



EUROPEAN COMMISSION
ENTERPRISE AND INDUSTRY DIRECTORATE-GENERAL

Public consultation on a future initiative concerning the registration of cars previously registered in another Member State

Synthesis of replies

This working document does not represent the official position of DG Enterprise and Industry. The suggestions put forward in it may in no way prejudice the nature, form or content of any future action by the European Commission.

1. INTRODUCTION

This paper summarises the responses of stakeholders to the public consultation on a future initiative concerning the registration of motor vehicles previously registered in another Member State, held between 3 March and 26 May 2011 by DG Enterprise and Industry (DG ENTR).

1.1 WHY A CONSULTATION ON A FUTURE CAR REGISTRATION INITIATIVE?

When buying a car in another Member State or transferring it to another Member State from where it was bought (e.g. when changing residence), EU citizens are frequently faced with cumbersome re-registration formalities and paperwork and, possibly, double payment of registration tax, because national laws on taxation upon registration of cars are not harmonised and are applied in an uncoordinated manner. This problem is also faced by car rental companies when trying to move their fleets from one Member State to another depending on seasonal variation in demand.

The diversity of rules and the various conflicting requirements for motor vehicles registered across the European Union still constitute a considerable impediment for the cross-border transfer of vehicles already registered in one Member State. Moreover, these problems also represent a significant barrier to the free movement of goods, services and workers.

As part of its strategic initiative to relaunch the Single Market, an essential element of the Europe 2020 strategy, the European Commission is considering the simplification of car registration procedures for citizens across the EU. Consequently, a future initiative concerning the registration of motor vehicles previously registered in another Member State is one of the actions set out in the EU Citizenship Report 2010¹ to complement the Single Market Act of 2010.²

1.2 THE PUBLIC CONSULTATION AND THE QUESTIONNAIRE

In this context, on 3 March 2011, DG ENTR launched a 12-week public consultation on a future initiative concerning car registration (closing date 26 May 2011).³ An online questionnaire, hosted on the European Union's website, was open to various categories of stakeholders.

Tailor-made questionnaires for different categories of stakeholders — citizens, businesses and public authorities — were available in all 22 EU official languages. Information on the public consultation was published on several websites⁴ and promoted through business networks, e.g. Enterprise Europe Network; E-Reg network, Industrie- und Handelskammer Frankfurt am Main (IHK), Leaseurope network and G+europe, with a view to reaching as many interested parties as possible.

¹ EU Citizenship report 2010 — Dismantling the obstacles to EU citizens' rights, COM(2010) 603.

² Communication from the Commission to the European Parliament, the Council, the Economic and Social Committee and the Committee of the Regions: Single Market Act — Twelve levers to boost growth and strengthen confidence, COM(2011) 206.

³ <http://ec.europa.eu/yourvoice/ipm/forms/dispatch?form=CARREGISTRATION>.

⁴ EUROPA website, E-Reg website, IHK website, Enterprise Europe Network bulletin.

2. OVERVIEW OF RESPONSES

There were 828 respondents to the public consultation. The vast majority of replies came from citizens (78%), followed by business organisations (19%) and public authorities (3%) (see Figure 1).

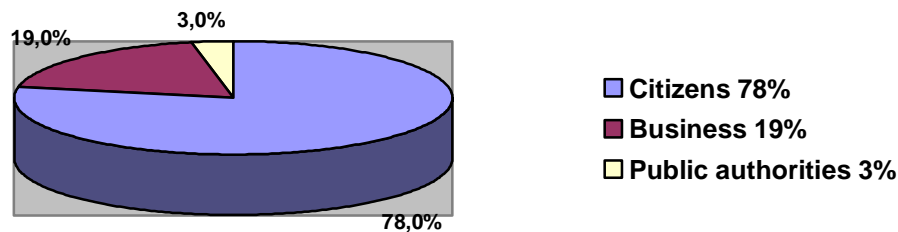


Figure 1: Contributions by category of stakeholders

Of the 651 replies received from **citizens**, most were from Poland (16.4%), Slovakia (15.9%), France (11.4%), Finland (9.6%), Belgium (8.6%) and Germany (5.9%).

Of the 151 replies received from **businesses** (143 replies via the public questionnaire and 8 submitted as separate contributions), the majority were submitted by companies selling second-hand vehicles (49.0%), followed by leasing companies (2.1%), car rental companies (0.7%), and other types of companies (35.0%). No contributions were received from businesses in 9 Member States. As regards geographical distribution, most replies were from Austria (61), France (15), Poland (16), Slovakia (14), Netherlands (10) and Germany (9).

Only 26 replies (3% of the total) were submitted by **public authorities**, namely 14 central public authorities and 12 local or regional public authorities (23 replies via the public questionnaire and 3 replies via e-mail). The largest proportion of contributions was from regional public authorities in Germany (12).

