



European Commission,  
Internal Market,  
Mr. Thierry Breton  
Rue de la Loi 200/Wetstraat 200  
1049 Bruxelles/Brussel  
Belgium

Brussels, 13/12/2021

**Subject: Issue with temporary transfer of road-legal / road registered vehicles between UK and EU**

Dear Sir,

**Introduction**

FEMA (the Federation of European Motorcyclists' Associations) represents the European motorcyclists in, amongst other, the European Union institutions. Our members are national motorcyclists' interest groups in the European Union, EFTA countries and the United Kingdom. We represent riders of powered two- and three-wheelers who use their vehicle for daily travelling and leisure riders.

FIVA (the Fédération Internationale des Véhicules Anciens) is a worldwide non-profit organisation dedicated to the protection, preservation, and promotion of historic vehicles. Established in 1966, it is active in more than 80 countries, representing millions of historic vehicle enthusiasts around the globe. Since 2017, FIVA has been a partner of UNESCO with consultative status, representing world motoring heritage and related culture.

NMC (the National Motorcyclists Council) is a coalition of motorcycling representative organisations in the United Kingdom, which works together on commonly held positions on a range of public policy issues affecting motorcyclists. The NMC also researches issues to both inform the policy debate and support the individual work of its members. Several NMC members are also FEMA members.

In the interests of owners of motorcycles and historic vehicles in the whole of Europe, FEMA, FIVA, and NMC wish to highlight concerns experienced by owners when *transporting* their vehicles from UK to EU and EU to UK – i.e. when they are not ridden or driven by their owners themselves across borders. These are situations where the vehicles are entering the UK or the EU on a short-term temporary basis and do not remain within either territory for more than a few weeks.

For clarity, the problem relates to vehicles which are road registered and legal for use on public roads – not unregistered vehicles for sports purposes or exhibitions for which the ATA Carnet regime is in place as detailed in the EU/UK TCA.

## **Description of the problem**

The problem has two elements:

1. Owners of motorcycles and historic vehicles travel with their vehicles to events such as shows, rallies, and exhibitions to share their passion with other lovers of cultural heritage and the public. Machines are also transported for short term tourism and holiday purposes. For practical purposes, the vehicles are often transported in vans, on trailers or in transporters to the place of the event, or to the place where the tourism journey is planned to start. We are aware of situations where owners of motorcycles and historic vehicles from the United Kingdom thought, after inquiries, that they did the right thing but were confronted with problems and extremely high fines and duties in EU countries they crossed or at the borders of EU countries. It seems that EU member states have different views on the necessary papers and how to handle this kind of transport. Similar problems have been experienced entering UK from EU.
2. The situation where the motorcycle or historic vehicle owner commissions a business to transport their vehicle, or asks a friend to do this for them. In other words, a situation where the vehicle owner is not present when it crosses the EU border. In this case, for such temporary imports experience shows that in some cases the current practice is that taxes and duties are payable as though this is a full and permanent import, this is both inappropriate and unwelcome.

Broadly, the concern is:

- Inconsistent approach by officials each side of the border to the application of customs procedures for EU citizens bringing vehicles into UK and UK citizens bringing vehicles into EU – either by themselves or via a third party.
- Inconsistent approach by EU member states regarding vehicles having already crossed the border from the UK into the EU
- Lack of common official procedure – notably when being stopped by police or customs authorities at border or on the road.
- Some EU MS authorities demanding that ATA carnets are present when this document is not intended for use for ‘Means of Transport’.

## **The request to the EC is as follows:**

That an official guidance be issued to member states - preferably also accepted by UK.

For road registered vehicles crossing the border between EU and UK for short term tourism and leisure purposes, such movements to be regarded as temporary import/export by the owner themselves in the same way as if they had driven or ridden the vehicles themselves for their holiday.

1. For owners of road registered vehicles to be able to enter and travel in the EU carrying these vehicles in a van or on a trailer for temporary tourism/event participation purposes, the vehicle owner must provide the following documents:
  - a. Vehicle registration document
  - b. Insurance document as proof of ownership
  - c. Travel itinerary for the visit to demonstrate that it is a temporary entry + details of the event or tourism activity, if applicable.

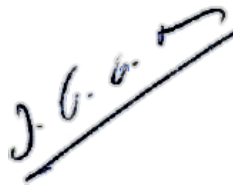
2. For Individuals or businesses transporting road registered vehicles into the EU on behalf of the vehicle owners for the purposes of temporary tourism/event participation, the following documents must be provided:
- a. Letter of authority from the owner to the person/business transporting the vehicle
  - b. Copy of vehicle registration document
  - c. Copy of insurance document as proof of ownership
  - d. Itinerary for the person owning the vehicle with details of drop off/pick up of that vehicle + details of the event or tourism activity, if applicable.

We would welcome the opportunity to discuss the matter further with you and we look forward to your reply.

Thank you in advance for your cooperation,  
Yours sincerely,



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