

Moving Europe towards a sustainable and
safe railway system without frontiers.

Light Impact Assessment

*on the specification for the European Vehicle Register
referred to in Article 47 of Directive (EU) 2016/797 of the
European Parliament and of the Council and repealing Commission
Implementing Decision (EU) 2018/1614*

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1. Context and problem definition

1.1. Problem and problem drivers

Article 47 of DIRECTIVE (EU) 2016/797 requires the European Commission to adopt by means of implementing acts the technical and functional specifications for the European Vehicle Register (EVR) on the basis of a recommendation of the Agency. These specifications have been laid down with the publication of the [Commission Implementing Decision \(EU\) 2018/1614](#) in October 2018. EVR was put in full operation in November 2021. Member States have the choice of either hosting their (national) vehicle register until June 2024 or having it hosted by ERA. The majority of EU MSs have chosen to use EVR from the start, while some countries are still planning to migrate despite of the legal obligations to do so by June 2021. From June 2024, all vehicle registers will be hosted (and maintained) by ERA. Vehicle registrations are currently managed by the Registration Entities (RE) of each Member State. Vehicle registers exist in all EU Member States as well as additional non-EU countries.

An internal Agency Task Force analysed over the past 12 months the Return of Experience with the EVR in order to identify the current situation (As-Is) considering the relevant objectives for EVR. This analysis is currently feeding into and supporting the EVR Revision Working Party established in July 2023. Moreover, a brief survey launched during the Working Party provided additional concrete examples of significant challenges re. vehicle registration in Europe. The survey also highlighted the importance of regular monitoring of vehicle registration which should be prioritised in order to have a more in-depth picture of the state-of-play, issues encountered and emerging trends.

On this basis, a number of problem areas have been identified that lead to sub-optimal results given the current specifications of EVR. The main problems identified by the internal Task Force are:

- *The **absence of harmonisation of the registration process**, e.g. because of different supporting documents and additional fields requested by the different Registration Entities among other factors due to limited cooperation and sharing of experience among registration entities. These types of issues were confirmed by the recently completed survey (see further details in Section 1.2)*
- *A **complex registration process** because roles and responsibilities are not sufficiently clear or well described and because of the lack of common approach on electronic transmission of data (applications for registrations/update), documents and notifications. Part of the complexity issue is linked to stakeholders (e.g. applicants) not always having information about additional requirements (as demonstrated by the survey). Moreover, there are examples of countries where guides are not available on the website of the national registration entities*
- ***Registration data is not publicly available** which limits the possibility for evidence-based decision-making by the sector stakeholders and authorities (no public access to data is equal to no analysis based on vehicle related data).*
- ***Suboptimal data quality** is considered an issue, mainly because users may make mistakes when manually entering data in vehicle applications, while these data already exist in other ERA's registers and applications. Agency-led work has confirmed that data quality can be further improved, e.g. in terms of data completeness. For further information about data quality issues and their importance, a recent Economic Survey Group Task Force looked into the issue with reference to: 1) CSIs, 2) RINF, 3) ERADIS, 4) Transport statistics and cross-cutting aspects, see this link: [ESG-TF-Data-Quality-Final-report_en.pdf \(europa.eu\)](#)*
- ***Partial support of stakeholders' business use cases** concerning the different requirements for vehicle registration as part of the approval framework for operating rolling stock in the EU. Indeed, vehicle authorisation and registration processes are not fully integrated/aligned. Following the 4th Railway Package, it is possible that an applicant will need to deal with separate entities for vehicle authorization and vehicle registration. This may create the possibility for friction in the approval*

flow before a vehicle can be used with the possibility of additional time and costs for the railway sector

1.2. Evidence of the problem

Further explanations and examples for the identified problem / problem drivers are provided below:

Overall, the available evidence suggests that the registration process is not yet harmonised in Europe, despite progress in recent years. For example, a number of national registration entities make use of custom fields as well as having additional requirements for information to be provided by applicants (e.g. signed declarations, maintenance plans and sale contracts). As such, this impression was confirmed by the results from the survey completed recently supporting the deliberations of the EVR WP.

Furthermore, this survey indicated that the time for registration of vehicle is subject to variation between countries (even though the survey is non-statistical and further information would be required in order to understand fully the reasons behind this variation in time involved). This finding in terms of time involved for registering vehicle is an indication that the registration process is not undertaken in the same way in the different countries and would suggest a harmonisation potential.