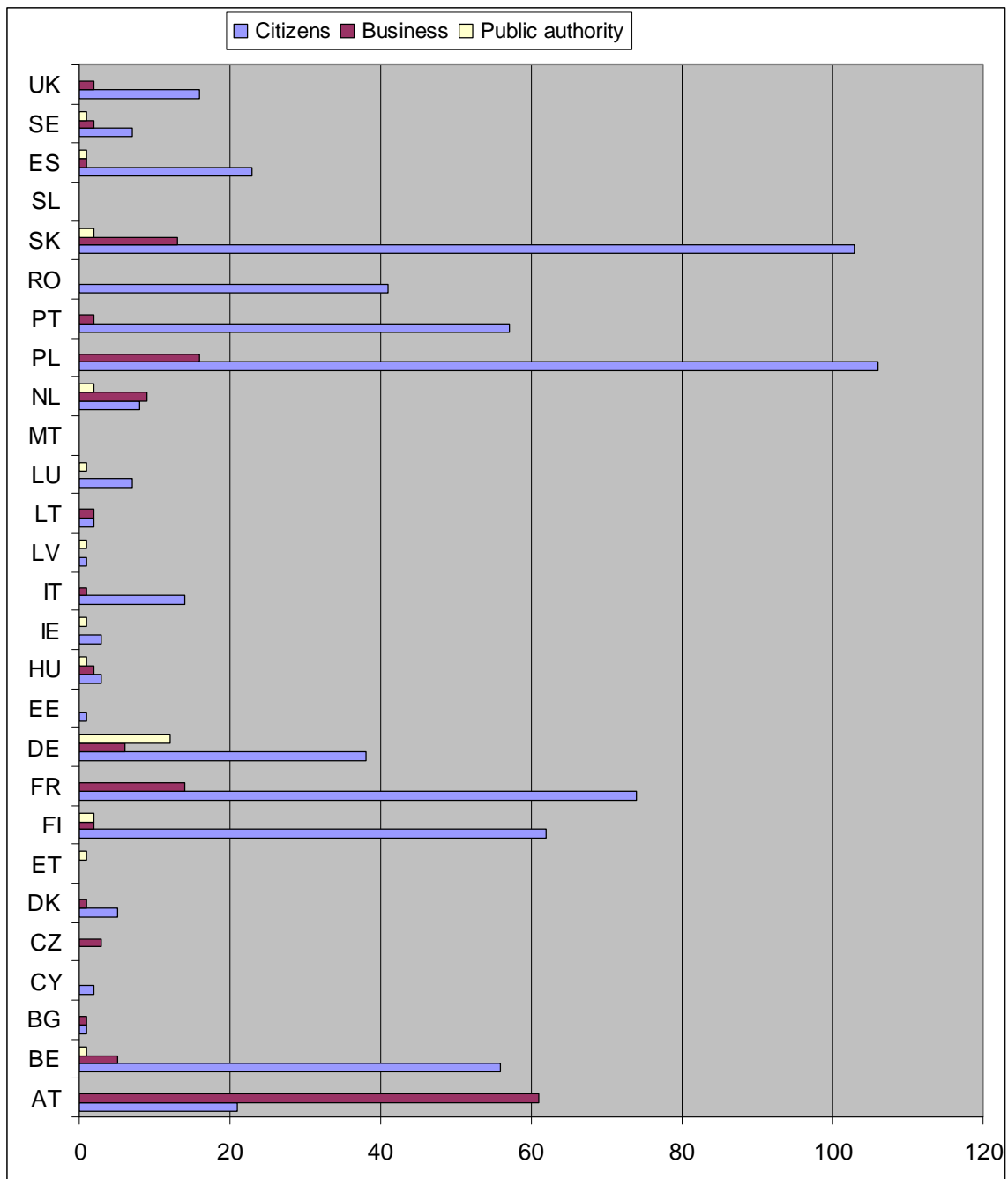


Figure 2: Contributions by category of stakeholder and Member State of origin

Respondents in all stakeholder categories generally welcomed the public consultation. A large majority supported a possible future initiative by the Commission to simplify and facilitate formalities and conditions for the registration of motor vehicles previously registered in another Member State.

3. OVERVIEW OF THE RESULTS

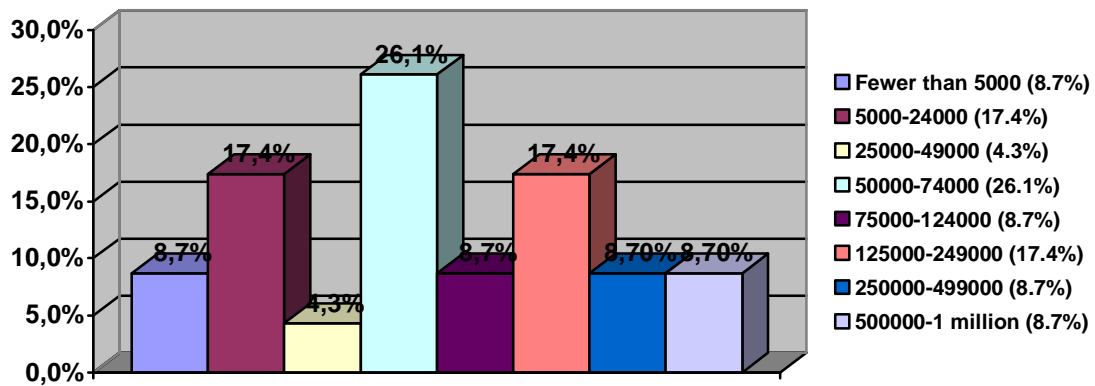


Figure 3: Number of applications to register new vehicles received in the past 12 months

In order to justify a future initiative based on existing data in the Member States, public authorities were invited to provide both the number of applications for the registration of new vehicles and the number of applications for re-registering previously registered vehicles.

Figures indicate that the public authorities in the Member States deal each year with a considerable number of applications for the registration of both new vehicles and vehicles previously registered in another Member State.

