Council of the European Union
General Secretariat

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Interinstitutional files:
2025/0096 (COD)

Brussels, 17 October 2025

WK 13198/2025 ADD 4

LIMITE

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WORKING DOCUMENT

From:	General Secretariat of the Council
To:	Working Party on Land Transport
N° prev. doc.:	ST 12452/2/25 REV 2 + ADD 1 + ADD 2
N° Cion doc.:	ST 8259/25 + ADD 1 - 4
Subject:	Proposal for a Directive of the European Parliament and of the Council on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC - Revised Presidency compromise - Comments from Germany

Delegations will find, attached comments from **Germany** on the above-mentioned subject.

Proposal on vehicle registration

Comments from Germany

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General comments		
2025/0096 (COD)		
Proposal for a		
DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL		
on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC		
[…]		
(5) To take account of the need for digitalisation, to strengthen Union competitiveness and to reduce administrative burdens, both physical and mobile registration certificates should be		No objections.

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harmonised. Such certificates should ~~be fully~~ ~~equivalent and~~ **contain** ~~exactly~~ the same information.		
	(9) To facilitate cross-border movements, in particular the re-registration of vehicles, Member States should electronically record all required data on all vehicles registered in their territory and keep that data up to date at all times. That data will help: improve the accuracy of vehicle registers; ensure better law enforcement; combat vehicle fraud, ~~and~~ theft, reduce **cost of public authorities to handle abandoned vehicles and eliminate re-registration of vehicles for which a certificate of destruction was issued;** improve the exchange of information between Member States; and facilitate checking the status of vehicles due for export.	Germany suggests amending recital 9 (see text proposal).

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	NEW (9a) **Different applications of the terms 'permanent cancellation of the registration', 'cancellation of the registration', 'temporary de-registration' and 'suspension of the registration' have caused incoherence in the implementation across the Member States. To better track the status of vehicles and record all data timely and accurately, clear definitions were introduced.**	
	NEW (12a) **In line with the End-of-Life Vehicles Regulation and to ensure that vehicle registers are accurate and up to date, information on the vehicle owner and change of ownership after de-registration of a vehicle should be included until the vehicle has been cancelled permanently. Furthermore, the owner of a de-registered vehicle should**	Germany suggests adding a new recital (12a) referring to the need of better tracking illegal activities and unknown whereabouts.

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	report the whereabouts of the vehicle to the competent authorities every 2 years. **The holder shall be obliged to demonstrate the reasons for cancellation of a registration in the cases listed in Article 6 (1) (g).**	
[…]		
	(19) To combat fraud, ~~and the~~ illegal trade in stolen vehicles, reduce **costs to public authorities for removing abandoned vehicles, and the re-registration of vehicles for which a certificate of destruction was issued**, Member States should assist one another in the implementation of this Directive. This should include providing access to relevant registration data and roadworthiness information, including suspensions **and ownership during temporary de-registration and cancellation of -**	Germany suggests amending recital 19 (see text proposal).

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	registration, to the **competent** authorities in other Member States.	
(20) To facilitate the exchange of data, Member States should interconnect their vehicle registers and electronic systems containing information on the last roadworthiness certificates including the EU temporary roadworthiness certificates with the Commission's MOVE-HUB system, for the purpose of exchanging messages. Member States may continue to use their own applications or third party applications, including the European Vehicle and Driving Licence Information System (EUCARIS), to connect to the MOVE-HUB electronic system.	(20) To facilitate the exchange of data, Member States should interconnect their vehicle registers and electronic systems containing information on the last roadworthiness certificates including the EU temporary roadworthiness certificates with the European Car and Driving Licence Information System (EUCARIS), for the purpose of exchanging messages. Member States may **additionally** ~~continue to~~ use the Commission's MOVE-HUB system. ~~their own applications or third party applications, including the European Vehicle and Driving Licence Information System (EUCARIS), to connect to the MOVE-HUB electronic system.~~	Germany emphasizes that it is strongly in favour of implementing EUCARIS as a default-solution in this directive. For full explanation see comment on Article 15 section 2.

