Stolen, Imported, Legalised

Russia's Proposed Vehicle Registration Framework and Its Implications for International Industry

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Executive Summary

In February 2026, Russia's Ministry of Internal Affairs (Министерство внутренних дел, MVD) published a draft regulation that, if adopted, would permit the country's traffic police to register vehicles listed on international wanted databases — provided the search request originated from a state Moscow has designated as "unfriendly," and no separate criminal link is established under Russian law. The list of "unfriendly" jurisdictions covers all European Union member states, the United Kingdom and its Crown Dependencies, the United States, Canada, Japan, Australia, New Zealand, South Korea, Switzerland, Norway, Ukraine and roughly forty other countries.

The ministry's stated justification is the protection of Russian citizens who purchased such vehicles in good faith and the practical impossibility, since 2022, of verifying foreign theft reports because the originating police agencies have ceased to respond. The Russian Interior Ministry has cited, as an example, 123 vehicles in Russia listed as internationally wanted by Germany on which Berlin had not replied to enquiries as of 19 January 2026. A State Duma committee has identified more than six thousand "problematic" foreign cars currently held in registration limbo inside Russia.

The proposal does not exist in a vacuum. It sits alongside an already-functioning informal pipeline, reported in November 2025 by the Russian newspaper *Izvestia* and *The Moscow Times*, in which cars stolen in EU countries are driven into the Russian-occupied portions of Luhansk and Donetsk, registered under "drops" using simplified procedures, then moved to Rostov-on-Don and re-registered to their final

Russian buyers — producing what the reports describe as a “clean” registration record. The proposed law would, in effect, codify and broaden that route.

Why this matters, and on what timeline. The exposed population is large, the recovery offset is collapsing, and the operative window is short. UK police-recorded vehicle theft now exceeds 130,000 vehicles a year; the wider EU figure is in the order of one million. The Thatcham/NaVCIS intercepted-exports series indicates that the export trade is concentrated in premium and SUV segments — segments in which insurers and finance houses have historically priced an implicit residual recovery offset. The Russian draft removes that offset for the cohort that reaches Russia, and the existing Donbas pipeline already moves stolen inventory through that route in the low thousands annually. The regulation has been published on Russia’s federal regulatory portal and can move to adoption inside a 2026 legislative cycle; the operational changes set out in Section 8 — portfolio re-segmentation, port-side resourcing, Interpol Article 2(1) supervision, manufacturer and finance-product redesign — are best taken now rather than after enactment.

For the international industry, the consequences are concrete:

For insurers, the proposal removes the residual prospect of cross-border recovery on stolen vehicles routed east, weakens subrogation in cases where vehicles surface in Russia, and pushes more events toward total-loss settlement. The Association of British Insurers reports a record £11.7 billion paid in UK motor insurance claims in 2024, with theft and repair costs cited as the principal drivers of premium pressure.

For governments and law enforcement, the proposal further degrades a cooperation channel already weakened by Russia’s restricted status at Interpol. It also overlaps materially with luxury-vehicle sanctions evasion: German Customs raids in Frankfurt in May 2025 seized twenty-one luxury cars worth €1.3 million and alleged that more than seven hundred vehicles valued at approximately €25 million had been moved to Russia and Belarus through third countries.

For end users — both consumers and fleet operators — the proposal raises three operational risks. First, premium pricing pressure persists: a Royal United Services Institute (RUSI) study published in June 2025 estimated the total social cost of UK vehicle theft in 2023–24 at £1.77 billion and noted an eighty-two per cent rise in car insurance quotes since 2021, with theft a contributing factor. Second, recovery prospects from organised theft are reduced when the end market is legally insulated. Third, individual Russian buyers of “legalised” cars face exposure to confiscation if cooperation with Interpol is restored.

This paper sets out, in section order: what the proposed legislation actually says and how it differs from existing Russian rules (Section 1); how the "unfriendly" designation works (Section 2); the operating laundering pipeline that has emerged through occupied Ukraine (Section 3); the source-country theft picture, particularly in the United Kingdom and European Union (Section 4); the export geography of stolen vehicles and where Russia sits within it (Section 5); the international legal framework, including Interpol's Stolen Motor Vehicle database and the present state of cooperation (Section 6); the implications for each stakeholder group (Section 7); and a set of operational recommendations (Section 8). Source materials, the current "unfriendly states" list and a timeline of relevant events are provided in the appendices.

A note on sourcing and methodology is in order. The legislative text discussed here has been published on Russia's federal regulatory portal but had not, at the time of writing (May 2026), been enacted. Reporting on the Donbas laundering pipeline relies principally on *The Moscow Times* and *Izvestia*, with operational detail attributed to a single unnamed automotive-security source. Statistical figures are drawn from official UK government data, the RUSI June 2025 study, Eurostat, Interpol and the Association of British Insurers. Where a figure or claim is contested, single-sourced or inferred, this is stated in the body of the text.

1. The Legislation: What Is Actually Proposed

1.1 The bill and where it sits

The instrument under discussion is a draft amendment to Russia's vehicle registration rules, prepared by the Ministry of Internal Affairs and published on Russia's federal regulatory portal *regulation.gov.ru* as project number 164880. *The Moscow Times* (Russian edition) carried the story on 5 February 2026; English-language coverage followed on 6 February 2026. The publication on the regulatory portal opens the statutory public-comment window; the draft had not been enacted at the time of writing.

The mechanism the bill would introduce is narrow but consequential. Under current Russian rules, a vehicle reported as wanted on an international database — including Interpol's Stolen Motor Vehicle (SMV) database — cannot be registered in Russia regardless of how the present holder acquired it. *Caspian Post*, citing the Russian outlet *Quto*, summarises the existing position: "Current legislation prohibits the registration of these vehicles, and requests for clarification from the countries

that reported them often receive no response. As a result, such cars are confiscated under Russian law, leaving owners without effective legal remedies."

The draft would change that default in one specific class of cases. If the originating search request was lodged by a state designated as "unfriendly" by Russia, and if no separate criminal connection is established under Russian law, Russia's traffic police would be empowered to register the vehicle. The Russian-language explanatory note attached to the draft, summarised in English-language reporting, frames this as restoring a balance: "Russia currently lacks a legal framework capable of 'protecting the interests of Russian citizens' who own such vehicles."

1.2 The ministry's stated rationale

Three lines of argument are advanced in the explanatory material:

First, foreign police agencies, according to the ministry, have ceased to engage with Russian enquiries. The benchmark case cited is Germany: 123 vehicles in Russia listed as internationally wanted by Germany had not been the subject of any substantive German response to Russian Ministry of Internal Affairs queries as of 19 January 2026.