In addition, our review of the state-of-play re. vehicle registration, points towards problems associated with limited transparency in terms of not all registration entities inform applicants up front about all the requirements, nor have publicly available guides. The lack of transparency is also illustrated through limited formal sharing of experiences and best-practices among the registration entities. More broadly, this is also reflected in the lack of consistent and regular monitoring of the vehicle registration at European level.

Moreover, it is important to highlight that in order to operate a vehicle, 3 steps are needed:

- a) *Vehicle type authorisation*
- b) *Conformity to type authorisation*
- c) *Vehicle registration into the European Vehicle Register*

The Agency is currently able to deliver the steps a) and b) but, to-date, the registration of vehicles can be done only by a registration entity of a Member State. This means that stakeholders must deal with different authorities creating the potential for add-on administrative costs and longer approval times.

Both aspects may undermine the efficiency level of the whole process by increasing the time needed to be able to operate vehicles on the rail network.

Another problem identified concern the sub-optimal level of accessibility to vehicle data for railways in Europe. Unlike data related to infrastructure and vehicle types, single vehicle data included in the EVR are not available to the public. EVR is in fact the only ERA Register with restricted access rights. This has an impact on the digitalisation of the railway industry as this cannot be achieved regardless of the availability of an open, solid and reliable reference dataset. Another issue deriving from a closed database is the limited data available for business intelligence, this results in:

- *Less evidence-based decision making by the different stakeholders involved,*
- *Limited transparency with regards to market opening and use of available rolling stock (it is noted that for maritime and aviation such overviews exist for vessels and airplanes).*

<p>An illustration of the issue of non-availability of vehicle data is provided by the recent requests from external stakeholders to the Agency to provide statistics on single vehicles in order to support their work. Furthermore, the existence of private companies providing data on railway vehicle statistics charging commercial rates for this information demonstrates the significant value of these data for the customers.</p>			
<p>1.3. Baseline scenario</p>			
<p>The baseline would mean the continuation of the current framework without any change to the current EVR decision. As such, the baseline also encompasses the discontinuation of the possibility for Member States to use a decentralised registration function by 16 June 2024 (according to the current EVR decision). The baseline scenario would imply that the problems identified above would not be addressed. In particular, the issue of sub-optimal level of harmonisation of vehicle registration in Europe would remain. Moreover, the untapped potential benefits of aligning / integrating vehicle registration and vehicle authorisation processes would not be realised.</p>			
<p>1.4. Main assumptions</p>			
<p>The adoption of technical and functional specifications for the EVR, following a cost-benefit analysis, is mandated by the Interoperability Directive - Article 47(5). Indeed, the current EVR Decision from 2018 was accompanied by a Full Impact Assessment with quantitative estimation of costs and benefits of the proposed specifications.</p> <p>The present impact assessment looks therefore to collect evidence on whether it is feasible and timely to revise the EVR but does not question the need for a European Vehicle Register, which had been already answered by the Interoperability Directive.</p>			
<p>1.5. Stakeholders affected</p>			
<p>The main stakeholders affected by the proposed amendment of the EVR Decision are listed in the following table.</p>			
Railway undertakings (RU)	<input checked="" type="checkbox"/>	Member States (MS)	<input checked="" type="checkbox"/>
Infrastructure managers (IM)	<input checked="" type="checkbox"/>	Third Countries	<input checked="" type="checkbox"/>
Manufacturers	<input checked="" type="checkbox"/>	National safety authorities (NSA)	<input checked="" type="checkbox"/>
Vehicle Keepers	<input checked="" type="checkbox"/>	European Commission (EC)	<input checked="" type="checkbox"/>
Entity Managing the Change (EMC)	<input checked="" type="checkbox"/>	European Union Agency for Railways (ERA)	<input checked="" type="checkbox"/>
Notified Bodies (NoBo)	<input type="checkbox"/>	Other (Please specify): Registration entities (RE), Owners, ECMs	<input checked="" type="checkbox"/>
Associations	<input checked="" type="checkbox"/>		<input type="checkbox"/>
Shippers	<input type="checkbox"/>		<input type="checkbox"/>
<p>1.6. Subsidiarity and proportionality</p>			
<p>European action concerning a European Vehicle Register (EVR) is provided for in the Interoperability Directive (EU) 2016/797, notably in its Article 47. The detailed requirements for EVR are set out in Commission Implementing Decision (EU) 2018/1614 of 25 October 2018. The (full) impact assessment that accompanied the Agency’s 2018 EVR recommendation provides more detailed arguments in support of European initiatives in this domain considering subsidiarity and proportionality aspects.</p>			

2. Objectives

2.1. Specific objectives

On the basis of the analysis of the As-Is situation with identification of the key problems / problem drivers the following specific objectives are put forward:

