The Law

If a vehicle has already [PREVIOUSLY] been duly registered in an EU member state, it therefore meets EU/EC homologation and type approval compliance. It will not require a manufacturer's certificate of production or manufacturer's EC whole vehicle type approval certificate of conformity (ECWVTACOC) if being re-registered in another EU state (in accordance with EC directive 2007/C68/04 - if a vehicle has been already registered in a member state, it should not pass again the same homologation criteria tests already passed, nor criteria, for registration again), only a national roadworthiness test.

Vehicle Classification: OLD and 'TYPE APPROVED' and 'NON EU'

In the early 1990s, EC type approval was introduced and then formalised in the mid to late 90s. A uniform minimum standard for key features and safety aspects of vehicles was allocated to all new vehicles and they were marked with an E number *[it looks like this: E1/2001*116*0242*27].* Some manufacturers were slower than others and some used the type approval numbering system and some didn't. Some marked vehicles with the E number, and some didn't. Right up until 2010 some vehicles, such as vans and trucks were allocated and marked in ad hoc or varying procedures. Nowadays, you can bet, for sure, that any vehicle you buy new in the EU will bear a type approval number. But this is all a very boring subject. The point is, if you are re-registering your vehicle in France you need to know which of the 4 categories it falls in to. This is summarised below:

- 1. **OLD.** A vehicle which, quite simply, predates the EC type approval system. Old vehicles means vehicle older than mid nineties.
- TYPE APPROVED. You are in luck. If your vehicle has a type approval number, on the vehicle VIN (vehicle Identification Number) plate, or on one of its documents, it should be easy to register, re-register, enter LEZ (Low Emission Zones), etc. <u>Go to</u> <u>Step 2</u>; Gathering your Documents.
- 3. **NON-EU.** This is a setback. Any vehicle made for a 'market' outside the EU may conform, as such, to EC road regulations. But it won't necessarily be stamped or plated with a type approval number. This can be very frustrating. If you put two BMWs together, side by side, one having been sent from the factory to the UK, and one to the middle east, they will both feature the same safety and technical aspects. But one is plated with a type approval number, and one maybe isn't.

4. NON-MOTORISED VEHICLES.

IMPORTANT, 1. Old Vehicles:

Generally speaking, if you have an OLD vehicle, you will not be able to get a manufacturer's COC (ECWVTACOC) for it as it predates the system. That means that if you are registering your old vehicle in France, if and when the authorities ask you for your conformity, which they usually will, you can only produce one of the following:

(i) Availability for old vehicles: <u>A general conformity certificate in French</u> - that relates to the matter or issue of conformity (such as the Eurocert ICOC – <u>www.eurocert.uk</u>). This document will explain why there is no type approval number for the vehicle, but all other pieces of information, as applicable, will

be included.

- (ii) Availability for old vehicles: An Attestation d'Identification. This is some kind of document that some vehicle manufacturers can produce, in place of an ECCOC. It allows some French bureaucratic staff to choose to tick a box, but that's about it.
- (iii) Availability for old vehicles: Other documents that do the same as (i) and (ii), such as a 'Partial COC', available from certain companies, mainly in France, may be accepted by some French bureaucratic staff.

If your vehicle is very old, it can be classed as COLLECTION. This is similar to the UK's 'HISTORIC VEHICLE' category and although it seems to vary, the benchmark in France is 'more than 30 years old'. This can be an easier category to work with as the authorities do not expect a type approval number, However, they do still ask for a COC. In this instance you have, again, the three options above to give them an acceptable document.

IMPORTANT 2. TYPE APPROVED Vehicles: Go to Step 2; Gathering your Documents.

IMPORTANT, 3. NON-EU Vehicles:

If you have a vehicle that has come from outside the EU, it will not have a type approval number, and sometimes its VIN will give away the fact it was made for outside the EU. Even if it has been registered in the UK, by way of an IVA test, the French authorities may very well not acquiesce on the issue of type approval number and insist on a manufacturer's ECWVTACOC. In this case you can only hope to get a document such as the Eurocert ICOC – www.eurocert.uk, or a Partial COC maybe. Please note that it may still be EC type approved, just not plated as such.

