BINER DATA

MARKET INTELLIGENCE REPORT

Who will repair Europe’s new cars?

23 December sets the terms

23 November 2026

For vehicle manufacturers and importers, tool makers and data publishers, independent workshops, fleets and insurers.

The story this week

Chinese brands are selling cars in Europe faster than they are building service for them, while Europe's largest groups, under cost pressure, have more reason than ever to protect their after-sales income. In 28 days the rules change: independent tool makers gain the right to code, pair and reprogram cars from every brand sold in Europe. Who is ready on that date, and who is willing to report gaps, will shape who repairs Europe's new cars.

Three things are happening at once, and together they decide who will be able to repair Europe's newest cars.

01 First, Chinese brands are adding cars faster than they are building service around them, and the evidence on service capacity is still thin. Chinese brands now take more than one in eight new-car registrations in Europe, and over one in five in Norway in October, while Europe's largest groups lose volume and cut costs. Under that pressure, after-sales becomes a profit pool worth protecting.

02 Second, new brands are building service the quick way: through partners, parts hubs and long warranties that keep early work inside their own networks. Independents are catching up where they can, starting with filters and brakes. Diagnostics, coding and software come last, and they depend on the manufacturer's data.

03 Third, on 23 December the rules move from reading data to acting on the car. From that date, tool makers can request coding, part pairing and reprogramming access. Public evidence of readiness is scarce: manufacturers are not announcing how they will provide it, and an industry test found most groups without an adequate data interface or pricing model for third-party data. That may mean they are not ready, or simply that they are not saying. Either way, enforcement only starts when someone complains.

THE STORY THIS WEEK

Biner Data's view

The right to repair these cars is settled in law. Who actually repairs them is being decided now: by how new brands build service, by how protective established groups become, and by who is ready on 23 December. Because checks start only with a complaint, independents who document gaps will help set the terms.

HOW TO READ THIS REPORT

Each fact carries a source grade: A a primary document we opened (law, court, regulator, company filing, official statistics); B a reliable secondary source; C a single or unverified source, to be read as a lead.

Paragraphs marked Biner Data's view are our analysis: our team's interpretation of the evidence, drawing on our work with vehicle manufacturers on repair-information compliance since 2017 and on our conversations with the market this week. They are not legal advice.

CHAPTER 1

The cars are arriving faster than the service around them

The new-car market is splitting in two. In ACEA's latest figures, Europe's three largest groups are growing more slowly than the market or shrinking, while Chinese groups such as BYD, Chery and Leapmotor are growing at triple-digit rates (ACEA, A). Across Europe, Chinese brands took 12.7% of registrations in the third quarter and a record 14.5% in September (Dataforce via Briefs, B). The market as a whole is growing: EU registrations are up 5.4% this year, and battery-electric cars hold 23.4% (ACEA, A).

Every one of those registrations becomes a car that someone has to service for the next fifteen years. With 7 to 8 year warranties at several new brands, early work stays in dealer networks. Independent workshops will meet these cars in waves, market by market, starting where penetration is highest.

At the same time, Europe's established manufacturers are under real pressure. Mercedes-Benz has halted investment in German plants and is exploring site closures (Reuters, 12 Nov, B). Volkswagen opened talks with IG Metall on 24 November under the threat of strikes from January (Reuters, 23 Nov, B). Supplier Schaeffler announced 3,460 job cuts and five European site closures (Reuters, 3 Nov, B).

WHY IT MATTERS

When new-car margins shrink, after-sales becomes more valuable: parts, service and the data that makes repair possible. That is exactly where access terms, fees and part pairing sit.

BINER DATA'S VIEW

We expect established manufacturers under pressure to protect after-sales income more closely, through the terms on which they open data, not through refusing it. This is our interpretation, not yet a documented trend; the test is what access conditions, and the prices for paid services, look like after 23 December. Confidence: high on the market figures, low on the behaviour we expect.