- *Reduce administrative burdens, and undue costs for vehicle keepers and other stakeholders (in line with the provisions in the Interoperability Directive, Article 47(5),*
- *Provide a harmonised interface to all users for the registration of vehicles and data management,*
- *Increase data Findability, Accessibility, Interoperability and Reusability,*
- *Harmonisation of registration processes and optimal alignment with the vehicle authorisation process*

As noted in the WP meetings it is possible to facilitate the achievement of these valid objectives concerning a more harmonised, simple and digitised vehicle registration process and optimised use of vehicle-related data through a number of measures. These measures would encompass among others strengthened availability of guidelines and templates; setting-up stakeholder platforms to facilitate cooperation and exchange of best-practice; removal of the possibility of customs fields / additional documents when feasible. Moreover, it would be relevant to consider measures that can bridge the current limited alignment between vehicle authorisation and vehicle registration in order to reduce the administrative burden for the railway sector, e.g. through providing a role for the Agency in vehicle registration building on its role regarding vehicle authorisations following the 4th Railway Package. In the following section three do-something options are considered (section 3). Subsequently, these options are assessed (in Section 4) and compared in Section 5 in order to identify an efficient and effective approach for optimising vehicle registration in the context of the 4th Railway Package.

3. Options

3.1. List of options

In this Light Impact Assessment three options have been assessed:

- **Option 0: Baseline scenario**
- **Option 1: Revision of EVR decision with limited scope in terms of Agency as registration entity and public data access:**
 - *Vehicle Keeper submissions of registrations to the Registration Entity:*
 - *For vehicles authorised by an NSA: to the Registration Entity of that Member State,*
 - *For vehicles authorised by ERA: to ERA as Registration Entity,*
 - *Relevant EVR data are public but some data (e.g. owners) could remain protected.*
- **Option 2: Revision of EVR Decision with wider scope in terms of Agency as registration entity and public data access:**
 - *Vehicle Keeper submissions of registrations to the Registration Entity:*
 - *For vehicles authorised by an NSA: to the Registration Entity of that Member State or to ERA as Registration Entity (free choice of Registration Entity by the keeper),*
 - *For vehicles authorised by ERA: to ERA as Registration Entity,*
 - *All EVR data are public.*

- **Option 3: Revision of EVR Decision with flexible scope in terms of Agency as registration entity and public data access (with mandatory review in 5 years):**
 - Vehicle Keeper submissions of registrations to the Registration Entity:
 - For vehicles authorised by an NSA: to the Registration Entity of that Member State,
 - For vehicles authorised by ERA or with an area of use including more than one Member State: Free choice of Registration Entity by the keeper
 - Relevant EVR data are public but some data (e.g. owners) could remain protected.

Details of these options are given below.

Option 0: Baseline scenario

The baseline scenario implies the status quo, meaning that the EVR will not be revised; the only change taking place would be the discontinuation of the possibility for Member States to use a decentralised registration function by 16 June 2024. This change is already provided for in Commission Implementing Decision (EU) 2018/1614.

Option 1: Revision of EVR Decision with limited scope

The main elements covered by the EVR revision include:

- **Operating mode:**
 - ERA as registration entity (RE), although limited to registrations of vehicles authorised by the Agency only,
 - All the EVR data are publicly available unless the Keepers request to keep private the full registration in justified cases or the Owner's part, subject to the approval of the Registration Entity,
 - It shall be possible to consume EVR data by other technical means than the web application and in machine readable format,
 - Registration Entities shall have a user management policy in place to make sure that only authorised organisations have access to EVR to submit data,
 - Only Registration Entity can approve/reject submitted data;
- Harmonise the vehicle registration process;
- **Data access and quality:**
 - A **single source of truth**: no data duplication,
 - **Open and FAIR Data** (Findable, Accessible, Interoperable, and Reusable);
- A change in the EVR logic or structure to identify an efficient and effective solution to the limited availability of letter marking in accordance with provisions set in Appendix 6 of the current EVR Decision;
- Changes of parameters in order to optimise synergies between common items and different data representation along with the harmonisation of the registration process.