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	(21) To enable the Commission to analyse the state of play in the Member States and to propose initiatives on a sound factual basis, Member States should communicate data to the Commission on the vehicles registered in their territory, including the number of physical and mobile registration certificates issued, the number of re-registrations of vehicles previously registered in another Member State, the number of vehicle registrations suspended **and of vehicles cancelled from the register in the cases mentioned in Article 6 (1) (g) .** The Commission should transmit the data collected to the European Parliament and to the Council.	Germany suggests amending recital 21 (see text proposal).
[…]		

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HAVE ADOPTED THIS DIRECTIVE:		
Chapter I **General provisions**		
Article 1		
Subject matter and scope		
1. This Directive lays down common rules on the following:		
(a) the vehicle registration documents issued by the Member States;		
(b) certain data to be recorded in national vehicle registers;		
(c) the exchange of such data between Member States.		

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2. This Directive shall not apply to documents for the temporary registration of vehicles, unless such documents meet the requirements of this Directive, in which case, they shall be mutually recognised by Member States in accordance with Article 9 .		In the Council Working Party on Land Transport meeting, the Commission explained that needs for a revision of the old provision in Article 1(2) of Directive 1999/37/EC had emerged. Besides recognising transfer trips, what needs have emerged? In this context, Germany would like to note that the registration of a motor vehicle is an act of state and, in accordance with the international law principle of territoriality, the attachment of foreign vehicle number plates cannot be permitted in Germany. Does the Commission otherwise assume that the provision extends the scope of application of the Directive such that specific national forms of registration that are only intended for domestic

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		traffic in a Member State must be recognised by the other Member States? Regardless of the aspect of legal recognition of certain types of license plates Member States should register and exchange data for every license plate they have issued so that every vehicle can at least be attributed to a specific holder/person.
	3. This Directive shall also not apply to vehicles registered for law enforcement authorities (armed forces, police, border control, customs, civil and disaster protection, etc.), to the relevant data registered in national vehicle registers, to the electronic systems on roadworthiness certificates and other relevant documents.	Germany emphasizes that the application of this Directive is not advisable with regard to vehicles that a registered for law enforcement authorities. The use of a digital certificate is not practical in these cases. Also, the national registers can contain sensible data.

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Article 2		
Definitions		
For the purposes of this Directive, the following definitions apply:		
(1) 'vehicle' means any vehicle as defined in Article 3, point 15 of Regulation (EU) 2018/858 or in Article 3, point 11 of Regulation (EU) No 167/2013 of the European Parliament and of the Council[(10)], and any vehicle referred to in Article 4 of Regulation (EU) No 168/2013 of the European Parliament and of the Council[(11)];		Germany requests a clarification that vehicles registered for law enforcement authorities or the military should not fall under the definition of the term 'vehicle'.
(2) 'registration' means the administrative authorisation for the entry into service in road traffic of a vehicle, involving the identification		

(10) Regulation (EU) No 167/2013 of the European Parliament and of the Council of 5 February 2013 on the approval and market surveillance of agricultural and forestry vehicles (OJ L 60, 2.3.2013, p. 1, ELI: http://data.europa.eu/eli/reg/2013/167/oj).

(11) Regulation (EU) No 168/2013 of the European Parliament and of the Council of 15 January 2013 on the approval and market surveillance of two- or three-wheel vehicles and quadricycles (OJ L 60, 2.3.2013, p. 52, ELI: http://data.europa.eu/eli/reg/2013/168/oj).

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of the latter and the issuing to it of a serial number, to be known as the registration number;		
(3) 'registration certificate' means the document, issued in a physical format, a digital format, or both, which certifies that the vehicle is registered in a Member State,	(3) 'registration certificate' means the document, issued **by the competent authority** in a physical format, a digital format, or both, which certifies that the vehicle is registered in **that** Member State,	Germany proposes these amendments for the sake of clarification.
(4) 'physical registration certificate' means a registration certificate in its paper or smart card format;		
(5) 'mobile registration certificate' means a registration certificate in its digital format;		
~~(6) 'vehicle owner' means any natural or legal person who is recorded as the owner of the vehicle;~~		Germany is in favour of maintaining this definition.
(7) 'holder of the registration certificate' means the legal or natural person in whose name a vehicle is registered;		

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(8) 'suspension' means a limited period of time in which a vehicle is not authorised by a Member State to be used in road traffic following which – provided the reasons for suspension have ceased to apply – it may be authorised to be used again without involving a new process of registration.		
(9) 'temporary de-registration' means a ~~limited~~ period of ~~time~~**[two/five] years** in which a vehicle is not authorised by a Member State to be used in road traffic on the request of the holder of the registration certificate;	**(9) 'temporary de-registration' means a limited period of time in which a vehicle is not authorised by a Member State to be used in road traffic (usually on the request of the holder);**	Germany strongly objects the wording of the proposed definition and therefore suggests an alternative definition. Germany emphasizes that according to German law the de-registration of a vehicle is generally not permanent (except for cases in which the cancellation is permanent by nature, for example when a CoD is issued). In any case the definition should only apply to the objective of this Directive and should not limit the holder's ability to de- and re-register at any time. Instead,

