

## Federal Ministry for Digital and Transport – Division StV 21

### List of questions on the registration of Ukrainian vehicles after 30 September 2024

#### A. Vehicle registration

- Which documents are required to register foreign vehicles in Germany?

The following documents must be presented to the competent registration authority:

- an identity document with the name written in Latin letters;
- the Ukrainian registration certificate and the number plates;
- an individual approval for the vehicle in accordance with section 21 of the German Road Vehicles Registration and Licensing Regulations (StVZO) or (if available) the EU certificate of conformity (CoC) and a certificate stating that the main inspection in accordance with section 29 of the StVZO has been successfully completed.
- the proof of insurance (eVB electronic insurance confirmation – not a Green International Insurance Card or frontier insurance, because these are only valid for international traffic);
- SEPA mandate for direct debits (IBAN and BIC); if required, consent of the account holder.

It is further recommended to present a customs clearance certificate, if such a document can be issued.

- In Ukraine, citizens can use not only paper documents but also electronic documents. This includes identification documents and vehicle ownership documents (registration certificate). Can documents of this kind be used in Germany when registering a vehicle?

Ukrainian digital documents are not admissible for vehicle registration purposes. In particular, the identity document and the Ukrainian registration certificate must be presented in physical form. If the original of the latter cannot be submitted, the applicant must provide other suitable proof of right to use the vehicle. The registration authority then decides on a case-by-case basis whether the vehicle can be registered

in Germany to the applicant who has proven that they have the right to use the vehicle.

➤ Can Ukrainian nationals keep their vehicle registration document and number plate when registering a vehicle in Germany?

In accordance with section 8 (4) sentence 1 of the German Vehicle Registration and Licensing Regulations (FZV), the registration authority must retain the foreign registration certificates, store them for six months from the date of collection and destroy them immediately after the retention period has expired. The registration authority must, if so requested by the competent foreign authority, return the collected registration certificate via the Federal Motor Transport Authority (KBA) within the retention period (section 8 (4) sentence 5 of the FZV).

With regard to Ukrainian registration certificates, section 8 (4) sentence 5 of the FZV initially stipulates a legal option of sending them to a body designated by Ukraine. If that is not possible, but a destruction of the Ukrainian registration certificates would also raise concerns because it could complicate re-registration in Ukraine, the Federal Ministry for Digital and Transport (BMDV) is of the opinion that the federal states can hand over the registration certificates with a note stating that a German registration certificate has been issued to the persons entitled to use the vehicle by way of an exemption in accordance with section 76 of the FZV.

The FZV does not regulate the whereabouts of foreign number plates. This means that there is no legal basis for retaining the number plates. However, vehicles registered in Ukraine do not have stamped number plates. They therefore cannot be cancelled to prevent potential abuse of the number plates by de-stamping. Nevertheless, against the background of a possible re-registration in Ukraine, the Federal Ministry for Digital and Transport is of the opinion that it seems justifiable to return the registration certificates to the persons entitled to use the vehicle if the Ukrainian registration certificates are clearly invalidated by a note stating that a German registration certificate has been issued. Reference should be made to the criminal liability of number plate abuse. In addition, the Federal Ministry for Digital and Transport will provide information on the criminal liability of number plate abuse using suitable means of communication (website/fact sheet).

How the Ukrainian authorities proceed after the return is outside the responsibility of German authorities.

- Does German law require that a vehicle be de-registered in Ukraine before it is registered in Germany?

This is an internal Ukrainian decision. In any case, there should be clear rules for vehicle keepers. In accordance with the Vienna Convention, registration and the principle of mutual recognition last up to one year. From the start of mandatory registration in Germany, Ukrainian documents and number plates will no longer be recognized in Germany; the latter may no longer be attached to the vehicle.

- What happens if a Ukrainian vehicle is not used in Germany by the owner, but by another Ukrainian refugee (e.g. on the basis of a written authorization)? How can such a person register the vehicle in Germany?

In line with consistent case law (particularly on section 7 of the German Road Traffic Act, StVG), the keeper is the person who uses a motor vehicle on their own behalf and for their own account and has the power of disposition, i.e. who determines the reason, duration and timing of the journeys themselves (Hamm Higher Regional Court, judgement of 7 December 2012 - I-9 U 117/12 -, marginal 13, juris with further references). In principle, the entry in Part I of the registration certificate does not provide prima facie evidence that the person entered in the certificate is the keeper (Nuremberg-Fürth Regional Court, judgement of 13 August 2015 - 8 O 9261/14 -, marginal 25, juris). As a consequence, the actual keeper and the keeper entered in the certificate may in principle be different persons.

For this reason, the following procedure should be applied: It is not the entries in the Ukrainian registration certificates (see Annex 1 for a template), but the actual ownership situation is considered as the basis to determine whether the Ukrainian refugee is actually authorized to dispose of the vehicle. If the applicant cannot provide proof of their right to use the vehicle (e.g. through invoices, declaration of transfer, etc.), they can submit a written declaration to the registration authority assuring that they have the right to use the vehicle and explaining why no proof can be provided. The registration authority then decides at its discretion after due assessment whether the registration can be granted based on the information provided and the circumstances of the individual case. The applicant is informed that any incorrect information may result in the withdrawal of the registration decision.

