



## **UEIL position paper on the implementation and enforcement of Chapter XIV of the Repair and Maintenance Regulation**

It is the mission of the Union of the European Lubricants Industry to represent and defend the interests of the independent lubricant operators in Europe. In this framework, UEIL seeks to protect the level-playing field in the automotive aftermarket, support consumer choice, and speak up when members and smaller businesses are prevented from accessing data they are legally entitled to access.

Chapter XIV of Regulation (EU) 2018/858, also known as the RMI/Repair and Maintenance Information Regulation, explicitly requires manufacturers to provide independent operators with unrestricted, standardised, and non-discriminatory access to repair and maintenance information, which is essential to maintain effective competition in the automotive aftermarket and ensure consumer choice and safety.

On two separate occasions, on 17 February 2022 and 16 February 2023, the European Commission confirmed that technical specifications regarding lubricants fall under the scope of the definition of 'Vehicle Repair and Maintenance Information.' Hence, the right for independent operators to obtain access to RMI includes access to technical specifications of lubricants to be produced and used for the maintenance of motor vehicles.

In practice, despite the unequivocal provisions established by the Regulation, UEIL members frequently report issues regarding significant challenges and delays to access RMI from Original Equipment Manufacturers (OEMs).

Moreover, the national Type Approval Authorities to which complaints have been filed are reluctant to effectively enforce these provisions and unwilling to take any appropriate action or sanction against the OEMs concerned, notwithstanding the clarifications given by the Commission.

Such inaction creates an unlevel playing field, especially for independent operators and SMEs, and ultimately harms European consumers by restricting competition, raising repair costs, and impairing vehicle safety and environmental compliance.

UEIL has actively raised these issues with the Commission on several occasions, notably during the meeting of the Motor Vehicle Working Group on 15 December



2022, in a meeting with the responsible unit at the Commission's Directorate-General for Internal Market, Industry, Entrepreneurship and SMES on 27 November 2023, by a letter of complaint addressed to that unit on 14 January 2025, and by a letter addressed to the Commission's Executive Vice-President for Prosperity and Industrial Strategy, Stephane Séjourné, on 10 June 2025.

Unfortunately, the situation remains the same, and no improvements have been noted yet. This undoubtedly provokes a negative impact on the automotive aftermarket and on SMEs in this sector.

UEIL thus calls on the Commission to investigate this matter and take corrective actions or initiate dialogue with the national Type Approval Authorities to ensure full compliance with Chapter XIV of the RMI Regulation.