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		Germany suggests a different framework (see comment on Article 8 (4) and (5).
(10) 'cancellation of a registration' means the permanent cancellation of a Member State's authorisation for a vehicle to be used in road traffic.		Germany would point out that the definition does not seem to be consistent with the cases laid down in Article 6 section 1 lit. g since not all of these cases are necessarily permanent. For example, cases in which a vehicle has been re-registered in a different Member State cannot be considered permanent. The vehicle could be registered again in the initial Member State at any time. Also, a stolen vehicle could be found and then be registered again. Further, we also understand that the temporary de-registration would fall under Article 6 section 1 lit. g (vii). See also the comment on Article 6 section 1 lit. g. Germany asks for clarification. Germany also suggests making a clearer distinction between

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		"cancellation of registration" and "permanent cancellation of registration.
Chapter II **Registration certificates**		
Article 3		
General requirements for registration certificates		
1. Member States shall issue registration certificates for vehicles which are subject to registration under their national legislation. The certificates shall comply with the requirements laid down in Article 4, as regards physical registration certificates, and Article 5 as regards mobile registration certificates.		
2. Where a registration certificate is issued for a vehicle registered prior to the implementation of this Directive, Member States may limit the ~~particulars~~ **data** ~~shown~~		No objections.

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on the registration certificate ~~therein~~ to ~~those for which~~ the required data **that is** ~~are~~ available.		
3. A vehicle shall not be the subject of more than one registration certificate, except as set out in paragraphs 4 and 5. However, a mobile registration certificate may be displayed on several mobile devices.		
4. Until [entry into force + 4 years], Member States shall issue physical registration certificates. They may also issue mobile registration certificates in addition to the physical certificates.		
5. With effect from [entry into force + 4 years + 1 day], Member States shall issue mobile registration certificates as the default format without prejudice to the right of the applicant to obtain the physical format or both formats with the same application. After the issuance of the registration certificate in one format, the holder of the registration shall continue to have the right to request the other format.		Germany is in favour of the proposal. Germany assumes that the changes mean that the issuance of a mobile registration certificate is not mandatory if the applicant demands only a physical certificate. In any other cases the mobile certificate will be issued by default.

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6. Member States shall ensure that physical and mobile registration certificates issued for the same vehicle are issued to the same holder and contain the same information, as set out in Annexes I and II. ~~Part II of the registration certificate or equivalent may only be issued to the registered owner of a vehicle as it serves as a proof of ownership for a new owner of a vehicle.~~		No objections.
7. Member States shall communicate any new specimen of the physical registration certificate and the description of the set of data of mobile registration certificates to the Commission and to the other Member States without undue delay. The Commission shall publish those specimens and descriptions of sets of data on its dedicated webpage.		No objections.
Article 4		
Physical registration certificates		

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1. Physical registration certificates shall consist of either a single part as set out in Annex I or two parts as set out in Annexes I and II. Member States may authorise the appropriate services they appoint, in particular those of the manufacturers, to complete the technical parts of the registration certificate.		
2. The data given in the physical registration certificate, as set out in Annexes I and II, shall be represented by the harmonised Union codes as set out in those Annexes.		
3. Member States may decide to include one or more QR code on the physical registration certificates in paper format which they issue. The QR code shall allow the verification of the authenticity of the information reported on the physical registration certificate.		
4. Physical registration certificates issued in a smart card format may contain a microchip in accordance with the requirements set out in Annexes I and II. If this is not the case Member		

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States may decide to print or engrave, in the space reserved for that purpose, a QR code on the registration certificates issued by them.		
5. The Commission shall adopt implementing acts laying down detailed provisions concerning the interoperability features for QR codes printed on physical registration certificates, and the security measures with which those codes are to comply. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 14(2).		
6. Member States shall inform the Commission of any measure aimed at the introduction of a QR code on their registration certificates, or of any change of such measure, within three months of its adoption.		
Article 5		
Mobile registration certificates		