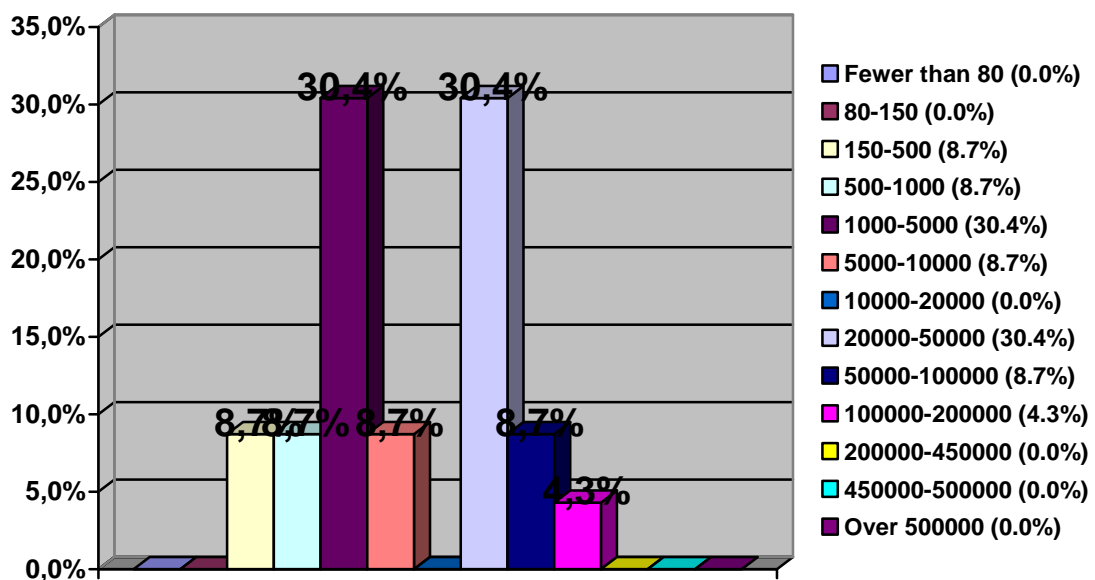
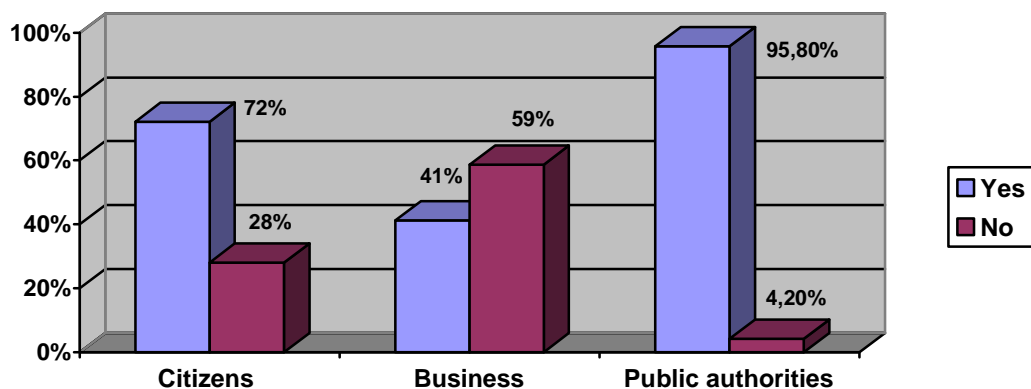


Figure 4: Number of applications to register vehicles that were previously registered in another Member State received in the past 12 months

Question 1: *Have you had (procedural) problems when registering vehicles that were previously registered in another Member State?*

Re-registration of a vehicle posed problems for a significant majority of citizens, but also for many businesses. The variation in the case of the latter is most probably due to a large number of identical answers from Austria.

The figure for public authorities (95.8 %) indicates that almost all faced several procedural problems when requested to register a vehicle previously registered in another Member State.



Question 2: *What problems did you have⁵?*

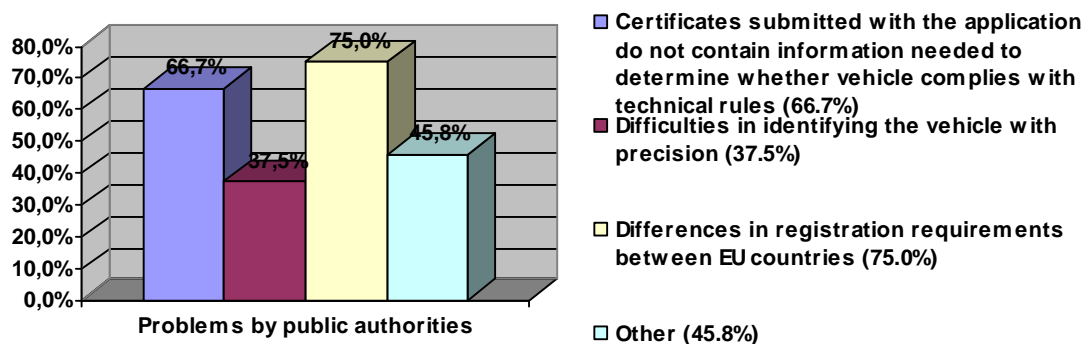
Citizens and businesses were requested to specify the types of problems encountered. The figures in the table below are comparable for both categories of stakeholders, thus indicating recurrent problems.

Apart from the listed problems, high registration taxes (Denmark), additional recycling fees (Poland), and problems with proving the identity of historic vehicles (Belgium, the Netherlands) were also mentioned.

⁵ Multiple choice reply.

	Problem	Citizens	Business
1	The vehicle reg. authorities required additional technical checks or certificates	67.9 %	69.5 %
2	The registering country required a new roadworthiness test, even though the vehicle had passed one in another EU country	54.3 %	50.8 %
3	Long and complicated procedures	81.6 %	67.8 %
4	Differences in registration requirements between countries	44.7 %	37.3 %
5	A valid EU type-approval certificate was not recognised by reg. authorities in the receiving country	17.3 %	13.6 %
6	The vehicle was not EU type-approved (new type approval requested)	18.2 %	20.3 %
7	Required to submit an EU type-approval certificate	20.7 %	11.9 %
8	Unable to temporarily transfer a vehicle from one EU country to another	12.4 %	18.6 %
9	Required to supply technical information you did not have	26.7 %	32.2 %
10	The authorities did not recognise some of the technical documentation submitted	15.2 %	30.5 %
11	The authorities refused requests to have the vehicle registered there	8.8 %	27.1 %
12	Other	25.4 %	18.6 %

For public authorities, the main problems relate to differences between Member States in registration procedures and to the exchange of information required for re-registering motor vehicles. In addition, not all Member States de-register motor vehicles automatically after receiving notification, and this leads to even longer and more complicated re-registration procedures for all concerned. Therefore, standardisation of the information exchanged could constitute part of the solution.



