Joint statement on the Agency becoming a registration entity for railway vehicles

15 November 2023

AERRL, ALLRAIL, CER, EAL, EIM, ERFA, UIP, UIRR and UNIFE support the implementation of the centralised registration function as the European Vehicle Register (EVR) defined in the Commission Implementing Regulation 2018/1614 of 25 October 2018 and the corresponding transfer of the relevant data of registered vehicles from the National Vehicle Registers to the EVR.

ERA as a registration entity

In line with the implementation of the EVR the European Union Agency for Railways (ERA) intends to become a vehicle registration entity. AERRL, ALLRAIL, CER, EAL, EIM, ERFA, UIP, UIRR and UNIFE (the associations) support the intention of the ERA in case it will be adequate and competitive to and in addition to the registration entities of the member states. Such a solution offers the vehicle keepers the free choice between a national registration entity and the ERA registration entity. The associations see this free choice as a stringent necessity to achieve the political targets of the railway sector, especially for hundreds of small and medium-sized companies (SME). Those shall have maximum flexibility for the realisation of the upcoming fleet innovations like ETCS, FRMCS and DAC and any risk of potential language and capacity barriers in case ERA becomes the only registration entity, shall be avoided.

Consequently, each keeper shall apply for registration via the ERA-EVR tool to a Registration Entity of its CHOICE within the area of use of the vehicle.

Coding of the countries in which the vehicles are registered.

The necessary assignment of a country code can be as follows:

In case a national registration entity (NRE) within the area of use of the vehicle is chosen, the NRE assigns the country code requested by the applicant.

In case that ERA is chosen as a registration entity, the relevant NRE shall assign the requested country code upon request of ERA.

The EVN can be allocated/assigned by the EVR tool according to the numbering scheme.

Access rights

The data from the EVR database are in general not publicly accessible.

AERRL, ALLRAIL, CER, EAL, EIM, ERFA, UIP, UIRR and UNIFE do not object that vehicle registration data being accessible to the entitled registered stakeholders, for example, RU’s, IM’s and ECM, based on their Organisation Code.
The owner of the data in EVR is the keeper of the vehicle(s). Therefore, the keeper is fully entitled to decide whether the owned data could be public. This right encompasses the definition of all the required parameters allowing access to the owned data.

Third parties, not railway-based, shall be registered only after their justification of the reasons for their need for data access.

The third-party must request access via the EVR Tool at an NSA or ERA registration entity. Only data that is directly related to the EVN marked on the vehicle shall be available to the public.

The related contents of the Annex should be modified in accordance with the proposals made.

Each request should be documented and need to be registered and archived. A review (Analysis and Evaluation) of the available records should be undertaken no longer than after a period of 2 years following the implementation of the new regulation.

**URVIS number**

Concerning the URVIS number, ERA/EC propose the status MA (Mandatory when Available). For AERRL, ALLRAIL, CER, EAL, EIM, ERFA, UIP, UIRR and UNIFE, the requirement to provide the URVIS number shall be deleted (or receive a status Optional only).

The requirement for the URVIS number is neither covered in the Interoperability Directive nor in the Safety Directive and consequently, there is no legal right or duty for the requirement.

The URVIS number is part of the so-called 'Luxembourg Protocol to the Cape Town Convention' that foresees a central international registry for rail assets. The protocol would be applicable world-wide and not only within the EU.

If there will be a future legal reason to justify the URVIS number as a parameter for the EVR the inclusion of it should be generated by an interface to the specific database, so called International Registry where the URVIS Number and EVN are registered. In the meantime, the URVIS number shall be optional.

**Expert Group**

It is crucial to involve the Railway Sector in defining the structure/software of the EVR Tool to ease implementation of changes.

AERRL, ALLRAIL, CER, EAL, EIM, ERFA, UIP, UIRR and UNIFE recommend setting up an Expert Group with end users to identify needs for updates and changes of the registration forms. This permanent group could be consulted at any time.