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1. Mobile registration certificates shall comply with the specifications in Annex III.		Is the distinction between a Part I and Part II, which is possible in accordance with Article 4(1) when issuing a physical registration certificate, also to be possible when a digital registration certificate is issued? Annex II says that Part II is implemented in either of two formats: as a paper document or as a smart card. Why is this the case?
2. Member States shall ensure that mobile registration certificates are issued free of charge as electronic attestations of attributes to the European Digital Identity Wallets in accordance with Regulation (EU) No 910/2014.~~,~~ The wallets shall provide Member States' authorities with the possibility to do at least the following:		Does this only mean that integration in the wallet must be facilitated (free of charge), or that digital registration documents are always to be issued free of charge exclusively as part of the wallet? In the latter case, this would mean that every vehicle keeper would need a wallet, and that the issuance of the registration

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		documents (digital only) would be free of charge. Germany requests clarification. It should be clarified within the legal text that the registration process as a whole is not required to be free of charge and only the issuance of a digital registration document is to be free of charge.
(a) to retrieve and store data to verify the authorisation of the vehicle to be used in road traffic;		
(b) to display and transfer the data referred to in point (a).		
3. Member States shall provide the Commission with a list of trusted issuers of mobile vehicle registration certificates. They shall keep that list up to date. The Commission shall make those lists available to the public through a secure channel and in an		

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electronically signed or sealed form suitable for automated processing.		
4. By [entry into force + 2 years], the Commission shall adopt implementing acts laying down detailed provisions concerning the technical specifications of mobile registration certificates, including verification features and the interface with national systems, and procedures for notifying trusted issuers of mobile registration certificates. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 14(2).		
Chapter III **General obligations**		
Article 6		
Data recorded in vehicle registers		

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1. Member States shall record electronically, in vehicle registers, all data listed in Annex I, points 2(e), (f) and (g), on all vehicles registered on their territory.		It should be ensured that Member States have the relevant data for all vehicle registration plates they have issued registered in their national registers; the Member States should make this data available electronically throughout the EU. This would for example also include temporary license plates and transfer license plates. The individual data items must be defined in more detail. For example, field V.7 CO_2 does not indicate how the corresponding value is calculated if it is not provided in the eCoC. Field B, the date of first registration, is also interpreted differently in different parts of Europe.

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In addition, the vehicle registers shall include:		
(a) relevant data from the certificate of conformity in electronic format as provided for in Article 37 of Regulation (EU) 2018/858;		Germany welcomes the reintroduction of the original provision. Article 6 Section 1 Lit. a shall ensure a uniform and comprehensive set of data in the national vehicle registers that is necessary for the re-registration of a vehicle in another Member State. The initial technical data laid down in the eCoC could change over time. Therefor authorities often cannot refer to the initial CoC-data in cases of re-registration.
(b) the result of mandatory periodic roadworthiness tests in accordance with Directive 2014/45/EU of the European		

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Parliament and of the Council[12] and the period of validity of the roadworthiness certificate, including the result of periodic roadworthiness tests carried out in, and the validity of the certificate issued by, a Member State other than the Member State of registration in accordance with Article 4(3) and (4) of Directive 2014/45/EU.		
(c) information on any significant modification of the safety or environmental systems and components of the vehicle;		
(d) information on the previous holder of the registration certificate and, where available, the previous owner of the vehicle;		
(e) information on vehicles, including vehicles which are not authorised to be used in road traffic due to suspension in accordance with Article 8, or due to the temporary de-registration of the vehicle;	(e) information **on any change to the ownership of the vehicle in cases where the vehicle is not authorised to be used in road**	Germany is in favour of registering the owner of a vehicle that has been temporarily de-registered. In this case there is no (current) registered holder who could be held accountable

[12] Directive 2014/45/EU of the European Parliament and of the Council of 3 April 2014 on periodic roadworthiness tests for motor vehicles and their trailers and repealing Directive 2009/40/EC (OJ L 127, 29.4.2014, p. 51, ELI: http://data.europa.eu/eli/dir/2014/45/oj).