Question 3: *What is the effect of these problems⁶?*

Registration problems have a negative impact on citizens and businesses. Long procedures (for 77.8% of citizens and 83.1% of businesses) and extra costs (for 86.5% of citizens and 81.4% of businesses) are identified as the main effects, with 50.8% of businesses being discouraged from moving cars from one Member State to another. For 55.9% of the businesses consulted, the problems identified under question 2 above seriously affect productivity. For 64.4%, they also affect growth. Finally, 23.7% of citizens and 28.8% of businesses stated that, in the end, they could not register a vehicle in the Member State concerned.

Effects of the problems	Citizens	Business
The procedure takes too long	77.8 %	83.1 %
It creates extra costs	86.5 %	81.4 %
In the end, you can not register vehicle	23.7 %	28.8 %
It discourages you from moving your car in the EU	-	50.8 %
It affects the productivity of your business	-	55.9 %
It affects the growth of your business	-	64.4 %
Other	-	13.6 %

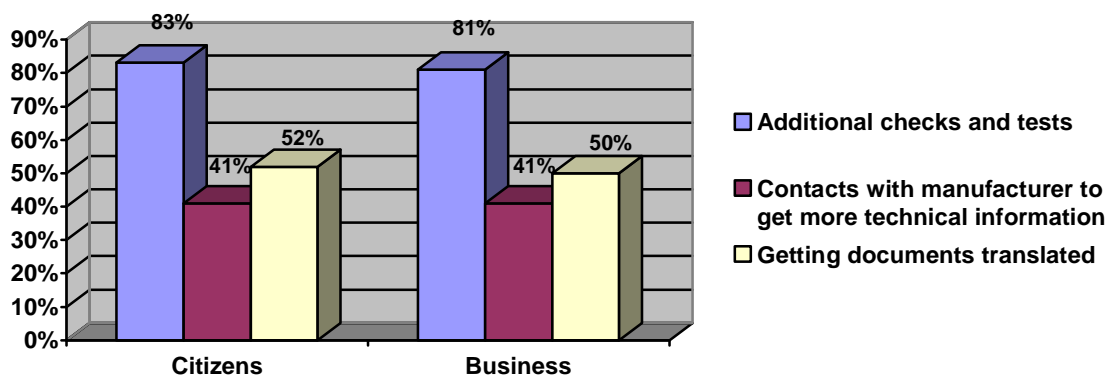
Question 4: *What causes these additional costs⁷?*

According to the contributions received, most additional costs are generated by requests to undergo additional checks and tests (83.2% of citizens, 81.2% of businesses), to translate documents (52.1% of citizens, 50.0% of businesses) and to contact the manufacturer for additional technical information (41.5% of citizens, 41.7% of businesses).

Citizens and businesses estimated the additional costs as ranging from EUR 200 – 400 in some Member States (France, Poland, Germany) to as much as EUR 10000 in the Scandinavian countries.

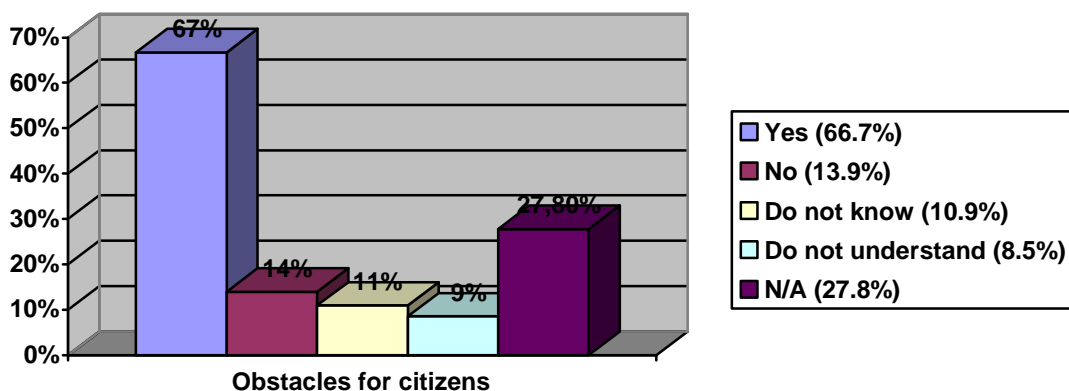
⁶ Multiple choice reply.

⁷ Multiple choice reply.