Option 2: Revision of EVR Decision with wider scope

Option 2 contains the same elements as Option 1 except for the scope of the Agency as Registration Entity and the extent to which data are open:

- **ERA Registration Entity: As for Option 1 as well as giving the choice of Registration Entity to the vehicle keeper for vehicles authorised by an NSA - either the Registration Entity of that Member State or ERA;**
- **EVR fully open: All data accessible.**

Option 3: Revision of EVR Decision with flexible scope in terms of Agency as registration entity and public data access (with mandatory review in 5 years)

Option 3 contains the same elements as Option 1 except for the scope of the Agency as Registration Entity and the extent to which data are open:

- *ERA Registration Entity: As for Option 1 for vehicles authorised by the NSA the RE would be the national VRE; for vehicles authorised by the Agency or with an area of use including more than one Member State the keeper would have a free choice of Registration Entity (+ mandatory review in 5 years of this scope)*
- *Relevant EVR data are public but some data (e.g. owners) could remain protected (+ mandatory review of this choice)*

4. Impacts of the options

4.1. Qualitative analysis

Stakeholder assessment

The stakeholder assessment summarises the how the main stakeholders are affected by the different options. In particular, the following stakeholders have been considered:

- *Vehicle Keepers, and applicants for the reservation of vehicle numbers,*
- *Registration entities / NSAs / Member States,*
- *Vehicle register users,*
- *Agency.*

<i>Option 0 (Baseline)</i>			
<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
Vehicle Keeper / applicants	Positive	Possibility to use a familiar / customised process with the different registration (use) cases. Stakeholders also benefit from the availability of the EVR live in production since 29/11/2021 with a test release since Dec.20.	Neutral
	Negative	Administrative burden for Keepers / applicants due to limited harmonisation of process as well as a complex registration process. This would affect adversely Vehicle Keepers through higher costs, time required for vehicle operation by stakeholders in the railway system thereby lowering the competitiveness of rail.	
Registration entities / NSAs / Member States	Positive	Perspectives may vary depending on whether country has chosen a decentralised or centralised solution. Main positive aspect would be linked to the use of a familiar process.	Neutral
	Negative	Main negative aspect would be linked to limited progress on harmonisation of process thereby resulting in additional costs for the REs as a whole. MSs that opted for a decentralised solution and MSs still lacking behind with the implementation of the current EVR Decision are not capturing the full benefits of a single European framework. Moreover, formal cooperation between REs is not provided for preventing synergies to be fully utilised.	
	Positive	N/A	

Vehicle register users (other than applicant; notably RUs and vehicle keepers)	Negative	Limits on access to EVR data and data quality issues not facilitating business use cases.	Rather negative
Agency	Positive	Avoided resource implications associated with registration entity role. On-track towards a fully centralised registration function by 2024 and decommissioning of decentralised functions.	Neutral
	Negative	Non-optimised EVR specifications with respect to level of harmonisation of the registration process across MSs and of the data quality.	
<i>Option 1: New EVR Regulation with limited scope</i>			
<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
Vehicle Keepers / applicants	Positive	Reduced administrative burden and improved level of harmonisation of the registration process and of data quality providing the basis for improved market access and competitiveness.	Very positive
	Negative	Revision is overlapping with the remaining MSs moving to the centralised system in 2024 compensated by the scope limitation in this Option. One-off impacts linked to familiarisation with using new EVR Regulation in day-to-day operations. Potential concern on increased public access to EVR data.	
Registration entities / NSAs / Member States	Positive	Clearer definition of roles and responsibilities in the registration process as well as harmonisation measures that could result in reduced administrative burden. Moreover, provisions for cooperation between REs would facilitate sharing of experience and utilising synergies.	Very positive
	Negative	Revision is overlapping with remaining MSs moving to the centralised system in 2024 (either from an implementation of decentralised EVR functions, or due to a late implementation after 2021 as required by current EVR Decision) compensated by the limited revision scope in this Option. One-off impacts from the changes in EVR provisions (that are expected to be outweighed by the harmonisation / clarification measures).	
Vehicle register users (other than applicant; notably RUs and vehicle keepers)	Positive	Improved access to EVR as well as steps concerning data quality thereby supporting business use cases, decision-making and rail competitiveness.	Rather positive
	Negative	Certain user categories may prefer a wider scope concerning data access (see Option 2), as the limits included in Option 1 reduce for this stakeholder group the benefits of the revision.	
Agency	Positive	Optimised EVR specifications supporting the Agency's roles and responsibilities as railway system authority and authorising entity.	Very positive
	Negative	Resource implications associated with role as registration entity along with other changes in the new EVR Regulation, although the limit in scope in this Option may minimise any adverse impacts.	
<i>Option 2: New EVR Regulation with wider scope</i>			
<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
	Positive	Reduced administrative burden and improved level of harmonisation providing the basis for improved market access and competitiveness.	Very positive