Second, only the originating state can remove a vehicle from international search lists, leaving the Russian authorities — on the ministry's account — without a procedural route to resolve cases where the underlying basis of the wanted notice is contested, withdrawn or simply abandoned by the originating agency.

Third, the ministry has alleged that some vehicles were placed on international search lists by Ukraine "wrongfully and without justification," and that the existing rules therefore expose Russian buyers to consequences disconnected from any actual theft.

The three arguments are not equivalent. The first is operationally verifiable, since absence of response to specific queries can in principle be documented. The second restates an established feature of how Interpol's SMV database operates: removal of a wanted record is the responsibility of the originating member-state National Central Bureau. The third is an assertion of fact that is not independently substantiated in the published material reviewed for this paper.

1.3 The scale claim: six thousand "problematic" vehicles

A figure that has recurred in coverage of the draft is that of more than six thousand foreign-made vehicles currently in registration limbo inside Russia. The number is attributed to the relevant profile committee of the State Duma. The published

reporting does not provide a methodological breakdown of how that total is composed — that is, what proportion are vehicles imported through parallel-import channels with lease-default histories, what proportion are vehicles reported stolen in EU jurisdictions and trafficked across borders, and what proportion are vehicles brought into Russia through the occupied territories pipeline described in Section 4.

For comparison, *Autonews* (Russia), in a July 2025 investigation cited by *UNITED24 Media*, reported that "approximately 150,000 new and 400,000 used vehicles were imported into Russia through parallel channels in 2024," with a further 127,000 vehicles entering the country by that method in the first four months of 2025. The six-thousand figure is therefore a small fraction of the parallel-import flow as a whole, but a non-trivial volume of contested registrations to clear by individual case work.

1.4 What the law would and would not do

It is worth being precise about the proposal's legal reach. The draft does *not*:

- transfer ownership from the original (foreign) owner to the Russian holder under Russian civil law;
- extinguish any cause of action available to the original owner, insurer, or finance company in their own jurisdiction;
- remove the vehicle from Interpol's SMV database, which can only be done by the originating National Central Bureau.

The draft *does*:

- give Russia's State Vehicle Inspectorate (GIBDD) administrative authority to issue Russian vehicle registration documents for a vehicle that, in international databases, remains flagged as wanted;
- substitute Russian-law adjudication of the criminal status of the vehicle for the originating jurisdiction's classification.

The practical effect, in international-law terms, is that the vehicle becomes economically usable inside Russia while remaining legally contested outside it. The Berlin police union (Gewerkschaft der Polizei, GdP) characterised this in the words of its spokesman Benjamin Jendro as a "disastrous sign" that would "encourage crime," noting that German theft volumes have remained "consistently high" for years.

In operational terms, the change is best understood as a before/after. Today, a UK or EU vehicle stolen and moved to Russia presents the Russian holder with an

unresolved administrative status: GIBDD will not register a vehicle on the Interpol SMV list, the originating insurer retains a subrogated interest in the asset, and the holder is exposed to confiscation if the asset moves to a cooperating jurisdiction or if Interpol cooperation is restored. The originating insurer's recovery prospect is poor in practice but not foreclosed in principle. After the draft, the Russian holder has a Russian registration document the Russian state will defend administratively, the originating insurer's recovery prospect against an asset in Russia falls to zero in practice, and confiscation risk to the Russian holder reduces to the cross-border movement scenario only. The shift is from "stuck inventory with residual recovery prospect" to "usable inventory with no recovery prospect inside Russia". The economic value of that shift, to the criminal supply chain, is the part of the proposal that does the most work — and the reason it deserves the response set out in Section 8.

1.5 The case for the draft, stated at its strongest

The Russian ministry's case, taken on its own terms, runs as follows. A Russian citizen who has bought a vehicle on the domestic market — from a dealer, with documents that pass at the time of sale — has no realistic means of checking the Interpol SMV database before purchase. The originating state, having designated Russia a hostile party, refuses to engage on case-by-case verification: 123 unanswered German requests as of January 2026 is the example the ministry itself cites. The result, in the ministry's telling, is not that a stolen car becomes a clean car under international law (the draft does not assert that), but that the Russian state acquires the administrative authority to issue a Russian registration document to a Russian buyer whose claim to good-faith acquisition the originating state declines to test. Framed that way, the proposal is consumer protection inside a single jurisdiction, not legalisation of theft across borders.

This paper takes that case seriously and rejects it for three reasons developed in Sections 2 to 7. First (Section 2), the trigger is the political designation of the originating state rather than any test of the underlying property claim, which inverts the normal direction of property-law analysis. Second (Sections 3 and 5), the population of vehicles to which the framework would apply is not, in operational fact, a population of innocently-acquired cars: the documented Donbas pipeline and the intercepted-exports profile show that a substantial portion of the inventory entering Russia has come through organised theft and laundering routes. Third (Section 6), the originating-state "refusal to engage" is itself a consequence of Russia's post-2022 conduct in respect of Interpol channels; treating that consequence as a justification for a substantive registration remedy is circular. The recommendations in Section 8 are calibrated to that diagnosis.

2. The “Unfriendly States” Designation

2.1 Origin and legal basis

The category of “unfriendly states” (Russian: *недружественные страны*) is not a colloquial description but a legal designation introduced by Russian Government Decree No. 430-r of 5 March 2022, which approved the initial list of foreign states and territories whose actions Russia considered hostile to its interests in the context of the sanctions imposed following the full-scale invasion of Ukraine. The list has been amended on several occasions to add jurisdictions that have subsequently imposed sanctions or taken measures regarded by Moscow as unfriendly.

The designation already carries substantial legal consequences inside Russia. It governs whether Russian persons and companies may discharge foreign-currency obligations to creditors in roubles under the Presidential Order of 5 March 2022 on a Temporary Procedure for Meeting Obligations to Certain Foreign Creditors, it conditions the application of capital controls and the rules on aircraft leasing, and it is the threshold criterion for a series of import-tariff measures introduced from 2023 onwards.

Extending the same designation to the question of vehicle registration is, in that sense, a natural extension of an existing legal architecture rather than a novel concept. The novelty lies not in the category itself but in its application to property rights in stolen goods.

2.2 Coverage of the list

As of the latest available updates, the “unfriendly states” list includes:

- All twenty-seven member states of the European Union.
- The United Kingdom, together with the Crown Dependencies (Jersey, Guernsey, and the Isle of Man) and a number of British Overseas Territories specifically named in the list (Anguilla, the British Virgin Islands and Gibraltar).
- The United States of America.
- Canada.
- Australia and New Zealand.
- Japan, South Korea, Singapore and Taiwan.
- Switzerland, Norway, Iceland and Liechtenstein.
- Albania, Andorra, Monaco, Montenegro, North Macedonia, San Marino and Ukraine.

