



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT

Directorate C – Land
The Director

Brussels
MOVE.DDG2.C.1/RD

Ms Raluca Marian
General Delegate to the EU
IRU
Avenue de Cortenbergh 71
1000 Brussels

Only sent by email to
Raluca.Marian@iru.org

Subject: Retrofit of smart tachograph v2 in vehicles operating in a Member State other than their Member State of registration by 31 December 2024 or 18 August 2025.

Dear Ms Marian,

As you know, Regulation (EU) 2020/1054 of the European Parliament and of the Council ⁽¹⁾ introduced a retrofit obligation for vehicles operating in a Member State other than their Member State of registration, to the most recent version of the tachograph, as designed by the EU co-legislators (smart tachograph v2). For vehicles currently equipped with an **analogue tachograph or a digital non-smart tachograph and which operators continue to expect to have operating in another Member State than the Member State of registration, the deadline to retrofit is 31 December 2024** ⁽²⁾. For vehicles currently equipped with a **smart tachograph v1 and which operators continue to expect to operate in another Member State than the Member State of registration, the deadline to retrofit is 18 August 2025** ⁽³⁾.

According to the estimates of DG MOVE, several hundred thousand vehicles need to be retrofitted across the Union by the end of 2024, and several hundred thousand more by 18 August 2025. The duration of the retrofitting period, taking as a start date 21 August 2023, is therefore of 16 months for vehicles registered before 15 June 2019 (1st mandatory installation for smart tachograph v1), and 24 months for vehicles registered between

⁽¹⁾ Regulation (EU) 2020/1054 of the European Parliament and of the Council of 15 July 2020 amending Regulation (EC) No 561/2006 as regards minimum requirements on maximum daily and weekly driving times, minimum breaks and daily and weekly rest periods and Regulation (EU) No 165/2014 as regards positioning by means of tachographs (*OJ L 249, 31.7.2020, p. 1*, ELI: <http://data.europa.eu/eli/reg/2020/1054/oj>).

⁽²⁾ Article 3(4) of Regulation (EU) No 165/2014.

⁽³⁾ Article 3(4a) of Regulation (EU) No 165/2014.

15 June 2019 and 20 August 2023. By extrapolation, and since a tachograph must undergo a regular inspection at least every two years ⁽⁴⁾, DG MOVE estimates that **if this planned inspection is used to replace the existing tachograph by a smart tachograph v2, close to 80% of vehicles would not need to plan an additional visit to a fitter or workshop for the sole purpose of replacing their tachograph.**

Should operators not be aware of their retrofit obligations, or choose not to retrofit their existing tachograph at the regular tachograph inspection, this will by nature lead to additional costs for them, and risk a tense situation closer to the retrofit deadlines, with possible consequences for operators including difficulties finding availability in an approved workshop or fitter, leading in the worst case to missing the retrofitting deadline and finding themselves needing to restrict the use of certain vehicles to domestic transport until the tachograph is replaced.

Tachograph manufacturers and representatives of the road transport operators have communicated to DG MOVE over the last weeks that the supply of smart tachograph v2 – which may have temporarily been constrained between July and December 2023 – is now secured and available to customers. There is, however, growing concern that the regular inspection of the tachograph is currently not being used to replace the existing tachograph with a smart tachograph v2.

Therefore, in order for the operator to avoid unnecessary additional retrofitting costs and start benefitting from the advantages of smart tachograph v2 as soon as possible, as well as to ensure sufficient workshop capacity and supply of smart tachograph v2 throughout the retrofit period, **I would invite you to raise awareness among your members about their retrofitting obligations by 31 December 2024 and 18 August 2025, and to strongly encourage them to organise the regular tachograph inspection so that the replacement of the tachograph in the relevant vehicles takes place during this inspection.**

In your letter to Commissioner Vălean on 17 August 2023 ⁽⁵⁾ mainly focused on the difficulties experienced around the 21 August 2023 deadline, you had asked the Commission to monitor the retrofitting situation, mentioning that your own estimates put the number of vehicles covered by the retrofitting obligations between 1.5 and 2 million. My team and I have used these last months to do exactly this – including by using IRU's own monitoring and reaching out to tachograph manufacturers – to assess the possibilities to avoid a similar situation at the upcoming retrofitting deadlines. These consultations confirmed that the main measure which could facilitate this retrofitting process is the need for road transport operators to anticipate the tachograph replacement (and not wait until the last minute) and to use to the maximum extent possible the planned regular tachograph inspection. For their part, as mentioned above, the tachograph manufacturers have let DG MOVE know that they have taken the appropriate measures in term of industrial process to cope with the anticipated surge in demand. I would therefore expect that IRU follows up on my invitation above, in the interest of all parties concerned.

⁽⁴⁾ Article 23(1) of Regulation (EU) No 165/2014.

⁽⁵⁾ Your reference: BRI 059679/VCO. Our reference: Ares(2023)5673074.

In the meantime, please be assured that my team continues to monitor the retrofitting process and that we remain available to support this transition towards smart tachograph v2 where needed and possible.

Yours sincerely,

Electronically signed

Kristian SCHMIDT

c.c.: Jean-Louis COLSON (Head of Unit, MOVE.C1).