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NOTE

From:	General Secretariat of the Council
To:	Council
Subject:	Roadworthiness Package: 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 - General approach

Delegations will find attached a statement by the German Federal Government, followed by a courtesy translation in English to be included in the minutes of the Transport, Telecommunication and Energy Council.

Statement by the Federal Government of Germany for the minutes of the Transport Council meeting on 4 December 2025

on the general approach on the proposal for a Directive on the registration documents for vehicles and vehicle registration data recorded in national vehicle registers and repealing Council Directive 1999/37/EC ('VRD Directive').

The Federal Government welcomes the compromise reached and agrees to the general approach. The digitalisation of vehicle documents is an important concern that will bring noticeable relief to citizens as well as to the economy in the medium term. The Federal Government also supports the introduction of uniform requirements for national vehicle registers and the regulation of data exchange.

However, in clearly defined cases, the State's interest understandably outweighs the interest in harmonising the exchange of data between Member States. This is the case when public order or security are affected.

It therefore makes sense that the VRD Directive provides for exceptions to data exchange in Article 15(1) for precisely these cases – the obligation to collect and store data must not pose a security risk for EU Member States.

The Federal Government therefore welcomes the fact that all vehicles of authorities responsible for maintaining public order and security are exempt from the obligation to exchange data, including those of the armed forces and customs authorities.

Furthermore, the Federal Government understands Article 15(1) to mean that it is in principle up to the EU Member States to define the relevant cases or case groups and to assess whether the conditions for exemption are met for each case group as a whole. A vehicle-specific case-by-case examination is therefore not required.