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INDUSTRY INTELLIGENCE REPORT

Regulations and trade rules redraw the landscape

Week 47 · 16 November 2026

This week in 60 seconds

On 23 December, vehicle manufacturers must open their newer models to independent diagnostic tools. This week we explain what that deadline really covers, who is allowed to check whom, and what a workshop must show before it can work on a car.

01 37 DAYS TO 23 DECEMBER

From 23 December, vehicle manufacturers must give independent tool makers what they need to set up a new control unit and pair a replacement part, such as a camera or a battery module, to the car. The rule covers models first approved from 6 July 2022. Older models follow in June 2027. Any job that needs a software update, such as reflashing a control unit, follows in June 2028.

02 DIRECT ACCESS IS NOT OPEN ACCESS

Since 23 June, independent workshops have had the right to reach the car the same way a dealer does: through the diagnostic port, through any other connector or wireless link the dealer uses, and remotely. Vehicle manufacturers can still require checks, but only the ones the regulation lists, and never tougher ones than their own dealers face. Reading fault codes and the VIN needs no check at all.

03 BYD NAMES SPAIN FOR ITS NEXT PLANT

On 11 November, BYD said Spain is among the countries preselected for its second European car plant. Building inside the EU keeps its cars clear of the extra duties on China-built electric cars and the planned cap on Chinese hybrids.

Most of the work now sits with the vehicle manufacturers, and the clock is running.

What this means for Biner Data

Ask a vehicle manufacturer about 23 December and the same three questions come up.

01 WHO CHECKS THE WORKSHOP?

Not the vehicle manufacturer. The tool maker vouches for the workshop and, for the most sensitive jobs, for the individual mechanic. Alternatively, the workshop shows a certificate from an approved Trust Centre, which every tool maker must accept. The vehicle manufacturer's job is to vet the tool makers: their security certification, their test results and the access they are given. Today each brand does this on its own, so the same tool makers go through the same checks again and again. The battery passport will raise the same question for repairers.

02 CAN DEALERS GET AN EASIER RIDE?

No. A vehicle manufacturer cannot make life harder for an independent workshop than for its own dealers, and it cannot ask more of a third-party tool than of its own. Connecting through the diagnostic port must also be free. Vehicle manufacturers, or a broker acting on their behalf such as Biner Data, may charge only for extras, such as remote access or help with integrating a tool.

03 WHO SHOULD A TOOL MAKER CALL?

The answer has to be on the vehicle manufacturer's repair information website: a contact for technical and commercial questions, a description of the integration process with a timeline, the terms and conditions, and a price list. Many newer brands have no European head office, so tool makers often end up calling importers that do not have the data. A brand whose website lacks these four items is not ready yet.

Answering these questions once, for every brand,
is the part we can make simpler.

RMI COMPLIANCE

Direct access is not open access

Independent workshops can now work on the car directly, but the vehicle manufacturer may set conditions first. The deeper the job goes into the car, the more it may check. Here is the chain, link by link.

01 The tool maker

Must hold a recognised security certification, such as TISAX or ISO 27001, and pass the vehicle manufacturer's security tests.

02 The tool

Must identify itself for any job beyond reading fault codes. Every job is logged against the car's VIN.

03 The workshop

Checked only when the job changes the car. It needs liability insurance of at least €1 million for injury and €500,000 for property damage, and a genuine automotive business. Nothing more can be asked.

04 The mechanic

Checked only for lasting software changes. Needs an employment contract with the workshop and a valid ID card.

Once every link checks out, the tool gets a pass valid for 30 days, or just 24 hours for jobs that change the car.

RMI COMPLIANCE

Where the checks stop

The regulation lists what a vehicle manufacturer may check. It is just as clear about what it may not do.

THE LIMITS

Every check must be necessary, proportionate and no stricter than for the vehicle manufacturer's own dealers. It sees a code number, not the name of the workshop or the mechanic. It can ask for names only to investigate misuse, a liability claim or a cyberattack, and the workshop must be told. If a vehicle manufacturer blocks access, the national approval authority reviews the decision within ten days.

01 WHY IT MATTERS

Tool makers must now promise, in their contracts with workshops, to accept a Trust Centre certificate. Vehicle manufacturers must provide a model security agreement on request. As a result, most agreements between vehicle manufacturers and tool makers will have to be rewritten. The industry is already preparing a shared workshop certificate, called EDIC, that can cover a whole company or named mechanics.

For most vehicle manufacturers, the next job is updating their tool-maker contracts.

REPAIR & DIAGNOSTICS

What getting ready for 23 December looks like

We are helping vehicle manufacturers prepare for the December deadline right now. Without naming anyone, this is what the work involves.

01 A LIST, A LADDER AND A PASS

First, a list of every obligation and its deadline. Second, a ladder that matches each repair job to the checks it needs. Third, a step-by-step flow showing how a digital pass is issued for each session. The test throughout is simple: independent workshops must get whatever the vehicle manufacturer's own dealers get, down to the same server uptime.

02 FOUR RUNGS ON THE LADDER

Reading	Fault codes and the VIN. No checks.
Service work	Resetting a service light, testing a part, calibrating a camera. The tool and the workshop are checked, and every step is logged.
Coding	Setting up a new control unit. The vehicle manufacturer can also require the tool to stay online for the whole job.
Reprogramming and part pairing	The individual mechanic is checked too, and the tool records the state of the car before and after.

