

## FIGIEFA is working for you on the coding of spare parts at EU level



### *What is the issue?*

Practitioners from the field have started reporting examples of the use of activation codes/QR codes by some vehicle manufacturers as an additional step required for the spare part installation process. Such activation codes tend to be used for parts tracking, internal supply chain management related activities but in parallel, we also see security reasons forwarded as arguments. The consequences of such measures are that the so coded spare parts can only be marketed by the vehicle manufacturers within their networks, along with the activation code on the part. The vehicle is equipped with an intelligence or algorithm to scan or read the code and complete the part installation process. Moreover, such activation codes can often only be scanned with the vehicle

manufacturers' own diagnostic tools, but not by independent multi brand diagnostic tools.

This introduction of activation codes for parts installation could mean for the aftermarket parts distributors and parts manufacturers that original or matching quality spare parts, which do not have a QR code, could not be successfully installed in the vehicle. Such spare parts, be they from an original equipment parts supplier or an independent parts producer, could be rejected by the vehicle. The overall electric and electronic architecture of the vehicle wouldn't recognise them. The current legislative framework on "Technical Information" does not have specific rules requiring vehicle manufacturers to share these activation codes with the independent operators.



### *How could it impact your business?*

If not addressed, FIGIEFA suspects that the issue can become a more widespread phenomenon which can directly affect your capability to provide competitive spare parts and thereby your business continuity.

The impact for independent parts distributors could be threatening. The phenomenon is currently limited to a number of spare parts for some vehicle manufacturers, but the trend is raising fast, especially for parts comprising electric or electronic components, such as headlamps. As more and more parts in the vehicles have an electric or electronic dimension, due to the rise of electromobility, connectivity and driver assistance systems, this means that entire categories of parts could become captive. Moreover, the problem will be compounded by the application of the UNECE ("Geneva") Cybersecurity Regulation R155 in the European Union. R155 requires vehicle manufacturers to set up a cybersecurity management system for their organisation and implement security controls and measures on their vehicles. This regulation also allows a proprietary implementation of security measures, leading vehicle manufacturers to set their own benchmarks and implementations, like the use of activation codes.

Significant segments of your current portfolios could be affected and disappear. Original equipment and independent parts producers on the one hand, independent and authorised repairers on the other hand, and all actors in the value chain (independent parts distributors, multibrand garage equipment suppliers, and publishers of technical information) are impacted.

Higher dependence of independent repairers on vehicle manufacturers' tools could also have a huge financial impact on them, as they would have to purchase the tools of each vehicle manufacturers' they want to work with. With around 40 brands on the European market, this could soon have an enormous cost, and independent repairers would most likely have to restrict their portfolio – and their customers' base.

This could drive independent and multibrand business out of competition through foreclosure of the installation of independent or independently sourced spare parts and reinforce the market share of the vehicle manufacturers' networks.



## What is FIGIEFA doing?

FIGIEFA is monitoring very closely, with the support of its members, the development of this rising trend, and is active at European level to get legislative provisions safeguarding the legitimate business continuity of our sector.

FIGIEFA, together with sector associations organised in AFCAR, the Alliance for the Freedom of Car Repair in the European Union, is arguing that it should remain possible for spare parts producers, original equipment suppliers and independents alike, to market all products which can be fitted if these respect the technical specifications required by the overall vehicle's architecture.

To this end:

- Original parts suppliers and independent spare parts manufacturers should receive the activation code/QR code required for the activation of the part in the vehicle;
- all processes required as prerequisite to provide the activation code should be supported by the vehicle manufacturer, including any compatibility, interoperability, verification or testing requirements, and/or the validation support required;

- vehicle manufacturers shall ensure that the required activation information (e.g. the part number or the hardware version number) for identifying the part as a valid part for the vehicle, is included in the configuration management system or any other relevant system which is used as a backend for the part activation process;
- independent operators have to be authorised and should be able to go online with multi-brand test equipment and have access to this configuration management system, from where they can check the validity of the part for the vehicle, for both original equipment and independent spare parts;
- independent diagnostic tools (using the pass through) should be able to facilitate this process by having the possibility to access the vehicle manufacturers' server where the information to be validated is present.

FIGIEFA has alerted the European Commission about this trend hindering fair competition in the automotive aftermarket. It supports the integration of dedicated clauses into the European legislation protecting the right of independent operators to conduct business.

**FIGIEFA advocates that  
activation codes should be made available,  
one way or another,  
to aftermarket operators,  
independent and authorised workshops,  
parts producers and parts distributors,  
garage equipment suppliers  
and providers of technical information alike.**

**The outcome of the political discussions on this issue will have a decisive impact on our sector. FIGIEFA will keep defending your interests in the upcoming months to make sure that your companies don't get hampered from conducting business. We will need your support to strengthen our activities and to convince political decision-makers of the importance of taking into consideration your needs. Stay tuned!**

**Any question on the topic?** Contact our expert, Hari Ramakrishnan ([hari.ramakrishnan@figiefa.eu](mailto:hari.ramakrishnan@figiefa.eu))

