



**NOTE FOR THE ATTENTION OF THE MEMBERS OF THE COMMITTEE ON ROAD  
TRANSPORT**

**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.**

1. Regulation (EU) 2020/1054 of the European Parliament and of the Council <sup>(1)</sup> 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 have operating in another Member State than the Member State of registration, the deadline to retrofit is 31 December 2024** <sup>(2)</sup>. For vehicles currently equipped with a **smart tachograph v1 and which operators continue to expect operating in another Member State than the Member State of registration, the deadline to retrofit is 18 August 2025** <sup>(3)</sup>.
2. 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 (1<sup>st</sup> mandatory installation for smart tachograph v1), and 24 months for vehicles registered between 15 June 2019 and 20 August 2023. By extrapolation, and since a tachograph must undergo a regular inspection at least every two years <sup>(4)</sup>, 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.**

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<sup>(1)</sup> 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>).

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

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

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

3. 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 for fitters, workshops, and tachograph manufacturers to cope with a spike in demand at that time.
4. 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 observed between July and December 2023 – does not appear to be an issue anymore. 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.
5. 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, **DG MOVE strongly encourages Member States to:**
  - (i) **raise awareness to their approved fitters and workshops of tachographs about these upcoming retrofitting deadlines, and**
  - (ii) **raise awareness and encourage operators established in their Member State to organise the regular tachograph inspection so that the replacement of the tachograph in the relevant vehicles takes place during this inspection.**
6. DG MOVE will also be sending a similar letter to representatives of road transport operators in the coming days, reminding them of their obligation should they wish to continue operating their vehicles in other Member States after the deadlines mentioned above.
7. This note is sent in the context of the difficulties experienced by Member States around the 21 August 2023 deadline where the sufficient supply of smart tachograph v2 was questioned. At that time, DG MOVE had informed Member States that it would contact relevant stakeholders – including 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. DG MOVE

therefore kindly expects Member States to carefully follow-up to point 5 above, in the interest of all parties concerned.

*Electronically signed*

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