03 REMOTE DIAGNOSTICS FOLLOWS THE VEHICLE MANUFACTURER

If a vehicle manufacturer uses remote diagnostics to repair its cars, independent workshops get the same access, even when only the vehicle manufacturer's own staff use it today. This is the one access route it may charge for, and the usual list of permitted checks does not apply, although every condition must still be justified. Tools used only in product development are not covered.

Whatever the dealer gets, the independent workshop gets too.

MARKET SIGNAL

Chinese brands start building in Europe

BYD is bringing car production to the EU, and trade rules are a big part of the reason. Cars built here avoid the extra duties on China-built electric cars and fall outside the planned cap on Chinese hybrids.

End of 2026	BYD Szeged, Hungary BYD's first European car plant is due to start production.
11 November 2026	BYD names Spain as a candidate Spain is among the countries preselected for BYD's second European car plant. No decision has been announced.
From 1 December 2026	A cap on Chinese hybrid imports The EU and China have agreed a cap of 350,000 hybrid and plug-in hybrid cars a year, which could apply from 1 December. Chinese-brand cars built in the EU do not count towards it.

01 WHAT IT MEANS FOR WORKSHOPS

Whichever plant they come from, more of these cars will be on European roads, and every one of them will one day need a workshop. Many of the newest brands are still setting up repair-data access for independents.

More of these cars on the road means more workshops asking for access.

AFTERMARKET SIGNAL

Chinese brands lead France's plug-in hybrids

Chinese brands' share of plug-in hybrid registrations, France, October

~59%

BYD alone 37.5%

France registered 10,503 plug-in hybrids in October, 13.1% more than a year earlier. Chinese models took the top five places, led by the BYD Atto 2.

Top plug-in hybrids in France, October 2026



01 WHY IT MATTERS

Think of a plug-in hybrid as two cars in one. It needs engine diagnostics like any petrol car, and it carries a high-voltage battery that needs trained hands and the right data. Most of these top sellers come from brands many independent workshops have never worked on.

As these cars age, more of them will find their way to independent workshops.

COMPLIANCE CALENDAR

Four dates before the year ends

Counted from Monday 16 November 2026.

Today

16 November 2026

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

13 days

29 November 2026

Euro 7 applies to new types of cars and vans, including a battery state-of-health display for the owner.

15 days

1 December 2026

The earliest date the agreed EU cap on Chinese hybrid imports could apply.

37 days

23 December 2026

Annex X. Tool makers must get what they need to set up control units and pair parts on models approved from 6 July 2022. Interface (API) details for older models are also due.

219 days

23 June 2027

Annex X. Repair information for an individual car (by VIN) and the digital service history become available through an approved third party. The coding and pairing rules extend to models approved from September 2020.

Further out: 23 December 2027, test information for software updates. 23 June 2028, every job that needs a software update.

Five weeks to go until the next Annex X date.

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THE BIGGER PICTURE

The checks are already written down

This report comes back to one date. On 23 December, vehicle manufacturers must give independent tool makers what they need to set up control units and pair parts on their newer models, with software updates to follow by 2028. The regulation is precise about the checks. The vehicle manufacturer vets the tool maker. The tool maker, or a Trust Centre certificate, vouches for the workshop. The vehicle manufacturer sees a code number, not a name. In our own work, vehicle manufacturers are building obligation lists, access ladders and pass flows to match, measured against what their own dealers get. Meanwhile, Chinese brands are building plants in Europe and leading segments such as plug-in hybrids in France, so more workshops will soon be asking for that access.

Connecting every brand to every tool maker should only have to happen once.

SOURCES & NOTES
MARKET INTELLIGENCE

BYD IN EUROPE

Hibridos y Electricos, 11 November 2026.
Spain among the preselected countries for BYD's second European plant, and the Szeged start-up.

TRADE RULES

Automotive World, 12 October 2026. autoevolution, 12 October 2026, citing Bloomberg. EUR-Lex, Implementing Regulation (EU) 2024/2754.
The planned hybrid import cap, its treatment of EU-built cars, and the EU duties on China-built electric cars.

FRANCE, OCTOBER REGISTRATIONS

Journal de l'Automobile, November 2026. Auto Infos, 3 November 2026, based on Mobilians data.
Plug-in hybrid registrations, brand shares and top models.

DIRECT ACCESS AND CHECKS

Commission Delegated Regulation (EU) 2026/699, OJ L, 3.6.2026, in force 23 June 2026: Annex X points 2.9, 6.1.1, 6.4a, 6.4b and Appendix 4. Noerr, 22 June 2026. Sicurauto, 1 October 2026, on the EDIC certificate. Biner Data project work, anonymised.
Checks on tool makers, tools, workshops and mechanics; pseudonymisation; fees; remote access; deadlines; practical preparation.

EURO 7 AND BATTERY PASSPORT

EUR-Lex, Regulation (EU) 2024/1257. European Commission consultation on battery passport access rights, reported by LexisNexis, 20 October 2026.
Application dates and the feedback deadline.

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 NOTE

Page 8 chart by Biner Data, based on Mobilians figures reported by Auto Infos.

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THANKS FOR READING

Regulated data, simplified.

Biner Data runs the layer between data providers and data recipients. Access is granted and revoked in one place, with both recorded.

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