- The Bahamas (added in 2023) for measures restricting operations with the Bank of Russia and other Russian financial institutions.

The list is therefore not a marginal sub-category. It encompasses substantially every major source-country for new and used vehicles that has any plausible export pipeline into the Russian Federation.

2.3 The asymmetry the draft creates

The interaction of the draft registration rule with the "unfriendly states" list produces a sharp asymmetry. A vehicle reported stolen by a wanted notice originating from a "friendly" jurisdiction (for example, Belarus, Kazakhstan, Armenia, China, or the United Arab Emirates) would continue to be ineligible for registration in Russia under existing rules. A vehicle reported stolen by a wanted notice originating from the United Kingdom, Germany, or Italy would, under the proposal, become registrable on the same facts. The criminal status of the vehicle does not change between those two scenarios; the diplomatic status of the originating state does.

That asymmetry is the operative legal innovation of the draft. It is also the feature most likely to be characterised, by foreign observers, as a form of state-sanctioned receipt of stolen property. *Caliber.Az*, summarising critical commentary, notes the concern that "luxury cars stolen in Europe or elsewhere and transported to Russia could soon drive legally through the streets of Saint Petersburg or Moscow, without owners fearing confiscation during registration, resembling a car laundering operation."

3. The Existing Laundering Pipeline

The proposed registration law arrives at a point when a parallel — and entirely informal — pipeline for legalising stolen European vehicles inside Russia has already been documented. The two facts taken together help explain why the draft is being characterised by Western policing voices not as a remedy for an existing problem but as an attempt to give state cover to an existing illicit flow.

3.1 The Donbas route

Reporting by the Russian newspaper *Izvestia*, picked up by *The Moscow Times* on 21 November 2025 and summarised in English by *UNITED24 Media*, describes a specific operating sequence used to bring vehicles stolen in EU countries into the Russian registration system:

1. The vehicle is stolen in a Western or Central European country.
2. It is moved across one or more borders into Ukraine, then onward into the Russian-occupied portions of Luhansk and Donetsk oblasts.
3. In those territories, which operate under what *The Moscow Times* describes as "simplified vehicle-control procedures", the car is registered to a person with clean documents — a so-called "drop".
4. The vehicle is then driven into the Russian Federation proper, typically to Rostov-on-Don, and re-registered to the actual buyer.
5. The final record in Russian databases shows what the reporting describes as a first-ever registration of the vehicle, with no trace of its European origin.

The operational detail above rests on a single unnamed automotive-security expert cited in the original *Izvestia* coverage. The broader claim — that stolen European vehicles are being moved through the occupied territories — is also supported by separate independent reporting, including statements from Valentin Stanovov, a retired Russian police colonel and organised-crime specialist, who told *The Moscow Times* that once Russia's cooperation with Interpol is restored, "a large volume of stolen vehicles will suddenly become visible in international databases" with the consequence that "hundreds of buyers" could lose both their cars and their money.

3.2 The "Dubai scheme"

A second informal route, which predates the Donbas pipeline and continues to operate in parallel with it, is the so-called "Dubai scheme" identified by Russian automotive expert Kirill Chernov in an *Autonews* investigation published in July 2025. Under that pattern:

- A vehicle is acquired on a lease contract in a Western country (the United States is repeatedly mentioned).
- It is exported, often to the United Arab Emirates or a former Soviet state, where it is sold on to a Russian buyer.
- The leasing company in the originating country does not initially report the vehicle as stolen, because lease payments are still being made.
- Once payments stop, typically some months after the vehicle has reached the Russian buyer, the lessor reports it stolen and the vehicle enters the Interpol SMV database.

The Russian end-buyer in those cases discovers the issue only on attempting to register the vehicle with the Ministry of Internal Affairs. As Chernov is quoted: "This problem has been around for decades, but it's escalated with the rise of parallel imports."

Auto lawyer Dmitry Dugin, also quoted in the same investigation, sets out the current legal position bluntly: “If the car is listed as wanted by Interpol, it cannot be legally registered or allowed on Russian roads.” The proposed registration rule is in effect a partial reversal of that position, applied to a particular slice of cases by reference to the originating state.

3.3 Why this matters for the industry case

The two pipelines, taken together, mean that by February 2026 there was a substantial population of Russian buyers — at least the six thousand vehicles cited by the State Duma committee, and plausibly more given the parallel-import volumes — holding cars that could not be registered under existing rules. As Section 1.3 notes, that figure is not disaggregated and probably includes vehicles flagged for non-theft reasons such as lease default or unpaid finance under parallel-import schemes; even on a conservative reading, however, a material share comprises vehicles wanted in Interpol’s Stolen Motor Vehicle database at the request of source-country authorities. That population, theft-flagged or not, is the political constituency for the draft.

It is also why the draft cannot fairly be read in isolation. The legislative proposal does not create the flow; it provides a framework intended to absorb the consequences of a flow that has already developed. Whether the framework’s design is proportionate, whether it stays within Russia’s existing international commitments, and whether it operates as a magnet for further theft are separate questions — and ones the proposal’s published explanatory material does not address.

4. Vehicle Theft at Scale: The Source-Country Picture

Russia’s domestic policy choices are not the only relevant variable in this story. The volume of stolen vehicles available to be moved east is set, in the first instance, by the source-country theft environment in the United Kingdom and the European Union. The picture in both is one of rising volumes, falling clearance rates, and increasing sophistication.

4.1 The United Kingdom

The most authoritative recent overview of UK organised vehicle theft is the June 2025 RUSI Occasional Paper *Organised Vehicle Theft in the UK: Trends and Challenges* by Elijah Glantz, Mark Williams and Alastair Greig. Its principal findings include:

- **Volume.** “Across the UK, since 2013–14, there has been a 75% rise in the number of domestic vehicle thefts, reaching 136,396 in 2022–23.”
- **Plateau, not recovery.** “There were 129,127 police-reported cases of ‘unauthorised taking of a motor vehicle’ in England and Wales in 2023–24, a slight decrease from 130,035 incidents in 2022–23.”
- **Per-capita exposure.** “Theft rates in the UK rose from 2.71 to 4.42 cases per 1,000 privately owned cars between 2014 and 2023.”
- **Clearance collapse.** “The fall in charge rates for vehicle theft from 9.2% in 2013–14 to just 2.6% in 2023–24.”
- **Total social cost.** “Adjusted for inflation and increases in thefts, the total economic and social cost of vehicle theft to the UK in 2023–24 is estimated to be at least £1.77 billion.”
- **Insurance pass-through.** The RUSI paper observes that thefts “have contributed to an 82% rise in the cost of car insurance quotes since 2021.”

