



PROTECTING CROSS-BORDER ROAD TRAFFIC VICTIMS

News from the COB


Greek Auxiliary Fund – 50 Year Anniversary Conference, Athens, May 2026

Sorin Greceanu - COB President



COB Map



COB system map

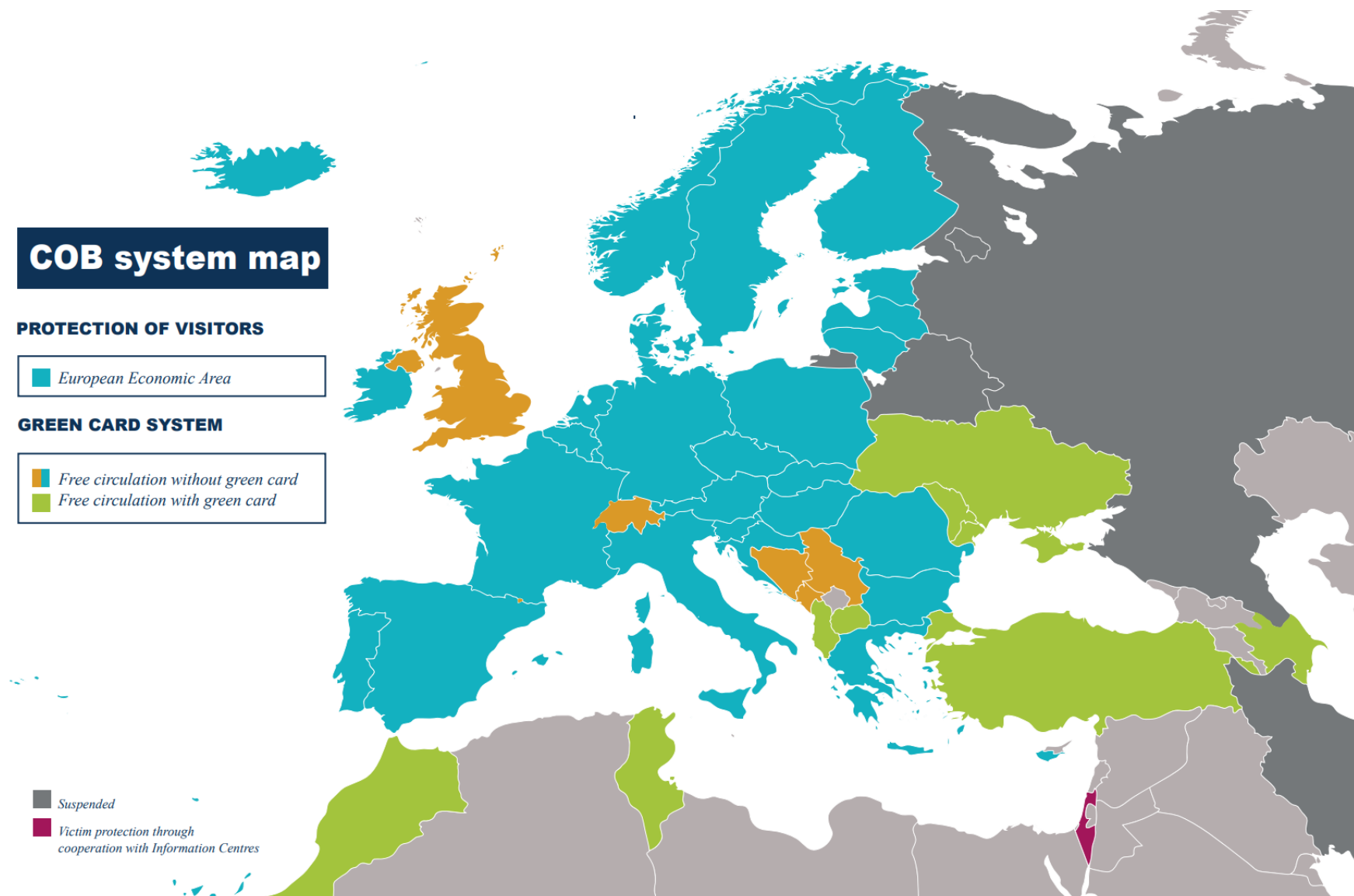
PROTECTION OF VISITORS

 *European Economic Area*

GREEN CARD SYSTEM

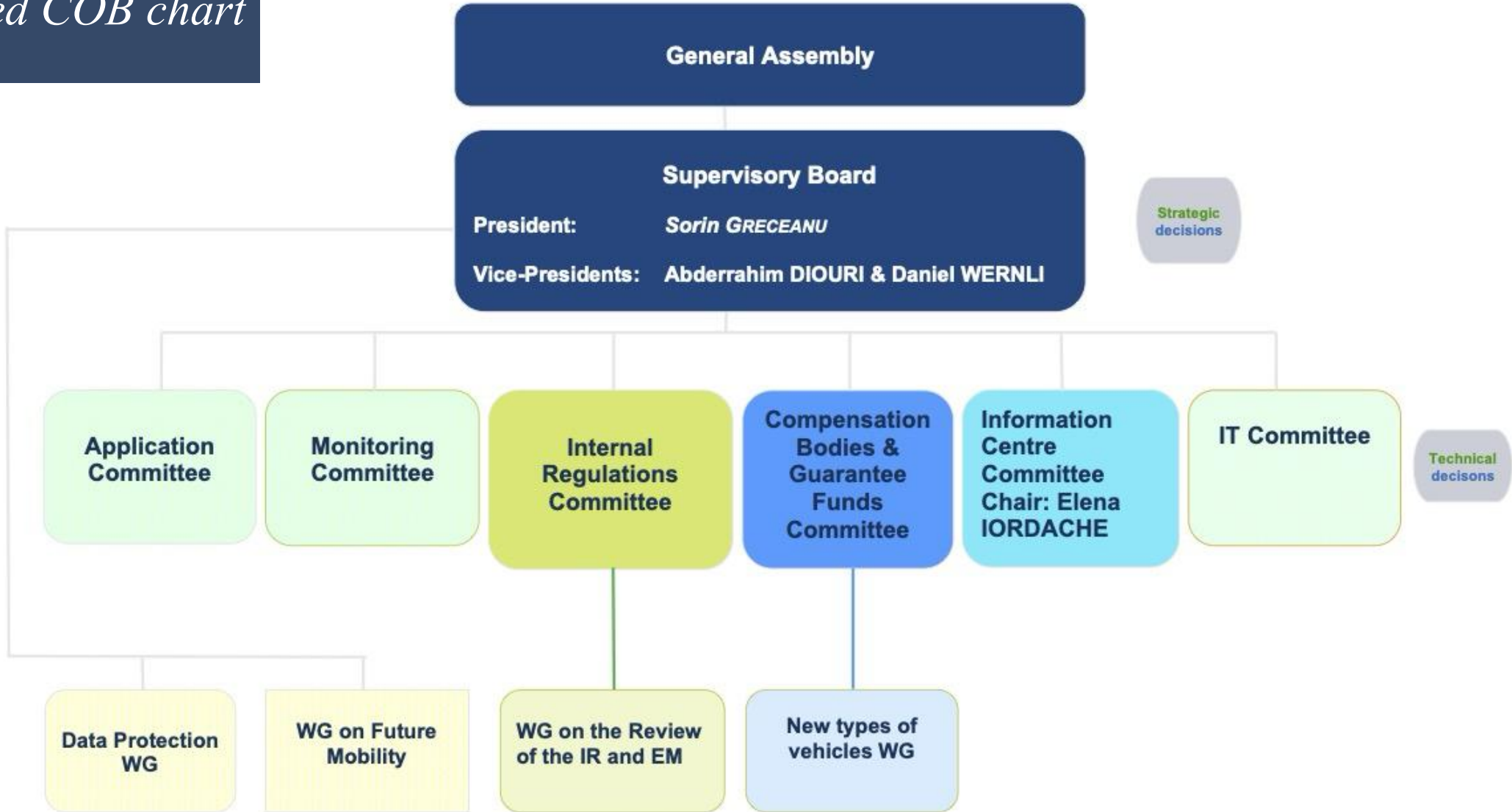
 *Free circulation without green card*
 *Free circulation with green card*