In cases where the right of use is not clear from the Ukrainian registration certificate, a declaration of transfer or a similar document, information on the origin of the vehicle

(Ukrainian number plate) must always be entered in field 22 of the German registration certificate.

If no Ukrainian registration certificate is available or if there is good reason to doubt its authenticity, the registration authorities can send a request for confirmation of information on the keeper to

[info@hsc.gov.ua](mailto:info@hsc.gov.ua).

The authorities are to send questions that must be answered with yes or no (Example: "Is Mr ... registered with you as the keeper?"); the authority must obtain the prior consent of the applicant for such a query.

If a registration certificate has merely been lost, the keeper can apply for it at the Centers of the State Migration Service of Ukraine ('SE Document') if required. The Centers are located in Berlin, Cologne and Munich (see <https://passport.org.ua/en/centres>).

Is it necessary to register a car twice, first in Germany and then again when returning to Ukraine?

This does not constitute a case of double registration, but depends on whether a vehicle is deemed to be participating in international road traffic or not. Under international law (Article 1 (b) of the 1968 Vienna Convention on Road Traffic, to which Germany and Ukraine are signatories), it is assumed that a vehicle is registered in one country and remains registered in that country as long as it is only used in international traffic, i.e. if it later returns to the country of registration. If a vehicle is imported into another country only temporarily, it is deemed to remain in international traffic; temporary is defined as the one-year period depending on the national legislation. Section 46 (7) of the FZV stipulates that the one-year period is the binding maximum duration in Germany. After one year, the vehicle can no longer be deemed to have remained in international road traffic under German legislation. Furthermore, as soon as a vehicle is regularly based in another country, it is no longer in international road traffic, even if one year has not yet elapsed. For Ukrainian refugees, it was decided to generally apply the one-year time limit, i.e. the maximum duration under German legislation. At the end of this period, the vehicles in question must be registered here if they remain in Germany and no exemption is granted. Such exemptions were granted in certain cases at federal state level until 30 September

2024 at the latest. The way in which the original registration is handled (in Ukraine in this case) is not regulated as this falls within the remit of the respective state.

➤ **In-depth information**

How can the regular base of a vehicle in Germany be determined? Is there a procedure to be followed? Which document confirms that a vehicle has crossed the border?

Section 46 of the FZV regulates the temporary participation in road traffic in the Federal Republic of Germany by foreign-registered vehicles. In accordance with section 46 (1) sentence 1 of the FZV, temporary participation in road traffic requires, among other things, that Germany is not deemed to be the regular base of the respective vehicle.

The regular base of a vehicle within the meaning of the provision is generally determined by the actual circumstances, i.e. according to objective characteristics (Federal Administrative Court, judgement of 18 June 1981 - 7 B 137/81 -, juris). It depends on the circumstances that are to be determined and not the result of an administrative procedure that must be followed. For example, the fact that a vehicle is regularly driven from a person's registered place of residence, i.e. put into operation there and parked there again after use, may determine a regular base. Within the meaning of section 46 (1) to (3) of the FZV, *temporary* means a period of up to one year. Once this period is exceeded, the regular base is no longer relevant; the respective vehicle is then subject to registration.

Response from the Federal Ministry of the Interior:

As to the question "Which document confirms that a vehicle has crossed the border?", the Federal Police does not issue any such documents for vehicles. However, in accordance with Regulation (EU) 2016/399 (Schengen Borders Code), passports of third country nationals (this includes nationals of Ukraine) are stamped systematically upon arrival and departure when they cross an external Schengen border subject to border controls. There are no controls at the internal Schengen borders, subject to the temporary reintroduction of internal border controls. Passports are not stamped if border controls are temporarily reintroduced at the internal Schengen borders.

How is the one-year period determined (on what day does this period start for a vehicle)?

The one-year period of temporary use of German roads starts on the day the vehicle crosses the border into Germany and ends no later than one year after that day, unless a regular base has been established for the Ukrainian vehicle in Germany before one year has elapsed. If a regular base is established, the period ends early.

Does this refer to the first or last entry into Germany or the EU?

In principle, the first entry into Germany marks the start of the period, unless, in individual cases, a new one-year period has begun because of further departures and re-entries. However, it is not possible to give a general answer to the question as to whether a new one-year period begins. Whether a temporary use of German roads can be assumed or whether the Ukrainian vehicle is subject to mandatory registration in Germany depends on the individual circumstances of each case. For example, when a vehicle is briefly driven across the border from Germany into Poland for the sole purpose of refuelling, this does not mean that a new one-year period begins. On the other hand, if a vehicle is driven to Ukraine for a longer stay and it is unclear whether there is an intention to return to Germany, this will result in the start of a new one-year period. The distinction can therefore only be made on a case-by-case basis. It will also probably be difficult to prove that a vehicle still meets the conditions for a temporary use of German roads.

Can this period be interrupted if, for example, the vehicle is driven abroad (to another EU Member State or to Ukraine)?

The period is not interrupted by any departure or re-entry. However, a new period may start in individual cases (see above).

