

## **Dimensions and other technical characteristics of registration plates and transfer signs**

### Contents

1.	Regulation background and legal basis.....	1
2.	Objective of the Regulation.....	1
3.	Drafting of the Regulation.....	2
4.	Feedback from consultation.....	2
5.	Amendments and assessment of the impacts of the Regulation.....	3
6.	Detailed rationale.....	4

### **1. Regulation background and legal basis**

On 18 May 2021, the Finnish Transport and Communications Agency issued a Regulation on the dimensions and other technical characteristics of registration plates and transfer signs (TRAFICOM/498866/03.04.03.00/2020), which entered into force on 1 April 2021.

This Regulation repeals the said Regulation and introduces a new updated Regulation on the dimensions and other technical characteristics of registration plates and transfer signs (TRAFICOM/65798/03.04.03.00/2024).

The Regulation being issued is essentially the same as the Regulation to be repealed. The Regulation amends the shape of the letter Y on the registration plate, adds a new plate type for T-category vehicles and deletes the references to customs plates. In addition, minor clarifying corrections and changes will be made to the Regulation.

The reason for the amendments is a problem raised by the police regarding the legibility of registration plates with regard to the letters Y and V and the need to meet the requirements of EU regulation by providing a type of registration plate that fits into a space of 255 mm x 165 mm as set out in Annex XIX to Commission Delegated Regulation (EU) 2015/208 supplementing Regulation (EU) No 167/2013 of the European Parliament and of the Council on the approval and market surveillance of agricultural and forestry vehicles (Framework Regulation for tractors and their trailers).

The authorisation to issue a regulation is based on section 99, subsection 3 and section 118, subsection 5 of the Vehicles Act (82/2021), in which the Finnish Transport and Communications Agency is authorised to issue further provisions on the dimensions and other technical characteristics of registration plates and transfer signs.

### **2. Objective of the Regulation**

The Regulation describes the materials of registration plates issued in Finland, the types of plates, and the heights and widths of registration plates and their numbers and letters. The Regulation also describes the dimensions and models of transfer signs issued in Finland. Images of the registration plates and transfer signs and their fonts are appended to the Regulation.

The aim of the new Regulation is to change the shape of the letter Y on registration plates and to add a new type of T-category registration plate. Due to the change to the letter Y, the letter Y can be more easily distinguished from the letter V on registration plates, and the aim of the change is to improve the legibility of the registration number. The aim of the new type of T-

category registration plate is to ensure that the registration plate fits those vehicles of category T that have a high space for the registration plate in accordance with the Tractor Regulation. By removing the references to customs plates, the Regulation is brought into line with the Vehicles Act.

### **3. Drafting of the Regulation**

The Regulation has been prepared by the officials of the Finnish Transport and Communications Agency. A notification of the start of the project to draft the Regulation was posted on the Finnish Transport and Communications Agency's website and also sent by email to subscribers to the mailing list for the drafting of new road transport regulations.

Written opinions on the draft regulation are invited from 4 June to 26 July 2024. The invitation for opinions will be published on the websites of the online consultation service lausuntopalvelu.fi and Traficom.fi. In addition, the invitation for opinions will be sent by email to those on the mailing list for the drafting of road transport regulations. Stakeholders and citizens will also have the opportunity to comment on the project as the drafting progresses.

The finalised Regulation will be published in Finlex and on the website of the Finnish Transport and Communications Agency. Notification of the issuance of the Regulation will be posted on the Finnish Transport and Communications Agency's website and also sent by email to subscribers to the mailing list for the drafting of new road transport regulations.

The draft Regulation will be notified in accordance with the notification procedure for technical regulations (Directive (EU) 2015/1535 of the European Parliament and of the Council).

### **4. Feedback from consultation**

Opinions submitted:

Stakeholder groups were invited to submit opinions on the Regulation. The consultation period ran from 4 June 2024 to 26 July 2024. One opinion had been submitted by a private individual by the deadline.

The opinion proposed that Finnish standard-sized car registration plates should be changed to the standard European size.

In European countries, with a few exceptions, the normal size of car registration plates is 110 mm x 520 mm. Finland has kept the size of the registration plate at 118 mm x 442 mm even after introducing the EU emblem. When considering the matter, this cannot be justified on the basis of cost, because the current Finnish registration plate is only around 10 % smaller in terms of area than the pan-European registration plate.

For European cars, the space allowed by car manufacturers for registration plates is 520 mm in terms of length while in terms of height, the space is larger than the size of the so-called standard plate. However, since the plate used in Europe is 110 mm x 520 mm, manufacturers, particularly manufacturers of plate holders, produce plate holders for that size. The non-standard Finnish plate size makes things difficult for car importers, for example, whose cars are fitted with standard-sized plate holders and fixings.