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	traffic due to the temporary de-registration of the vehicle;	(for example in cases of illegal disposal of a vehicle). Therefore, Germany suggests an amendment of the text.
(f) where available, the ~~Member State~~ **country** where the vehicle was registered for the first time;		Objection. According to Germany, this information is required to implement the cross-border EPR under Art. 22 in the ELVR. We would like to ask for further explanation why the "where available" was introduced.
(g) information on reasons for cancellation of a registration of the vehicle, where that vehicle:		Germany supports chapeau G and the intention to specify the cases for the permanent cancellation of registration. Question: According to the chapeau (g), information regarding the reasons for cancellation must be provided. This implies a requirement to provide evidence where

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		necessary and available, such as a CoD, a report of theft. Is such an understanding correct?
(i) has been treated as an end-of-life vehicle and a certificate of destruction has been issued in accordance with Article 5(3) of Directive 2000/53/EC;		
(ii) has been re-registered in a different Member State, upon confirmation by the new Member State of registration;		
(iii) has been exported outside the Union, upon presentation of customs documents;		
(iv) has been stolen or otherwise unlawfully taken over, as confirmed by a police report issued to the last vehicle owner;		
(v) has been registered in breach of the requirements on vehicle registration under Union or national law;		

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(vi) has been registered under an incorrect Vehicle Identification Number; and		
(vii) has been subject to cancellation of its registration for any other reasons.-		Germany asks for clarification regarding this provision. According to the definition laid down in Article 2 Number 10 the term "cancellation of a registration" means that a cancellation is permanent. The cases listed in Article 6 (1) (g) in contrast are not necessarily permanent. Against this background Germany sees a need for clarification. Shall the term "any other reasons" cover every other de-registration/cancellation such as temporary de-registration that is not specifically listed in Article 6 (1) (g) or does the term only address other cases of a permanent cancellation? If the latter is the case, which other cases might arise?

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The information referred to in the first and second subparagraphs shall be kept up to date.		
2. The Commission may adopt implementing acts specifying the relevant data referred to in paragraph 1, second subparagraph, point (a). Those implementing acts shall be adopted in accordance with the examination procedure laid down in Article 14(2).		
Article 7		
Verification of vehicle registration data		
Member States shall ensure that the personal data necessary for the verification of the information reported on the physical registration certificate or mobile registration certificate are not retained by the verifier, unless retention is authorised by Union or national law. They shall also ensure that the issuing authority of the registration certificate is not notified about the verification process of physical vehicle registration certificates, and that it processes the information received through the notification		

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only for the purpose of responding to the verification request for mobile vehicle registration certificates.		
Article 8		
Suspension of registration	**Suspension of registration <u>and temporary de-registration</u>**	Germany is in favour of registering the owner in cases of temporary de-registration. In addition, certain obligations regarding the owner are necessary. Therefore, we suggest these amendments.
1. Where the competent authority of a Member State receives notification of a periodic roadworthiness test showing that the authorisation to use a particular vehicle in road traffic has been suspended in accordance with Article 9 of Directive 2014/45/EU, the suspension shall be recorded electronically in the vehicle register.		
2. The suspension shall be effective until the vehicle has passed a new roadworthiness		

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test. On successful completion of the roadworthiness test, the competent authority shall without delay re-authorise the use of the vehicle in road traffic, and the end of the suspension shall be electronically recorded in the vehicle register. No new process of registration shall be necessary.		
3. Member States may adopt measures to facilitate the retesting of a vehicle the authorisation of which for use in road traffic has been suspended. Those measures may include the grant of permission to travel on public roads between a place of repair and a test centre for the purpose of a roadworthiness test.		
	4. Member States shall adopt measures that oblige the owner of a de-registered vehicle to report on changes to ownership to the competent authority.	DE proposed to add a new paragraph 5 under Art. 8. This is necessary to gain the required data regarding the current owner of the vehicle in question.
	5. Furthermore, Member States shall oblige the owner of a de-registered vehicle to report on its whereabouts every two years from the time of de-registration.	See above.

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Article 9		
Mutual recognition		
1. A physical registration certificate issued by a Member State in accordance with Article 4 shall be recognised by the other Member States for the identification of the vehicle in international traffic or for its re-registration in another Member State.		
2. A mobile registration certificate issued by a Member State in accordance with Article 5 shall be recognised by the other Member States for the identification of the vehicle in international traffic or for its re-registration in another Member State with effect from [entry into force + 4 years + 1 day].		
3. For vehicles that **do not comply with** ~~are not subject to~~ an EU type approval **or an EU individual approval**, Member States may **require proof of compliance with the technical requirements applicable in the**		No objections.