How long does a vehicle have to be outside German territory for a new one-year period for temporary use of German roads to start?

There are no explicit provisions in this regard in the FZV. It is therefore not possible to give a general answer to this question. It depends on the circumstances of a given case. In any case, crossing the border for a short time will not be sufficient. The Federal Ministry for Digital and Transport is of the opinion that even a stay of

several days or a few weeks – the usual short business trips or holidays – will not lead to the start of a new one-year period.

#### What are the penalties for exceeding this period?

Exceeding this period without registering the vehicle in Germany is not a criminal offence. However, it does constitute an administrative offence that can be punished with a fine. The fines range from €70 to €105.

#### What is the procedure for de-registration in Germany before returning to Ukraine?

If a vehicle once registered in Germany is de-registered, it may no longer be used on German roads. It is therefore necessary to keep the German registration to return to Ukraine. The vehicle therefore cannot be de-registered before returning to Ukraine. The application for de-registration of a vehicle may be submitted at the last responsible registration authority in Germany or online. The vehicle is then de-registered automatically.

#### [Federal Ministry for Digital and Transport – Web-based vehicle registration: how to use the i-Kfz web service](#)

Alternatively, it is possible to apply for an export number plate in accordance with section 45 of the FZV.

## **B. Vehicle technology**

When looking for solutions to support Ukrainian vehicle keepers/drivers, which only have a national impact because they are exclusively used to issue licences for individual vehicles that are valid in Germany<sup>1</sup>, in principle, it is not necessary to involve the EU/the Commission. This is ensured by the fact that any exemptions in accordance with section 70 of the StVZO are granted for a specific keeper and/or specific vehicle depending on the degree of deviation of the vehicle. If exemptions go beyond the usual level, they must be granted for a specific keeper (for an overview, see Annex 2). This exemption granted for a specific keeper is valid for as long as the vehicle is operated on German territory

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<sup>1</sup> These vehicles may be used in cross-border transport operations. If such a vehicle is sold to be registered in an EU Member State or EEA state, the authority of that state then decides whether it will recognize such an approval (see Article 46 of Regulation (EU) 2018/858).

and has a German registration certificate. This is intended to prevent vehicles that do not comply with the harmonized regulations being brought into the internal market as this would result in unequal treatment.

- Non-compliance of the vehicle's technical condition with the German requirements. These aspects were already discussed last year (vehicles not manufactured for the EU market, vehicles without COC, old vehicles, non-compliance with CO2 emission standards, car headlights, tyres, etc.). Is it possible to register a car on the basis of a simplified safety test, which is currently still in force?

The simplified safety test approach cannot be used for approving and registering Ukrainian vehicles. The simplified safety test approach was developed so that the federal states could grant an exemption to vehicles of Ukrainian refugees for them to continue to operate the vehicles with a foreign licence plate, even though they are no longer in international traffic. The approach was to ensure a minimum level of road safety and environmental protection of Ukrainian vehicles, as these vehicles are not subject to the periodic main inspection in accordance with section 29 of the StVZO since they were registered in Ukraine. At the end of September of this year, the exemptions granted will expire or be revoked. It will then be generally required for Ukrainian vehicles to have an unrestricted registration in Germany. The prerequisite for this will be the granting of an individual approval in accordance with section 21 of the StVZO, including a main inspection in accordance with section 29 of the StVZO, since the affected vehicles regularly do not have an EU type-approval or a German type-approval.

The majority of Ukrainian vehicles will probably not meet the relevant requirements – for example with regard to exhaust emissions – on the date of their first registration. Nevertheless, the Federal Ministry for Digital and Transport still believes it is necessary to take the special situation of Ukrainian refugees into account. The federal states responsible for approving the vehicles have therefore already been asked to implement the following requirements in processing the expected applications for individual approval for the aforementioned vehicles.

Failure to fulfil the environmental standards to be met for the granting of individual approvals is to be accepted for Ukrainian vehicles, provided the vehicle in question was first registered in the country of origin no more than 15 years after the cut-off date for recognition of a given emission standard within the EU and/or in Germany



(e.g. Euro 3 ceased to be recognized for first registration in the EU/in Germany from 1 January 2006; as a result, vehicles first registered before 1 January 2021 in Ukraine, for example, could be accepted by way of exemption). The aforementioned recommendation that older exhaust emission requirements may form the basis for individual approvals of these vehicles by way of exemption takes into account

- the assessment of the vehicles based on the 'Imported Vehicle Fact Sheet' as 'personal property' and the fact that retrofitting to comply with stricter emission standards is either impossible or only possible at an extremely disproportionate cost;
- the delayed national application in Ukraine of emission standards comparable to the Euro categories<sup>2</sup>; and
- the economic situation of the refugees.

See the annex for the exhaust emission standards to be met and the recommendation to support exemptions under section 70 from section 47 of the StVZO.

#### ➤ **In-depth information**

##### What type of exemption is it? Who makes the decision?

Pursuant to section 70 (1) no. 2 of the StVZO, exemptions from all provisions of the StVZO may be approved by the competent top-level federal state authorities, bodies designated by them or bodies competent under federal state legislation (these are generally the registration authorities/district commissioners' offices) in certain individual cases or generally for certain individual applicants. Exemptions are required for each individual aspect in which the vehicle concerned does not comply with the European type-approval regulations or does not fulfil the national regulations.