CHAPTER 2

How new brands build service, and where independents can start

New brands cannot build a full workshop network in time for their sales ambitions, so they borrow one. Omoda & Jaecoo UK made the RAC an authorised repairer, so its 400 mobile mechanics now carry out warranty and recall work at customers' homes and workplaces (Fleet News, Jaecoo UK, A; announced 8 September 2026, UK). Others build their own parts hubs (Chery in Germany, Geely in the Netherlands and Spain, GAC in Rotterdam) and contract logistics firms for spare parts (industry reporting, C).

Insurers are watching closely, because repair cost is where a new brand is judged. Allianz Center for Technology reports that European brands' repair-cost advantage over Chinese brands shrank from three rating classes in 2024 to one in 2026, crediting better service networks and parts availability at the major Chinese players (report via logistik-heute, B). Not every insurer agrees: in August, Dutch insurer Univé stopped covering nine brands, citing parts, repair information and qualified repairers (report, B), while other Dutch insurers exclude none.

Independents are catching up in a clear order. Parts come first: MANN+HUMMEL aims to cover more than 82% of Chinese-brand cars in Europe with its filters by the end of 2026 (company statement, September, B). Diagnostics come last: in the UK, nearly 9 in 10 independent workshops have turned away or referred an electric or plug-in hybrid job, and 27% name diagnostic access to newer brands as the main barrier (LKQ Euro Car Parts survey, UK only, B).

CHAPTER 2

What an independent workshop needs ready for a new brand

- **Parts.** Service and wear parts available through its usual distributor.
- **Repair information.** Procedures, wiring diagrams and torque values, from the manufacturer's portal or a data publisher.
- **Diagnostics.** A multi-brand tool that can read the car's fault codes and data.
- **Coding and software.** The ability to code a new part, pair it and update software. This is the step that 23 December opens to tool makers.
- **Skills and safety.** Trained technicians, including high-voltage qualifications for electric cars.

BINER DATA'S VIEW

Every step depends on manufacturer data. The difference is how. For parts and diagnostics, the aftermarket already has channels that can adapt (parts catalogues, distributors, multi-brand tools), provided the manufacturer supplies the parts identification and diagnostic information the law requires. Repair information and coding need direct access, brand by brand, and access for coding only opens on 23 December.

Long warranties delay independent demand but do not remove it: when the first large cohorts reach second owners, the question will not be whether a filter fits, but whether a workshop can code and update the car. Confidence: medium; the evidence is partly UK-only, and no Europe-wide data on repair times or parts waits for these brands exists yet.

CHAPTER 3

The 23 December test, and who has to blow the whistle

THE OBLIGATION

From 23 December 2026, Delegated Regulation (EU) 2026/699 requires manufacturers to give independent tool makers the software, web services or information they need for variant coding, part pairing and reprogramming (A). It is the first time the rules move from reading a car's data to changing its software.

THE READINESS EVIDENCE IS THIN

We found no public statement from any manufacturer, industry association or major tool maker on how this will work in practice. Earlier this autumn, CARUSO's field test of 28 manufacturer groups, reported by CLEPA and Insurance Europe, found that 68% lacked an adequate data interface for third parties and 64% lacked an adequate pricing model (B). A study for FIA Region I found that only one of the ten largest groups, BMW, publishes its prices for third-party data access (FIA Region I, B).

WHICH PRICES, AND WHY THEY MATTER

Two different regimes are involved. Under the type-approval rules (Regulation 2018/858, Article 63), manufacturers may charge reasonable and proportionate fees for repair and maintenance information, including services such as reprogramming, and must state those fees on their information website. Access to the OBD port itself, including the tokens or certificates needed for it, may not be charged for. Separately, under the EU Data Act, manufacturers may ask third parties for reasonable compensation for in-vehicle data. The CARUSO and FIA findings above concern this second kind of pricing. In both cases, a published price list lets a tool maker or workshop plan and compare brands, and shows that a working process exists. It does not prove compliance, and a missing one does not prove non-compliance.

CHAPTER 3

Silence, audits and the courts

Silence does not prove a manufacturer is unready; many may simply not be advertising their plans. But it means the market cannot see who is ready until tool makers start asking. Our own work points the same way: Biner Data is currently running a pre-study with manufacturer clients to prepare their readiness and compliance for 23 December. Preparation is happening, even where it is not announced. This is our own client work rather than independent evidence, and we do not name clients.