Vehicle Keepers / applicants		Improved flexibility when registering vehicles with an area of use limited to a single MS with a choice to either submit an application to the RE of that MS or to the Agency.	
	Negative	The wider scope may result in increased transition costs (compared to Option 1). Potential concern on full public access to EVR data.	
Registration entities / NSAs / Member States	Positive	Clearer definition of roles and responsibilities in the registration process as well as harmonisation measures that could result in reduced administrative burden. Moreover, provisions for cooperation between REs would facilitate sharing of experience and utilising synergies.	Rather positive
	Negative	Overlap with the scheduled migration to the centralised system for the remaining MSs in 2024 (either from an implementation of decentralised EVR functions in due time, or due to a late implementation after 2021 as required by current EVR Decision). One-off impacts from the changes in EVR provisions (that are expected to be outweighed by the harmonisation / clarification measures).	
Vehicle register users (other than applicant; notably RUs and vehicle keepers)	Positive	Improved access to EVR as well as steps concerning data quality, especially with all data being accessible thereby largely supporting business use cases, decision-making and rail competitiveness.	Very positive
	Negative	For some vehicle register users, a more limited scope for data access may have been preferred (e.g. owners).	
Agency	Positive	Optimised EVR specifications supporting the Agency's roles and responsibilities as railway system authority and authorising entity.	Neutral
	Negative	Resource implications associated with extended role as registration entity, along with the effort required to implement the other changes in the new EVR Regulation, might have a significant impact on the Agency's work generating risks of excessive workload.	

Option 3: New EVR Regulation with flexible scope

<i>Category of stakeholder</i>	<i>Impact type</i>	<i>Description</i>	<i>Overall Impact</i>
Vehicle Keepers / applicants	Positive	Reduced administrative burden and improved level of harmonisation of the registration process and of data quality providing the basis for improved market access and competitiveness. Moreover, flexibility for choice of registration entity for vehicles authorised by Agency or with an area of use with more than 1 country is of relevance.	Very positive
	Negative	Revision is overlapping with the remaining MSs moving to the centralised system in 2024 compensated by the scope limitation in this Option. One-off impacts linked to familiarisation with using new EVR Regulation in day-to-day operations. Potential concern on increased public access to EVR data (though mitigated by review in 5 years).	
Registration entities / NSAs / Member States	Positive	Clearer definition of roles and responsibilities in the registration process as well as harmonisation measures that could result in reduced administrative burden. Moreover, provisions for cooperation between REs would facilitate sharing of experience and utilising synergies.	Very positive

	Negative	Revision is overlapping with remaining MSs moving to the centralised system in 2024 (either from an implementation of decentralised EVR functions, or due to a late implementation after 2021 as required by current EVR Decision) compensated by the limited revision scope in this Option (which also introduces a review in 5 years). One-off impacts from the changes in EVR provisions (that are expected to be outweighed by the harmonisation / clarification measures).	
Vehicle register users (other than applicant; notably RUs and vehicle keepers)	Positive	Improved access to EVR as well as steps concerning data quality thereby supporting business use cases, decision-making and rail competitiveness.	Rather positive
	Negative	Certain user categories may prefer a wider scope concerning data access (see Option 2), as the limits included in Option 3 reduce for this stakeholder group the benefits of the revision. This is though mitigated by the 5-year review	
Agency	Positive	Optimised EVR specifications supporting the Agency’s roles and responsibilities as railway system authority and authorising entity. Moreover, requirements for improved monitoring of the registration process as a whole, strengthened cooperation among the affected stakeholders and 5-year review of specifications re. access to EVR data and scope for Agency as Registration Entity	Very positive
	Negative	Resource implications associated with new role as registration entity along with other changes in the new EVR Regulation, although the limit in scope in this Option may minimise any adverse impacts.	

Railway system assessment

	<i>Option 0 (baseline)</i>	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>
<i>Safety</i>	No changes in safety related aspects.	Improved vehicle traceability and thus reliability, and higher level of data quality in EVR could play a role from a safety management perspective.	Improved vehicle traceability and thus reliability, and higher level of data quality in EVR could play a role from a safety management perspective.	Improved vehicle traceability and thus reliability, and higher level of data quality in EVR could play a role from a safety management perspective.
<i>Interoperability</i>	Under this Option no further progress on interoperability is expected.	Harmonisation of vehicle registration process would facilitate interoperability.	Harmonisation of vehicle registration process would facilitate interoperability. The wider scope is likely to strengthen the positive impacts.	Harmonisation of vehicle registration process would facilitate interoperability. The flexible scope is likely to ensure that the potential benefits are realised.
<i>Competitiveness</i>	No further contribution towards railway competitiveness is anticipated.	The measures introduced could reduce administrative burden for the concerned stakeholders. This would also support	The measures introduced could reduce administrative burden for the concerned stakeholders. This would also support	The measures introduced could reduce administrative burden for the concerned stakeholders. This would also support

		improved market access and railway competitiveness.	improved market access and railway competitiveness. The wider scope is likely to strengthen the positive impacts.	improved market access and railway competitiveness. The flexible scope is likely to ensure that the positive impacts are realised.
Effectiveness	Neutral	Very high	Very high	