A separate June 2025 report from Thatcham Research and the National Vehicle Crime Intelligence Service (NaVCIS), summarised in industry coverage, records that in 2024 a vehicle was stolen in the UK every five minutes on average; of vehicles intercepted on their way abroad between 2021 and 2024, 52% were premium or luxury brands and 79% were SUVs.

Method has shifted. The RUSI paper identifies keyless-entry attack as the dominant modern modus operandi, noting that the change “coincided with the widespread introduction of keyless and remote-start vehicles” from the mid-2010s. High-end attack devices are an industrial input: “devices targeting higher-end vehicles can sell for more than £20,000.”

The headline cost figure — £1.77 billion in 2023–24 — should not be read as an insurance-industry-only number. The RUSI calculation extends an earlier Home Office methodology in which the average cost of an individual stolen vehicle, including police time, victim impact and recovery activity, was set at £13,603, with commercial vehicles costed at £45,927.

4.2 The European Union

Aggregate EU figures lag the UK data, in part because Eurostat does not yet publish a consolidated total beyond 2017. The most recent Eurostat headline, covering 2015–17, reported a yearly EU average of approximately 697,000 police-recorded car thefts, a 29 per cent reduction on the 2008–10 average of 983,000. Country-level data for 2023, drawn from national statistics agencies and police reports, indicates that the broad trend has reversed in several large member states:

- Italy: 131,679 thefts in 2023, an increase of approximately 7 per cent on 2022.
- France: 70,649 thefts in 2023, an increase of approximately 18.9 per cent on 2021.
- Germany: 29,985 thefts in 2023, an increase of approximately 17.5 per cent on 2022.
- Spain: 30,982 thefts in 2023, an increase of approximately 17.3 per cent on 2022.

Germany sits at the centre of the Russia-facing exposure. The country has been the named example in the Russian Interior Ministry's own framing of the draft law (the 123 unanswered enquiries), it is the source jurisdiction in much of the contemporaneous reporting on the Donbas pipeline, and it is the location of the Frankfurt-am-Main customs raids of May 2025, in which 21 luxury cars worth approximately €1.3 million were seized and authorities alleged that more than 700 vehicles worth approximately €25 million had been smuggled to Russia and Belarus through third-country routings.

4.3 Operational characteristics

Three features of the source-country theft environment matter for what follows in Sections 6 and 7:

The first is speed. Vehicles are now "stolen, loaded and out of the UK within a day" through container shipments at the major ports. The window for intervention by victim, finance company, insurer or police is compressed to hours.

The second is concentration. The intercepted-exports profile — 52% premium and luxury, 79% SUVs — indicates that organised theft is increasingly focused on the higher-margin segment of the vehicle parc. That is also the segment most exposed to sanctions-evasion overlap with the Russia-facing flow.

The third is the gap between recorded crime and downstream visibility. RUSI states the point directly: "A comprehensive review of export trends for stolen vehicles has not taken place in the UK." The absence of a structured export-side picture is itself a vulnerability that the proposed Russian legislation can exploit.

5. Where Stolen Vehicles Go — and How Russia Fits In

Stolen vehicles do not move uniformly to a single destination. The export trade is structured through a small number of hub jurisdictions that perform either

consumption or onward-redistribution functions, and the route to Russia runs principally through that hub structure rather than direct.

5.1 The named hubs

The Global Initiative against Transnational Organized Crime (GI-TOC) published a research report in April 2026, *Theft for export: Where do stolen cars and parts from the UK and EU end up?*, led by Dr Liam O'Shea of SGI Research, identifying two primary nodes in the export trade: the Democratic Republic of the Congo, as a destination market for high-end vehicles, and the United Arab Emirates, as a major commercial hub from which cars and parts are redistributed across Africa, the Middle East and beyond.

The RUSI June 2025 paper adds two further destinations that operate as both consumption markets and onward-staging jurisdictions: Cyprus and Georgia. It states: "UK-based experts from law enforcement, manufacturers and recovery specialists confirmed this finding, noting a marked increase in stolen vehicles being tracked to destinations such as Cyprus, the UAE and the Democratic Republic of the Congo (DRC)."

On Russia specifically, the RUSI paper is explicit about onward routing through these hubs: "Vehicles often arrive at second-hand dealerships or scrapyards where they are sold into other Middle Eastern and North African countries, and as far as Russia."

It then states the geopolitical inflection directly: "Following Russia's full-scale invasion of Ukraine, trade data indicates persistent demand for vehicles in these countries [Georgia, Azerbaijan and similar transit jurisdictions] — likely facilitated by UK exports to countries neighbouring Russia — that, in turn, are moved across the border. Analogous examples have emerged of vehicles vanishing from UK streets and reappearing in Moscow."

5.2 Speed, container density and port intervention

The operational efficiency of the export trade is high. Containers reportedly hold "up to four vehicles" each, and "vehicles can be loaded up before victims, lenders or the police are able to react… others are stolen, loaded and out of the UK within a day."

Port-side interception remains the principal intervention point. UK examples in 2024–25 include Essex Police's Stolen Vehicle Intelligence Unit halting the export of six stolen Lexus vehicles in April 2025. The National Vehicle Crime Intelligence Service (NaVCIS), the cross-force national policing unit responsible for vehicle-crime

intelligence, has reported “316 Stolen Vehicles Recovered in Intensification Week” as a single operational benchmark. These numbers indicate that interception works when it is funded; they do not yet indicate that interception is operating at scale relative to the export volume.

No authoritative dataset breaks UK–Russia stolen-vehicle volumes out as a discrete figure, but a bounded estimate is possible. The Thatcham Research / NaVCIS joint investigation covering 2021–2024 identifies the top destinations for stolen UK vehicles as the DRC (38.5%), the UAE (20.1%), Cyprus (6.7%), Jamaica (5.7%) and Georgia (5.1%). Russia is not among the top five direct destinations. The Russia-facing flow therefore comes via two channels: the UAE re-export trade, which both RUSI and GI-TOC identify as serving Russia and former-Soviet markets as one of its secondary distribution arms, and the South Caucasus route via Georgia, identified by Thatcham/NaVCIS as a likely Russia-feeder given sanctions-driven OEM withdrawal in neighbouring Russia. On Home Office figures of approximately 130,000–136,000 UK vehicle thefts a year and the share of those exported being a matter of estimate rather than measurement, a plausible UK→Russia figure is in the low thousands annually — a small fraction of UK theft volume, but a material share of the Russian “problematic” population the draft proposes to absorb. This estimate is deliberately bounded; it should be read as a basis for further work, not a finding.