Question 5: *Are problems with vehicle registration creating obstacles to your commercial choices and /or everyday life?*

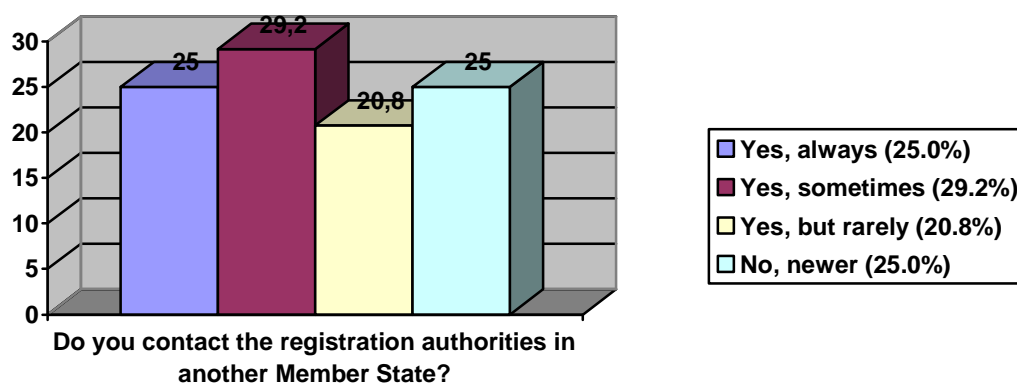
Two out of three citizens consider that problems encountered when moving a car from one Member State to another result in obstacles to choice.



Question 6: *When one of the problems listed in the previous questions arises, do you contact the registration authorities in the EU country where the car was previously registered to get more information?*

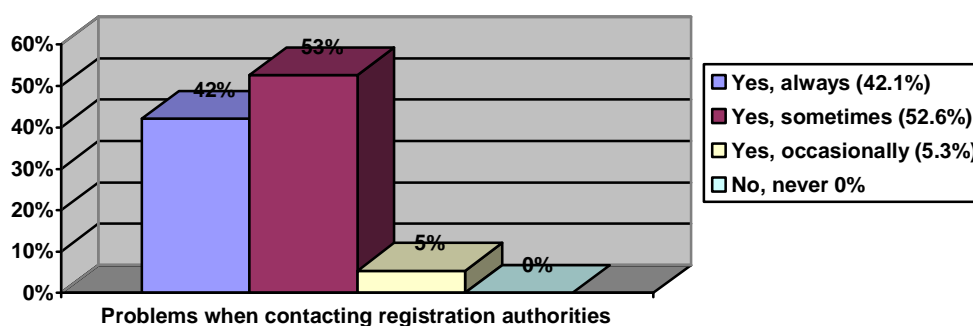
Three quarters of the public authorities say they contact the registration authorities in the Member State where the motor vehicle was previously registered in order to get information needed for re-registration.

However, only one quarter of the public authorities always contact their counterparts in another Member State in such cases.



Question 7: *Do you have problems when contacting registration authorities in other EU countries?*

Most public authorities frequently face problems when contacting registration authorities in other Member State. 95.8 % of public authorities state they have encountered problems.

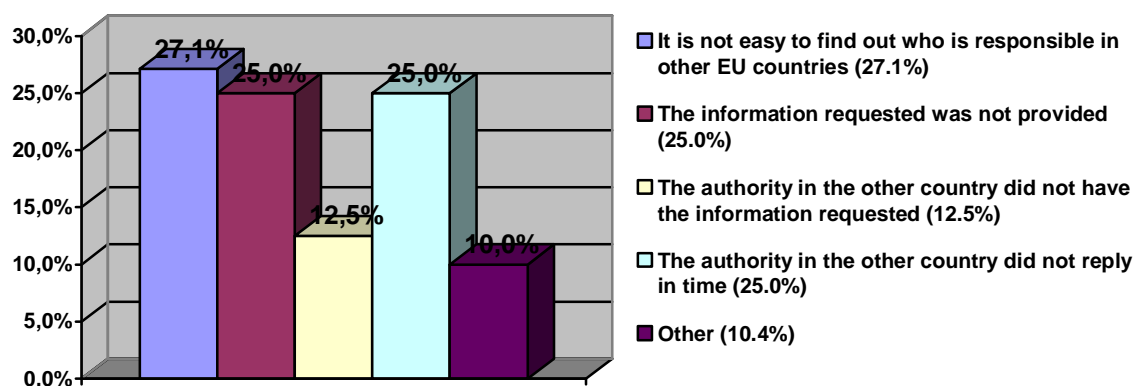


Question 8: *What are these problems⁸?*

The main problems mentioned by public authorities are identification of the competent public authority in the other Member State (27.1 %), not being given the required information (25.0 %), late reply from the counterpart (25.0 %), their counterparts did not have the information requested (12.5 %).

10% of the public authorities pointed at other problems.

⁸ Multiple choice reply.

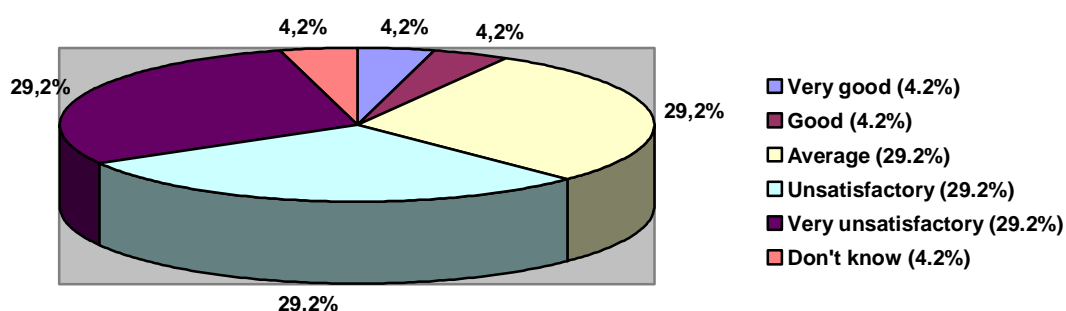


Types of problems

Question 9: *In your view, is the current system for sharing information between registration authorities in different countries very good/good/average/unsatisfactory/very unsatisfactory?*

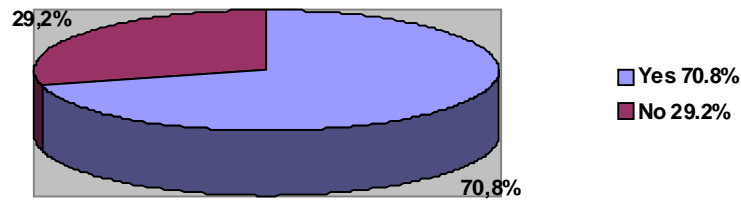
Almost 60% of the public authorities consider the current system for exchanging information to be unsatisfactory. This figure indicates the importance of tackling the issue of exchanging and sharing information between registration authorities in the EU, in order to facilitate the overall re-registration procedure by decreasing its duration and cost.