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<u>Member State and may</u> carry out technical inspections prior to re-registration.		
Article 10		
Identification of vehicles		
Until [date of entry into force + 4 years], Member States may require that the driver carry Part I of the physical registration certificate to identify a vehicle in road traffic. After that date, Member States shall accept both physical and mobile registration certificates for that purpose.		
Article 10a		
Re-registration of vehicles		
1. Until [date of entry into force + 4 years] the competent authorities shall require the submission of Part I of the physical registration certificate and the submission of Part II if it was		

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issued when re-registering a vehicle previously registered in another Member State. Until that date, they may also accept the presentation of a mobile registration certificate, if any. Where the registration certificate consists of Parts I and II, and Part I or Part II is missing, the competent authorities in the Member State where the new registration has been requested may decide, in exceptional cases, to re-register the vehicle, but only after having obtained confirmation by electronic means, from the competent authorities in the Member State where the vehicle was previously registered, that the applicant is entitled to re-register the vehicle in another Member State.		
2. From [entry into force + 4 years +1 day], Member States shall accept both Part I of the physical registration certificate and the presentation of the mobile registration certificate for the purposes of re-registering a vehicle previously registered in another Member State. The re-registering Member State shall verify with the Member State of registration which format(s) of the registration certificates have been issued.		

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3. Where only a physical registration certificate was issued, the competent authorities of the re-registering Member State shall withdraw the part(s) of the registration certificate submitted and shall keep the withdrawn part(s), or an electronic record thereof, for five years. They shall, without undue delay:		GER welcomes the amendment. Germany would like to point out that there are cases in which the (invalid) physical registration certificate should be given back to the holder (for example with regard to classic cars). According to this provision Member States are to inform one another when a vehicle first registered in another Member State has been re-registered in their Member State. There was already a similar provision in Article 5 of Directive 1999/37/EC. Unfortunately, the present draft does not indicate how this notification is to be provided. To date, the REGINA working group primarily receives notifications as CSV/XLS files, by e-mail and even in letters. Only in the exchange with the

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		Netherlands are the notifications electronically structured using the EUCARIS-VHRNotification procedure. It would be ideal if the Directive were to prescribe an electronically structured notification method, ideally using EUCARIS-VHRNotification.
(a) inform the authorities of the Member State which issued the certificate of such withdrawal;		
(b) return the relevant part(s) to those authorities if they so request.		
4. Where only a mobile registration certificate was issued, the competent authorities of the re-registering Member State shall, without undue delay, inform the authorities of the Member State which issued that certificate. The competent authorities of that Member State shall immediately revoke the previous mobile registration certificate and shall keep the		

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information contained in the previous registration in the vehicle register for five years.		
5. Where both a physical and a mobile registration certificate were issued, the steps in both paragraphs 3 and 4 shall be followed.		
Article 11		
Administrative cooperation between Member States		
1. Member States shall designate one or more national contact point responsible for exchanging information with the other Member States and the Commission with regard to the implementation of this Directive. Member States shall ensure that their respective national contact points cooperate with each other in order to ensure that all necessary information is shared in due time**,** including in relation to requests from re-registering Member States under the provisions of Article 10a.		Germany proposes that the exchange pursuant to Article 10a (4) and (5) be carried out via an electronically structured notification procedure using EUCARIS-VHRNotification. Germany already exchanges notifications with the Netherlands in this format. With other Member States, the exchange takes place in the REGINA working group via CSV/XLS files, email, and even letters.

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2. Member States shall forward to the Commission the names and contact details of their national contact point by [*date of transposition*], and shall inform it without delay of any changes thereto. The Commission shall draw up a list of all contact points and forward it to the Member States.		
Chapter IV **Implementing acts and delegated acts**		
Article 12		
Delegated acts		
The Commission shall be empowered to adopt delegated acts in accordance with Article 13 in order to amend:		

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(a) point 2(d)(ii) and point 3(a)(i)(2) of Annex I and point 2(d)(ii) and point 3(a)(i)(2) of Annex II, in the event of enlargement of the Union,		
(b) point 2(f) of Annex I and Annex II in relation to non-mandatory elements in the event of changes of the content or definitions of certificates of conformity in the relevant Union type-approval legislation, as well as in order to take account of technical, operational or scientific developments,		
(c) Tables 2 and 3 in both Annex I and Annex II, in order to list the tags identifying the data objects corresponding to the mandatory and optional registration data.		
(d) Annex III, in order to take account of technical, operational or scientific developments.		

