BINER DATA

INDUSTRY INTELLIGENCE REPORT

European automotive & regulated data

Week 39 · 21 September 2026

This week in 60 seconds

Europe's regulated data landscape is moving from regulation to operation.
New compliance deadlines are taking effect, new automotive brands are expanding across Europe, and questions around verification, access and responsibility are becoming increasingly practical.

01 REGULATION IS BECOMING OPERATIONAL

A new Annex X deadline takes effect on 23 September, requiring manufacturers to provide diagnostic tool manufacturers with information needed to implement API access for certain operations. Further deadlines follow through 2026–2028.

02 EUROPE'S OEM LANDSCAPE IS EXPANDING

Chery, GAC, Dongfeng, XPeng, Lucid and other manufacturers are expanding their European presence. New markets, dealer networks and aftersales operations also bring new requirements around regulated data access.

03 VERIFICATION IS BECOMING A KEY QUESTION

As requirements around the Battery Passport, RMI and connected-product data develop, the challenge is increasingly not only making data available, but determining who should receive access and under what conditions.

What this means for Biner Data

The opportunity is not created by regulation alone. It is created by the operational work that follows.

01 MORE OBLIGATIONS TO OPERATE

As new requirements take effect, data providers need practical ways to manage access, verification, distribution and documentation.

02 MORE COMPANIES TO CONNECT

New manufacturers entering Europe create new relationships between data providers and the businesses that need regulated data.

03 MORE NEED FOR VERIFICATION

Making data available is only one part of the process. Data providers still need to know who is requesting access, for what purpose and under which conditions.

Biner Data sits in the work between access being required and access actually working.

23 September: regulation becomes operational

A new Annex X deadline takes effect on 23 September 2026. It is the first in a series of operational requirements extending through 2028.

23 SEP 2026

Diagnostic tool API information for operations not involving software updates.

23 DEC 2026

Additional API information for vehicles first type-approved before 6 July 2022

23 JUN 2027

VIN packages, electronic maintenance-history API and further software-update API requirements.

23 DEC 2027

Information required for testing update functionality.

23 JUN 2028

Further requirements for operations involving or dependent on software updates.

The shift is from understanding the regulation to operating it.

CASE STUDY

The importer disappeared. The cars didn't.



Skywell's UK importer ceased trading in summer 2026, pausing sales and leaving an existing dealer network and vehicles already on the road. The case highlights what happens when the commercial structure around a vehicle brand suddenly changes.

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01 WHY IT MATTERS

The vehicles already in the market remain. Their repair, maintenance and data-access needs do not disappear when an importer exits.

02 THE BIGGER QUESTION

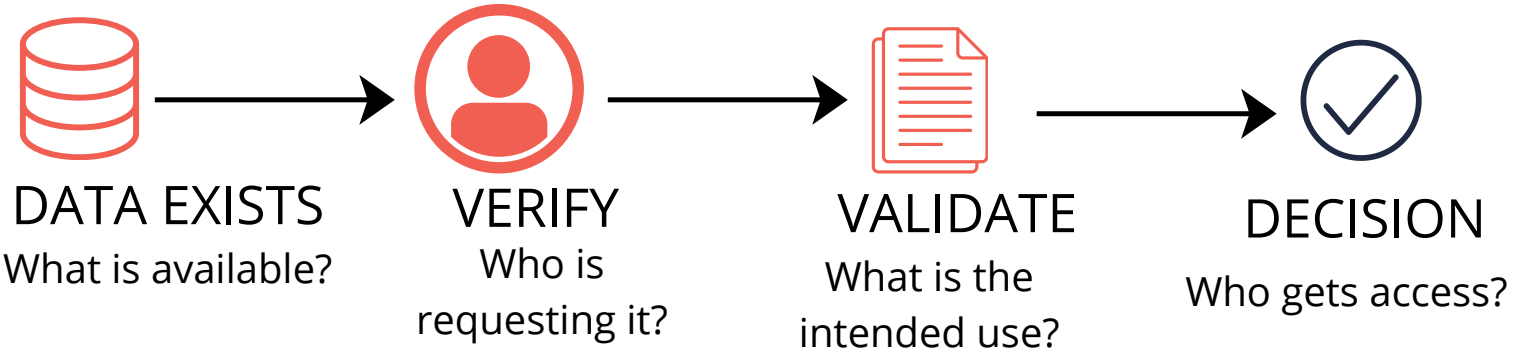
How should regulated access remain available when the commercial structure around a vehicle brand changes?

The commercial relationship can disappear.
The need for regulated data access doesn't.

Battery Passport: access is only half the question



From 18 February 2027, new Battery Passport requirements begin to apply. But making battery data available is only one part of the challenge. Who gets access, and how are they verified?



THE VERIFICATION QUESTION

As Battery Passport requirements develop, verification becomes an operational issue. Data may need to be available, but access still requires a process for identifying recipients, understanding intended use and managing permissions.

Making data available is a requirement.
Making access work is an operation.

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THE BIGGER PICTURE

Regulation defines access.

Making it work is the real challenge

Across regulation, market change and new data requirements, the same operational question remains: how do you make regulated access work in practice?

Sources & notes

EU REGULATION

European Commission, Delegated Regulation (EU) 2026/699

Regulation (EU) 2023/1542 concerning batteries and waste batteries

MARKET INTELLIGENCE

Autocar, Skywell brand in limbo after UK importer closes doors, 6 July 2026

Additional market reporting and company announcements, September 2026

EDITORIAL NOTE

This report combines publicly available regulatory and market information with Biner Data analysis. Regulatory summaries are provided for industry intelligence purposes and do not constitute legal advice.

IMAGE NOTE

Vehicle illustration on page 5 is AI-generated.