In separate written contributions, public authorities from the Netherlands, Ireland and Germany specifically identified EUCARIS (the European Car and Driving Licence Information System) as a useful and practical tool to improve communication and information exchange between registration authorities.



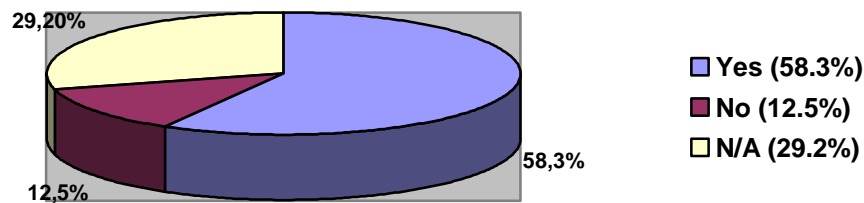
Question 10: *Are you aware of the existence of any centralised or local databases?*

In general, most public authorities (70.8%) are aware of the existence of centralised or local databases. However, it should be noted that almost one third do not know of such databases, which is bound to affect the duration of the overall re-registration procedure and its effectiveness.



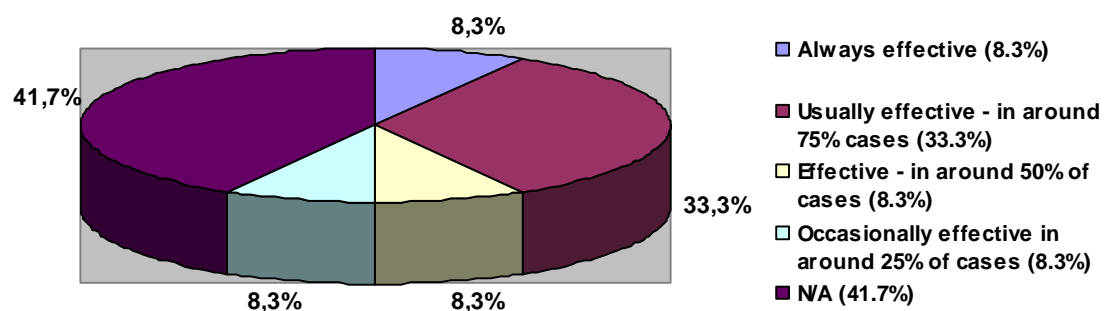
Question 11: *If so, have you ever used the database(s) when dealing with an application to register a vehicle previously registered in another EU country?*

58.3 % of the public authorities aware of the existence of databases stated that they make use of them, but the overall figure is not encouraging and reflects a need to improve communication and information exchange. Moreover, the respondents also admit there is still room for improving their effective use (see also question 12).



Question 12: *Do you think this method is effective?*

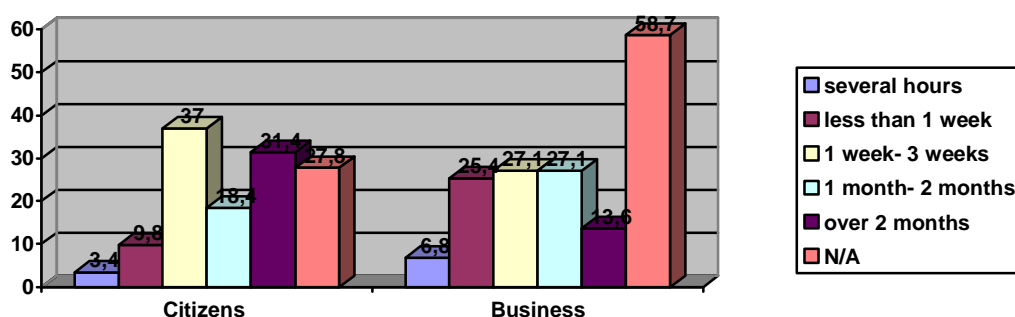
The majority of public authorities that use the databases available consider them to be a very effective tool, significantly facilitating their work. It is worth noting, however, that 41.7 % of public authorities did not reply to this question.



Question 13: *How long did the registration procedure take in the receiving country?*

Replies from citizens and businesses illustrate a large variation in the duration of registration procedures. Thus, almost half of the consulted citizens said registration took more than 1 month. The figure for businesses is similar (for 27.1 %, registration took over

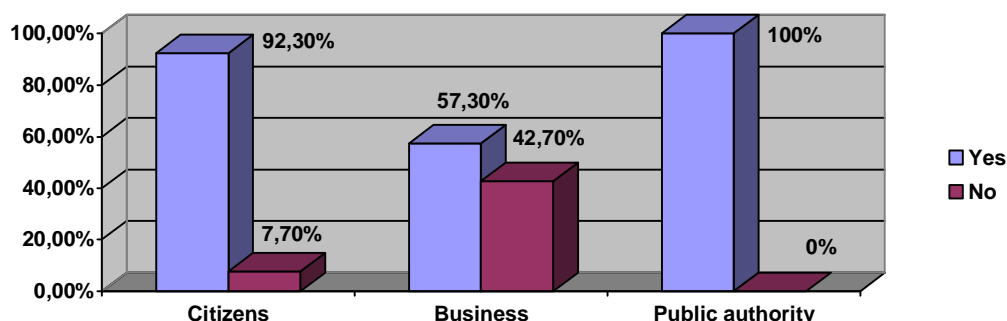
1 month and for 13.6% more than 2 months). It is worth noting that almost 60% of businesses and 30% of citizens did not reply to this question.



