

Briefing Note for AME Board

Digital Omnibus – a short briefing note about the whole package

1. What is it about?

The Digital Omnibus is a European Commission simplification initiative aimed at aligning and modernising existing digital and internal market legislation. It complements frameworks such as the Digital Service Act, Digital Markets Act, Data Act and Artificial Intelligence Act and seeks to:

- Reduce regulatory fragmentation
- Digitise information and documentation obligations
- Enhance legal clarity in the digital single market

Whether this will result in genuine simplification or additional regulatory overlap remains to be seen.

2. Why does it matter for AME?

Although horizontally designed, the Omnibus has direct implications for digital business models in the automotive aftermarket:

- Online parts distribution and platform models
- Digital booking and comparison systems
- Telematics and fleet management solutions
- E-mobility and data-driven service offerings

The key issue is its structural impact on competitive neutrality, particularly in relation to OEM-integrated digital ecosystems.

3. Key Areas of Relevance

Platform and Transparency Obligations.

Potential additional disclosure and ranking requirements for digital intermediaries.

→ Risk of disproportionate compliance burdens for SME-operated platforms.

Data Access and Standardisation

In interaction with the Data Act, this may affect digital interfaces, product information, and vehicle data access procedures.

→ Risk of reinforcing manufacturer-controlled data architectures.

Digital Consumer Law

Modernisation of information duties for online and subscription-based models.

→ Need for harmonised EU-wide standards without Member State gold-plating.

Administrative Simplification

While simplification is the stated objective, cumulative layering of Digital Service Act, Digital Markets Act and Data Act and sectoral rules remains a concern.

4. Strategic Significance for AME

The priorities for AME are to ensure:

- Functionally equivalent data access
- Interoperability
- Proportionality for SMEs
- Avoidance of additional reporting layers

Next steps

The Digital Omnibus is not sector-specific legislation, yet it will shape the regulatory architecture of digital mobility markets.

AME's goal is to ensure that regulatory simplification strengthens market openness — not vertically integrated automotive ecosystems.

In the AME lobby group, we are working through the different frameworks in the Digital Omnibus to identify more precise implications for the automotive industry. We will return to the Board with more clear implications for the industry and an AME lobby position.