For the regulation drafting project, such a longer plate size would also simplify the modification of the typeface to make it easier to read by making it possible to simply widen the font size by 10 mm to make all the letters easier to read.

Traficom's assessment of the opinions submitted:

There is no EU regulation on registration plates that sets out requirements in respect of material, fonts and registration plate size. The regulations only determine the size of the space in which the registration plate must fit.

The plate of 118 mm x 442 mm currently used for cars fits in the space of 120 mm x 520 mm required in accordance with the type approval requirements for the mounting and fixing of rear registration plates on motor vehicles and their trailers set out in Annex III to Commission Implementing Regulation (EU) 2021/535 laying down rules for the application of Regulation (EU) 2019/2144 of the European Parliament and of the Council as regards uniform procedures and technical specifications for the type-approval of vehicles, and of systems, components and separate technical units intended for such vehicles, as regards their general construction characteristics and safety.

The proposed amendment cannot be implemented in the Regulation entering into force in the current year. The effects of replacing the low 118 mm x 442 mm car plates with a new 110 mm x 520 mm plate on the registration plate manufacturers' production lines and sites and the sites of private service providers distributing registration plates, as well as on the Finnish Transport and Communications Agency's plate inventories and systems, are so significant from an economic point of view that the change requires a longer-term impact assessment and implementation.

The amendment proposed in the submitted opinion requires further investigation of its necessity and practical implications. The assessment criteria will be the mandatory nature, necessity and cost implications of the proposed change.

## **5. Amendments and assessment of the impacts of the Regulation**

The update to the Regulation amends the current letter Y on registration plates, adds a new type of T-category plate and removes the references to customs plates from the Regulation. In addition, some linguistic and technical revisions will be made to the Regulation.

The new shape of the letter Y improves the legibility of the registration number so that the letter Y is more easily distinguished from the letter V. However, registration plates containing the old-style letter Y produced before the entry into force of the Regulation will remain in force and registration plates produced before the entry into force of the Regulation will be distributed for use to end users from plate inventories.

The new type of T-category plate is more suitable for some tractors; the current type of plate does not fit on the rears of all tractors (tractor ATVs) in a way that ensures the plates are affixed in accordance with Regulation (EU) 2015/208.

The Regulation will not introduce other changes to the dimensions and other technical characteristics of the registration plates and transfer signs currently issued in Finland.

After the amendment to the Regulation, there will be 22 different types of plates in Finland:

- registration plate with international vehicle registration code (low) vehicle/trailer
- registration plate with international vehicle registration code (high) vehicle/trailer
- registration plate with international vehicle registration code motorcycle/quadricycle
- registration plate (low) tractor/power-driven machine
- registration plate (high) tractor/power-driven machine

- registration plate snowmobile
- registration plate moped/light quadricycle
- registration plate without international vehicle registration code (long) vehicle/trailer
- registration plate without international vehicle registration code (short) car
- registration plate without international vehicle registration code (small) car
- registration plate without international vehicle registration code motorcycle
- black registration plate (long) vehicle/trailer
- black registration plate (short) vehicle
- black registration plate (high) motorcycle
- black registration plate (low) motorcycle
- test plate
- diplomatic registration plate vehicle
- diplomatic registration plate (small) vehicle
- diplomatic registration plate motorcycle
- registration plate (low) of export-registered car
- registration plate (high) of export-registered car
- registration plate of export-registered motorcycle

In addition, there are two (2) different types of transfer signs in Finland:

- transfer sign for cars, trailers and tractors
- transfer sign for motorcycles and mopeds

## **6. Detailed rationale**

### *1 Scope*

The Regulation applies to registration plates and transfer signs issued in Finland. Only registration plates and transfer signs complying with the Regulation are produced in Finland. This Regulation will not apply to registration plates and transfer signs previously manufactured in Finland, with the exception of registration plates containing the old-style letter Y manufactured before the entry into force of this regulation on 1 September 2024. Registration plates containing the old-style letter Y and manufactured before the entry into force of this Regulation will be delivered to end-users from plate inventories and will remain valid until the end of their lifespan, and registration plates containing the old-style letter Y already in use will also remain valid until the end of their useful life.