The respondents were given the opportunity to express their view on a possible EU action to improve the current situation, as well as their preference on different proposals.

Question 14: *Should action be taken at EU level to improve the situation?*

As shown in the table below, for all categories of stakeholders, a significant majority believe that action should be taken at EU level to improve the current situation. Most importantly, all public authorities that contributed to the consultation are in favour of action been taken at EU level.



Question 15: *Could the situation be improved by a new EU system that recognises vehicles already registered in another EU country?*

54.9% of businesses, 69.7% of citizens and 41.7% of public authorities replied that the current situation could be improved by a new EU system that recognises vehicles already registered in another Member State.

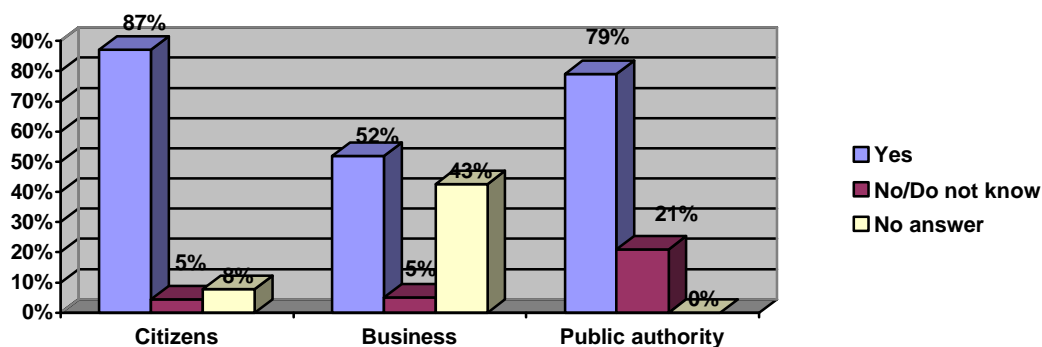
For 23.4% of businesses, 15.4% of citizens and 16.7% of public authorities this measure alone would not completely solve the current problems, and should be accompanied by additional measures. In the case of Austria, the majority of stakeholders (70%) considered that this issue should preferably be addressed through national legislation.

Proposals	Citizens	Business	Public authorities
Yes, definitely	69.7 %	54.9 %	41.7 %
Yes, it could help although the problem would not be totally solved	12.0 %	13.4 %	16.7 %
Yes, but only if combined with other measures	15.4 %	23.2 %	16.7 %
No, it would not improve things	0.4 %	2.4 %	8.3 %
No, it could create administrative problems between different countries	0.2 %	1.2 %	0.0 %
No, it could create conflicts with national registration requirements	0.3 %	1.2 %	4.2 %
Do not know	1.8 %	3.7 %	12.5 %
N/A	7.7 %	42.7 %	0.0 %

Question 16: *Would it be useful to introduce an EU registration certificate, which would not need to be replaced when a vehicle is transferred from one Member State to another?*

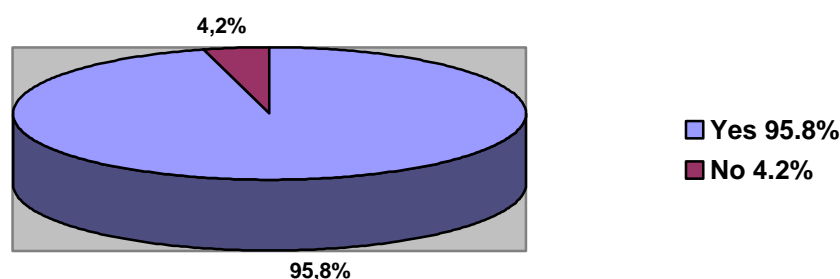
A significant majority of stakeholders would like to see an EU registration certificate: 87.7 % of citizens, 52.4 % of businesses and 79.2 % of public authorities.

Moreover, they welcome the idea that this new certificate would not need replacing when a vehicle is transferred between Member States and would contain all the necessary technical and personal information in a unique format, recognised in all Member States



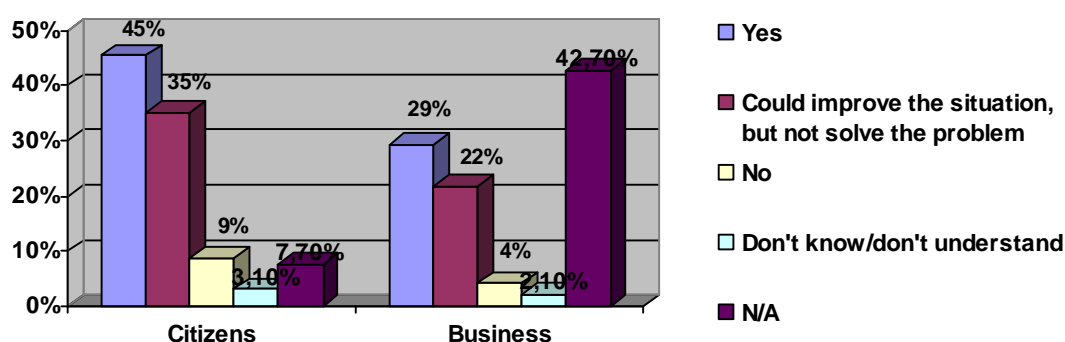
Question 17: *Would the situation be improved by a shared system linking the different registration authorities in every EU country and enabling them to exchange vehicle data and technical registration information?*

A vast majority of public authorities supported a shared system, linking the different registration authorities in every Member State, which would ensure effective exchange of vehicle data and technical registration information. However, some concerns were expressed as to the timing and costs of introducing such a system.