The vehicles are to be classified pragmatically for the group of keepers addressed here based on the information available on the exhaust emission behaviour and a comparison of the emission-reducing components installed in the vehicle to be assessed in comparison to vehicles type-approved in Germany or the EU. The functionality of the installed emission-reducing components and the plausibility of the exhaust gas classification are to be checked as part of an exhaust emission test to be carried out in accordance with Annex VIIIa of the StVZO. Specific adverse impacts

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<sup>2</sup> Compare: Possibility of importing Euro 4 vehicles to Ukraine ( <https://www.automotive-logistics.media/ukraine-emissions-ruling-will-hit-asian-imports/13377.article>) and introduction of Euro 6 in Ukraine (<https://en.interfax.com.ua/news/general/427466.html>)

on the environment (e.g. leaks or emission-reducing components that have been removed or are not fully functional) are not to be accepted.

The federal states were also asked to grant further exemptions where the deviations from the provisions of the StVZO do not raise safety concerns and retrofitting in accordance with the StVZO provisions would be technically impossible, disproportionate or unreasonable. Among other things, exemptions are to be granted for Ukrainian vehicles unless simple retrofitting measures are available on the market. 'Simple retrofitting measures' means that they are technically feasible, can be procured on the market in a timely manner and the total costs for all retrofitting measures required on the vehicle do not exceed 5% of the estimated current market value of the vehicle in Germany. The federal states were also asked to keep the costs for granting individual or multiple exemptions from the provisions of the StVZO and for approval of the vehicle to an absolute minimum.

➤ **In-depth information**

Have the federal states already given their approval? Will uniform federal standards apply here, or will each federal state handle this differently?

The Federal Ministry for Digital and Transport has already asked the federal states at working level to grant further exemptions where the deviations from the provisions of the StVZO do not raise safety concerns and retrofitting in accordance with the StVZO provisions would be technically impossible, disproportionate or unreasonable. In the opinion of the Federal Ministry for Digital and Transport, exemptions may be granted for Ukrainian vehicles unless simple retrofitting measures are available on the market.

With regard to emission requirements, if the vehicle does not comply with the emission standard actually applicable to the vehicle in the European Union or Germany when it was first registered, environmental standards of Ukrainian vehicles are to be accepted if their first registration in Ukraine was no more than 15 years after the cut-off date for recognition of this emission standard in the EU and/or in Germany. In proven cases of hardship, more extensive exemptions remain possible, provided they are granted on a keeper- and vehicle-specific basis.

➤ What options are there for registering Euro 2 vehicles in Germany?

Insofar as Ukraine asked about the eligibility for approval of Euro 2 vehicles, the question is technically related to that raised by Belarus on the 15-year period: Here, the Federal Ministry for Digital and Transport is in favour of a pragmatic approach that seeks to mediate between Ukraine's aim (registration of as many vehicles as possible) and the German legal situation (individual approval, section 21 of the StVZO – "in principle, all requirements must be met"). This is intended to strike a compromise between providing aid for Ukraine and compliance with the technical regulations. The applicable emission standard always depends on the individual date of first registration in the country of origin. According to the table in the annex, a Euro 2 passenger car first registered by 31 December 2011 would be eligible for registration by way of exemption.

- Will Germany recognize Ukrainian vehicle certificates for the purpose of roadworthiness testing for the registration of Ukrainian vehicles in accordance with the Geneva Agreement concerning the adoption of uniform technical prescriptions for wheeled vehicles, equipment and parts which can be fitted to and/or be used on wheeled vehicles and the conditions for reciprocal recognition of approvals granted on the basis of these prescriptions?

Recognition is not possible because Germany and the EU did not accede to the 97 Agreement. Contracting states within the meaning of section 8 of the Vehicle Registration and Licensing Regulations (FZV) are only EEA<sup>3</sup> states that also apply Directive 2014/45/EU themselves. The procedure for registration in the Federal Republic of Germany following prior registration in another country is governed in principle by section 8 of the FZV.

- How are critical technical points (e.g. non-compliance with Union law requirements) to be handled? Which points need to be discussed?

The Federal Government will make the 'Imported Vehicle Fact Sheet' available to the federal states as recommendations for action. The Federal Ministry for Digital and Transport will contact the Commission and explain the procedure if requirements under EU law are at issue.

The 'Imported Vehicle Fact Sheet' (fact sheet on the assessment of an imported vehicle of categories M1 and N1 in accordance with section 21 of the Road Traffic

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<sup>3</sup> <https://www.auswaertiges-amt.de/de/service/fragenkatalog-node/02-ewr-eu/606444> (German only)

Registration and Licensing Regulations (StVZO) and section 13 of the EC Vehicle Approval Regulations (EG-FGV) and on possible exemptions under section 70 of the StVZO) was created for the assessment of individual vehicles of categories M1 and N1, manufactured in non-EU states or for non-EU states, which are imported into the territory governed by the StVZO and have not been equipped by the manufacturer in accordance with the construction and operating provisions of the StVZO or EG-FGV. The Federal Ministry for Digital and Transport supports the use of the fact sheet as a basis for the assessment of Ukrainian vehicles.

