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INDUSTRY INTELLIGENCE REPORT

Repair goes deeper. Verification and access get stricter.

Week 46 · 9 November 2026

This week in 60 seconds

European regulation keeps evolving on how far independent operators and workshops may work on the software in a vehicle. It is also raising the bar for how they are securely verified.

01 BATTERY PASSPORT FEEDBACK CLOSES ON 16 NOVEMBER

The Commission's draft sets out who may access restricted battery data. The battery industry has asked for proof of role before access is granted, but who should check that proof is still open.

02 GERMANY HITS A RECORD 37% ELECTRIC SHARE

Fully electric cars took 37.0% of new registrations in Germany in October. BYD registered 5,173 cars, ahead of Tesla's 2,932, and Leapmotor almost quadrupled its volume to 3,661.

03 INDEPENDENTS HOLD ABOUT 64% OF THE AFTERMARKET

A Roland Berger study for FIGIEFA, the association of independent parts distributors, puts the independent share of Europe's aftermarket at about 64%, up from about 62% in 2021.

More people may ask for the data.
Someone still has to check who they are.

A NOTE FROM MARIE

Access comes with responsibility on both sides

When I read the Roland Berger study for FIGIEFA last week, one number stayed with me. Independent workshops and distributors hold about 64% of Europe's aftermarket. The other third is the manufacturers' own authorised networks.

That number matters, but it is not the essence of Annex X. Holding most of the aftermarket is not the same as being able to do the work. Most independent workshops still cannot carry out the full extent of a modern repair, especially the work on the vehicle's software. Annex X of Regulation 2018/858 exists so that they can. Coding a new part, recalibrating a camera after a windscreen change or programming a key should not mean sending the customer back to a dealer.

That right comes with a higher level of responsibility, and it sits on both sides.

What the workshop has to bring

The workshop needs the right certificates and the right tools. For security-related work, that means accreditation under SERMI. For software work, it means diagnostic equipment that can carry out the job properly.

What the manufacturer has to bring

The manufacturer carries just as much responsibility. It has to verify that the workshop asking really holds those certificates, and it has to provide the right information for the job. With security demands rising and more brands entering Europe, that check is getting harder to do brand by brand.

When both are in place, the workshop properly equipped and the manufacturer verifying and delivering, that is what compliance with the regulation looks like.

This is where we work. Verification is built into how Biner Data operates. We confirm who is requesting access and what they are entitled to, and keep a record of what they received. A workshop verified once is the same workshop whichever brand's data it needs next.

Access works when both sides carry their part.

Marie Bredberg
CEO, Biner Data

What this means for Biner Data

Annex X lets independent workshops carry out the full repair, software included. That only works if the manufacturer can verify that the workshop holds the right certificates. As security tightens and more brands arrive, that check becomes the step everything depends on.

01 VERIFICATION COMES BEFORE ACCESS

Before any data flows, someone has to confirm that a workshop or tool maker is who they say they are and holds the right credentials. That step looks the same whichever brand the data comes from.

02 THE NEW BRANDS ARE GROWING FASTEST

Chinese and electric brands are gaining ground quickly in Germany. Each one brings a new set of workshops and fleets that will ask for its data.

03 THE INDEPENDENTS ARE THE ONES ASKING

Independent workshops and distributors handle about two thirds of the aftermarket. The remaining third runs through the brands' own dealer workshops, which get repair information directly from the manufacturer. That makes the independents the largest group requesting access.

Check a requester once,
and every brand can rely on the answer.

RMI COMPLIANCE

Every access obligation assumes a check

Two European regulations decide who may reach data about a car. Both say who may ask. Only one has started to say who checks.

Battery passport

Regulation (EU) 2023/1542

WHO MAY ASK

Workshops and other repairers with a legitimate interest in the battery.

WHAT THEY MUST SHOW

Not decided. The battery industry proposes proof of role.

WHO CHECKS

Not decided yet

The passport holder or a designated body has been suggested.

Repair information

Annex X, Regulation (EU) 2018/858

WHO MAY ASK

Independent workshops, diagnostic tool makers and other independent operators.