The Russia-facing dimension of this picture is shaped by two factors. First, direct UK–Russia or EU–Russia vehicle exports are prohibited under sanctions regimes implemented from 2022 onwards — in the EU principally Article 3h of Council Regulation (EU) 833/2014, with the relevant threshold for passenger cars now defined by engine capacity (above 1,900 cm^3, and for all electric and hybrid vehicles, under Annex XXIII) rather than declared customs value, and on the UK side regulation 46B of the Russia (Sanctions) (EU Exit) Regulations 2022 as amended — which means the flow runs through third-country re-export rather than direct shipment. Second, the most reported real-world pipelines into Russia appear to use land routes through Belarus, the Baltic transit corridor (subject to its own enforcement), the South Caucasus (Georgia, Azerbaijan, Armenia), and — since the war began — the Donbas route described in Section 4.

5.3 Sanctions-evasion overlap

The Russian-facing dimension of vehicle export is not a stand-alone phenomenon. It overlaps materially with luxury-vehicle sanctions evasion, in which legally acquired vehicles in the EU are re-routed to Russia and Belarus through third countries in breach of EU export controls. Operations against this trade have

produced significant seizures: the May 2025 Frankfurt-am-Main raid (21 vehicles, €1.3 million seized; €25 million in alleged total traffic), and a separate German police operation in July 2025 against a network smuggling Land Rovers and Porsche Macans to Lithuania.

The distinction between "sanctions-evading legally-acquired vehicles" and "stolen vehicles routed east" is operationally relevant but increasingly porous. Both flows use the same export infrastructure, the same third-country re-routing techniques and, in some cases, the same intermediaries. A registration framework on the Russian side that legitimises one part of the resulting inventory inside Russia — without distinguishing between the two — has the practical effect of subsidising both.

6. The International Legal Framework — and Where It Breaks

6.1 Interpol's Stolen Motor Vehicle database

The principal international instrument for tracking stolen vehicles is Interpol's Stolen Motor Vehicle (SMV) database. As of 2024, the SMV contained "more than 12 million records" and was used by police in Interpol's 196 member countries to run real-time checks against suspect vehicles. The database covers "stolen cars, trucks, motorbikes, trailers, caravans, buses and their components."

The scale of identification through the database has grown sharply. Interpol reports that in 2024, "around 270,000 vehicles were identified as stolen globally through the SMV database", an average of more than 5,000 vehicles per week, up from "around 226,000" in 2023. Following the integration of the Canadian Police Information Centre with the SMV database in February 2024, more than 1,500 vehicles stolen in Canada had been detected internationally by mid-2024, at a running rate of more than 200 per week.

The SMV database is intentionally agnostic on jurisdictional politics. A record entered by any member-state National Central Bureau is searchable by any other. Removal of a record is a unilateral act of the originating NCB. The system does not, and was never designed to, depend on bilateral cooperation between any specific pair of states.

6.2 Russia's status at Interpol

In response to the full-scale invasion of Ukraine in February 2022, Interpol's General Secretariat imposed heightened supervision and monitoring measures on Russia, which remain in force. In operational terms, the most significant of these is that "diffusions can no longer be sent directly by NCB Moscow to member countries; NCB Moscow must send all diffusions to the General Secretariat to be checked for compliance with INTERPOL's Rules, and only if compliant will the General Secretariat then disseminate it to member countries."

At the 91st Interpol General Assembly in Vienna (November–December 2023), proposals to suspend Russia's membership outright did not succeed. The heightened supervision and monitoring regime was retained. The Russian Federation has not been suspended; nor has it withdrawn, although press reporting in 2024 indicated that withdrawal was under internal Russian consideration.

For practical purposes, the position is therefore that:

- Russia continues to have access to the SMV database in principle, including the ability to register stolen-vehicle alerts and to perform queries.
- The flow of Russian-originated notices to other members is filtered through the General Secretariat for compliance.
- Cooperation between Russia and individual NCBs in EU member states, the UK, the US and Ukraine has, on practitioner accounts, collapsed in substance even where it remains nominally available through Interpol channels.

6.3 What "legalising" actually means in this context

Three distinctions are necessary.

Russian-law title is not international-law title. A Russian vehicle registration certificate issued under the proposed framework would, inside Russia, be a valid administrative document. It would not, of itself, extinguish title held by the original foreign owner, an insurer that has paid out and acquired subrogated rights, or a finance company holding a security interest. Those rights persist under the law of the originating jurisdiction.

Civil and criminal status remain distinct. A vehicle the original owner is entitled to recover under, for example, English or German civil law is not necessarily one in respect of which any Russian or international criminal proceedings would attach to the current Russian holder. The proposed Russian framework expressly preserves

Russia's ability to assess any "criminal link" under Russian law as a precondition for registration. In practice, the Russian-law assessment of criminal status will diverge from the originating state's assessment, especially where the originating state's basis is one Russia does not recognise (for example, where the wanted notice originated through Ukrainian channels).

The Interpol record is unaffected. The SMV record persists until the originating NCB removes it. The Russian registration would therefore create a vehicle that is simultaneously:

- registered in Russia as the property of its Russian holder;
- listed in Interpol's SMV database as stolen on the request of an EU, UK, US or other "unfriendly" jurisdiction;
- enforceable as stolen in any of those jurisdictions if the vehicle is moved across an international border.

That last point is the practical lever for downstream enforcement: drivers of such vehicles will continue to face seizure on any cross-border movement out of Russia, a risk recognised even in the original *Moscow Times* reporting.

6.4 The broader treaty environment

There is no single multilateral convention on stolen-vehicle cross-border registration analogous to, for example, the 1970 UNESCO Convention on cultural property. The applicable framework is a patchwork of:

- Interpol's SMV database and operational protocols, described above;
- Bilateral treaties on stolen-vehicle recovery, which the United States has concluded with Mexico, the Dominican Republic, Panama, Belize and others, but which do not extend in any comparable form to Russia;
- EU-internal instruments on cross-border vehicle registration and the suppression of cross-border crime, including the 2000 EUCARIS Treaty (European Vehicle and Driving Licence Information System), which connects national registration authorities and is intended specifically to prevent national authorities from "unwillingly legalising vehicles that have been stolen in other countries"; the Schengen Information System (SIS II); Council Decision 2004/919/JHA on cross-border vehicle crime; and Regulation (EC) 1986/2006 on registration services' access to SIS II — all of which apply only inside the Union and to states bound by the relevant agreements, with Russia outside the framework;

- Customs cooperation and sanctions instruments, which since 2022 are the principal tool through which the EU, the UK and allies have addressed Russia-facing vehicle flows.