IMPORTANT, 4. Non-motorised Vehicles:

It is not only cars, motorbikes, motorhomes, vans and trucks that have to be registered in France. Trailers, agricultural machines, ATVs, and caravans do too. This is a surprise to most British people and is daunting since there is no registration history from the UK for these vehicles.

- (i) Availability for non-motorised vehicles: <u>An independent document</u> that relates to the matter or issue of conformity (such as the Eurocert ICOC – <u>www.eurocert.uk</u>). This document will explain why there is no type approval number for the vehicle, but all other pieces of information, as applicable, will be included.
- (ii) **Availability for non-motorised vehicles:** <u>A manufacturer's COC</u> may be available for your caravan, horsebox, trailer, plant, machine. This document may include a type approval number for the non-motorised vehicle.

Re-registering in France

The French Registering Authority and its Duties

The law as summarised above may be followed or considered by a member state's vehicle registering authority. In the UK, this is the DVLA. In France this is currently the Agence Nationale des Titres Sécurisés (ANTS).

The ANTS users and operators do not normally recognise foreign compliance tests, such as the UK's IVA or MSVA test. However, they will usually recognise a UK MOT test pass certificate issued in the past 6 months.

The ANTS users and operators will sometimes accept a UK V5C that bears an EC WHOLE VEHICLE TYPE APPROVAL NUMBER [it looks like this: E1/2001*116*0242*27] as evidence of EU/EC compliance.

The ANTS users and operators will sometimes accept a UK V5C that does <u>not</u> bear an EC WHOLE VEHICLE TYPE APPROVAL NUMBER as evidence of EU/EC compliance.

The ANTS users and operators will usually accept an independent source or provider of EU/EC compliance (such as the Eurocert ICOC – <u>www.eurocert.uk</u>).

Aside from the above, there are many other elements of the re-registration process at the ANTS level of processing.

ANTS procedure 1: assess the vehicle's current registration and/or its origin (within the EU or from outside).

ANTS procedure 2: check the vehicle's TVV (Type, variant and Version; AKA 'D2').

ANTS procedure 3: enter the vehicle's TVV in to the ANTS computer system and obtain a Code national d'identification du type (CNIT) number.

ANTS procedure 4: check all other documents relating to the vehicle and the registrant (person). See below, under MAKING THE APPLICATION.

Step 1; driving your vehicle to France on 'foreign' plates.

Under current European Area rules and norms, a foreign-registered number plate can be used for UP TO 6 months (180 days) or 90 days, depending on the emerging rules and guidelines by a particular European Area country. while the person is settling in and looking for work, etc. Note that the 6 month rule had already started to crumble and fade around the EU during COVID YEAR 1. It used to be set in stone and not aggressively enforced by local Police (meaning you might have got, and might still get, much more than 6 months). In Italy in December 2018 this was reduced to 60 days by state legal statute, so it now seems that this rule can be changed by member states at their discretion and COVID and 2021 changes mean – you should check with the most-local authorities.

Step 2; Gathering your Documents, to apply for a Carte Grise (officially now called CERTIFICAT D'IMMATRICULATION)

Below is the list normally required for immatriculation (issue of certificat d'immatriculation);

