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Dear Consultee

Consultation on Vehicle Number Plate Security

As you are aware, DVLA recently conducted a consultation on vehicle number plate security. The consultation paper contained a number of outline proposals aimed at reducing opportunities for vehicle crime.

108 responses were received from a variety of sources, including the number plate industry, police and other enforcement authorities, and the general public. There was widespread support for the principle of greater number plate security, and a wealth of useful information and suggestions. DVLA would like to thank all those who took the trouble to examine the document and respond.

The responses have been considered and a shortlist drawn up of those ideas the Government wishes to take forward for further investigation. A brief description of these is shown at annex A. Those ideas which we believe should be set aside for the time being are described at annex B.

Having decided upon those ideas we want to investigate further, the next step will be to develop them in greater detail with the assistance of experts in the field and those who are directly affected.

Part of any implementation process will involve the development of regulatory impact assessments to ensure that there are clear benefits that outweigh any burdens imposed on business, enforcement authorities or Government. Provided that this can be demonstrated, appropriate legislation will be drawn up in most cases with a view to implementing these measures at the earliest opportunity.

No definite timescale has been set for implementation and it is possible that some of the measures would be introduced in advance of others.

Interested parties will be notified of further developments in due course.

Yours sincerely
Dave Warren
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Annex A

OUTLINE OF PROPOSALS TO BE INVESTIGATED FURTHER

Visible Vehicle Identification Number

- 1. This proposal is supported in principle by the major manufacturers.**
2. The value of this is that it would provide a visible link between the number plate and the vehicle for which it is intended. The culture of secure number plates that we are attempting to develop requires that plates should no longer be seen as isolated commodities but as an integral part of the vehicle. A visible vehicle identification number (VIN) on the number plate would provide the enforcement authorities with a clear indication as to whether the plates match the vehicle to which they are fixed.

3. It could be argued that a visible VIN would provide criminals with information they would need to clone vehicles. However, it is now common practise for manufacturers to etch the VIN into car windscreens, so this argument does not have the force it might have had in the past.

4. There would undoubtedly be implications for business and the public, which will have to be carefully assessed.

a. Manufacturers and assemblers would have to include the new information. While the manufacturers do not see this as a major issue, one of the leading retailers, Halfords, foresees a major investment in new equipment.

b. There would be important implications for motor traders who order plates already made up from a manufacturer. Many traders tend to order plates displaying registration marks allocated by DVLA in bulk in advance. The plates are not allocated to any particular vehicle until the vehicle is sold. If it were made mandatory to print the VIN on plates, it would be necessary for the trader to either assemble the plates themselves, or to allocate them to a particular vehicle before making the order.

c. It would no longer be possible for people who transfer a cherished mark from one vehicle to another to simply transfer the plates. They would need to purchase a new set of plates showing the correct VIN for the new vehicle.

5. There would have to be more detailed discussion with representatives of the industry and with the police to ensure that the benefits of this proposal outweigh the burdens. A regulatory impact assessment would be produced before making regulations.

Use of a watermark

6. There was strong support in the consultation exercise for this proposal. It is generally accepted that there should be some way of differentiating the reflective material used for number plate manufacture from that used for similar products such as signs.

7. It is thought that a watermark would have greater durability than a holographic feature.

8. It would be necessary to restrict access to watermarked materials. The security marking of documents or materials is based on the presupposition that use is restricted to a closed group. Anyone trying to simulate the secure material would be producing a counterfeit. Currently the manufacture of number plates is not restricted in any way. The supply of number plates is regulated, but not restricted as any business may register as a number plate supplier provided that they are in fact supplying plates. Although materials manufacturers cannot lawfully sell number plate components to a number plate supplier who is unregistered, it is still possible for members of the public to obtain materials and number plates are relatively easy to assemble.

9. In order for this proposal to be fully effective, it would be necessary to restrict the supply of watermarked materials to registered number plate suppliers only, so that the practice of self assembly by the public would cease. This would be very beneficial from the standpoint of reducing vehicle crime, but it would have a substantial impact on the business practises of fleet operators for example, who currently assemble their own plates but do not supply them to others.