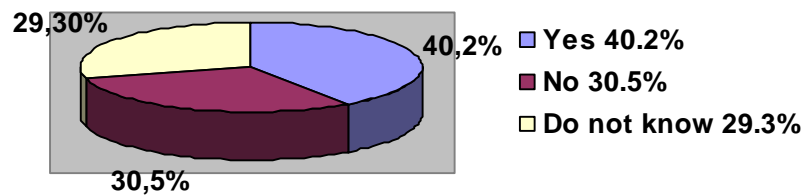
Question 18: *Could problems be solved by improving communication and information sharing between national registration authorities?*

For 80% of citizens and 51% of businesses improving communication and information sharing between national registration authorities would properly address the current problems, though not all consider that this alone would solve the problems. It is worth noting that over 40% of the businesses did not answer the question.



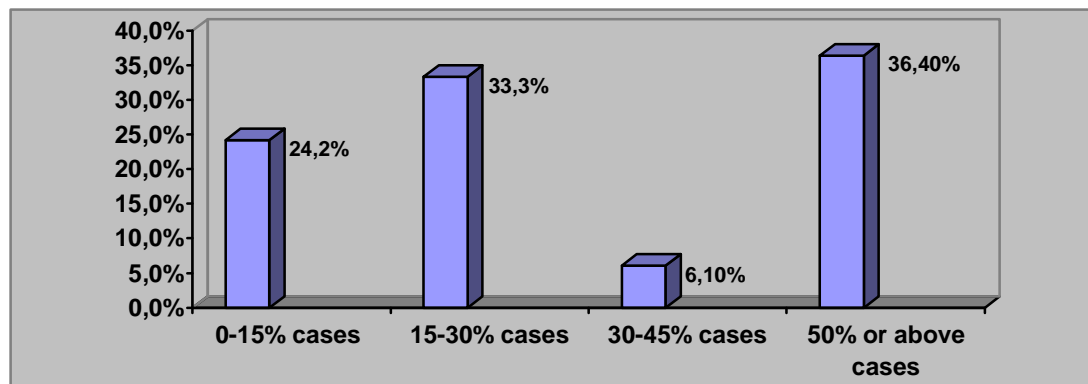
Question 19: *Would it help your business if we introduced a temporary authorisation for transferring vehicles already registered in one EU country, provided they are used for commercial purposes (e.g. car rental, leasing)?*

40.2% of businesses would welcome the introduction of temporary registration for businesses at EU level, given that registration procedures vary from one Member State to another, resulting in legal uncertainty. However, for a significant number of businesses (30.5%) a temporary authorisation for transferring vehicles would be of no help.



Please estimate by how much:

36.4% of businesses in favour of temporary registration for businesses at EU level⁹ expect this to help their business in 50% or more of cases and for 6.1% of them only in up to 45% of cases.



Question 20: *Please rank the following proposals in order of preference*

Following on from questions 14-16, stakeholders were invited to rank the proposals in order of preference. While public authorities and businesses give preference to improving communication and information sharing between authorities, for the majority of citizens the first choice is an EU system for mutual recognition of registration.

Worth observing is that, while the preferences of public authorities are evenly balanced between the three proposals, for citizens and businesses the preference is strong for their respective first options.

⁹ See above, Question 19.

Proposals	Citizens	Business	Public authorities
Improving communication and information sharing between authorities	10.7 %	58.5 %	37.5 %
European document containing all the necessary information	34.6 %	25.6 %	33.3 %
EU system for mutual recognition of registration	54.7 %	15.9 %	29.2 %

Some public authorities included additional comments when answering the questionnaire. An important point relates to the need to improve the system for the detection of stolen vehicles in the EU to tackle illegal cross-border vehicle trafficking, considering the magnitude of the phenomenon (approx. 800 000 vehicles a year are stolen in the EU). Furthermore, problems could arise with registering motor vehicles built and designed in series for third country markets where requirements are less strict than in the EU (e.g. lower safety and environment performance).

3. CONCLUSION AND SUBSEQUENT STEPS

A conference on the re-registration of vehicles previously registered in another Member State was held on 21 June 2011 in Brussels. The conference was well attended by stakeholders (including businesses and the European association of national registration authorities) from 22 Member States. One of the objectives of the conference was to present the preliminary results of the public consultation on car registration. It also provided a forum for debate and exchange of information between the different stakeholders. The Commission presented the preliminary results of the public consultation and the conclusions of the impact assessment preceding adoption of a future instrument by the European Commission.

The main issues raised by participants from Member States concerned: the need to improve and standardise the exchange of information between national authorities; the importance of a traceable legal status for vehicles (including for stolen and scrapped vehicles); the proper use of existing databases (e.g. EUCARIS); the need to improve Commission supervision and enforcement of existing EU legal instruments; the importance of harmonised certificates for vehicles, from placing on the market to end of life; the need to harmonise the registration procedure at EU level in order to resolve certain problems that create obstacles.

Businesses mainly called for facilitating the temporary transfer of vehicles in order to meet seasonal demands and to ensure the genuine free movement of goods and services.

According to the contributions received during the public consultation and the conference, consideration should be given to simplification of the formalities and facilitation of the requirements for the registration of motor vehicles in the EU and action should be taken at EU level.

Contributions to the public consultation will constitute important inputs in preparing the legislative proposal to be tabled for adoption by the Commission in 2012.