- (i) **Completed application form** (Demande de certificat d'immatriculation, [cerfa 13750]).
- (ii) **Contrôle Technique (CT).** The equivalent to the UK MOT test; if the car is more than 4 years old.
- (iii) **Previous certificat d'immatriculation** (V5C, aka 'British logbook').
- (iv) Facture d'achat. Original 'VAT invoice' or receipt from the vehicle's seller [to you]. This may of course be totally impossible to obtain or present. If the person or agency processing the application insists it may all drag on for weeks or months, but see point 9 (below).
- (v) **Pièce d'identité.** Photographic ID.
- (vi) Justificatif de domicile. This means proof of address. A utility bill, such as EDF, or another proof of address. Or they may ask for your social security number.
- (vii) Certificat de Conformité 'COC'. This is the fly in the ointment, and the main reason for this lengthy article. It can always be overcome but you may need a huge amount of staying power. Note that usually this is required in French and in some areas must be in French.
- (viii) Fees for tax. Fees are based on region, the age of the vehicle and the CO2 emissions. But the ancient method still used for car tax assessment is Puissance fiscal, which is based on a calculated CV (its 'chevaux fiscaux'). Note that this does NOT mean horsepower. It is a calculation, which may be got from the vehicle manufacturer or on some documentation you can purchase for your vehicle (such as the Eurocert ICOC www.eurocert.uk).

- (ix) Completed 846A form. This is a signed-off form stating that the vehicle complies with France TVA (VAT) rules. The same system is now in place in the UK; it is to stop vehicles being smuggled around the EU by road, especially in the Schengen area. This can be obtained from your local tax office (Centre des Impots) or Tresorerie Impots) or Tresorerie. Please note that for all unregistered vehicles in France, the 846A is essential, and the previous Quitus Fiscal is no longer applicable to UK-registered vehicles. So if your car is unregistered, and in France, it must have arrived there after 01.01.2021 and you must get a completed 846A.
- (x) NOTE: the 846A may be accepted in place of a receipt or invoice for the vehicle. To obtain an 846A you may need to present to the tax office person the vehicle conformity document. This is because they consider the vehicle conformity document / COC the identity document for the vehicle (*which of course it isn't buy never mind* (2)). The V5C is the identity document. If they do ask for a COC as well, they will usually happily accept an independent company's document stating the same basic information as a vehicle manufacturer's COC (such as the Eurocert ICOC www.eurocert.uk).

Step 3; Making the Application for a Carte Grise

CT: A Controle Technique (CT) test must come first (or after the 846A), as it always has done. This is the French equivalent to the UK MOT test. You will need some paperwork to book this test. Usually the UK V5C will suffice but this is all at the discretion of the tester and testing station or garage. Quite often they will ask for the vehicle COC at this point. A manufacturer's COC (aka ECWVTACOC or 'type approval certificate') will then be required, but almost always they will accept an independent source or provider of EU/EC compliance (such as the Eurocert ICOC – www.eurocert.uk).

After the CT: In the old days (before 2018) a vehicle owner would go to the local Prefecture or even French Town Hall and present documents for scrutiny and consideration. Nowadays almost every Prefecture has closed and there is a variety of ways to make an application for 'immatriculation'. According to the region, the ways and as things change, the following are ways that may be open to you in your area:

- (i) *CT garage* or testing station may do all the work. They will do the CT, and they will gather your documents, scan everything, and upload in an online application using ANTS system access.
- (ii) **Special shop** or office called **SERVICE CARTE GRISE** (if you google it you may have one nearby).
- (iii) **Agents** and agencies exist and these will gather up your documents, advise you, take a fee, and upload an online application using ANTS system access.
- (iv) Prefectures and administrative desks at Town Halls some do still exist in remote areas and you will be able to take all your documents and speak to someone, before and after the application.

- (v) **Online** access to the ANTS system is being made available directly to members of the public.
- (vi) *Main dealers* may do all the work. They will gather your documents, scan everything, and upload in an online application using ANTS system access.

Step 4; Dealing with arising problems (REJECTION)

If your application is rejected there could be any number of reasons. However, if the rejection is because of the 'COC' side of things and/or no CNIT number (French vehicle ID system) was generated, the following section is relevant.

In the unfortunate situation that conformity verification/corroboration is mentioned by Prefecture staff as a reason for rejection of your application (i.e. not enough corroboration), what they mean is THE COMPUTER SAYS NO.