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Article 13		
Exercise of the delegation		
1. The power to adopt delegated acts is conferred on the Commission subject to the conditions laid down in this Article.		
2. The power to adopt delegated acts referred to in Article 12 shall be conferred on the Commission for a period of five years from [*date of entry into force*]. The Commission shall draw up a report in respect of the delegation of power not later than nine months before the end of the five-year period. The delegation of power shall be tacitly extended for periods of an identical duration, unless the European Parliament or the Council opposes such extension not later than three months before the end of each period.		
3. The delegation of powers referred to in Article 12 may be revoked at any time by the European Parliament or by the Council. A decision to revoke shall put an end to the		

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delegation of the power specified in that decision. It shall take effect the day following the publication of the decision in the Official Journal of the European Union or at a later date specified therein. It shall not affect the validity of any delegated acts already in force.		
4. Before adopting a delegated act, the Commission shall consult experts designated by each Member State in accordance with the principles laid down in the Interinstitutional Agreement of 13 April 2016 on Better Law-Making.		
5. As soon as it adopts a delegated act, the Commission shall notify it simultaneously to the European Parliament and to the Council.		
6. A delegated act adopted pursuant to Article 12 shall enter into force only if no objection has been expressed by either the European Parliament or the Council within a period of two months of notification of that act to the European Parliament and the Council or if, before the expiry of that period, the European Parliament and the Council have both informed		

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the Commission that they will not object. That period shall be extended by two months at the initiative of the European Parliament or of the Council.		
Article 14		
Committee procedure		
1. The Commission shall be assisted by a Committee. That committee shall be a committee within the meaning of Regulation (EU) No 182/2011.		
2. Where reference is made to this paragraph, Article 5 of Regulation (EU) No 182/2011 shall apply. Where the opinion of the committee is to be obtained by written procedure, that procedure shall be terminated without result when, within the time limit for delivery of the opinion, the chair of the committee so decides or a simple majority of committee members so request. Where the committee delivers no opinion, the Commission shall not adopt the implementing act and Article		

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5(4), third subparagraph, of Regulation (EU) No 182/2011 shall apply.		
Chapter V **Final provisions**		
Article 15		
Exchange of data		
1. Member States shall assist one another in the implementation of this Directive. They shall exchange information relating to vehicle registration data, data contained in the last roadworthiness certificate, any EU temporary roadworthiness certificate issued during the last [three] years technical roadside inspection reports of at least the last [three years], and the odometer history of the vehicle stored in national databases, in particular so as to check, before any registration of a vehicle, that vehicle's legal status, where necessary in the Member State in which it was previously registered.		Germany emphasizes that vehicles that are registered for law enforcement should not be covered by this Directive. Therefore, there should not be an exchange of data with regard to these vehicles.

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2. Member States shall interconnect their national vehicle registers and electronic systems on roadworthiness certificates via the MOVE-HUB electronic system developed by the Commission in such a way that a competent authority of any Member State is able to consult the vehicle register of any other Member State in real time. That interconnection shall be operational within two years after the adoption of the implementing act referred to in paragraph 4.	Member States shall interconnect their national vehicle registers and electronic systems on roadworthiness certificates via the **European Car and Driving Licence Information System (EUCARIS)** in such a way that a competent authority of any Member State is able to consult the vehicle register of any other Member State in real time. That interconnection shall be operational within one year after the adoption of the implementing act referred to in paragraph 4. **Furthermore, the Member States may interconnect their national vehicle registers and electronic systems on roadworthiness certificates via the MOVE-HUB electronic system developed by the Commission.**	Germany wants to emphasize again that EUCARIS is an established and reliable system for data exchanges between the contracting states and/or Member States, which has established itself as the standard in the Union law context (e.g. within the framework of the CBE Directive) and thus should be the default system within the VRD. This is a vital point for Germany. EUCARIS already provides technical solutions for all data exchange purposes envisaged in the RWP. With EUCARIS Operations and the EUCARIS Secretariat, the EUCARIS General Assembly and the EUCARIS Technical Working Group, EUCARIS also offers a structure that allows the Member States that use

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		it to discuss and find joint solutions to legal and technical questions. Germany also considers EUCARIS preferable from a technical perspective. For example, the MOVE-HUB provides a hub architecture with a central data-transmitting entity. By contrast, EUCARIS is a peer-to-peer network, via which states exchange data with one another directly. Considering the volume and scope of the personal data that is to be exchanged for the purposes of the Directive, a peer-to-peer model is more conducive to data protection. The mandatory connection to MOVE-HUB would create a duplicate structure, which Germany considers unnecessary. Besides the once-off costs incurred by the Member States to produce the required software, permanent