Coherency assessment

	<i>Option 0 (baseline)</i>	<i>Option 1</i>	<i>Option 2</i>	<i>Option 3</i>
Policy analysis	The current EVR specifications are aligned with the provision in the Interoperability Directive along with other related legislation.	The proposed revision is aiming to optimise the EVR specifications further in order to enable enhanced harmonisation and reduced administrative burden.	The proposed revision is aiming to optimise the EVR specifications further in order to enable enhanced harmonisation and reduced administrative burden.	The proposed revision is aiming to optimise the EVR specifications further in order to enable enhanced harmonisation and reduced administrative burden.
Coherence	Rather high	Very high	Very high	Very high

4.2. Quantitative analysis (optional)

Given the initial timescale available for the proposed revision of the EVR, it has not been possible to undertake any specific quantitative assessment of costs and benefits involved. However, the findings of the original Full Impact Assessment for the EVR Decision from 2018 (Commission Implementing Decision (EU) 2018/1614) justify the absence of new quantitative assessment. As such, this Light Impact Assessment builds on those findings, in particular, with reference to the indication of order of magnitude costs and benefits figures.

It should be noted that the figures included in the 2018 IA focused on direct impacts, whereas it is likely that the current proposed revision could result in additional advantages by supporting further harmonisation, potentially unlocking untapped harmonisation benefits to the overall framework for vehicle authorisation as well as facilitating benefits associated with facilitating a digital transformation of the railway sector in general.

5. Comparison of options and preferred option

5.1. Comparison of options

	<i>Option 0 (baseline)</i>				<i>Option 1</i>				<i>Option 2</i>				<i>Option 3</i>			
Stakeholder impact	Keepers	REs	Users	Agency	Keepers	REs	Users	Agency	Keepers	REs	Users	Agency	Keepers	REs	Users	Agency
Effectiveness	Neutral				Very high				Very high				Very high			
Coherence (optional)	Rather high				Very high				Very high				Very high			

Colour legend	Very low/neg.	Rather low/neg.	Neutral	Rather high/pos.	Very high/pos.
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5.2. Preferred option(s)

Based on the above analysis, there are clear arguments in favour of revising the current EVR Decision with the specified elements (Option 1, Option 2 or Option 3). Further details of the proposed revision per element are provided in Annex 1. It is noted that Option 1 may offer the possibility for a phased approach and appropriate transitions that would start with a relative limited scope of revision in terms of Agency as Registration Entity along with some data not being accessible. Subsequently, based on return of experience, and further exchanges with stakeholder experts in the future, it could be considered whether an adjustment in scope for Agency as Registration Entity, and extent of public data access would be beneficial. Such an adjustment would reflect the elements encompassed within Option 2 but eventually put forward as part of a phased / gradual evolution. Option 3 is also (as Option 1) providing a more limited and flexible scope with regards to Agency as Registration Entity giving the keeper the choice of RE for those vehicles authorised by the Agency or with an area of use larger than a single country. From an Agency perspective, being a Registration Entity for the vehicles it authorises seems more reasonable in terms of resources consumption so that the business continuity of the Agency is not impacted by this new task. In addition, this Option has also a more limited scope for public data accessibility. Both aspects (data accessibility and Agency as Registration Entity) would be subject to close monitoring and evaluation review of specifications after 5 years.

5.3. Risk assessment

The work of the internal Agency Task Force examining the EVR includes possible areas of improvements built on earlier Agency work, notably the analyses carried out for the 2018 EVR recommendation as well as earlier work (Rationalisation of Vehicle Related Registers, RVR). These workstreams involved in-depth contributions from the railway sector and authorities, especially in the context of the EVR Working Party.

For most of the proposed changes to the current EVR Decision, the impacts are well-understood and likely to result in improvements, although for some aspects the impacts may be negligible.

In the case of the Agency as registration entity, this is likely to be beneficial bringing further impetus for harmonisation of the registration process as well as facilitating alignment with respect to the vehicle authorisation framework. However, some details in reference to the precise role of the Agency in the registration process may need further fine-tuning in order to minimise any adverse impacts and maximise the advantages. This is reflected in the consideration of three Options covering different scope for the Agency as Registration Entity (Options 1, 2 and 3).