WHO CHECKS

Nobody, by default. Under Regulation 2018/858 a manufacturer must prove compliance within six months of type approval (Article 64(1)). The approval authority may check at any time (Article 65(1)), but must audit only when an independent operator or trade association complains, with results within three months of the request (Article 65(3)) (EUR-Lex consolidated text, A). The new rules make this explicit: the authority may presume arrangements are satisfactory provided no complaint has been made (new Annex X point 7.4; A, clause number to be verified in the Official Journal). We found no publicly reported complaint, audit or Commission action against a named manufacturer in the past twelve months.

THE COURTS HAVE ALREADY DRAWN THE LINE

The Court of Justice ruled in C-296/22 (October 2023) that access cannot be made subject to conditions the law does not provide for, and in C-319/22 (November 2023) that VINs must be available to independent operators (A). Delegated Regulation 2026/699 now spells out which security conditions manufacturers may apply.

BINER DATA'S VIEW

23 December will not be tested by an authority. It will be tested by tool makers asking for access and by associations deciding whether to complain. For manufacturers, the routine risk is low but a single complaint starts a mandatory audit on a three-month clock. For independents, the rights are clear, but using them takes documentation, time and an association willing to file. Not legal advice; confidence high on the mechanism, medium on readiness.

DEEP DIVE

What a manufacturer must have running on 23 December

A repair-information portal is not enough. A portal serves documents to workshops; the 23 December step is about software access for tool makers, which needs a live gateway between the manufacturer's back end and every authorised tool. A brand can have a good portal and still not be ready.

From the text of Delegated Regulation 2026/699 (A; clause numbers to be verified in the Official Journal):

ELEMENT	WHAT THE RULES ALLOW OR REQUIRE	WHAT THE MANUFACTURER MUST RUN
Authentication	The tool and tool maker may be required to authenticate; individual technicians only for operations that change the vehicle	A process to issue and revoke credentials, with identity checks on tool makers
Security standards	May require Cyber Resilience Act compliance and TISAX or ISO 27001 certification, but no more than the manufacturer asks of its own tools	A published, non-discriminatory requirement set, and someone who checks certificates
Credentials	Issued without delay; valid at least 30 days, or 24 hours for operations that change the vehicle	Service levels for issuing credentials, around the clock for short-lived ones
Fees	No fee for access itself, including tokens and certificates; reasonable and proportionate fees only for defined services such as remote facilities, hardware loans and tool validation	Free access set up, plus prices and billing for any paid services
Suspension	Only for misuse or cyber incidents, with the approval authority notified and reviewing within 10 days	An incident process with a line to the regulator
Parity	Independents get the same availability and performance as authorised partners	Monitoring that can prove equal service
Standards and scope	Reprogramming on open standards (J2534, ISO 22900-2, SOVD); ADAS calibration, high-voltage battery repair and variant-coding information included	Engineering work, not only legal work

DEEP DIVE

Five public signals of readiness we will check from next week

Because a portal says little about 23 December, we will track each brand against what a tool maker would actually look for:

- Published security and certification requirements for tool makers
- Published access terms for tool makers, confirming that access, tokens and certificates are free of charge
- A registration route for tool makers to request coding and reprogramming access
- A named process or contact for issuing credentials
- A route for security-related access through SERMI

BINER DATA'S VIEW

For an importer-led brand there is a question before any of this: which European entity holds the obligation and can sign agreements for all markets? Where nobody can, each country ends up solving the same task separately.

ON THE COST OF COMPLIANCE

We found no credible industry figure for what manufacturers spend to meet repair-information, Data Act, Battery Passport and cybersecurity rules together. We will ask manufacturers and importers directly in the coming weeks.