This is a thin treaty environment. It works adequately so long as states cooperate in good faith on the underlying administrative records. It does not, in its current form, accommodate a member state systematically reclassifying stolen-vehicle records on the basis of the political status of the originating state.

7. Implications by Stakeholder

This section sets out the practical consequences of the draft legislation, in combination with the existing pipelines, for each of the principal stakeholder groups.

7.1 Insurance industry

The insurance dimension is the most quantifiable. Three effects are foreseeable.

Subrogation collapse on Russia-routed losses. The classical recovery pathway after a theft loss involves an insurer paying the policyholder, taking title by subrogation, and pursuing recovery against the vehicle wherever it surfaces. The proposed Russian framework removes the principal residual avenue for recovery on vehicles that have reached Russia, by giving the in-country holder a registration document the Russian state will defend administratively. Recovery in the originating jurisdiction's civil courts remains available in theory, but enforcement against an asset in Russia is, in present geopolitical conditions, effectively impossible. Insurers should treat Russia-routed losses as terminal for recovery purposes and price accordingly.

Pressure on the total-loss ratio. The Association of British Insurers reported a record £11.7 billion in UK motor insurance claims paid out in 2024, with theft and repair costs cited as the dominant drivers; the average theft-of-vehicle claim in the third quarter of 2024 was £12,200. The RUSI June 2025 paper, citing Association of British Insurers and comparison-site data, attributes a meaningful share of the 82 per cent rise in UK car insurance quotes since 2021 to vehicle theft. A Russian framework that absorbs a portion of stolen vehicles into a legally functional secondary market reinforces these pressures by removing any residual recovery offset.

Underwriting and risk-segmentation implications. The intercepted-exports profile reported by Thatcham/NaVCIS — 52 per cent premium and luxury brands,

79 per cent SUVs — means the impact does not fall evenly. The high-end and SUV segments of the parc carry the disproportionate share of the export-driven theft risk, with corresponding pressure on premiums in those segments and, by knock-on effect, on residual values. Tracker fitment, immobiliser standards and post-theft recovery technology are the principal variables on which insurers can underwrite the residual recoverable share.

A specific operational point: insurers and finance companies that have to date relied on the prospect of recovery to argue for non-write-off in the immediate aftermath of theft should re-examine that position for vehicles where the loss pattern is consistent with eastbound export (high-end SUV, port-region geography, organised modus operandi).

7.2 Government and law enforcement

The government dimension is principally one of degraded enforcement capability and overlap with the sanctions regime. The numbers carry a state-cost dimension that is rarely stated explicitly: an EU-stolen-vehicle estimate of approximately one million units a year (EU Council Decision 2004/919 working figure), of which 30 to 40 per cent are stolen by organised crime for onward export, sits next to a UK police charge rate that has fallen from 9.2 per cent in 2013–14 to 2.6 per cent in 2022–23 — in other words, the export end of the trade has grown while the prosecution end has contracted. The Frankfurt May 2025 raid alone (€1.3 million seized, €25 million alleged total in luxury-vehicle re-exports to Russia and Belarus) indicates that, on a single-operation basis, the sanctions-evasion overlap discussed below is already moving sums materially above the threshold at which a coordinated enforcement response would be cost-justified.

Enforcement gap at the export point. RUSI's blunt assessment — "A comprehensive review of export trends for stolen vehicles has not taken place in the UK" — describes the central institutional gap. Port-side interception, where it occurs, is effective; but it operates against an export flow whose total scale is, on the UK government's own data, not characterised.

Sanctions-evasion overlap. The Frankfurt May 2025 raid (€1.3 million seized, €25 million alleged total), the July 2025 Hamburg-Lithuania ring, and the wider pattern of luxury-vehicle re-exports through third countries indicate that vehicle flows from EU jurisdictions to Russia operate through the same logistics infrastructure regardless of whether the underlying vehicle is legally acquired or stolen. The proposed Russian registration framework adds value to both flows by making the in-country end-state more functional. From the EU and UK enforcement

perspective, this argues for treating vehicle theft and luxury-vehicle sanctions evasion as a single operational problem rather than as separate workstreams.

Diplomatic and Interpol implications. Article 2(1) of Interpol's Constitution requires the Organization's activities to be conducted "in the spirit of the Universal Declaration of Human Rights", and Interpol's 2024 Repository of Practice now treats Article 2(1) as a freestanding compliance benchmark for member-state conduct, alongside the better-known Article 3 prohibition on political, military, religious or racial activities. The Interpol General Secretariat already operates a regime of "corrective measures" in respect of Russia following its 2017 partial restriction and the post-2022 heightened-supervision regime imposed on Russian use of Interpol's channels. A draft framework that, by design, refuses to act on wanted notices issued by other NCBs on the basis of the political relationship between the issuing state and Russia, and that uses national registration to deliver a substantive outcome (clean Russian title) on vehicles SMV-flagged by those NCBs, is a candidate for further General Secretariat review under the existing Article 2(1) compliance framework. Member-state NCBs that are the originators of the wanted notices the draft proposes to disregard accordingly have an institutional interest in formally requesting that review. Suspension from Interpol is the maximalist position; a more proportionate response would be a further tightening of the heightened-supervision regime as it applies to Russian use of, and benefit from, the SMV database — for example, requiring General Secretariat clearance before Russian deletions of SMV records, or restricting Russian write access to records originated by "unfriendly" NCBs.

7.3 Manufacturers, dealers and finance companies

Manufacturers face two converging problems. First, theft-segment exposure is concentrated in their premium models, and the cost is increasingly carried in residual values and insurance pricing rather than in production cost. The Thatcham/NaVCIS 2021–2024 intercepted-exports series puts numbers on that concentration: 52 per cent of intercepted vehicles were in premium or luxury bands and 79 per cent were SUVs, with the Democratic Republic of the Congo (38.5 per cent), the United Arab Emirates (20.1 per cent), Cyprus (6.7 per cent), Jamaica (5.7 per cent) and Georgia (5.1 per cent) as the named destination concentrations. The OEMs whose model line-ups dominate those segments accordingly carry the bulk of the residual-value pressure. Second, the proposed Russian framework provides legal cover for the secondary use of vehicles whose stolen status is documented in

international databases, weakening the manufacturer's residual ability to assert IP and warranty rights against unauthorised in-country operations.

