

Position Paper

July 2025

Revision of the EU's Roadworthiness Package

Summary

Bitkom supports the EU Commission's goal of further digitalizing the transport sector and making things noticeably easier for citizens and mobility providers in the EU by digitalizing vehicle registration documents and processes.

The 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 provides the right impetus and is to be welcomed in principle. At the same time, key points for the widespread use of the digital registration certificate must be clarified or adapted and the use of register data must be optimized.

Individual remarks

Creating a viable solution for operators of large vehicle fleets

According to Art. 5 (1) in conjunction with Annex III of the draft directive, Member States are obliged to provide the digital registration certificate in the EUDI wallet (European Digital Identity Wallet). In addition, the registration certificate must meet the requirements of Regulation (EU) No. 910/2014 on electronic identification and trust services for electronic transactions in the internal market.

Regarding provision in the EUDI wallet, the directive should clarify that this also explicitly refers to a wallet based on an organizational identity (such as the European Business Wallet currently being developed by the EU Commission). Otherwise, a central user group risks being left out: Companies that manage a large fleet of vehicles and may want or need to provide digital registration certificates to a large number of changing individuals.

The fleet business is fast-moving and is characterized in particular by scalability (size). Fleet vehicles are used in a wide variety of business areas: in car sharing, in the rental car sector, in the replacement car business and in company fleets. Due to the daily use of the vehicle by frequently changing drivers and the cleaning processes, the possibility of documents being lost or stolen cannot be ruled out. Once they have been identified, affected vehicles must be taken out of the fleet at short notice for the duration of the replacement, which is time-consuming, costly and simply inefficient. In addition, there is case law (see Higher Regional Court (OLG) Celle, VersR 2008, 204) which assumes that the storage of original documents in the vehicle increases the risk in the event of vehicle theft, meaning that comprehensive cover may no longer apply.

A digital registration certificate would not only reduce bureaucracy when providing the vehicle, but also in the context of the annual general inspection, as tens of thousands of registration certificates would no longer have to be physically stored.

The directive must therefore ensure that the digital registration certificate can also be applied for and used by companies in an unbureaucratic manner (e.g. via a suitable major customer interface). In addition, companies should be able to pass on the digital vehicle registration certificate to authorized natural persons - such as employees, drivers or tenants - via their own existing channels, e.g. via an app, an online portal or as part of digital contract documents.

In addition, the question arises as to whether the current obligation to carry the certificate is necessary and up to date at all. The fact that the directive merely gives member states the option - i.e. does not oblige them to do so - and that EU member states such as Ireland, Poland or the Czech Republic manage without an obligation to carry and instead use data from the national registration registers, shows that there is no need for an obligation. In line with the EU Competitiveness Compass, we therefore propose that Article 10, paragraphs 1 and 2, be deleted or at least amended so that drivers of fleet vehicles are exempt from the obligation to carry their vehicle registration.

Enable use for citizens from non-EU countries

In principle, the possibility of using the digital registration certificate as a driver in the EUDI Wallet is to be welcomed. However, limiting its use to the EUDI wallet threatens to deny the digital registration certificate to all those who do not have identity documents or an electronic residence permit from an EU member state and are therefore unable to use the EUDI Wallet. Travelers from non-EU countries or people who do not (yet) have official residence status would therefore be forced to insist on a physical registration certificate when renting a car or using a car-sharing vehicle, for example.

This in turn would significantly hinder the spread of the digital registration certificate, as operators of large vehicle fleets would be forced to apply for physical registration certificates. It must therefore be ensured that third parties who are authorized to use a vehicle and do not have access to an EUDI wallet can also use the digital registration certificate in a legally secure manner.

Making vehicle registers effective and comprehensive

We expressly welcome the fact that the national vehicle registers are to be consistently digitized and linked across Europe in accordance with Article 6 of the draft directive. In the current draft version, the digital vehicle registers are only to be used for the exchange of information between Member States and for access by the competent authorities of the EU Member States.

Enable digital «Sharing Vignettes»

Vehicles that are used in car sharing fleets in Germany and wish to make use of privileges as defined by the German Carsharing Act (CsgG) - such as the prioritized use of or preferential fees for parking spaces - require an official sticker in accordance with Section 4 CsgG, which must be visibly affixed behind the windshield.

The application, affixing and, if necessary, removal of the sticker leads to considerable, unnecessary bureaucratic effort for operators and road traffic authorities alike. Affixing a physical sticker is also no longer in keeping with the times, especially as a simple digital solution can provide a remedy here. All that would be required is a corresponding entry in the vehicle register that the vehicle is a sharing vehicle. The directive must include a corresponding provision for digital vehicle registers.

Make relevant registration data accessible to all competent authorities

To enable owner and vehicle checks even without an individual registration certificate, official access to the vehicle register should be designed in a targeted manner. We propose that access to all relevant data (roadworthiness status, vehicle registration data, insurance status, etc.) be made possible with graduated and needs-based access rights depending on the requesting authority. In this case, for example, the police, customs or other legitimate control authorities would have access to all relevant information based on the license plate number. The implementation of such a solution throughout the EU would not only facilitate the resale of vehicles but would also make the issuing of digital (or even analog) registration & inspection certificates completely superfluous.

In the UK and Poland, there is already a register-based solution that allows third parties to check vehicle taxation, insurance status and the result of regular technical inspections, among other things, using the vehicle registration number. With the introduction of these systems, the need to carry vehicle registration documents has become obsolete, while the direct retrieval of official register data has simultaneously reduced fraud - and thus strengthened consumer protection.

Enable access to selected vehicle register data also for owners

In addition, the vehicle owner should have access to individual data points from the vehicle register to obtain transparency about the history of their own vehicle, as well as to pass this data on to third parties - for example for the purpose of providing digital services:

- »information on any significant modification of the safety or environmental systems and components of the vehicle;« (Art. 6 (1) c)

- »information on reasons for cancellation of a registration of the vehicle, where that vehicle:«
 - »has been registered in breach of the requirements on vehicle registration under Union or national law;« (Art. 6 (1) g) v) RL-E)
 - »has been subject to cancellation of its registration for any other reasons. (Art. 6 (1) g) vii) RL-E)

Adjust the timeframe to be more ambitious

According to Article 3 (4) of the draft directive, the obligation to issue digital registration certificates should only apply four years after the directive comes into force. This means that a nationwide rollout of the digital vehicle registration certificate is not expected before 2031. This is clearly too late in view of the justifiably high public expectations of an effective and digital public administration and an efficient transport system. The transition period should therefore be reduced to one year after entry into force.

Against the background of UNECE R156 (Software Update Management) / R155 (Cyber Security Management), which has been mandatory for all newly produced vehicles since July 2024, and ISO 24089, which applies in Europe, car manufacturers will increasingly install over-the-air (OTA) software updates in vehicles. These may be relevant for type approval and therefore also relevant for the digital registration certificate. An end-to-end process from software changes to digital homologation / type approval through to OTA and the adaptation of the digital registration certificate must therefore be a top priority.

Bitkom represents more than 2,200 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 500 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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WG Smart Mobility (AK Intelligente Mobilität)

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