 *Suspended*
 *Victim protection through cooperation with Information Centres*





Updated COB chart



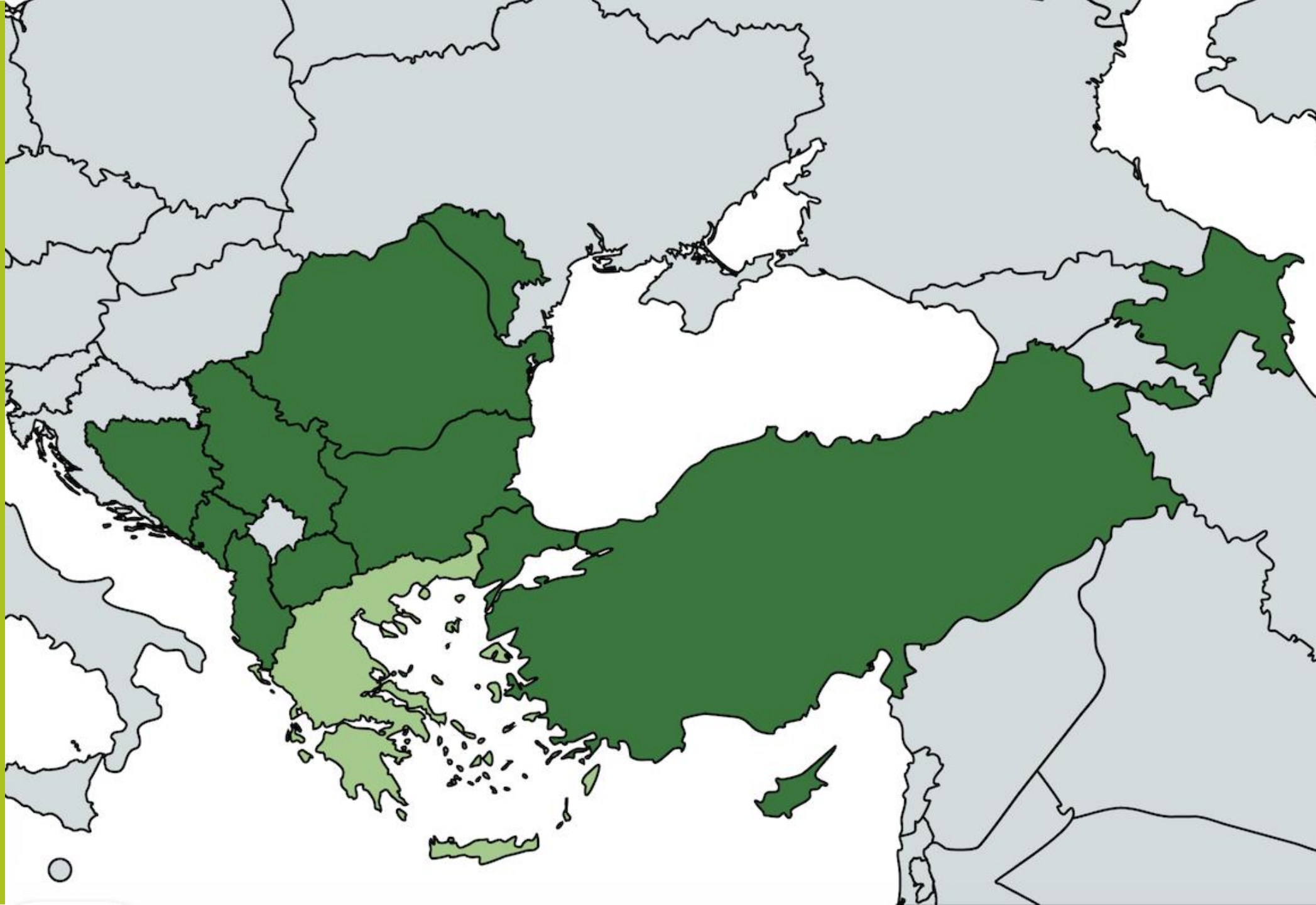
COB
Regional Groups

Regional Groups

- A Group
- Northern Group
- Western Group
- Central Group
- South Eastern Group



**South
Eastern
Group**



COB IN NUMBERS



60

ACTIVE ORGANISATIONS



500 MILLION

TOTAL POTENTIAL NUMBER OF VEHICLES COVERED ACROSS GREEN CARD ZONE



48 DIFFERENT COUNTRIES



731 MILLION, POPULATION OF GREEN CARD ZONE

9

THE NUMBER OF TIME ZONES COVERED BY THE GREEN CARD AREA



7.5 MILLION SQUARE KM, SIZE OF GREEN CARD ZONE



OVER THE LAST 20 YEARS, HELPED VICTIMS OF

7.5 MILLION

CROSS BORDER ROAD TRAFFIC ACCIDENTS RECEIVE COMPENSATION.



THAT'S AVERAGE OF **375,000** PER YEAR; **31,250** PER MONTH; OVER **7,211** PER WEEK, **1,027** PER DAY

Two pillars, under the same roof

The Green Card system and the POV - Motor Insurance Directives — the two columns that hold up cross-border motor third-party liability protection in Europe, the Mediterranean basin and parts of the Middle East.