Dealers in source jurisdictions face an underwriting question with respect to the used-vehicle inventory they trade. Vehicles passing through known transit-hub jurisdictions (UAE, Georgia, Cyprus) with weak provenance documentation are, post-2026, a higher-risk class of inventory than they were before. Where the originating chain cannot be evidenced, the increased likelihood that the vehicle has come from a Russia-facing flow argues for stricter provenance checks.

Finance companies carry the credit risk where vehicles are subject to leases or finance agreements. The "Dubai scheme" identified by Chernov is, at its core, a finance-product attack: lease the vehicle in the originating country, default after the vehicle has been moved to the secondary buyer. Finance-product design — earlier default-flagging, GPS-based geofencing, deeper integration with the SMV database — is the relevant defensive lever.

7.4 End users and the general public

Consumers. Premium pricing, particularly on the high-value SUV segment, will continue to rise so long as the export-driven theft environment continues. The Association of British Insurers' Q3 2024 average theft-of-vehicle claim of £12,200, taken against the 82 per cent rise in UK car insurance quotes since 2021, gives the household-level magnitude: the policyholder of a high-end SUV in a port-region postcode now carries, in the underwriting view, a residual recovery offset of effectively zero on Russia-routed theft scenarios, and the premium structure has begun to reflect that. Tracker fitment is the single most effective consumer-level intervention; the RUSI paper notes the role of recovery specialists and tracking companies as part of any credible response.

Fleet operators. Where a fleet includes the brands and segments concentrated in the intercepted-exports profile (premium SUVs, in particular), the operational case for fleet-level tracking, after-market immobiliser upgrade and active recovery contracts is stronger than the simple loss-cost calculation suggests, because the absence of recovery effectively eliminates the salvage offset on total-loss claims.

Russian end-buyers. The proposed framework's most underdiscussed exposure is, in fact, on the Russian buyer side. Stanovov's warning is direct: when cooperation with Interpol is restored — and the public reporting assumes a "when" rather than an "if" — the population of registered-in-Russia vehicles with persisting SMV records becomes immediately visible. Russian buyers who relied on the new framework

will, at that point, face the risk of losing both the vehicle and the purchase price, with no civil remedy against either the chain of middlemen or the originating thief.

8. Recommendations

The recommendations below are addressed to the principal stakeholder groups identified in Section 7. They are operational rather than diplomatic.

The two that matter most. Of the recommendations set out across the subsections that follow, two carry materially more leverage than the others and should be read as the operational core of this paper. The first is, for insurance (§8.1), the re-segmentation of the motor book by Russia-routed-export risk with the residual recovery offset priced at or close to zero in the exposed segments — because that single underwriting change moves the largest pool of capital and forces the market signal that drives the rest of the chain. The second is, for government (§8.2), the formal application through the Interpol Executive Committee of the heightened-supervision regime to Russian use of the SMV database, including General Secretariat clearance before Russian deletions of SMV records and a restriction on Russian write access to records originated by "unfriendly" NCBs — because that is the one intervention that operates at the level of the regulatory architecture the Russian draft is designed to exploit. Everything else in this section is supporting work around those two.

8.1 For insurance

1. Re-segment the motor book by Russia-routed-export risk, using the intercepted-exports profile (premium and luxury, SUV-weighted) as the variable. Price the residual recovery prospect for vehicles in these segments at, or close to, zero.

2. Mandate after-market tracker fitment as a pricing input on new policies in the highest-risk segments, drawing on the established Thatcham category framework.

3. Coordinate with NaVCIS and equivalent EU and EU-adjacent bodies on a single export-side data picture, so that insurers can underwrite against an actual export-volume series rather than against the police-recorded-theft series alone. The current absence of such a series is a market failure noted by RUSI.

4. Re-examine the recovery-prospect assumptions used in total-loss decisioning at first notification of loss, particularly for the high-end SUV segment.

8.2 For government and law enforcement

1. Treat vehicle theft and luxury-vehicle sanctions evasion as a single operational portfolio in the UK and EU, given the shared logistics infrastructure documented in this paper.

2. Fund port-side interception at a level commensurate with the export volume. The 2025 RUSI paper makes the case that current resourcing is below the level needed to materially affect the export flow.

3. Through the Interpol Executive Committee, formalise the application of the heightened-supervision regime to Russian use of the SMV database, specifically including a mechanism by which member states whose wanted records are administratively disregarded by Russia can have that disregard reflected in Russia's standing within the organisation.

4. Publish, on a regular basis, source-country export estimates for stolen vehicles. The current absence of an authoritative UK government export-volume series, in particular, is a transparency gap.

8.3 For manufacturers, dealers and finance companies

1. Manufacturers should make tracker and recovery technology a standard feature, not an option, on the brand and segment combinations identified as disproportionately exposed.

2. Dealers should adopt enhanced provenance documentation for used vehicles entering the trade through known transit-hub jurisdictions (UAE, Georgia, Cyprus), with an SMV-database check as a non-optional step before retail listing.

3. Finance companies should redesign lease products to flag earlier on payment default and to integrate, where data-sharing arrangements allow, with Interpol's SMV record-update workflow. The "Dubai scheme" is fundamentally a finance-product vulnerability and should be closed at the source.

8.4 For consumers and fleet operators

1. Fit a tracker. The case for after-market tracking, particularly in the high-end and SUV segments, is now operational rather than precautionary.

2. Treat unusually attractive pricing on used premium vehicles imported via UAE, Georgia or Cyprus channels with caution. A documented provenance is now a substantive value driver.

3. Fleet operators should assume that the salvage-recovery component of their total-loss exposure for high-end SUVs is zero, and structure their replacement-cycle and tracking arrangements on that basis.

8.5 An industry-wide observation

The proposed Russian legislation is the most visible recent example of a broader pattern: source-country theft volumes have risen, charge rates have fallen, the export trade has matured into a structured global logistics flow, and a major destination market has now begun to introduce administrative arrangements that absorb the resulting inventory inside its jurisdiction. None of these problems can be solved by a single industry stakeholder acting alone. The structural answer is a tighter feedback loop between source-country police data, intercepted-export data, manufacturer and tracker telemetry, finance-product design and insurance pricing — a loop in which Russia's policy choices are a discrete input, but not the only one.

9. Appendices

Appendix A — Russia's "Unfriendly States" List

The list below reproduces the categories of jurisdictions identified in Russian Government Decree No. 430-r of 5 March 2022 and the subsequent amending decrees. It is not a complete legal text — for that, see the primary sources cited at footnotes 3 and 14 — but indicates the scope of the designation as it applies to the proposed registration framework.

European Union (all 27 member states): Austria, Belgium, Bulgaria, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Malta, Netherlands, Poland, Portugal, Romania, Slovakia, Slovenia, Spain, Sweden.