➤ **In-depth information**

The following points should also be noted:

Noise:

In accordance with the official announcement of the 'Imported Vehicle Fact Sheet' in the Federal Ministry of Transport Gazette (VkBl): "Exemptions from exhaust and noise regulations are also possible for personal property, unless simple retrofitting measures are available". The 15-year period for the granting of necessary exemptions for exhaust emissions should apply analogously to noise emissions.

Military equipment:

Is to be removed completely. For vehicles as defined in section 19 (2a) of the StVZO, the provisions of section 19 (2a) of the StVZO apply.

Tinted windows

In accordance with section 22a (1) no. 3 of the StVZO, films for safety glass windows must be of an officially approved design. Other types of glass tinting are not permitted. Section 40 (1) sentence 3 of the StVZO ("safety glass windows that are important for the driver's vision must be clear, translucent and distortion-free") applies for the field of vision.

Tyres:

When inspecting tyres, the procedure recommended in the 'Imported Vehicle Fact Sheet' (Annex 3) is recommended. Studded tyres are not permitted, see section 36 (1) sentence 3 ("Tyres or other running surfaces must not have any unevenness that could damage a firm road surface").

Lighting equipment:

Pragmatic handling on a case-by-case basis in accordance with Annex 3 to this document in conjunction with Annex 3 to the 'Imported Vehicle Fact Sheet'.

Refrigerants in motor vehicles:

The Federal Ministry for Digital and Transport recommends tackling the problem by granting keeper-specific exemptions.

## **C. Financial aspects**

### **I. Customs and taxes (Federal Ministry of Finance, BMF)**

➤ Customs or registration office – which should those affected contact first?

The recommendation is to first apply to the customs office for customs handling. For the subsequent roadworthiness testing to register the vehicle, it is helpful to have already had your vehicle cleared by customs and be in possession of the relevant documentation. However, the recommended sequence is not legally binding.

➤ Do I also have to declare the vehicle (and the goods I bring with me) to customs?

In principle, yes.

Goods from non-EU countries, for example from Ukraine, which are to be imported for private use or private consumption within the EU, must be released for free circulation.

➤ What customs duties, taxes and other fees are incurred when a vehicle is released for free circulation?

As a rule, a car or other vehicle imported to Germany from outside the EU is subject to an import duty of 10% and import VAT of 19%. Clearance at the customs office itself is free of charge.

For refugees from Ukraine to the EU who relocate their habitual residence to the customs territory, their personal effects (including vehicles) may be exempt from import charges if the conditions set out in Articles 4 to 11 of Regulation (EC) No 1186/2009 setting up a Community system of reliefs from customs duty are met.

➤ **In-depth information**

Articles 4 to 11 of Regulation (EC) No 1186/2009 contain a reference to a habitual place of residence outside the customs territory of the Community for a continuous period of at least 12 months. Do these regulations then apply to all Ukrainian persons seeking protection?

The provisions of Articles 4 to 11 of Regulation (EC) No 1186/2009 apply in principle to all Ukrainian persons seeking protection.

Does this include exemptions from both rates (10% and 19%) or just one?

In principle, all import charges (customs duties and import VAT) are covered. The import VAT exemption is derived from section 1 of the Import VAT Exemption Ordinance (Einfuhrumsatzsteuer-Befreiungsverordnung).

➤ What are the penalties for non-payment of customs duties?

Properly registered motor vehicles do not incur penalties. Default interest and reminder fees may be charged for late payment of import charges.

➤ Under what conditions is a vehicle exempt from import charges as personal property?

The main conditions are that

- the vehicle belongs to the person in question; and
- has been used by them at their former habitual residence for at least six months in the third country of origin.

In addition, a retention period of twelve months after customs clearance applies, i.e. the vehicle may not be pledged, hired out, sold or otherwise transferred to third parties without prior notification of the competent customs office. In the case of refugees who have transferred their habitual residence to the customs territory of the EU due to the war, the customs office will generally waive this requirement.

➤ Is it also possible to have a family vehicle cleared as personal property?

In principle, the exemption from charges as personal property applies to the passenger car belonging to the relocating person. Family members who are also refugees and who have lived in the car keeper's household in Ukraine can also register the relocating person's vehicle as personal property.

A declaration by the refugee family member is sufficient proof that the vehicle has been transferred by the vehicle keeper.

A form is available for this for download at Zoll.de:

[https://www.zoll.de/SharedDocs/Downloads/DE/Links-fuer-Inhaltseiten/Fachthemen/Zoelle/erklaerung\\_verwendung\\_ukrainischer\\_fahrzeuge\\_in\\_deutschland.pdf?\\_\\_blob=publicationFile&v=4](https://www.zoll.de/SharedDocs/Downloads/DE/Links-fuer-Inhaltseiten/Fachthemen/Zoelle/erklaerung_verwendung_ukrainischer_fahrzeuge_in_deutschland.pdf?__blob=publicationFile&v=4)

The document is also available on the website in Ukrainian and English.

➤ Who can those affected contact personally? Which customs office can clear my vehicle?

