



Railway sector statement on the Agency becoming a registration entity for railway vehicles

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AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE support the centralised registration function of the European Vehicle Register as defined in the Commission Implementing Regulation 2018/1614 of 25 October 2018. AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE support the migration of data for registered vehicles from the NVRs to the centralised registration function of EVR.

ERA as a registration entity

AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE support the intention that the Agency becomes a registration entity and hence giving the applicant the choice between a national registration entity and the European registration entity. AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE underline the need for the correct use of the indefinite article “a” in the legal text. The provisions in article 5 of the Commission Implementing Regulation 2018/1614 need to be amended accordingly.

In the translation of the text into the other official languages of the European Union, the indefinite article “a” must be correctly translated and not be transformed into the definite article “the”.

Coding of the countries in which the vehicles are registered

If article 5 is amended, AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE suggest to allocate a numerical “country” code to ERA as registration entity (with the alphabetical “country” code being “EU”) [Reference: Appendix 2 - Part 4 - Coding of the countries in which the vehicles are registered (digits 3-4 and abbreviation)].

Access rights

AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE do not object to all vehicle registration data in EVR being public. Nonetheless, AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE stress that only interoperability related vehicle information shall appear publicly and all data about natural persons (staff of RUs, IMs, keepers, ECMs and other actors) must be protected in line with REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data. AERRL, ALLRAIL, CER, EIM, ERFA, FEDECRAIL, UIP and UNIFE recommend refraining from publicly sharing information on the owner, keeper and ECM.

A further discussion on the full access to **all** parameters in the respective Annex of the EVR together with the sector stakeholders is suggested.