repair of EVs, as well as access to traction battery-generated data for diagnostics and repair.

## 4. Recommendations

FIGIEFA urges the European Commission to address the concerns raised in this position paper to support a successful transition towards greener corporate fleets. To achieve this, FIGIEFA recommends the following actions:

- **Exempt LDVs and HDVs from mandatory ZEV quotas:** imposing forced requirements for these vehicle types would cause significant disruption to businesses and is currently unviable due to the limited availability of suitable vehicles for meeting existing operational demands. A targeted exemption is therefore needed to preserve business continuity and industrial competitiveness.
- **Ensure the necessary enabling conditions to incentivise voluntary uptake:** improve access to public and private charging infrastructure for ZEVs, while also reinforcing the EU's energy grid preparedness. Introduce financial incentives, particularly for SMEs, and guarantee policy clarity and long-term predictability.
- **Enable the reparability of EVs:** improve the legal framework for the comprehensive and affordable reparability of EVs for businesses and consumers – this will boost the primary market and help the creation of a second-hand market for EVs.
- **Conduct a thorough market study and impact assessment:** the Commission should respect the Better Regulation principle, including SME and competitiveness check, and perform an in-depth analysis to ensure that policies put forward in the expected legislative proposal are realistic, proportionate, and supported by market evidence.
- **Adopt a technology neutral approach:** legislation should remain open to all low- and zero-emissions technologies, including hydrogen and sustainable fuels, to account for differing operational needs and regional infrastructure readiness, as set out in Commission President's Political Guidelines.

FIGIEFA is committed to ensuring that mobility in Europe becomes more sustainable and circular. However, this should not come at the cost of businesses, supply chains and essential services. Failure to adopt a holistic approach for this initiative could ultimately result in the decline of the EU's industrial competitiveness.

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<sup>1</sup> Roland Berger, *European Independent Automotive Aftermarket Distributors: From Automotive Aftermarket to Vehicle Lifecycle Solutions Industry* (2024). Available at: [https://content.rolandberger.com/hubfs/Q7\\_presse/European%20Independent%20Automotive%20Aftermarket%20Panorama\\_final.pdf](https://content.rolandberger.com/hubfs/Q7_presse/European%20Independent%20Automotive%20Aftermarket%20Panorama_final.pdf)

<sup>2</sup> Ibid.

<sup>3</sup> German Insurance Association, *Insurers criticise high repair costs for electric cars* (2024). Available at: <https://www.gdv.de/gdv-en/media/insurers-repair-costs-electric-cars-182684>

<sup>4</sup> Mitchell, *Plugged-In: EV Collision Insights Q1 2024*. Available at: <https://www.mitchell.com/insights/auto-physical-damage/article/plugged-in-ev-collision-insights-q1-2024>

<sup>5</sup> Uncertainty about the condition of batteries after accidents often leads to more cautious and expensive repair decisions, like quarantining vehicles or even submerging them in water as a fire precaution.