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Handläggare  
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## **Swedish comments for the development of Directive 1999/37/EC**

A development of 1999/37/EC is certainly to be welcomed as the directive is out-dated and there are some gaps in it. A rewriting of the directive is preferable. A framework regulation should be created as a basis for giving the EU Commission a mandate to come with implementing acts. In the same area, vehicle registration, there is, for example, implementing regulation 2021/133/EU where the mandate is found in Article 37.8 of 2018/858/EU. The amendment of 1999/37/EC could be developed in the same way.

### **New provisions**

(1) SE- we support the introduction of digitization of the registration certificate. It's a natural step as the CoC was recently digitized, see 2021/133/EU. The CoC and the registration certificate have connections. The digitization of the registration certificate should be organized and harmonized and follow ISO standards. However, the shift requires extensive work in the MS and the MS should have a long time frame for implementing it.

Exchange of information between the countries should take place electronically without having physical documents. The existing EUCARIS system is preferable as many countries already use it, see e.g. 2021/133/EU. It's a obvious choice of system and are used for various purposes and is cost-effective. EUCARIS only transports data, it doesn't store data and is not a database. A MS asks a question about a vehicle and receives an answer from another MS. The source of the information remains in the MS of registration, while the interlinking of national registers is linked.

(2)SE- we support harmonization of additional information to be registered in the national vehicle register and then exchanged between the MS. It must be a benefit and purpose of the information before taking the step. It's extensive registration data that is proposed and the MS should have several years to implement it.

In Sweden, the odometer is read out during a PTI and registered in the vehicle register and is available several years. We think it's sufficient input

in this area and don't see the benefit of reading out the odometer in connection with workshop visits also. To introduce read out from the odometer by an actor other than a vehicle inspection would result that new functionalities has to be introduced and are likely to be associated with a lot of costs both for the vehicle owner and for the authorities in Sweden. After 5 years, a car must do PTI every 14 months in Sweden, we see that it's sufficient to out read the odometer during this interval.

In order to increase the road safety, it's a good idea to exchange information about major accidents and incidents between the MS. The concepts should be harmonized and defined to avoid interpretations. Sweden will start registering information about major accidents in the vehicle register from February 2023. The police will have the opportunity to report major accidents to us, which will then be registered in the vehicle register.

It's unclear if the proposed PTI status will take effect. Either a vehicle is approved in the PTI and may be used on the roads, or the vehicle is not approved in the PTI and has got suspended. We believe that this is sufficient information about a vehicle.

The question needs to be developed more in order to gain an understanding of what is behind and what the problem is. If the vehicle is modified, the vehicle must appear to the vehicle inspection in Sweden and the inspection is registered in the vehicle register.

(3) There is a lot of development in the vehicle industry now, autonomous cars are on the way and we have the ITS system and other new technical functions are coming. Soon a vehicle will be able to have one colour when you go to work, and another colour when you are coming home. What colour should be registered in the vehicle register? We are used to have static registration, but dynamic registration is the future, and the question is if the time is right to switch to it now? On the other hand, the real-world data will start to be registered, see 2021/392/EU, so we have already taken a step closer to dynamic registration. The vehicle industry develops new technologies and we must follow the development and enable it through legislation.

(4) Please see question 1.

(5) Digitization of the transport sector is very good as it already contains a lot of administrative parts for both the vehicle owner and the authorities. The more digital we become, the less burden becomes for everyone who is involved. It should be in orderly forms and harmonization and follow standards.

### **Improving or Extending existing provisions**

(1) Such work has already been done by the registration authorities in the EReg collaboration. There is a draft report which can be read here <https://www.ereg-association.eu/media/2641/annex-iii-draft-report-topic-group-xxi-proposal-on-the-registration-of-vehicle-data-v09.pdf>.

(2) A work on re-registration of vehicles was done about 10 years ago. The MS were divided and we never reached the finish line. This issue should be re-opened and complete. We should not use physical paper and switch over to digitization.

The work with revision of the end-of-life directive of vehicles (2000/53/EU) is ongoing in another expert group under DG-ENV that handles the questions and it should be coordinated. A national coordination is ongoing and a final position will be delivered later on questions related to ELV, deregistration for export and provisions for export etc.

It's a large demands to register component traceability. It's a large volume of data that needs to be managed and registered. There will likely be a significant cost to start this. The question is what benefit this provides. An impact assessment should be prepared before proceeding.