The vehicle can be cleared at any customs office in Germany. The customs office closest to your place of residence can be found using the general office search on Zoll.de:

[https://www.zoll.de/DE/Service/Dienststellensuche/Dienststellensuche/\\_function/DienststellenSuche\\_Formular.html?nn=282022&ambit\\_distance=25&ambit\\_distance.GROUP=1](https://www.zoll.de/DE/Service/Dienststellensuche/Dienststellensuche/_function/DienststellenSuche_Formular.html?nn=282022&ambit_distance=25&ambit_distance.GROUP=1)

➤ Which formalities are necessary?

In principle, a written customs declaration is required to place the car into a customs procedure for exemption from import charges. It can be submitted using form 0350 (Personal property).

It is available for download at [www.zoll.de](http://www.zoll.de).

<https://www.formulare-bfinv.de/ffw/action/invoke.do?id=0350>

An English-language translation is also available on the website.

➤ What documents are required for import clearance of the vehicle?

The following are generally required

- a registration document;
- a valid Ukrainian driving licence, also digital where appropriate,
- the current residential address in Germany or in the EU.

➤ What is the deadline for declaring a vehicle to customs?

In principle, the vehicle must be registered at the time of entry into the European Union. As a rule, personal property must be registered within one year of establishing habitual residence in the EU. The customs authorities will handle these deadlines generously and allow exemptions in justified cases.

➤ Where can those affected obtain further information?

Information on the customs clearance of goods brought into the EU by refugees is available in German on the following customs page:  
<https://www.zoll.de/DE/Fachthemen/Zoelle/Ukrainekrieg/Ukrainekrieg-Waren-Flucht/ukrainekriegwaren-flucht.html>

➤ In Germany, motor vehicles are subject to motor vehicle tax. What is the average motor vehicle tax rate? Can persons with temporary protection status from Ukraine be exempted from this tax?

The motor vehicle tax rate (KraftSt) depends on the individual assessment bases under section 9 of the Motor Vehicle Tax Act (Kraftfahrzeugsteuergesetz). An online calculator is available in German on the homepage of the Federal Ministry of Finance to find out how much tax you are likely to have to pay. You can find it at the following link:

[https://www.bundesfinanzministerium.de/Web/DE/Service/Apps\\_Rechner/KfzRechner/KfzRechner.html](https://www.bundesfinanzministerium.de/Web/DE/Service/Apps_Rechner/KfzRechner/KfzRechner.html).

Receipt of social benefits such as citizen's benefit is not grounds for an exemption from the obligation to pay motor vehicle tax. As a legal transaction tax, motor vehicle tax is a fixed, calculable amount. There are no material reasons of equity for a remission of the motor vehicle tax pursuant to section 227 of the Fiscal Code (Abgabenordnung).

## II. Other costs

➤ Are there any costs for the translation and certification of documents that need to be submitted?

Translations and certifications of Ukrainian documents will generally not be necessary for vehicle registration, as the Ukrainian registration certificate also contains Latin letters and the relevant data – e.g. the owner's name – can therefore be read by the registration authority. This means that no costs are incurred. If only a Cyrillic version is



available in a given case, the person who has the right to use the vehicle is not permitted to use the roads in the first place, as the relevant requirements (section 46 (5) of the FZV) are not met.

➤ What costs are incurred for the technical inspection of the vehicle?

The costs in accordance with the German Schedule of Fees for Measures relating to Road Traffic (GebOSt) are shown below.

Costs at the technical inspection agency (Technischen Prüfstelle, TP):

- Passenger car inspection in accordance with section 21 of the StVZO: €97.90
- Main inspection for a passenger car in accordance with section 29 of the StVZO: from €32.90 to €51.60;
- Exhaust emission tests with exhaust gas measurement at the tailpipe of passenger cars: €23.70 to €109.80.

➤ **In-depth information**

Why is there such a wide range of costs?

The prices stated cover all motor vehicles except motorbikes. They reflect the potentially higher workload for conducting the general inspection and exhaust emission test for heavier vehicles, such as heavy-duty vehicles, trailers, buses and coaches.

If the exhaust emission test is carried out as part of the main inspection, the permitted fee range is calculated by multiplying the fixed fees by 0.85.

- Where applicable, gas system installation test in accordance with section 41a (5) of the StVZO: €123.20

If the aforementioned inspections are not carried out by a technical inspection agency, but by an officially recognized inspection organization, the costs will probably be higher, as these organizations are not subject to the regulations of the GebOSt. The workshop where the inspection is carried out may also invoice additional charges.

Costs at the local competent authority in accordance with the GebOSt:

- Decision on an exemption from an StVZO provision per exception and per vehicle: from €10.20 to €511

➤ **In-depth information**

The difference here is significant; what does it depend on?

The costs depend on the amount of work involved in processing each exception and its assessment by the local competent authority. When determining the charge, it is usually also taken into account whether an exemption is granted for larger quantities (e.g. vehicle dealers) or for the commercial use of a vehicle.

- Granting of type-approvals in accordance with section 21 of the StVZO: €39.50

Total costs

Depending on the case and the extent to which inspections have to be carried out and exemptions granted, the costs range from €200 to around €500 for normal cases, and more if very special circumstances apply to the vehicle.

