



The Fédération Internationale des Véhicules Anciens (FIVA) was founded in 1966 as the international federation of historic vehicle clubs. FIVA member clubs currently count for over one million members in 60 countries. (www.fiva.org).

FIVA's principal objective is to further the preservation and use of historic vehicles, which by their nature, are owned by enthusiasts and preserved in historically correct condition. Historic vehicles are kept for their technical, cultural and historical contribution to our common heritage and those which are in road-use are well maintained and not generally used as everyday transport. Within the EU the most commonly accepted age threshold for historic vehicles is 30 years.

FIVA has made a submission to the on-line questionnaire and has also informed FIVA's members of the on-line questionnaire to encourage submissions from the historic vehicle community. However, as the on-line questionnaire did not address the most common problem faced by historic vehicle owners: attempting to register historic vehicles, which is the situation when a vehicle/owner has no original, or only incomplete documentation, FIVA is making this additional submission.

It is not uncommon for a historic vehicle to fail have original, or only incomplete documentation, when it is sold/bought within the EU. This is generally due to the passage of time and history of the vehicle since its manufacture, because it has been restored from a "barn find" or because the vehicle has never been registered because it was originally a military or similar vehicle. In some cases, if a vehicle has no documentation, on importation it is treated as "new" for registration purposes. This is not only inappropriate, but it also results in practical problems and means that the vehicle does not benefit from being treated as a "historic vehicle".

FIVA suggest that this situation can in future be avoided by:

- National registration authorities being willing and able to answer queries from registration authorities of other EU-countries within a reasonable timeframe to allow a swift resolution for the owner to questions concerning the registration documentation of a vehicle; and/or:
- authorities referring to available documented evidence of date of manufacture or documented evidence of first purchase in order to determine the age and details of the vehicle. This would be consistent with the *Footnote* provision provided by Commission Regulation No 183/2011 of 22 February 2011 amending Annexes IV and VI to Directive 2007/46/EC where in the Annex in Appendix 2 , Point 0: Objective states:

"A vehicle is deemed to be new where:

"(a) it has never been registered previously; or

(b) it has been registered for less than 6 months at the time of the application for individual approval.

A vehicle shall be considered registered where it has obtained a permanent, temporary or short-term administrative authorisation for entry into service in road traffic, involving its identification and the issuing of a registration number ⁽¹⁾.

The *Footnote* is detailed on page 30 (L 53/29 of 26.2.2011 - attached) and states:

⁽¹⁾ In the absence of a registration document, the competent authority may refer to available documented evidence of date of manufacture or documented evidence of first purchase."

FIVA is most willing to try to gather detailed data concerning this matter in order to try to help the Commission address this particular, limited, but real problem faced by historic vehicle owners buying vehicles within the EU.

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