The on-going established EVR Revision Working Party (WP) is now addressing any outstanding issues thereby optimising the proposed recommendation.

5.4. Further considerations

The proposed revision of the current EVR decision is likely to result in further optimisation of the EVR specifications resulting in reduced administrative burden for the concerned stakeholders. Importance should be given to the significant harmonisation potential drawing on the provisions for strengthened cooperation among registration entities that would facilitate experience sharing and identification of best practices. Moreover, enhanced monitoring requirements of the vehicle registration process across Europe would facilitate regular reviews and return of experience in order to determine areas in need of improvements.

Overall, the precise specifications are benefiting from additional specific inputs from the sector along with the national authorities to optimise the revision of current EVR Decision through the established ERA WP.

It would be highly important to ensure coordination between the revised EVR specifications being introduced and the transition to a fully centralised registration function for the remaining MSs by June 2024.

6. Monitoring and evaluation

6.1. Monitoring indicators

It could be highly relevant to monitor closely the stakeholders’ experiences during the introduction of the adjusted requirements of the EVR specifications in order to assist towards a smooth implementation.

Particular aspects to cover as part of ongoing and regular (annual) monitoring would include:

- › Data completeness and wider data quality issues,
- › Usability of the EVR by the different user groups (incl. REs, vehicle keepers etc.),
- › Degree of satisfaction of the various users,
- › Fulfilment of use cases.

6.2. Future evaluations

In accordance with the provision of the Agency Regulation (EU) 2016/796 (Art. 8.3) the Agency may conduct *ex post* assessment of the legislation based on its recommendations (e.g. the current EVR Decision). Such assessment would be framed in accordance with the intervention logic concept in line with the European Commission’s [Better Regulation Guidelines](#).

As a starting point for future evaluations of EVR, it is recommended to prepare an implementation report by the end of 2025 to examine state-of-play in reference to the updated provisions (which would also cover the Return of Experience of the discontinuation of decentralised solutions in 2024). Subsequently, an evaluation study could be considered 2-3 years later to provide an overview of the experience so far and indications concerning possible future improvement areas. Particular evaluation topics over the next 5 years should look into: 1) extent of data accessibility; 2) scope of the Agency as registration entity; 3) overall approach for vehicle authorisation and its relationship with vehicle authorisation.

7. Sources and methodology

7.1. Sources

Desk research	<input checked="" type="checkbox"/>	Interviews	<input checked="" type="checkbox"/>
ERA database	<input checked="" type="checkbox"/>	Meetings	<input checked="" type="checkbox"/>
External database	<input type="checkbox"/>	Survey	<input checked="" type="checkbox"/>

The Light Impact Assessment builds on the following sources:

- *Internal EVR Revision Task Force: background documents, analyses and (sector) meetings*
- *Bilateral discussions with EVR team*
- *EVR Revision Working Party inputs and discussions as well as RISC / Expert Group meetings*

- *Several previous analyses and surveys on vehicle registers at national and EU level (notably the work undertaken for the 2018 EVR decision)*
- *EVR / ECVVR register to examine determine patterns in records, use cases and experiences*
- *Short survey on practices vehicle registration and stakeholder perceptions*

7.2. Methodology (optional)

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Annex 1. Additional information

Title	Description of problem and solution	Main Stakeholders impacted	Benefit of solution	Costs of solution
Registration entity concept	<p>To date, the registration of vehicles can be done only by a registration entity of a Member State. This means that stakeholders must deal with different authorities.</p> <p>A solution to this problem is to introduce the Agency as a Registration Entity. This may take the form of limited scope (limited to vehicles authorized by the Agency) or a wider scope (free choice for keeper). Amendment to move from the concept of Member State to the concept of Registration Entity. A mandatory evaluation in 5 years on the return of experience with Agency registration entity could be beneficial</p>	Agency as well as the national registration entities and other stakeholders.	Main benefit would be the possibility for a more harmonised registration process along with removal of national silos in the EVR facilitated by strengthened cooperation and experience sharing among the registration entities.	Limited costs for all stakeholders, except the Agency through additional resources for this role. Overall costs / resources could be minimised through a more limited scope for the Agency as Registration Entity.
EVR access	<p>Unlike data related to infrastructure and vehicle types, single vehicles data included in the EVR are not available to the public. This has an impact on the digitalisation of the railway industry as this cannot be achieved regardless of the availability of an open, solid and reliable reference dataset.</p> <p>Two possible solutions are put forward: 1) Relevant EVR data are public but some data (e.g. owners) could remain protected; 2) All EVR data are public. A third option provides for a mandatory evaluation in 5 years to review experience and identify areas of improvement / adjustment</p>	All stakeholders, in particular potential EVR users.	Positive impacts in terms of increased transparency and improved information available for the different stakeholders of relevance for evidence-based decision-making.	Limited cost impacts are foreseen. Any adverse impacts could be managed through a reduced scope for data access (full access to EVR but not access to all data).
Tool for EVR data usage	<p>Restricted possibilities for alternatives for users to access EVR data by other means than the web application.</p> <p>It shall be possible to consume EVR data by other means than the web application and in machine readable format.</p>	All stakeholders, in particular potential EVR users.	Positive impacts for users.	Negligible adverse impacts on stakeholders.