➤ **In-depth information**

Could the Federal Government and/or the federal states cover at least part of these costs, at least for the initial technical inspection and registration?

The costs are based on the Schedule of Fees for Measures Relating to Road Traffic (GebOST), which are standardized and mandatory nationwide.

- What is the Federal Ministry for Digital and Transport's estimate of the total cost of registering a foreign vehicle in Germany, including customs duties and other associated costs?

Ukrainian vehicles cannot be registered online. This must be done in-person at the competent vehicle registration authority. The charges are based on the GebOST. A charge of €30.00 applies for registration. This increases by a further €15.30 because it is not possible to retrieve data from the Federal Motor Transport Authority. In addition, further charges are incurred in connection with vehicle registration: see 'Costs for the technical inspection of the vehicle'.

- Does the registration of a vehicle affect the receipt of social assistance?

Response from the Federal Ministry of Labour and Social Affairs (BMAS):

The basic income support for jobseekers (citizen's benefit) in accordance with the Second Book of the Social Code (SGB II) ensures a minimum subsistence level. Citizen's benefit is therefore subordinate, meaning that those affected must prioritize the use of existing assets to secure their livelihood, unless these are not to be taken into account under the statutory provisions. The assets not taken into account also include an appropriate motor vehicle. Currently, a vehicle with a value of up to €15,000 is considered appropriate. If the vehicle itself exceeds this value, its value as an asset must be prioritized to secure the person's livelihood. However, the registration of a motor vehicle must be distinguished from this. This is for use of the vehicle on the roads. In order to qualify as assets within the scope of citizen's benefit, the location of the respective registration is irrelevant. The act of registration itself therefore has no impact on social assistance.

- Are such vehicles removed from the control of the aforementioned authorities when they leave EU territory with a German registration?

On duty-free release of the vehicles for free circulation as personal property, the vehicles are in free circulation in the EU. Customs supervision is then – in principle – no longer required. The vehicles have the status of Union goods.

If these vehicles leave the territory of the Union, they are not removed from the control of the aforementioned authorities.

- What customs procedures and status does it take for a Ukrainian car with a German registration to be cleared when it leaves the EU, taking into account the provisions of the Convention on Temporary Admission (Istanbul Convention)?

The customs procedure and the status such vehicles have under the provisions of the Istanbul Convention depend on the specific circumstances of the individual case. It is not mandatory to use the customs documents provided for in the Convention (e.g. ATA carnet or CPD).

When leaving the customs territory of the EU, vehicles released for free circulation in Germany change their status under customs law and become non-Union goods. However, if these vehicles are re-imported into the customs territory of the EU within a period of up to three years, they can be left duty-free as returned goods and regain the status of Union goods.