United Kingdom and dependencies: United Kingdom, Jersey, Guernsey, Isle of Man, Anguilla, British Virgin Islands, Gibraltar.

Other Western states: United States of America, Canada, Australia, New Zealand, Japan, South Korea, Switzerland, Norway, Iceland, Liechtenstein, Singapore.

Other named jurisdictions: Albania, Andorra, Micronesia, Monaco, Montenegro, North Macedonia, San Marino, Taiwan (the Republic of China), Ukraine.

Subsequent additions: The Bahamas (operations restricting the Bank of Russia and other Russian financial institutions); Greece, Denmark, Slovenia, Croatia and Slovakia (in the context of diplomatic and consular measures); other amendments as published on *government.ru*.

Appendix B — Timeline of Key Events

Date	Event
5 Mar 2022	Russian Government Decree No. 430-r approving the initial "unfriendly states" list.
2022–2023	Interpol Executive Committee imposes heightened supervision and monitoring on Russia.
19 Apr 2022	Public reporting (NEXTA, social media) of cars stolen in Ukraine being driven to Russia for resale.
28 Nov – 1 Dec 2023	91st Interpol General Assembly, Vienna. Heightened supervision regime retained; suspension not adopted.
20 Apr 2024	*The Telegraph* reports on UK-stolen Range Rovers and Rolls-Royces surfacing in Moscow.
2024	Approximately 270,000 vehicles identified as stolen globally through the Interpol SMV database.
2024	UK police recorded 129,127 cases of unauthorised taking of a motor vehicle (E&W).
13 May 2025	German Customs raid in Frankfurt am Main: 21 luxury vehicles worth €1.3 million seized; alleged €25 million in onward Russia/Belarus traffic.

20 Jun 2025	Thatcham Research / NaVCIS publish 2024 UK vehicle theft data ("every five minutes").
June 2025	Royal United Services Institute publishes *Organised Vehicle Theft in the UK: Trends and Challenges*.
3 Jul 2025	*Autonews* (Russia) publishes investigation of parallel-import vehicles flagged on Interpol's SMV list.
21 Nov 2025	*The Moscow Times* / *Izvestia* report on the Donbas-route laundering pipeline.
19 Jan 2026	Cut-off date used in Russian Interior Ministry's "123 unanswered German queries" figure.
5 Feb 2026	Draft regulation published on regulation.gov.ru (Project No. 164880); *The Moscow Times* (Russian) reports.
6 Feb 2026	English-language coverage of the draft (*UNITED24 Media* and others).
25 Mar 2026	Foreign Intelligence Service of Ukraine (SZRU) public commentary on the draft.
Apr 2026	GI-TOC publishes *Theft for export: Where do stolen cars and parts from the UK and EU end up?*

Appendix C — Glossary

Diffusion (Interpol). A request for cooperation or alert sent directly by one Interpol member country's National Central Bureau (NCB) to one or more other NCBs. Distinguished from a Notice, which is issued by the Interpol General Secretariat.

GIBDD. *Gosudarstvennaya Inspektsiya Bezopasnosti Dorozhnogo Dvizheniya*, the State Vehicle Inspectorate of the Russian Federation. The branch of the Russian Interior Ministry responsible for vehicle registration and road traffic.

MVD. *Ministerstvo Vnutrennikh Del*, the Ministry of Internal Affairs of the Russian Federation. The sponsor of the draft regulation discussed in this paper.

NaVCIS. National Vehicle Crime Intelligence Service (United Kingdom). National policing unit working with police forces and industry on serious and organised vehicle theft.

NCB. National Central Bureau, the standing liaison body in each Interpol member state.

Parallel imports. Goods imported by a route other than the manufacturer's authorised distribution channels. Authorised by Russian Government Decree in

2022 in response to sanctions; the principal mechanism by which a large volume of foreign vehicles has entered the Russian market since.

Royal United Services Institute (RUSI). UK defence and security think tank. Publisher of the June 2025 *Organised Vehicle Theft in the UK* paper.

SMV database. Stolen Motor Vehicle database, operated by Interpol. Searchable in real time by member-country police; records entered and removed by the originating NCB.

Subrogation. The right of an insurer that has paid out on a claim to step into the shoes of the policyholder and pursue recovery against third parties responsible for the loss.

"Unfriendly states" (*nedruzhestvennye strany*). Russian legal designation introduced by Government Decree No. 430-r of 5 March 2022 covering states whose actions Russia treats as hostile. The category triggers a series of legal consequences inside Russia, of which the proposed vehicle registration rule is the most recent.

Appendix D — Consolidated Source List

The sources consulted for this paper are listed below.

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Appendix E — Notes on Scope and Limitations

This paper has been prepared in May 2026 on the basis of publicly available reporting and primary documents accessible at that date. Three limitations should be made explicit to any reader.

First, the draft regulation has been published on Russia's federal regulatory portal but had not, at the time of writing, been adopted. The text may be amended in the course of the statutory comment period.

Second, the operational reporting on the Donbas registration pipeline (Section 4) ultimately rests on a single unnamed automotive-security source quoted by *Izvestia* and reproduced by *The Moscow Times*. The broader phenomenon of stolen-vehicle movement through the occupied territories is supported by other reporting, but the specific registration sequence described in Section 4.1 should be treated as well-attested but single-sourced.

Third, no published source — Russian, EU, or international — provides a hard figure for the total annual flow of stolen vehicles from the UK and EU into the Russian Federation as such, distinct from the broader UAE / Georgia / Cyprus hub flows. The figures cited in this paper for those hubs and for the in-Russia "problematic" inventory are the closest available proxies.

The "low thousands annually" order-of-magnitude estimate used in Section 5.2 for the UK→Russia component is derived, not measured. It is constructed by taking the destination shares reported by Thatcham Research and the National Vehicle Crime

Intelligence Service (NaVCIS) for 2021–2024 — in which the Democratic Republic of the Congo accounts for 38.5% and Georgia for 5.1% of intercepted UK stolen-vehicle exports — and applying the Georgia transit share, together with corroborating reporting on the Donbas registration pipeline and the Russian State Duma committee's reference to roughly 6,000 "problematic" foreign cars accumulated in Russia, as the basis for a hedged range. No primary dataset isolates the UK-origin sub-flow from the broader transit volumes, and the estimate should be read as an order-of-magnitude indicator rather than a measurement. It is offered to give the operational recommendations in Section 8 a scale anchor; readers with access to non-public NaVCIS, NCA, or insurer data are better placed to refine it.

The author has not had access to non-public law enforcement, insurance, or government data. Where the analysis in this paper makes inferences from the public evidence base, those inferences are labelled as such in the text.