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		maintenance and upkeep would be necessary and would require the provision of additional resources. What is more, the connection would be a potential source of error that no technical requirement could justify. Moreover, the connection to a new system would delay the implementation of the Directive. As a result, EUCARIS should be the default, with connection to MOVE-HUB as a voluntary option.
3. Access to the MOVE-HUB network shall be secured. Member States may connect only the authorities competent for the purposes referred to in paragraphs 1.	Access to the **EUCARIS** network shall be secured. […].	See above.
4. By [*date of entry into force + 2 years*], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the **MOVE-HUB** electronic system ~~**referred to in paragraph 2**~~, and specifying the minimum	~~4. By [date of entry into force + 2 years], the Commission shall adopt implementing acts laying down the necessary arrangements for the implementation of the functionalities of the~~	See above. With regard to EUCARIS there wouldn't be implementing acts by the Commission necessary.

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requirements for the format and content of the message to be used by Member States. It shall specify which authority is responsible for access to data and further use. Those implementing acts shall **ensure the protection of personal data and** be adopted in accordance with the examination procedure referred to in Article 14(2).	~~MOVE HUB electronic system referred to in paragraph 2, and specifying the minimum requirements for the format and content of the message to be used by Member States. It shall specify which authority is responsible for access to data and further use. Those implementing acts shall ensure the protection of personal data and be adopted in accordance with the examination procedure referred to in Article 14(2).~~	
Article 16		
Communication of information to the Commission		
1. By 31 March 2030, and by 31 March of each third year thereafter, Member States shall communicate to the Commission through the online reporting platform referred to in Article 28 of Regulation (EU) 2018/1999 of the		

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European Parliament and of the Council[13] ('e-platform'), the data relating to the vehicles registered in their territory during each of the previous three calendar years. The data shall comprise (per calendar year):		
(a) the number of physical registration certificates issued, per vehicle category;		
(b) the number of mobile registration certificates issued, per vehicle category;		
(c) the number of re-registrations of vehicles previously registered in another Member State, per vehicle category;		
(d) the number of vehicle registrations suspended, per vehicle category;		

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[13] Regulation (EU) 2018/1999 of the European Parliament and of the Council of 11 December 2018 on the Governance of the Energy Union and Climate Action, amending Regulations (EC) No 663/2009 and (EC) No 715/2009 of the European Parliament and of the Council, Directives 94/22/EC, 98/70/EC, 2009/31/EC, 2009/73/EC, 2010/31/EU, 2012/27/EU and 2013/30/EU of the European Parliament and of the Council, Council Directives 2009/119/EC and (EU) 2015/652 and repealing Regulation (EU) No 525/2013 of the European Parliament and of the Council (OJ L 328, 21.12.2018, p. 1).

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	(e) <u>the number of cancellations of registrations per reason and per vehicle category;</u>	Germany proposes to add a new entry (e) to report the number of cancellations of registrations as laid down in the proposals to the definitions in Article 2 and in the comment to Article 6 section 1 lit. g.
The first report shall cover the years 2027, 2028, and 2029, separately.		
The Commission shall transmit the data collected to the European Parliament and to the Council.		
2. Commission shall adopt implementing acts specifying the format in which the data referred to in paragraph 1 are to be communicated through the e-platform. Those implementing acts shall be adopted in accordance with the examination procedure referred to in Article 14(2).		

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Article 17		
Transposition		
1. Member States shall bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by [*date-of-entry into force + 2 years*] at the latest. They shall forthwith communicate to the Commission the text of those provisions.		
When Member States adopt those provisions, they shall contain a reference to this Directive or be accompanied by such a reference on the occasion of their official publication. Member States shall determine how such reference is to be made.		
2. Member States shall communicate to the Commission the text of the main provisions of national law which they adopt in the field covered by this Directive.		

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Article 18		
Repeal		
1. Directive 1999/37/EC is repealed with effect from [*date of entry into force + 2 years*].		
2. References to Directive 1999/37/EC shall be construed as references to this Directive and be read in accordance with the correlation table in Annex IV.		
Article 19		
Entry into force		
This Directive shall enter into force on the twentieth day following that of its publication in the *Official Journal of the European Union*.		

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Article 20		
Addressees		
This Directive is addressed to the Member States.		
Done at Brussels,		
For the European Parliament For the Council		
The President The President		
[...] [...]		

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