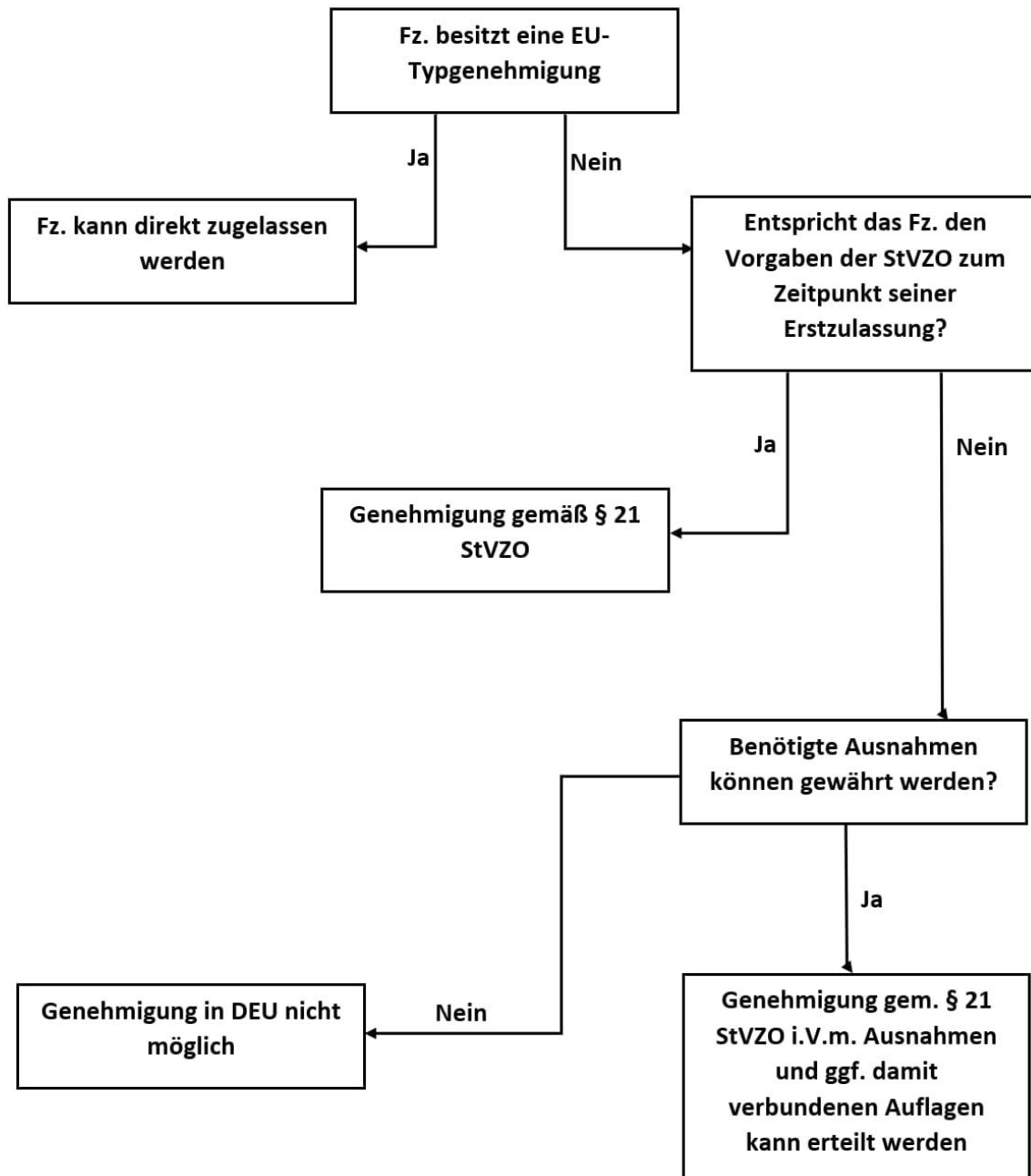


**Sample of a Ukrainian registration certificate**

**Annex 1**

**[to be submitted later by the Ukrainian side]**

Genehmigung von Fahrzeugen mit UKR-Zulassung



**Exhaust emission standards to be fulfilled in the EU and recommendation for support of exemptions under section 70 from section 47 of the StVZO**

In the case of used vehicles, the relevant regulations for an individual approval in accordance with section 21 of the StVZO are based on the date of first registration in a non-European country and the mandatory exhaust emissions regulations applicable in the EU or Germany at that time.

**Diesel-engined passenger cars**

	Introduction dates for the first registration of diesel-engined passenger cars in the EU and recommendation for the granting of an exemption under section 70 from section 47 of the StVZO for vehicles of refugees from Ukraine									
Standard	Euro 1	Euro 2	Euro 3	Euro 4	Euro 5a	Euro 5b	Euro 6b	Euro 6c	Euro 6d-TEMP	Euro 6d
Approval of new vehicles ( <b>first reg.</b> ) in the <b>EU/GER</b>	from 1 Jan. 1993	from 1 Jan. 1997	from 1 Jan. 2001	from 1 Jan. 2006	from 1 Jan. 2011	from 1 Jan. 2013	from 1 Sep. 2015	from 1 Sep. 2018	from 1 Sep. 2019	from 1 Jan. 2021
First registration <b>UKR vehicle</b> with exemption recommendation	until 31 Dec. 2007	until 31 Dec. 2011	until 31 Dec. 2015	until 31 Dec. 2020	until 31 Dec. 2025	until 31 Dec. 2027	from 31 Aug. 2029	from 31 Aug. 2032	from 31 Aug. 2033	No exemption req.

**Petrol-engined passenger cars**

	Introduction dates for the first registration of petrol-engined passenger cars in the EU and recommendation for the granting of an exemption under section 70 from section 47 of the StVZO for vehicles of refugees from Ukraine									
Standard	Euro 1	Euro 2	Euro 3	D3/D4	Euro 4	Euro 5a	Euro 6b	Euro 6c	Euro 6d-TEMP	Euro 6d
Approval of new vehicles ( <b>first reg.</b> ) in the <b>EU/GER</b>	from 1 Jan. 1993	from 1 Jan. 1997	from 1 Jan. 2001	from 1 Jan. 2001	from 1 Jan. 2006	from 1 Jan. 2011	from 1 Sep. 2015	from 1 Sep. 2018	from 1 Sep. 2019	from 1 Jan. 2021
First registration <b>UKR vehicle</b> with exemption recommendation	until 31 Dec. 2007	until 31 Dec. 2011	until 31 Dec. 2015	until 31 Dec. 2015	until 31 Dec. 2020	until 31 Dec. 2025	from 31 Aug. 2029	until 31 Aug. 2032	from 31 Aug. 2033	No exemption req.

**Example:**

A diesel vehicle with a first registration date of 15 June 2015 in Ukraine is presented for inspection in Germany in accordance with section 21 of the StVZO. The available information on the exhaust gas behaviour and the comparison of the installed emission-reducing components of the vehicle to be assessed shows that the vehicle is classified as Euro 3-equivalent. A Euro 3 vehicle was eligible for first registration in Germany/EU until 31 December 2005. The period between

the date of first registration (outside the EU) and the date from which vehicles that fulfil the Euro 3 emission standard were last allowed to be registered in the EU/Germany is less than 15 years. A passed emissions test in accordance with Annex VIIIa of the StVZO (in accordance with no. 3.5 of the exhaust emission test guidance) confirms the functionality of the emission-reducing components.

An exemption due to the special situation of the Ukrainian applicant is approved.