GC Green Card system

Private-law cooperation between bureaux · 47 states · est. 1949

MID Motor Insurance Directives

EU directive-based regime · 27 EU + 3 EEA states
· introduced by 4th MID — public law, since 2000





Cross-border Motor Third-Party Liability Claims in Europe

Functional harmonization through soft law?

1 A cross-border motor traffic accident



Greece → Germany → Italy

A driver registered in one EU state collides with a vehicle from another, causing injury to a victim travelling abroad.

Three jurisdictions. Three legal traditions. One injured party seeking redress.

47

states covered by Green Card

27+3

EU states under the MIDs

1949

Green Card system established

2 The legal framework



A. Green Card system - GC

Protection for injured parties of an accident with a foreign liable vehicle

- Introduced 1949, under UN auspices
- Scope: 47 states across Europe, Middle East, Asia
- Built on private-law agreements between national bureaux
- Overarching body: COB - Council of Bureaux



B. Protection of Visitors system - POV

Protection for visiting victims within the EU + EEA

- Introduced via the EU Motor Insurance Directives (MIDs)
- Established by the 4th MID in 2000
- Scope: European Union + EEA member states
- Operates alongside private international law and national tort law
- Overarching body: COB - Council of Bureaux

No harmonization of national tort law

How the systems interact

Coordination without formal harmonization

3 Two systems, one legal framework



The Green Card and Protection of Visitors systems, in combination with private international law, have produced a coordinated framework for handling cross-border MTPL claims. Together they show how private and semi-public coordination — for example, agreements between insurers — can absorb legal diversity and deliver an operational system for cross-border cooperation, even in the absence of formal harmonization.

4 Notably



Private-law foundation

GC Internal Regulations published as annex to EU Decision 2003/564.



MIDs reshape the GC

Motor Insurance Directives modify how the GC system operates within the EU.



Bureaux wear two hats

National Green Card Bureaux can also act as institutions under the MIDs.



Specific obligations

MIDs impose explicit duties on the National Green Card Bureaux.



Council of Bureaux

Now the overarching body for both the GC and the PoV systems.



Free movement goal

Both systems exist to support the free movement of persons in Europe.

Yet — the CJEU has no jurisdiction to interpret the acts underpinning the Green Card system (Dockevičius, 2017).

A hybrid framework — open questions

Where soft-law coordination meets EU oversight

5 Open questions in this hybrid legal framework



Is there an accountability gap?

Advocate General Bobek (Dockevičius) argues that EU institutions rely on private instruments to achieve EU objectives, yet no EU body accepts responsibility for their interpretation or effects.

A 'black hole of review'



How is the cooperation with the supervisory authorities?

The framework spans private agreements, EU directives and national tort regimes. A good cooperation with the supervisory architecture might be helpful – *MOU COB & EIOPA*

Supervisory architecture



Functional harmonization through soft law?

Without formal harmonization of tort law, can private agreements and directive-based duties together produce a working, de facto harmonized regime for cross-border claims?

Soft law in action



How does this impact victim protection?

The combined GC and PoV systems aim to safeguard victims abroad. But hybridity, jurisdictional gaps and limited review may shift cost and complexity onto the injured party.

Victim-centred review



Implementation of the 6th MID and Insolvency Agreements

6th MID - Insolvency

Article 10a

*Protection of injured parties in respect of damage resulting from **accidents occurring in their Member State of residence** in the case of the insolvency of an insurance undertaking*

Member States shall set up or authorise a body
'Insolvency Body'

Article 25a

*Protection of injured parties in respect of damage resulting from **accidents occurring in a Member State other than their Member State of residence** in the case of the insolvency of an insurance undertaking*

Member States shall set up or authorise a body
'PoV Insolvency Body'

6th MID – Insolvency Agreements

- **23 Dec. 2023** - ***deadline to sign Insolvency Agreements***
 - - *missing 2 signatures from 2 MS (M / L)*
- **10 June 2024** - ***final signature received***
- **09 July 2024** - ***notice from EC published in Official Journal***
- **10 July 2024** - ***Insolvency Agreements entered into force, except in Ireland, Poland and Latvia***
 - *entry into force:*
 - *in Ireland* - 17 October 2024
 - *in Poland* - 6 November 2024
 - *in Latvia* - 10 December 2024

Now in force in all 27 EU MS

***What about all EEA MS? - 27 EU MS + 3 EEA EFTA States -
- Iceland- IS, Norway - N, and Liechtenstein FL***



**Thank you
for your attention!**

Sorin Greceanu | COB President

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