



RDW

Board

European Commission
Idaira ROBAYNA-ALFONSO

Directorate-General Enterprise & Industry
Unit 4. Internal market and enforcement
B-1049 Brussels
BELGIUM

Your reference

Our reference

Date

Enclosure(s)

27 May 2011

Contactperson

Extension

E-mail

Subject

Additional information concerning the Public Consultation on Vehicle Registration

Dear Mrs Robayna-Alfonso,

First of all, I would like to thank the European Commission for taking action on the important subject of re-registration of motor vehicles within the EU. In addition, I would like to inform you that RDW in the Netherlands has participated in the public consultation. With this letter, I take the opportunity to send you more detailed information about the problems and solutions regarding the process of re-registration in Europe to be able to do justice to the complexity of the subject.

As you may know, RDW actively participates in Topic Group II of EReg (the Association of European Vehicle and Driver Registration authorities) which deals with the issue of re-registration of vehicles within the EU. As discussed in previous meetings of EReg Topic Group II, RDW mainly has problems with the lack of proper communication between some of the Member States with regard to the re-registration process. In case of doubts about the status of a motor vehicle, the RDW needs to be able to check available information by making an inquiry to the Member State of origin. However, unfortunately, there are Member States (for instance Italy and France) that do not react to these inquiries, which makes it impossible to safely re-register the motor vehicle in the Netherlands.

In the public consultation the European Commission expresses the following possible solutions to deal with the problems:

- (1) Improved communication and information exchange between authorities;
- (2) A European document containing all necessary information;
- (3) A central EU system for exchange of vehicle registration information.



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RDW has the opinion that solution (2) and solution (3) are no remedy for the real problems that arise at the re-registration process. The RDW also sees that in every Member State there are important national dependencies concerning the vehicle registration. For the Netherlands for example these are private motor vehicle tax and legal weights. It will be impossible and unnecessary to resolve this with a European document or a central EU system. Additionally, a major problem will arise regarding the technical management of these solutions.

Solution (1) is actually already in place due to the existence of Eucaris (the European Car and Driving Licence Information System), which is used to exchange vehicle and driver information between the Member States. The philosophy behind Eucaris is that all incoming and outgoing requests go through the national registration authority. The RDW has also the legal view that Eucaris completely fits in Article 9 1999/37/EC and can be used by for the mentioned purpose. Member States shall assist one another in the implementation of this Directive. They may exchange information at bilateral or multilateral level in particular so as to check, before any registration of a vehicle, the latter's legal status, where necessary in the Member State in which it was previously registered. Such checking may in particular involve the use of an electronic network.

The use of Eucaris avoids spaghetti of connections between different European registration authorities. Eucaris not only contributes to the prevention, detection and prosecution of violations of the law, the system also plays a part in keeping the national vehicle and driving licence records accurate and up-to-date. The quick exchange of data increases the efficiency, efficacy and accuracy of administrative procedures and the registers. For citizens the use of Eucaris means that vehicle documents and motor vehicles from abroad are checked before re-registration. Eucaris provides an easy and fast way of assuring that motor vehicles are free of fraud and crime when admitted on the roads in another Member State.

RDW would like to recommend the European Commission to make the use of Eucaris mandatory under EU regulation would be a good solution, ensuring proper communicating between Member States in the re-registration process. This approach would also be in line with the Prüm Council Decision (2008/615/JHA), which requires all Member States to use Eucaris for Prüm-related exchange of vehicle owner/holder information as from 1 January 2012.

I hope to have informed you sufficiently. Please note that experts of RDW are available to assist the European Commission, providing their knowledge, time and expertise.



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With kind regards,

A handwritten signature in black ink, appearing to read "J.G. Hakkenberg", is enclosed within a large, loopy oval stroke.

Mr J.G. Hakkenberg
CEO RDW
The Netherlands