### *3 Dimensions and colours of registration plates*

Section 3.6 'Registration plates of tractors and power-driven machines' lays down the width of the registration plates for tractors and power-driven machines. The registration plate is issued in Finnish Transport and Communications Agency Traficom • PO Box 320, 00059 TRAFICOM • Tel. +358 29 534 5000 • Business ID FI-29247533 • [traficom.fi](http://traficom.fi)

three different sizes. The section stipulates that the low and high registration plates shall contain six (6) characters and the short registration plate shall contain five (5) characters. The dash is not included in the characters referred to in this section. The feedback received from the consultation round on the Regulation that is now to be repealed highlighted that the space for the registration plate set out in Annex XIX to Regulation (EU) 2015/208, either A) 520 mm x 120 mm or B) 255 mm x 165 mm, does not accommodate the registration plates currently in use in the size of 397 mm x 118 mm or 338 mm x 118 mm other than in the space set out in Option A. It was hoped that the current plate sizes would be replaced by a considerably smaller registration plate. The police have had problems with the legibility of small registration plates and for this reason, for example, the preferred type of plate for snowmobiles was not wanted for tractors. The new plate type is also more suitable for a space of the dimensions set out in Option B; the current type of plate does not fit on the rear of all tractors (tractor ATVs) in a way that ensures the plates are affixed in accordance with Regulation (EU) 2015/208.

### 3.10 Customs plates

The section on customs plates will be deleted. In Act 493/2023 amending the Vehicles Act, which entered into force on 1 April 2023, section 128 on the use of vehicles registered in other states was deleted. This section has been repealed as redundant. Instead of customs plates, a vehicle registered in states not party to the Geneva or Vienna Conventions is granted a transfer permit if the conditions are met.

### *4 Technical characteristics of the registration plates as well as dimensions and colours of the registration number and international vehicle registration code*

Minor linguistic corrections have been made and sentence structures have been clarified in section 4.1.1. on plate blanks

The registration plate font is specified in section 4.2. The font does not have a name and has evolved over time into a unique font used only for registration plates of vehicles registered in Finland. Annexes 1 to 5 describe the fonts in force, including registration plates manufactured before 1 September 2024 with the old-style letter Y, which remains in the annexes because it will be present in road traffic for years following the change.

According to section 103 of the Vehicles Act, the Finnish Transport and Communications Agency is responsible for the production and delivery of registration plates and transfer signs to those who have the right to make them available and to those who submit advance notifications. In accordance with section 211, section 1, subsection 4 of the Act on Transport Services, the Finnish Transport and Communications Agency has delegated the tasks related to the production and distribution of plates to private service providers. The plate manufacturers manufacture registration plates to order on behalf of the Finnish Transport and Communications Agency. The registration plate manufacturers are obliged to maintain inventories of registration plates at a level specified by the Finnish Transport and Communications Agency. In addition, private service providers who have the right to make registration plates available are also obliged to maintain inventories of registration plates at their premises in volumes specified by the Finnish Transport and Communications Agency.

The Finnish Transport and Communications Agency issues registration plates with the vehicle's registration number for the vehicle's first registration. If necessary, registration plates shall also be issued for a vehicle that is put into service, for example, when the registration plates have been returned or no registration plates exist for any other reason. As a rule, the registration number remains unchanged throughout the life cycle of the vehicle until its final removal. However, the registration number can be changed, for example, in the case of stolen registration plates or in connection with orders for special plates. In addition, registration plates for a valid registration number may be issued to order to replace a lost or damaged plate.

Registration plates shall be made available from the warehouses of the establishments in the order from oldest to newest plates. End users are not able to influence the order in which the

registration plates are issued from the warehouse, nor can they choose the registration number to be issued, except in the case of an order for an individual or special plate.

In connection with the introduction of the new-style letter Y, it is not appropriate, taking into account environmental and economic considerations, to destroy registration plates that have already been manufactured or to replace registration plates already in use.

Thus, following the entry into force of this Regulation, there will be existing inventories of registration plates bearing the old-style letter Y. Registration plate manufacturers, private service providers distributing registration plates and the Finnish Transport and Communications Agency have inventories of registration plates. The sizes of the registration plate inventories vary. Manufacturers have the largest inventories of registration plates (62,500 registration numbers) and the size of the plate inventories of private service providers distributing plates varies from 60 to 2 000 registration numbers, adding up to a total of 116 000 registration numbers. Thus, registration plates containing the old-style letter Y will be made available at different places of business at different times and over a long period of time.

The dimensions of the new high registration plate for tractors and power-driven machines have been added to section 4.3, 'Dimensions of the registration number and the international vehicle registration code FIN', and the references to the dimensions of the customs plates have been deleted. In addition, the reference to the colour of the border of the customs plate in section 4.4, 'Colour of the border on the registration number and the registration plate', has been deleted.

#### *6 Regulation timetable/entry into force*

The decision on the Regulation project has been made on 06 February 2024 and it has been reported and published on the Finnish Transport and Communications Agency's website on 12 February 2024.

The Regulation will be drafted during 2024 and its provisional date for entry into force is 30 November 2024.