WHAT THEY MUST SHOW

Accreditation under SERMI for security-related work, under stricter security conditions.

WHO CHECKS

Partly decided

Accredited bodies under SERMI today. From June 2027, a third party for VIN requests, not yet named.

01 WHY IT MATTERS

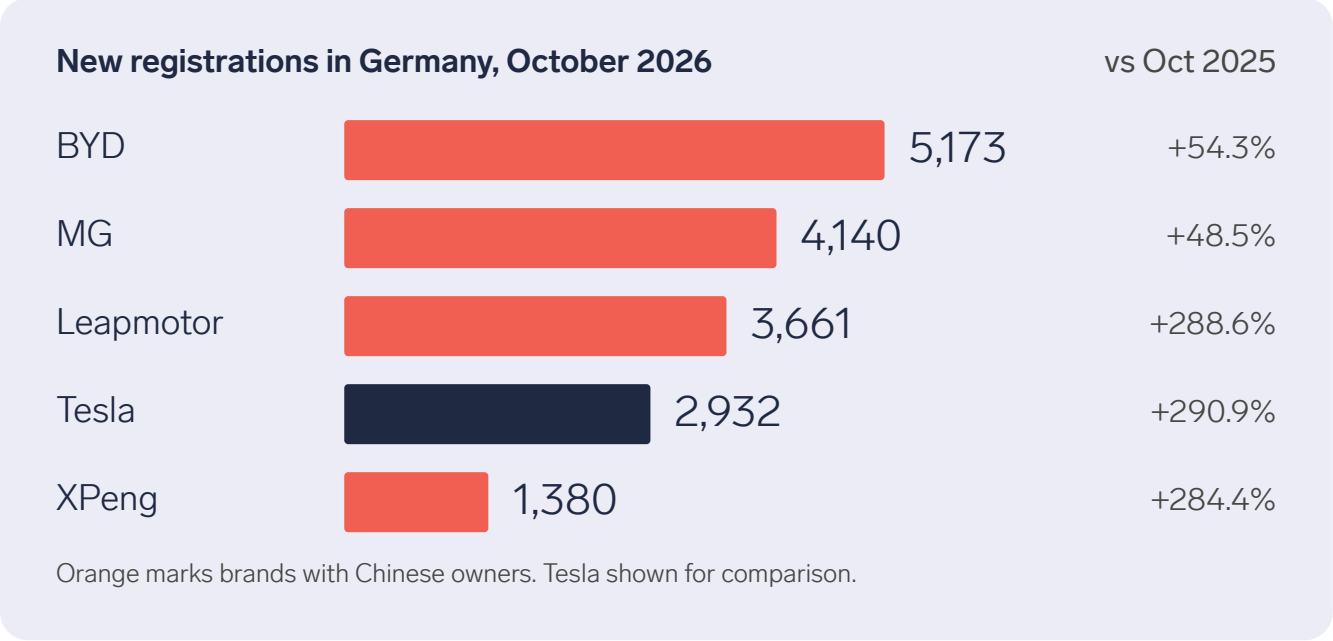
Every manufacturer and passport holder faces the same task, confirming who is asking and keeping a record of what they received. As security demands rise and more brands enter the market, doing it brand by brand gets harder. Done once and shared, it holds for every brand.

European regulation says who may ask.
It says far less about who checks.

MARKET SIGNAL

Germany’s fastest growers are the newest brands

Germany registered 254,492 new cars in October, 1.7% more than a year earlier. Fully electric cars reached a record 94,086, or 37.0% of the market. Several of the brands behind that growth have only been on sale there for a few years.