MARKET DASHBOARD

The demand the new brands' cars will join

INDICATOR	LATEST	SOURCE AND SCOPE
EU new-car registrations, year to date	+5.4% battery-electric 23.4%	ACEA, to October (A)
Chinese-brand share, Europe	12.7% in Q3 record 14.5% in September	Dataforce, EU, EFTA and UK (B)
Independent channel share of the parts market	64.1% of EUR 156bn (61.8% in 2021)	Roland Berger for FIGIEFA, 4 Nov (B); by sales channel, excludes labour
Independent workshops	332,095 (2025)	Same study (B)
Manufacturer-controlled workshops	Down from 71,142 to 67,700 since 2021	Same study (B)
Average car age	12.9 years (34 countries; ACEA EU-only 12.7)	Same study (B)

The independent aftermarket's share is growing while the manufacturers' own workshop networks shrink, and Europe's cars keep getting older. That is the demand the new brands' cars will join.

SCANDINAVIA WATCH

Is there a trend?

Yes in Norway, which is the clearest early-warning market in Europe. Denmark is high but has no trend series yet. Sweden is far behind.

MARKET	CHINESE-BRAND SHARE OF NEW CARS	SOURCE
Norway	10.4% (2024) → 13.7% (2025) → 17.7% (January to October 2026). October: record 22.5%, up from 16.9% a year earlier	OFV via electrive and Xinhua (B)
Denmark	October: 16.0%, with about 88% of new cars battery-electric	bilstatistik.dk via China EV Home (B)
Sweden	January to August: 4% (2.5% a year earlier)	Mobility Sweden via EFN (B)

All three figures exclude Volvo and Polestar, despite their Geely ownership.

WHY NORWAY LEADS

Almost every new car is electric, about 98% this year, so Chinese makers compete in their strongest segment and there is no petrol or hybrid market for established brands to defend. Norway has not applied the EU's extra duties on China-built electric cars (ScandAsia, citing Reuters, B). New brands enter quickly through local importers. And demand holds despite doubts: 31% of Norwegian EV owners say they would avoid a Chinese brand (Euronews, B), yet share keeps rising.

SCANDINAVIA WATCH

Why Sweden and Denmark differ

Both apply EU duties. Sweden has a strong home brand in Volvo and fewer electric cars; Denmark has almost as many electric cars as Norway and a 16% Chinese share.

BINER DATA'S VIEW

EV maturity seems to matter more than tariffs.

WHAT IT MEANS FOR THE AFTERMARKET

Norway's independent workshops will meet these brands in volume first, from around 2029 as warranties end. One open question matters a lot: Norway applies EU vehicle rules through the EEA Agreement, and we have not yet confirmed whether the 23 December step applies there, or which Norwegian authority enforces it.

QUESTIONS WE ARE TESTING

Two questions we are testing

We keep a set of standing questions about the market and test them every week against new evidence. Each edition reports on the one or two where the evidence moved.

DO NEW BRANDS' AFTERMARKET CAPABILITIES LAG THEIR SALES?

Mixed. For: all four of this week's conversations described entrants arriving with little knowledge of European repair rules, and one Dutch insurer excluded nine brands over parts and repair information. Against: Allianz finds the major Chinese brands' service networks and parts availability have improved significantly. The answer depends on the brand, which is why we will start scoring brands individually.

IS ENFORCEMENT DRIVEN ONLY BY COMPLAINTS?

Supported. The law requires an audit only after a complaint, the new rules let authorities presume compliance when nobody complains, we found no public case against a named manufacturer in twelve months, and both associations we spoke to described complaints being passed between national authorities.

FIELD NOTES

What we heard this week

Four conversations between 17 and 19 November: a software partner to a Nordic importer of several Chinese brands; an import and distribution manager at a large Nordic retail group; an independent adviser in fleet and automotive data; and two aftermarket trade associations in Denmark and Sweden. Participants are not named. These are accounts of what was said, not verified facts.