- Missing documents. Even though a bureaucrat or email may tell you that one thing was missing or 'not accepted', it may be that an entirely different document was missing. (*Hey. Come on, it's the same with the UK DVLA (*). Revisit the list above of Gathering your Documents. The most common omissions and/or objections are referred to below:
 - a. 846A form. This is the more difficult to obtain for new arrivals in France and many people overlook it. It is true that sometimes an application can go through without it or they may be able to use an old QUITAS FISCAL if you have one. But this is not to be relied on now that the ANTS system is centralised, rather than the old person-person system.

To obtain an 846A, as mentioned above, this can be obtained from your local tax office (Centre des Impots) or Tresorerie

b. Missing <u>Type Approval Number</u> on V5C, COC, ICOC, Attestation (for whatever reason). If the system operators are insisting on a type approval number, which really is not available or applicable, and agencies such as EUROCERT cannot find one, you can do the following to overcome the problem:

If you have one nearby, you go to a local **DREAL** office, present your V5C and give them a photocopy of it (they can't copy it for you) and a cheque for around 64€. They will send you by post, often within a week, an "identification document", which the ANTS operators will usually accept for input of vehicle information (bypassing the type approval element).

If DREAL can't give you an "identification document", you have to apply to them for a "DEMANDE DE RÉCEPTION À TITRE ISOLÉ", which will cost you around 86€.

Sometimes DREAL will get in touch with the UK DVLA to get the information on which registration was granted (eg. an IVA test). Sadly, this can take a month or more but eventually a document will usually arrive that can be used to force the ANTS operators, agency or Prefecture to issue a Carte Grise.

2. Their entry into the ANTS computer system didn't work. First, if the staff say 'not accepted' or simply 'non', please ask them why. It is normally the D2 (TVV) section they have problems with, because the TVV input generates a CNIT, which is needed to create a Carte Grise. Your COC or ICOC (www.eurocert.uk) provider may be able to modify and reissue accordingly, usually free of charge.

Last Resort

If all your efforts have failed with the ANTS procedure, whether on your own, or through an agent or garage, or any other way, because your vehicle is too old for their liking, or its origins unclear, etc etc etc. you still have the vehicle compliance testing option. There has been some confusion about who is handling compliance testing, which is similar to the British IVA test. It was the DRIRE (Les Directions Régionales de l'Industrie, de la Recherche et de l'Environnement) and subsidiaries, then DREAL. But then DREAL centres and offices started disappearing and/or limiting their responsibilities. It varies from region to region but at the point of complete rejection, ask the ANTS representatives or your agent or garage how you can get the vehicle tested by DRIRE or DREAL.

Or....sell the car or return it to the UK. Re-registration in the UK and/or removal of Export Marker can be done by Eurocert (<u>www.eurocert.uk</u> or <u>www.vehicleregistrationservices.co.uk</u>).

Conclusion

If you have got this far in this document you probably have not succeeded, at least not yet, in re-registering your vehicle in France. If so, you may like to appeal to the ANTS operators, using email, or via your chosen agency or garage. Below are some bullet points for your appeal. As they say in France - Courage!

The principle and philosophy of the European Area is ease of movement of people. In this case, the vehicle has been already registered within the EU (in an EU member state) and the owner wishes to relocate easily within the EU.

En vertu du droit communautaire et des principes de la CE (UE) / Espace économique européen, tous les services administratifs du gouvernement sont tenus d'apporter une aide positive en cas de demande de modification de l'immatriculation d'un véhicule dans l'UE / Espace économique européen.

I understand that the Agence Nationale des Titres Sécurisés (ANTS) system will generate a CNIT after the user input of the vehicle TVV (D2) and/or the 'ECWVTA' number (homologation number). Therefore, your system can check the validity of the numbers provided on the COC / UK V5C CARTE GRISE / ATTESTATION / EUROCERT ICOC.

Je comprends que le système de l'Agence Nationale des Titres Sécurisés (ANTS) générera un CNIT après la saisie par l'utilisateur du véhicule TVV (D2) et / ou le numéro 'ECWVTA' (numéro d'homologation). Par conséquent, votre système peut vérifier la validité des numéros fournis sur COC / UK V5C CARTE GRISE / ATTESTATION / EUROCERT ICOC.

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