



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT
Directorate C – Land
C.1 – Road Transport

Brussels
MOVE.DDG2.C.1/JLC

**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 18 August 2025 or 1 July 2026.

1. 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).
2. This Note concerns the next two tachograph retrofit deadlines:
 - For vehicles registered in the EU, 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 last day to retrofit is 18 August 2025 ⁽²⁾.**
 - For vehicles registered in the EU, engaged in international transport operations or in cabotage operations for hire or reward, where the maximum permissible mass of the vehicle, including any trailer, or semi-trailer, exceeds 2,5 tonnes (hereinafter referred to as ‘Light Commercial Vehicles’ or ‘LCVs’), the deadline to have a smart tachograph version 2 installed is 1 July 2026 ⁽³⁾.

⁽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(4a) of Regulation (EU) No 165/2014.

⁽³⁾ Point (aa) of Article 2(1) of Regulation (EC) No 561/2006, combined with Article 3(1) of Regulation (EU) No 561/2006.

Deadline of 18 August 2025

3. The upcoming deadline of 18 August 2025 concerns vehicles which – by definition – are relatively recent, since they have been registered for the first time between June 2019 and August 2023. Thus, in these cases, an existing tachograph of 2 to 6 years old needs to be replaced. Such recent heavy-duty vehicles are also more likely to be engaged in international road transport than the vehicles under the scope of the 31 December 2024 deadline, and therefore more likely of needing a tachograph retrofit.
4. The observations set out in the Note of 4 March 2024 ⁽⁴⁾ to the Members of the Committee remain valid today. In particular, it is crucial that operators do not wait until July or the beginning of August 2025 to replace their smart tachograph version 1 with a smart tachograph version 2, unless this is the normal timing of their regular 2-year periodic tachograph inspection.
5. Based on the data collected and available to DG MOVE as of today, there appears to be no clear justification for requests similar to those received in the summer of 2023 and at the end of 2024. As a result, and as mentioned in the Committee meeting of 18 December 2024, DG MOVE has the clear intention to ensure proper and strict implementation of the 18 August 2025 deadline.

Deadline of 1 July 2026 for Light Commercial Vehicles (LCVs)

6. From 1 July 2026, **both newly registered LCVs as well as existing LCVs, engaged in international transport or cabotage operations for hire or reward,** will fall in the scope of Regulation (EU) No 165/2014 and will thus need to be fitted with a smart tachograph version 2.
7. DG MOVE continues to work on estimating the number of vehicles which would fall under the scope of this installation/retrofit obligation, and we invite Member States to communicate to us any estimates you may have in this respect.
8. **It is important to note that this provision brings into the scope of Regulation (EC) No 561/2006 not only drivers who may not be familiar with the use of the tachograph or even of driving times and rest periods, but also vehicles which may not have been designed to install a tachograph.**
9. In this respect, the technical specifications of smart tachograph provide for an adaptor to be installed in M1/N1 vehicles ⁽⁵⁾. However, it is only natural that the installation of a tachograph in a new category of vehicles will be faced with its set of practical difficulties and challenges in workshops.

⁽⁴⁾ Ares(2024)1655409.

⁽⁵⁾ Appendix 16 to Annex 1C of Commission Implementing Regulation (EU) 2017/799.

10. DG MOVE trusts that these practical difficulties can be resolved through exchanges of practices within the industry. If necessary, DG MOVE also remains available to use the Committee on Road Transport or the Tachograph Forum ⁽⁶⁾ to facilitate such exchanges among Member States and the industry. For this to take place, it is however essential that the retrofit of smart tachograph v2 into LCVs takes place as early as possible, to anticipate such practical difficulties in advance of the legal deadline and to allow time to find practical solutions.

Conclusion

11. DG MOVE therefore strongly encourages Member States to:

- (i) **raise awareness to their approved fitters and workshops of tachographs about these upcoming retrofitting deadlines;**
- (ii) **raise awareness and encourage operators established in their Member State to organise workshop visits as early as possible for the installation of smart tachograph version 2 to take place as soon as possible;**
- (iii) **ensure that operators, drivers, workshops and vehicle manufacturers are aware and preparing for the 1 July 2026 deadline for LCVs.**

12. DG MOVE will be sending a similar letter to representatives of road transport operators as well as vehicle manufacturers in the coming days, reminding them of these upcoming deadlines.

13. DG MOVE kindly requests Member States to carefully follow-up to point 11 above, to ensure that the ‘tachograph retrofit’ pillar of Mobility Package 1 is implemented in a proper and timely manner.

Electronically signed

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Head of Unit

⁽⁶⁾ Established by Article 43 of Regulation (EU) No 165/2014.