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PUBLIC

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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 Ireland

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

IE Comments in relation to: st12452-re02, st12452-re02ad01 and st12452-re02ad02

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Ireland welcomes the updated draft texts for each part of the proposed directive. We have no major concerns with the text provided but have some queries below for clarification.

Ireland would like to thank the Commission for facilitating a presentation on the EU Digital Wallet on the 30th September. This was very useful and would seem to be a very practical way to implement digital certificates such as registration documents and roadworthiness certificates. We would like to see further details on the development of these 2 document types/standards, notably in relation to updating the wallet in real-time once a registration document or RWC is amended or updated.

Main Text.

- Article 2 (9) – Temporary De-registration.

Ireland notes the change of timeframes and suggests that such a defined period may not be considered to be temporary. Can the Presidency outline the rationale behind these timeframes further please?

- Article 2(6) – Vehicle Owner

Ireland notes the deletion of the definition of “vehicle owner”. Does this need to be reflected in Article 6 1(g)(iv)?

- Article 6 1 (f)

Ireland notes the change back to “country” from “Member State” and thanks the Presidency for this change to account for Ireland’s, and other Member States’, vehicle imports coming from 3rd countries.

- Article 9(3)

Ireland welcomes the clarification for this article.

Annex I

Ireland has no issues of comment in relation to this Annex.

Annex II

- Article 2(e)

Data listed Code (C.1) as “Personal Data” includes an email address. Could the presidency outline the rationale for including this please?

We note a minor typographical error - Under Code(C.4)(c) “Regsistration Certificate” should be “Registration Certificate”..

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