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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 Belgium

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

Roadworthiness Package – BE comments on ST12452-rev2 (vehicle registration documents)

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BE would like to thank the Presidency for its work on the Roadworthiness Package proposals and is pleased to provide the Presidency with additional written comments on the latest version of the compromise on the VRD proposal.

- Article 6.1(c)

Point (c) of this article still requires the recording of 'information on any significant changes to the vehicle's safety or environmental protection systems and components'.

As we already pointed out several times, with regard to the recording of significant changes to systems and components, this means that the vehicle no longer complies with its certificate of compliance (COC). In this case, it must undergo a new type approval and the vehicle will then have a new type approval number which will be stated on a new registration certificate.

BE views negatively the recording of these changes (point c), as the vehicle will have to undergo a new type-approval and be issued with a new registration certificate.

- Article 15.1 – Exchange of data with other Member States

This article states in particular that Member States shall exchange 'information relating to vehicle registration data, data contained in the latest roadworthiness test certificate, any temporary EU roadworthiness test certificate issued in the last three years, and roadworthiness test reports for at least the last three years'.

→ 'Data contained in the latest roadworthiness test certificate': this suggests that this refers to all the data contained in the roadworthiness test certificate. BE requests that this article be amended to **limit this to the result of the roadworthiness test and its period of validity** (as mentioned in Article 6(1)(b)).

→ 'Any temporary EU roadworthiness certificate issued in the last three years': which roadworthiness test is specifically referred to? What data is referred to? Which directive does this refer to? What is the purpose of this, given that the result of the last roadworthiness test must be recorded (see above)?

→ 'Roadworthiness test report from the last three years': what do these terms refer to? What data is covered? What is the purpose of this point, given that the result of the last roadworthiness test is already recorded? Which directive does this refer to?

Belgium kindly asks the Presidency to provide answers to these questions.

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- Article 15.2 – Move-Hub

This article states that Member States shall interconnect their national vehicle registers and their electronic systems relating to roadworthiness certificates using the MOVE-HUB electronic system developed by the Commission.

Belgium is opposed to this article for the following reasons:

- EUCARIS is best used as the primary system with peer-to-peer traffic between EUCARIS users.
- MOVE-HUB can be one of the 'peers'. It is perfectly possible and does not introduce a 'bottleneck'.
- In that situation, existing EReg technical specifications should be adopted by the European Commission for the MOVE-HUB functionality as leading.
- New specifications for data exchange will have to be set by the Registration Authorities in cooperation with the EC, within the existing structures of EReg and EUCARIS.

We suggest the following amendment for article 15.2:

« *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. A solution for interconnection should be robust and based on a peer-to-peer architecture to prevent single points of failure that would harm service delivery.*

Solutions must take into account the installed base and investments already done by the member states.] That interconnection shall be operational within one ***two*** *years after the adoption of the implementing act referred to in paragraph .*

And recital 20 :

(20) To facilitate the exchange of data, Member States should interconnect their vehicle registers and electronic systems ***containing information*** *on the* ***last*** *roadworthiness certificate* ***including the EU temporary roadworthiness certificates*** *with the Commission's MOVEHUB system [with the EUCARIS-system that includes MOVE-HUB as a peer-system.,* ***for the purpose of exchanging messages****. [The purpose is to exchange data messages] so that competent authorities are able to consult the register of another Member State in real time.* ***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.*** *['Single points of failure' and confusion about technical specifications must be avoided to protect service delivery and enforcement on national member state level.*

2. Comments on the annexes concerning data

Annex I

- (C.1.4) electronic address (e-mail), where available

Belgium does not want the e-mail address to be a mandatory field on the registration certificate. After all, there is no way of verifying whether the e-mail address provided actually belongs to the holder of the registration certificate.

- (J) vehicle category, (J.1) bodywork,

Both are already included in the current registration certificate. However, code J.1 is currently used for the national nature (bodywork currently has code J.2).

Belgium therefore requests flexibility in the code for bodywork type.

- CO2 and Euro standard become mandatory: Addition of 'if available'

(V.7) CO2 (in g/km) or Specific CO2 emissions where indicated at entry 49.5 of the Certificate of Conformity of heavy-duty vehicles defined in the Appendix to Annex VIII to Commission Implementing Regulation (EU) 2020/683(1) or at entry 49.5 of the individual vehicle approval certificate defined in Appendix 1 to Annex III to that Regulation, if available

(X) proof of having passed the roadworthiness test, date of next roadworthiness test or expiry of current certificate on mobile registration certificates.

- In accordance with Article 6,1,b: the result of mandatory periodic roadworthiness test and the period of validity of the roadworthiness certificate
- Annex I only deals with the paper document and the smart card. Mobile registration certificates are dealt with in Annex III, as specified in Article 5.

So either extend the scope in point 1 of Annex I to include mobile registration certificates, or specify the specific data for mobile registration certificates in Annex III.

Annex II

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