Noting of stolen plates on police national computer

10. This was fully supported by the National Criminal Intelligence Service, but there was some concern that with the increased use of ANPR cameras, the innocent victims of number plate theft might be inconvenienced unduly. However, the well publicised reports of the use of false plates to evade London Congestion Charging and other fines and charges have highlighted the need for action in this area.

11. The Police Information Technology Organisation (PITO) has now agreed to update the Police National Computer manual in relation to vehicle cloning. Officers who sight or stop a suspected cloned vehicle will be advised that the registration mark is in use by another vehicle and will be instructed to establish the true identity of the vehicle.

Distinctive Number Plates for Taxis and Private Hire Vehicles

12. Those local authorities that responded to the consultation generally supported this idea and it has been enthusiastically received by Transport for London. It would make taxis and private hire vehicles (PHVs) easier for the public to identify and also assist local authorities in the regulation of this activity. It would be beneficial as a safety measure, in particular for vulnerable members of the public and would also help local authorities to weed out rogue operators.

13. There was a more mixed response for distinguishing between taxis (available for immediate hiring) and PHVs (must be booked through an operator). However, consideration should be given to this in order to help the public to tell the difference and the licensing authorities to enforce the statutory rules governing each mode.

14. There is a potential cost to proprietors, as vehicles taking on the role of taxis or PHVs would have to be equipped with new plates. Also, the plates would have to be converted back if the licence was suspended.

15. There would have to be strict controls on the issue of coloured plates to prevent their unlawful use. One option might be to have them issued by the licensing authority only and to restrict the sale of coloured reflective material to this source alone. There could then be a requirement to return the plates to the licensing authority when they were no longer needed. There will need to be further discussion with the relevant authorities about this. Alternatively, the plates would have to be issued by ordinary number plate suppliers only upon production of suitable evidence that the

vehicle concerned was a taxi or private hire vehicle. However, the latter option would not afford a means of recalling the plates if the vehicle ceased to be used for this purpose.

16. The effect of using a different colour on the performance of automatic number plate recognition (ANPR) cameras will also need to be assessed.

17. This system is known to be in use in the Netherlands, and DVLA is liaising with the registration authorities there.

Inclusion of year and month of issue

18. This would help the police identify stolen plates on cloned vehicles, particularly when used in conjunction with marking stolen plates on the police national computer. DVLA is currently making enquiries to clarify whether a similar system is used in Portugal.

Tamper Proof Number Plates

19. The use of number plates that cannot be re-used once detached from a vehicle would be a major step forward in preventing the theft of number plates for cloning vehicles or to avoid congestion charges etc.

20. Number plate manufacturers have indicated that this should be technically feasible, and there are potentially a number of varying technical solutions. It would be necessary to draft regulations so as to avoid giving a monopoly of production to any single manufacturer.

21. The question arises as to whether to make the requirement mandatory or to simply permit the use of such plates as a customer option. The danger of making the use of tamper-proof plates optional is that they might not be taken up on a wide enough scale to have an impact on crime. Also manufacturers and retailers might choose not to market them if they felt that a market did not exist. It would therefore seem preferable to require that any new plates fitted after a certain date must be tamper proof. Manufacturers would undoubtedly have investment costs and this would have to be explored further before making a regulatory impact assessment.

Electronic Tagging of Number Plates

22. The consultation paper referred to the use of a microchip containing the vehicle identification number in number plates. It has been suggested that the vehicle registration number should also be included as a minimum.

23. The paper did not address the issue of electronic vehicle identification (EVI) in general, but nevertheless, many of those consulted asked about the wider implications of using microchip technology. In 2002 the independent Jill Dando Institute published a report on the UK's vehicle registration system. One of its 11 recommendations was that the Government should introduce EVI to improve vehicle identification systems. The Department for Transport has agreed to look into this recommendation and is undertaking feasibility work to consider all the related technical, legal and privacy and cost issues. No decisions have been taken to introduce EVI at this stage and there would have to be consultation before any decision was taken.

24. Several companies have indicated their willingness to become involved in further discussions about the development of systems that could be used for the electronic tagging of plates and it is evident that technological solutions exist and could be put into operation in the not too distant future.