- **Entrants do not know, more than they refuse.** All four described new brands arriving with little knowledge of European repair rules. “The aftermarket is an afterthought,” one association said.
- **The distributor is not the importer.** The retail group buys cars already cleared through customs inside the EU; the manufacturer’s European company is the importer. It receives no requests from independents, only questions from its own dealers, which it passes upstream one brand and one country at a time.
- **Data arrives but stays inside.** An importer’s software partner receives technical documentation as spreadsheets and PDFs, translates it for internal use, and had not known it must be offered to independents.
- **People change, knowledge resets.** European teams at new brands change roughly every six months.
- **Complaints bounce.** Associations described complaints being referred from one national authority to another. In Sweden, type-approval complaints go to Transportstyrelsen and block-exemption complaints to Konkurrensverket. One proposed a routine check on day 183 after type approval.
- **Nobody mentioned security conditions.** Not one conversation raised the certification and authentication rules that dominate the 23 December text, a sign the date is not yet on most radars.

THE QUESTION TO ANSWER NOW

One question for each role

IF YOU ARE	QUESTION
A manufacturer entering Europe	Which European entity holds the repair-information duty, and can it sign agreements, issue credentials and confirm free access terms by 23 December? Is repair information live on the day your cars go on sale?
An established manufacturer	Are repair-information, Data Act and Battery Passport requests handled in one process, or by three teams with three sets of contracts?
An importer or distributor	When an independent asks for data, who at the manufacturer answers, and how fast? Does the duty to share apply to material you now keep for internal use?
A tool maker or data publisher	Which certifications and logs will each brand ask for, and how many separate onboardings will that mean before 23 December?
An independent workshop	For the brands in your area, can you read, code and update the car today? Which failures should you document and report to your association?
A fleet, lessor or insurer	As new brands enter your fleet or claims, is repair tied to dealers by data rather than by warranty?

LOOK AHEAD

The dates to watch

Countdowns from Wednesday 25 November 2026.

DATE	EVENT	WHY IT MATTERS
29 Nov 4 days	Euro 7 applies to new car and van types	More type-approval and compliance work (date to verify)
1 Dec 6 days	EU cap on hybrid imports begins: 350,000 in year one; EU-built cars exempt (just-auto, B)	More of the new-brand parc will be EU-built or fully electric
Early Dec	November registrations in Norway, Sweden, Denmark and Germany	Next reading for the Scandinavia watch
2 Dec 7 days	Roadworthiness package negotiations	Inspection rules for electric cars and post-crash checks
23 Dec 28 days	Coding, part pairing and reprogramming access for tool makers	The first real test of manufacturer readiness
Q4 2026	Battery Passport access rules adopted	Who may read restricted battery data
18 Feb 2027 85 days	Battery Passport obligations apply	Battery repair and reuse
23 Jun 2027 210 days	Per-VIN data access through a third party under agreement with the manufacturer	Defines the model for independent data access
31 May 2028	Block exemption regulation expires	Shape of aftermarket competition rules after 2028

METHOD & SOURCES
MARKET INTELLIGENCE

HOW THIS REPORT IS MADE

Biner Data's team combines desk research on legal texts, court decisions, regulator publications, company filings and official statistics with the team's own conversations with the market each week. Every fact is graded A, B or C, and any number we headline has a primary source or two independent ones. Paragraphs marked "Biner Data's view" are our interpretation.

ALSO THIS WEEK, NOT COVERED IN DEPTH

The Commission's evaluation of the block exemption regulation found the regime broadly working but independents' ability to compete only partly achieved (SWD(2026) 174, A); and the consultation on Battery Passport access rights closed on 16 November with 98 submissions (Commission, A).

STILL TO VERIFY

Clause numbers in 2026/699; Euro 7 and roadworthiness dates; the final legal form of the hybrid cap; Norway's 2024 and 2025 annual shares; whether 2026/699 applies in Norway through the EEA.

NOT FOUND

Any public enforcement action on repair information against a named manufacturer; public manufacturer statements on 23 December readiness; Europe-wide data on repair times or parts waits for new brands; an industry figure for the total cost of compliance.

LIMITS

We cannot read paywalled sources in full. Field evidence comes from four conversations led by Biner Data.

DISCLOSURE

Biner Data is a neutral data intermediary that works with vehicle manufacturers and independent operators. This report does not name customers, and mentioning a company does not imply a commercial relationship. Regulatory summaries are our analytical reading and not legal advice.

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