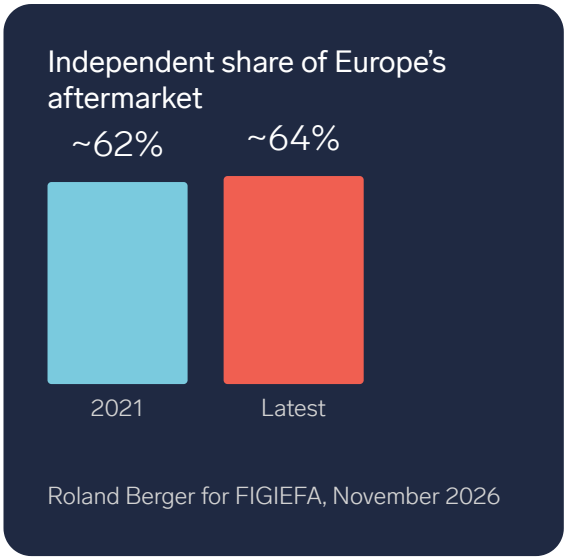
01 WHY IT MATTERS

Leapmotor and XPeng have nearly quadrupled their German volumes in a year. As these cars leave warranty, independent workshops across the country will need their repair information, often for models they have never serviced before.

The fastest-growing brands
are the newest to the workshop.

AFTERMARKET SIGNAL

Two thirds of the aftermarket is independent



A study by Roland Berger for FIGIEFA, published on 4 November, puts the independent share of Europe's aftermarket at about 64%, up from about 62% in 2021. Independent distributors and workshops sell around €100 billion of spare parts a year.

332 million

vehicles on Europe's roads, according to the study.

12.9 years

average age of a passenger car in 2024, up from 11.9 years in 2020.

01 WHY IT MATTERS

Cars are kept longer, and most of their later repairs happen outside the brand's own network. Independent workshops need information from every brand they see, including the new ones arriving now.

Most repairs happen outside the brand's own network.

COMPLIANCE CALENDAR

Three dates in seven weeks

Counted from Monday 9 November 2026.

7
days

16 November 2026

Feedback closes on the Commission's draft act on who may access restricted battery passport data.

20
days

29 November 2026

Euro 7 applies to new types of cars and vans. Among other things, the car must show its owner the battery's state of health.

44
days

23 December 2026

Annex X. Software, web services or information for independent diagnostic tool makers, covering variant coding, parts pairing and reprogramming.

101
days

18 February 2027

Battery passport mandatory for EV batteries placed on the market.

226
days

23 June 2027

Annex X. VIN-specific information and the maintenance-history API through a third party.

Three deadlines arrive before the year is out.

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THE BIGGER PICTURE

Repair goes deeper. Verification and access get stricter.

Repair now reaches the software, and access security rises with it.

This week's signals point the same way. Annex X lets independent workshops carry out the full repair, software included, and it relies on accreditation and stricter security conditions to do so. From 2027, a third party adds another layer. The battery passport will open restricted data to workshops and repairers, but the draft leaves the check open. New electric brands are growing fastest in Germany, and independents already handle about two thirds of the aftermarket. The deeper the repair, the more each request depends on someone who can confirm who is asking.

Whoever carries out that check well makes access possible for everyone else.

SOURCES & NOTES
MARKET INTELLIGENCE

BATTERY PASSPORT ACCESS

European Commission consultation on access rights, reported by LexisNexis, 20 October 2026. EUROBAT, feedback on battery passport access rights, 27 May 2026. EUR-Lex, Regulation (EU) 2023/1542.
Feedback deadline, proposals for verifying who may access restricted data, and the application date.

NEW-CAR REGISTRATIONS IN GERMANY

Kraftfahrt-Bundesamt (KBA), reported by electrive.net, 4 November 2026.
October registrations by brand and fully electric share.

INDEPENDENT AFTERMARKET

Roland Berger, study for FIGIEFA, press release, 4 November 2026.
Independent share of the aftermarket, parts sales, vehicle parc and average age.

EURO 7

EUR-Lex, Regulation (EU) 2024/1257. Nordisk Bil, 2 June 2026.
Application dates and battery state-of-health display.

REPAIR INFORMATION

EUR-Lex, Regulation (EU) 2018/858, Annex X, as amended by Delegated Regulation (EU) 2026/699.
SERMI accreditation, the third-party route and the deadlines.

EDITORIAL NOTE

This report combines publicly available information with Biner Data analysis. References to companies do not imply a commercial relationship. Regulatory summaries are for industry intelligence purposes and do not constitute legal advice.

CHART NOTES

Page 6 chart by Biner Data, based on KBA figures. Page 7 graphic by Biner Data, based on rounded shares published by Roland Berger.

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