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ACTION:		ÉCHÉANCE:		
CODE DOSSIER:				
09-01-2019 (CA)				
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Mr Henrik Hololei
Director General
European Commission
Directorate-General for Mobility and
Transport

Rue Demot, 28
1040 Brussels

By email and post

Brussels, 13 December 2018

Introduction of the smart tachograph on 15 June 2019: Need for a public monitoring and reporting system on the progress made in meeting key intermediary milestones and deadlines.

Dear Mr Hololei,

IRU fully supports and is working towards a timely and successful introduction of the smart tachograph on 15 June 2019. This introduction is a process, which, due to its complexity and challenges for all involved public and private stakeholders, is unique and unprecedented compared to any similar previous challenges.

We appreciate the constant efforts of the European Commission services and experts, including from the Joint Research Centre, to facilitate and streamline the process, including the assurances given that the deadline of 15 June 2019 would be respected.

However, a number of concerns are increasingly shared by the European road transport industry.

Recent discussions with key public and private stakeholders directly involved in the process, such as tachograph, card and vehicle manufacturers, and enforcers, raised concerns relating to the capacity of all involved public and private stakeholders to meet key intermediary milestones and deadlines on time.

The main issue is the extremely demanding deadlines imposed by the legislation to move from a temporary interoperability type approval to a definitive one, within a period of 4 months, after the first type approval has been issued. As we are writing this letter, it is still unknown whether the first temporary type approval has already been issued and whether the 4-month period has started or not.

We are aware that some individual tachograph manufacturers are willing to swiftly start the production of smart tachographs on the basis of a temporary type approval, to be installed in commercial vehicles in production already in the first months of 2019. Yet, a risk remains that temporary type approvals might be revoked in case of potential interoperability problems and different interpretations among tachograph manufacturers. This would lead to a situation where operators may need to send their vehicles back to workshops leading to significant direct and indirect costs, with a heavier impact in particular on small and medium-sized road transport operators.

In addition, road transport operators are also facing the uncertainty of ordering and buying vehicles with tachographs that are only temporarily type approved. In such a

situation, it is very difficult for trade associations to advise their members, the fleet operators, on whether to order new vehicles, in particular in the first months of 2019.

We have also been informed that in some specific cases of specialised vehicles, which would need a longer assembly period, a real risk exists of vehicles, already ordered by road transport operators, to be delivered after 15 June 2019 with a digital tachograph installed in them, since there is still no type approved smart tachograph available on the market. This would mean that such vehicles with digital tachographs would be illegal, and their drivers fined when controlled by enforcement authorities.

Such concerns are further exacerbated by the lack of official and consistent public information and reporting to all stakeholders, on the progress made in meeting key intermediary deadlines, such as:

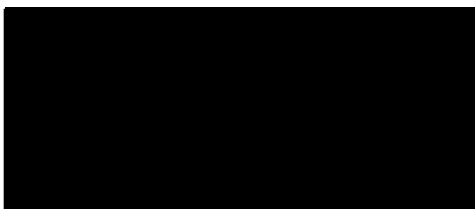
- the beginning and the end of the 4-month period,
- the preparedness and readiness of Member States to start issuing workshop cards, and
- for workshops, to have the necessary training, software and hardware readily available.

This is the reason why, IRU and its Members across Europe are inviting the European Commission to:

- Establish, as soon as possible, a public monitoring and reporting system on the progress made in implementing, by all relevant public and private stakeholders, of the various planned intermediary steps and milestones, up to the actual introduction of the smart tachograph on 15 June 2019.
- Such public monitoring and reporting system should also play the role of a risk management system, reducing legal and operational uncertainty, whilst at the same time providing an early warning mechanism and contingency planning, to act on time and adapt deadlines, should important milestones be missed.
- Encourage and assist tachograph manufacturers to informally communicate among themselves in case of interoperability issues in the 4-month period, to find workable solutions sufficiently in advance.
- Intensify contacts, i.e. via a dedicated ad-hoc task force, with industry and all relevant stakeholders, including tachograph and vehicles manufacturers, as well as enforcers, to regularly assess the situation and remedy potential problems, in particular in the key period between mid-December 2018 to mid-March 2019.

IRU is ready and willing to play its role in this process, to guarantee a successful introduction of the smart tachograph as foreseen by 15 June 2019, and avoid postponement, which may become an unwelcome option in case the above concerns are not clarified and intermediary milestones are not met.

Yours sincerely,

A large black rectangular box used to redact the signature of the IRU General Delegate.

IRU General Delegate