Title	Description of problem and solution	Main Stakeholders impacted	Benefit of solution	Costs of solution
User management policy	Roles and responsibilities are not sufficiently clear or well described in reference to user management policy. Registration Entities shall have a user management policy in place to make sure that only authorised organisations (Vehicle Keepers / applicants) have access to EVR to submit data.	Mainly Registration Entities along with EVR users.	Clarification of roles and responsibilities will strengthen the level of accountability of the concerned stakeholders. This will contribute to ensure the reliability of EVR data and therefore its usability.	Any cost impact with this solution is likely to be limited.
Validation of submitted data	Roles and responsibilities are not sufficiently clear or well described in reference to approval / rejection of submitted data. Only Registration Entity can approve/reject submitted data.	Registration Entities, EVR users and applicants / Keepers.	Clarification of roles and responsibilities will strengthen the level of accountability of the concerned stakeholders. Solution contributes to ensure the reliability of EVR data and therefore their usability thereby improved support to business use cases.	Any cost impact with this solution is likely to be limited.
Vehicle registration process	The registration process is not harmonised across Europe as demonstrated by available evidence. This undermines the efficiency level of the whole process by increasing the time needed before to operate vehicles on the railways network. The solution consists of several elements, including: Increased use of vehicle registration data already available in other ERA registers, list of common supporting documents as well as the removal of the possibility for additional parameters (custom fields) per country, return of experience on the use of EVR, strengthened monitoring, increased availability of guides / templates, cooperation among REs and Agency as Registration Entity,.	All stakeholders referred to in the EVR Decision, notably applicants / Keepers.	Increased efficiency of the vehicle registration process which would be an advantage to the stakeholders concerned as well as strengthening railway competitiveness. Harmonisation benefits are likely to outweigh any cost impacts.	Costs are mainly linked to implementation costs for the Agency. Moreover, ongoing resources for the Agency.

Title	Description of problem and solution	Main Stakeholders impacted	Benefit of solution	Costs of solution
Data quality	<p>Suboptimal data quality is considered an issue, mainly because of users may make mistakes when manually entering data in vehicle applications, while these data already exist in other ERA registers and applications.</p> <p>The EVR will make extensive reuse of data available in other ERA registers and applications and will avoid data errors by consuming data from other systems, when possible. The reference data will include:</p> <ul style="list-style-type: none"> - <i>Lists of codes (e.g. country codes, authorising entity codes ,...),</i> - <i>Authorisation data,</i> - <i>EC Declarations data,</i> - <i>ECM certificates data,</i> - <i>Organisations reference data.</i> <p>Moreover, Open and FAIR Data (Findable, Accessible, Interoperable, and Reusable).</p>	All stakeholders referred to in the EVR Decision with particular focus on the users of the EVR.	The proposed solution will result in efficiency gains through avoidance of manually entering data which already exist in other ERA registers and applications along with improved data quality. As such the latter would ensure that there would be a higher level of usability of EVR data supporting improved decision-making by the EVR users.	Main cost impact would be related to the linking of existing data (from different registers) to EVR. On the other hand, these costs should be balanced against efficiency due to gains through reduced time required for data input by users, and improved data quality.
Letter marking codes	<p>Not enough letter marking codes available with running out of some ranges. Notably for S type wagons: 54 new codes left, while Since 2008, 99 new codes related to “S” wagons were assigned. Codes for such wagons would be running out likely in 2025.</p> <p>There is a need for a change in the EVR logic or structure to identify an efficient and effective solution to the low number of letter marking codes available in accordance with provisions set in Appendix 6 of the Commission Implementing Decision (EU) 2018/1614.</p>	All stakeholders involved in the authorisation, registration and use of railway rolling stock.	Continued unique identification of railway vehicles is ensured. This is of critical importance in a number of contexts, e.g. for vehicle authorisation, registration and monitoring the vehicle in operation.	Expected to be limited and mainly linked to short-term transition.