25. Electronic tagging of number plates offers the possibility of making a limited improvement in advance of a full system of EVI. However, decisions on electronic plates will need to be taken in the broader context of the Department for Transport's work on EVI.

Re-Define the term "Supplying outlet"

26. The current British Standard requires that the name and postcode of the "supplying outlet" must be printed on number plates. The term "supplying outlet" is not defined, so that more than one company in the supply chain might lay claim to this title. For example, the supplying outlet might be either a motor dealer or the manufacturer that supplies the motor dealer.

27. In order to assist the police, DVLA already advises that the supplying outlet shown on the plates should be the retailer that keeps records of sales under the register of number plate suppliers scheme. However, this does not have the force of law.

28. It is suggested that this issue should be addressed when the current British Standard is reviewed.

ANNEX B

OUTLINE OF PROPOSALS TO BE SET ASIDE FOR THE TIME BEING

Proposal to Regulate the Supply of VIN Plates

1. The purpose of any proposal controlling the supply of VIN plates would be to make it difficult for criminals to obtain VIN plates for re-badging a stolen vehicle by mimicking a legitimate plate. The results suggest that this aspect of vehicle cloning should be controlled in some manner, the favoured suggestion being the regulation of suppliers.
2. Unfortunately, the demand for replacement or new plates/stickers in commercial terms is very low. There is a voluntary agreement between SMMT and ACPO whereby the police will check the validity of a vehicle's VIN before manufacturers supply a replacement. Support for this is very varied, both from manufacturers and police authorities.
3. The demand is not just for replacement plates for vehicles currently in production, which could be supplied by the manufacturers. New vehicles such as kit cars, rebuilds and restorations, as well as imports arriving with plates not complying with the EC Directive all need VIN plates to pass an MOT, often not available from manufacturers. The best estimate from the police is that there are only 'a few' suppliers involved, apart from manufacturers. There is no way of identifying who they are unless they are already known to the police or the motor trade. There are no specialist materials involved, so there is no restricted supply chain to act as a reference.
4. The vinyl stickers or tin plates can easily be set up as a template on a computer and then completed through reasonably cheap printing facilities and by punch hammering. The only absolute way of controlling the supply other than from manufacturers would be to restrict it solely to the DVLA, who would in turn source from authorised suppliers. This is not considered a practical proposal at present.
5. However, because of the importance of this issue DVLA intends to facilitate workshops with interested parties to explore alternative methods of making VIN plates more secure.

Suppliers Identity Number

6. The consultation paper suggested that the supplier identity number allocated to registered number plate suppliers should be printed on the plates sold by that supplier. It should be noted, however, that current regulations already require number plate suppliers to print their company name and postcode on the plates, which provides the enforcement authorities with a means of tracing the supplier when required. It is a simple matter for the police to check whether any given supplier is registered or not by reference to DVLA's web site.
7. Although printing the supplier identity number on the plate would reinforce the requirement for suppliers to register, it would not materially add anything in terms of traceability.

Display of Make/Model

8. Displaying the make and model of the vehicle on the number plate might have benefits in terms of combating the casual theft of plates. However, the make/model is not vehicle specific and would not be of any use in combating vehicle cloning. While lacking the precision of a visible VIN, this suggestion faces the same obstacle. As in the case of a visible VIN, the trade would have to adapt to the fact that pre-ordering plates in advance of allocating them to a particular vehicle would no longer be possible.
9. There is also a concern that some motor traders might use this requirement for promotional purposes, possibly leading to excessive clutter on the plates.

Use of Hyphens on Number Plates

10. This was conceived as a means of deterring the mis-spacing of characters. However, it is recognised that it might ruin the effect of a cherished mark even when correct spacing is used. There are also fears that use of a hyphen might make ANPR images less easy to read.

Bar Coding

11. This could be seen as an alternative method of covertly displaying a VIN on number plates, and so must be assessed against the idea of electronic tagging. Both methods would require reading equipment.
12. Of these two options, electronic tagging is seen as the technically superior, enabling plates to be read at a greater distance and on a moving vehicle. In addition, wear and tear on the number plate might lead to degradation of the bar code making it impossible to read.