BINER DATA

INDUSTRY INTELLIGENCE REPORT

Automotive data needs common ground

Week 42 · 12 October 2026

This week in 60 seconds

The rules for automotive data are largely in place.
What differs now is how each manufacturer puts them into practice, and which data the market wants next.

01 ANNEX X HAS A NEW RULEBOOK

Delegated Regulation 2026/699 has applied since 23 June. For the first time it sets out how far manufacturers may go in securing access to vehicles, and it widens the repair information they must share. The next deadline is 23 December.

02 THE DATA ACT LOOKS DIFFERENT AT EVERY OEM

A field test by CARUSO, reported by SICURAUTO.it on 1 October, shows that Data Act access still varies a lot between manufacturers. They differ in what data they share, how they deliver it and what they charge for it.

03 BATTERY DATA IS BECOMING A MARKET

A battery's documented state of health is starting to set the value of used electric cars. From 18 February 2027, every new EV battery needs a battery passport, but who may access its restricted data is still being decided.

The right to access is settled.
Making it work the same way everywhere is not.

What this means for Biner Data

When every manufacturer implements the same rules differently, the cost lands on everyone who needs the data, and on the manufacturers who have to explain their choices.

01 THE CLOCK IS RUNNING

Ten weeks remain until 23 December, when independent diagnostic tool makers must get software, web services or the information to build them. Security set-ups and agreements with tool makers need to match the new rules.

02 CONSISTENCY BECOMES A COMPETITIVE FACTOR

Data Recipients serving many brands need comparable data, delivery and terms. The manufacturers that are easiest to work with are the ones services will be built on.

03 BATTERY DATA NEEDS ROLE-BASED ACCESS

The battery passport is not one public page. Different parties see different data, which means verifying who is asking, and why.

Biner Data helps Data Holders offer structured, consistent access, and helps Data Recipients reach it.

RMI COMPLIANCE

Annex X has a new rulebook

Delegated Regulation (EU) 2026/699 has applied since 23 June. It rewrites Annex X of the type-approval regulation, which sets out how manufacturers must give independent operators access to OBD and repair and maintenance information.

01 SECURITY IS ALLOWED, WITHIN LIMITS

After the Court of Justice's Carglass ruling, it was unclear whether manufacturers could protect the OBD port at all. The new Appendix 4 settles it, and the rules apply already.

MANUFACTURERS MAY

Use certificates and tokens.
Authenticate the diagnostic tool and its maker.
Authenticate the workshop, and sometimes the technician, when the vehicle is being changed.

BUT THEY MAY NOT

Go further than Appendix 4 allows.
Use measures that are not necessary and proportionate.
Treat independent operators worse than their own network.

02 MORE INFORMATION IS IN SCOPE

Manufacturers must now also share repair and calibration information for driver-assistance systems, battery diagnostics and battery repair, and whether a repair needs a software update or variant coding.

03 AVAILABLE FROM THE FIRST CAR

Repair and maintenance information has to be available to independent operators no later than the day a new vehicle is placed on the market.

Manufacturers can secure access,
as long as independent operators can still get in.

RMI COMPLIANCE

THE 2026/699 TIMELINE

The obligations arrive in stages. The next big one is on 23 December, ten weeks from now, when manufacturers must give independent diagnostic tool makers the software, web services or information they need.

23 JUN 2026 PASSED

In force. The security rules in Appendix 4 apply from day one.

23 SEP 2026 PASSED

API information for activities other than software updates.

23 DEC 2026 10 WEEKS

Software, web services or the information to build them, for independent diagnostic tool makers. Also API information for vehicle types approved before 6 July 2022.

23 JUN 2027

VIN-specific information packages only via API, and an API for the electronic maintenance record. Tool-maker access extends to types approved from September 2020 to July 2022.

23 DEC 2027

Information for checking the update function and hardware compatibility.

23 JUN 2028

Obligations for work that involves or depends on software updates.

Source: Delegated Regulation (EU) 2026/699; Noerr, June 2026 Regulated data, simplified.

DATA ACT IN PRACTICE

The Data Act looks different at every manufacturer

CARUSO has tested Data Act access on real vehicles, through the manufacturers' own channels. The first round covered about 170 car and van brands, and they fall roughly into three groups.

EARLY ADOPTERS	LATE FOLLOWERS	NOT YET MOVED
Up and running, but often still changing.	Working on it during 2026.	No working solution so far.

01 WHAT IS SHARED

Some manufacturers include fault codes. Others leave them out.

02 HOW IT IS DELIVERED

Anything from a file sent by email to a live data stream.

