



# EUROPEAN DATA PROTECTION SUPERVISOR

The EU's independent data  
protection authority

## Opinion 11/2025

on the Proposal on the registration  
documents for vehicles and vehicle  
registration data recorded in national  
vehicle registers and repealing Council  
Directive 1999/37/EC

*The European Data Protection Supervisor (EDPS) is an independent institution of the EU, responsible under Article 52(2) of Regulation 2018/1725 ‘With respect to the processing of personal data... for ensuring that the fundamental rights and freedoms of natural persons, and in particular their right to data protection, are respected by Union institutions and bodies’, and under Article 52(3)‘... for advising Union institutions and bodies and data subjects on all matters concerning the processing of personal data’.*

*Wojciech Rafał Wiewiórowski was appointed as Supervisor on 5 December 2019 for a term of five years.*

*Under **Article 42(1)** of Regulation 2018/1725, the Commission shall ‘following the adoption of proposals for a legislative act, of recommendations or of proposals to the Council pursuant to Article 218 TFEU or when preparing delegated acts or implementing acts, consult the EDPS where there is an impact on the protection of individuals’ rights and freedoms with regard to the processing of personal data’.*

*This Opinion relates to 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<sup>1</sup>. This Opinion does not preclude any future additional comments or recommendations by the EDPS, in particular if further issues are identified or new information becomes available. Furthermore, this Opinion is without prejudice to any future action that may be taken by the EDPS in the exercise of his powers pursuant to Regulation (EU) 2018/1725. This Opinion is limited to the provisions of the Proposal that are relevant from a data protection perspective.*

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<sup>1</sup> COM(2025) 179 final.

## Executive Summary

On 24 April 2025, the European Commission issued a 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<sup>2</sup> ('the Proposal').

The Proposal aims to lay down common rules on the vehicle registration documents issued by the Member States, on certain data to be recorded in national vehicle registers and on the exchange of such data between Member States.

The EDPS notes that the Proposal would require Member States to record in vehicle registers certain personal data in accordance with Annex I. In addition, Article 6(1) defines additional data to be recorded in the vehicle registers, including the outcome of mandatory periodic roadworthiness tests, information on changes to the ownership of vehicles and information on reasons for the cancellation of the vehicle registration.

The EDPS welcomes that the Proposal recalls that any processing of personal data for the implementation of the Proposal should comply with the data protection framework of the Union. For the sake of clarity, the EDPS recommends making particular reference to the General Data Protection Regulation (the 'GDPR').

The EDPS also welcomes that the Proposal indicates that any personal data used in the verification of a vehicle's registration data should not be retained by the verifier, unless such retention is authorised by Union or national law.

Finally, the EDPS positively notes that the Proposal specifies that the Member States should ensure that the issuing authority of the registration certificate is not notified about the verification process of physical vehicle registration certificates, and that it processes the information received through the notification only for the purpose of responding to the verification request for mobile vehicle registration certificates.

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<sup>2</sup> COM(2025) 179 final.

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## **THE EUROPEAN DATA PROTECTION SUPERVISOR,**

Having regard to the Treaty on the Functioning of the European Union,

Having regard to Regulation (EU) 2018/1725 of the European Parliament and of the Council of 23 October 2018 on the protection of natural persons with regard to the processing of personal data by the Union institutions, bodies, offices and agencies and on the free movement of such data, and repealing Regulation (EC) No 45/2001 and Decision No 1247/2002/EC (the 'EUDPR')<sup>3</sup>, and in particular Article 42(1) thereof,

## **HAS ADOPTED THE FOLLOWING OPINION:**

### **1. Introduction**

1. On 24 April 2025, the European Commission issued a 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<sup>4</sup> ('the Proposal').
2. The objective of the Proposal is to lay down common rules on the vehicle registration documents issued by the Member States, on certain data to be recorded in national vehicle registers and on the exchange of such data between Member States<sup>5</sup>.
3. The present Opinion of the EDPS is issued in response to a consultation by the European Commission of 15 of May, pursuant to Article 42(1) of the EUDPR. In this regard, the EDPS also positively notes that he was already previously informally consulted pursuant to recital 60 of the EUDPR.

### **2. General remarks**

4. The Sustainable and Smart Mobility Strategy<sup>6</sup> called for adjustments to the roadworthiness legislative framework to ensure a vehicle's lifetime compliance with emission and safety standards.
5. The Proposal aims to further improve road safety in the EU, contributing to sustainable mobility and facilitating the free movement of people and goods in the EU. In particular, it aims to improve the electronic storage and the exchange of relevant vehicle identification

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<sup>3</sup> OJ L 295, 21.11.2018, p. 39.

<sup>4</sup> COM(2025) 179 final.

<sup>5</sup> Article 1 of the Proposal.

<sup>6</sup> COM(2020) 789 final.

and status data in order to address the lack of availability of such data and improve mutual recognition by enforcing authorities. It introduces general rules applicable to vehicle registration certificates, in particular by distinguishing between physical and mobile vehicle registration certificates. In addition, by ensuring more accurate status data (such as mileage) and a more efficient exchange of information among Member States, the Proposal would also help identify vehicles with tampered odometers<sup>7</sup>.

6. The EDPS notes that Article 6(1) of the Proposal would require Member States to record in vehicle registers certain personal data in accordance with Annex I<sup>8</sup>. Such data include the identity and address of owner of the vehicle, as well as the identity and address of a natural or legal person who may use the vehicle by virtue of a legal right other than that of ownership. These data would be kept up-to-date by the Members States. In addition, Article 6(1) defines additional data to be recorded in the vehicle registers, including the outcome of mandatory periodic roadworthiness tests, information on changes to the ownership of vehicles and information on reasons for the cancellation of the vehicle registration.
7. The EDPS welcomes recital 10 of the Proposal, indicating that it should be ensured that personal data processing for the implementation of the Proposal complies with the data protection framework of the Union. For the sake of clarity, the EDPS recommends including in the same recital of the Proposal a particular reference to the applicability of the Regulation (EU) 2016/679<sup>9</sup> (the ‘General Data Protection Regulation’).
8. The EDPS also welcomes Article 7 of the Proposal, providing that any personal data used in the verification of a vehicle’s registration data should not be retained by the verifier, unless such retention is authorised by Union or national law. Furthermore, the EDPS positively notes that Article 7 of the Proposal specifies that the Member States should ensure that the issuing authority of the registration certificate is not notified about the verification process of physical vehicle registration certificates, and that it processes the information received through the notification only for the purpose of responding to the verification request for mobile vehicle registration certificates.
9. The EDPS notes the absence of the reference to this consultation in a recital of the Proposal. Therefore, the EDPS recommends inserting such a reference in a recital of the Proposal.
10. Given the subject matter and the provisions of the Proposal, which do not raise specific issues having regard to the protection of personal data, the EDPS does not have any further comments on the Proposal.

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<sup>7</sup> COM(2025) 179 final, p. 2.

<sup>8</sup> Annex 1, Part I, point 2, point (e) and point (f) of the Proposal.

<sup>9</sup> 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, and repealing Directive 95/46/EC (General Data Protection Regulation) (Text with EEA relevance), OJ L 119, 4.5.2016, p. 1.

### 3. Conclusion

11. In light of the above, the EDPS makes the following recommendations:

- (1) to include in recital (10) a reference to the applicability of the Regulation (EU) 2016/679;
- (2) to insert a reference to this consultation in a recital.

Brussels, 23 June 2025

*(e-signed)*

Wojciech Rafał WIEWIÓROWSKI