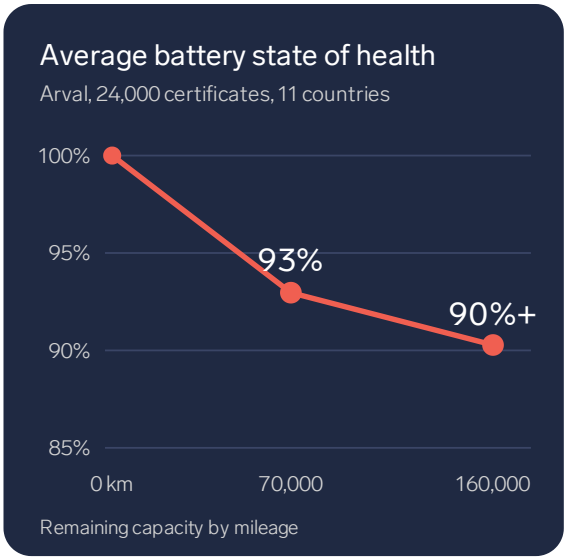
03 WHAT IT COSTS

From free up to about €30 per vehicle and month.

For the companies using the data,
a lot depends on which brand the car carries.

AFTERMARKET SIGNAL

Battery health is becoming a data product.



As more electric cars reach the used market, a battery's documented condition is starting to carry real value. Leasing company Arval has issued more than 30,000 battery state-of-health certificates before resale. Its analysis of 24,000 of them, across 11 European countries, found 93% remaining capacity on average at 70,000 km.

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01 WHY IT MATTERS

Buyers, dealers, remarketers and insurers increasingly need verified battery data. According to Arval, Euro 7 and the Battery Regulation will standardise how state of health is shown, and from February 2027 the battery passport will carry it for every new EV battery.

02 THE BIGGER QUESTION

When battery health helps decide a used car's price, who gets access to that data, on what terms, and how is it verified?

A battery's history now affects what the car is worth.

BATTERY DATA

WHO SEES WHAT IN THE BATTERY PASSPORT

A battery passport is not a public web page. What you can see depends on who you are.

PUBLIC → Anyone who scans the QR code can see what the battery is, its chemistry and how to recycle it.

LEGITIMATE INTEREST → Repairers, remanufacturers and recyclers also see how the battery is built and taken apart, and how each battery has aged and been used.

AUTHORITIES → Market surveillance authorities and notified bodies can also see the test reports.

Exactly who counts as having a legitimate interest has not been decided yet. The Commission was due to settle that in August, and now expects to do it before the end of the year.

THE ROAD TO 18 FEBRUARY 2027



20 JUL 2026
EU digital product passport registry goes live

18 AUG 2026
Legal deadline for the access-rights act, not met

Q4 2026
Act expected, per the Commission's timetable

18 FEB 2027
Battery passport mandatory for EV batteries

The data points are set.
The rules on who may see them are still to come.

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THE BIGGER PICTURE

Automotive data needs common ground.

The rules are in place. The practice differs.

This week's signals all point the same way. Annex X now has detailed rules for secure access, with the next deadline on 23 December. Manufacturers are applying the Data Act in different ways, and battery data is gaining a market value of its own. For the companies that rely on vehicle data, how each manufacturer puts the rules into practice now matters as much as the rules themselves.

The next challenge is not getting access.
It is getting comparable access across brands.

SOURCES & NOTES
MARKET INTELLIGENCE

DELEGATED REGULATION (EU) 2026/699

European Commission / EUR-Lex. Official Journal L, 3 June 2026, and corrigendum, 17 June 2026.
Amendments to Annex X of Regulation (EU) 2018/858 on access to OBD and repair and maintenance information.

ANNEX X ANALYSIS

Noerr, 22 June 2026; Taylor Wessing, July 2026; UEIL, June 2026.
Security rules in Appendix 4, extended information requirements and implementation deadlines.

CARUSO CONNECTED VEHICLE FIELD TEST 5.0

SICURAUTO.it, 1 October 2026.
How manufacturers implement the Data Act in practice, including data scope, delivery and pricing.

ARVAL BATTERY STATE OF HEALTH ANALYSIS

Arval, 25 February 2026.
Analysis of 24,000 battery state-of-health certificates across 11 European countries.

EU BATTERY PASSPORT

EUR-Lex, Regulation (EU) 2023/1542, Article 77 and Annex XIII; BD Emerson, 16 September 2026; battery-tech.net, 2026.
Access levels, registry launch and the status of the Article 77(9) access-rights act.

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 5 chart by Biner Data, based on averages published by Arval. Points are joined by straight lines for readability.