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By email and post

Brussels, 13 February 2019

Introduction of the smart tachograph on 15 June 2019: industry efforts to inform and raise the road transport sector's awareness, and questions on progress made

Dear Mr Hololei,

Allow me to begin by thanking you for your letter of 21 December 2018, containing useful explanations and reassurances that the deadline of 15 June 2019 for the introduction of the smart tachograph in the EU will be met.

Indeed, the timely, informed and smooth introduction of the smart tachograph remains a priority for IRU at EU, but also at UNECE level, within the AETR Agreement.

As requested in your letter, we shared your answer with all our EU member associations, both freight and passenger.

We have also started informing members regularly about the progress made in meeting critical intermediary stages, including the interoperability certificates issued in December 2018 to both Continental and Gemalto, as well as the type approval obtained by Continental later on in December.

On 8 March, IRU, in partnership with our member company Continental, is organising a dedicated training and awareness-raising workshop for IRU members throughout Europe, to present the smart tachograph in more detail and its wider ecosystem of analytical software, clouds, link with smart phones, training, etc.

We are also preparing a short introductory package, for European companies and drivers, to introduce the new features of the smart tachograph and its functioning.

IRU has also been actively engaged, together with CORTE, in advocating, at UNECE level, the acceptance of EU-registered vehicles equipped with smart tachographs by non-EU AETR Contracting Parties, after 15 June this year.

In addition, and in order to even better inform road transport trade associations and companies across Europe, we would appreciate if you could provide additional details on the below issues, which were mentioned in your December letter:

- Firstly, in regard to the main tachograph manufacturers, are there any other manufacturers, apart from our member company, Continental, which have been able to pass the interoperability tests so far? In addition, are the relevant Commission services aware of any technical problems or interoperability issues

that may have arisen among tachograph manufacturers' products and software systems?

- Secondly, does the Commission services have an overview available of the level of preparedness of EU Member States to meet the 15 March 2019 milestone, to be able to issue second generation workshop cards (and all types of cards by 15 May 2019)?
- In regard to multi-stage vehicles, which need a long production lead-time, in your contacts with ACEA and commercial vehicle manufacturers, were the Commission services able to estimate the real size of the problem? Is the issue pertaining to several thousands of vehicles, which may be delivered with a digital tachograph after 15 June 2019, and, hence, would need to undergo a replacement? If so, do the competent Commission services have an idea of the cost of such replacement? Indeed, if it is confirmed that thousands of vehicles are affected, the IRU would be strongly in favour of an appropriate transitional solution, which would avoid a presumably costly replacement.

In the meantime, and with 15 June rapidly approaching, the issue of the acceptance of EU-registered vehicles equipped with smart tachograph by non-EU AETR Contracting Parties is increasingly gaining in importance, bearing in mind the relatively slow progress made within the UNECE AETR Group of Experts, in particular as far as the joint IRU-CORTE proposal is concerned, submitted in 2018, to swiftly deal with this issue.

Here again, we do believe that a stronger involvement of the European Commission services in formally raising the issue, and looking for a solution before 15 June this year, is indeed of vital importance, to avoid situations where EU-registered vehicles equipped with smart tachographs are stopped at external EU borders, thus endangering the smooth flow of trade and tourism between EU and third countries.

Looking forward to your reply to these questions, I would like to assure you that IRU will remain, also in the future, a strong supporter and advocate of an informed and smooth introduction of the smart tachograph in the EU and beyond.

Yours sincerely,

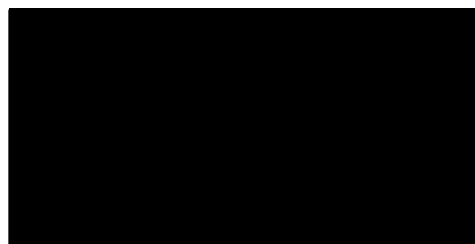


General Delegate



EUROPEAN COMMISSION
DIRECTORATE-GENERAL FOR MOBILITY AND TRANSPORT
Director General

Brussels,
MOVE (2018) 7337964



Subject: 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 [REDACTED]

I thank you for your letter of 13 December 2018 on the above subject.

Let me emphasise once more the importance of an early introduction of the smart tachograph, both in terms of enforcement and in terms of reaching an agreement on the Mobility Package I. Meeting the long known deadline of 15 June 2019 is crucial.

I regret that, despite the assurances provided by the Commission on the timely introduction of the smart tachograph, doubts continue to persist about readiness and interoperability issues. This is creating undue uncertainty in this transition phase and I will therefore use my reply to provide reassurances.

Most importantly, the industry is ready to go ahead. The main tachograph and tachograph card manufacturers have clearly stated that they are able to deliver smart tachographs and tachograph cards by early next year, and they have not raised possible delays due to interoperability issues.

The Commission's Joint Research Centre has granted on 19 December 2018 the first provisional interoperability certificates to Continental and Gemalto. The next stage is type-approval, which according to our information should be ready by the very beginning of January 2019.

Secondly, we should keep in mind the very objective of the 4-month period, namely to strike a balance between giving sufficient time to tachograph manufacturers to develop their products and present them for testing, while at the same time limiting this period to avoid adverse impacts on vehicles manufacturers and the haulage sector.

In the letter of 15 October from DG MOVE to the tachograph manufacturers, which was forwarded to IRU, we explained that the legislation allows Member States to grant type-approval on the basis of a provisional certificate. In the same letter, we confirmed that a

certain risk indeed exists, but that this risk – according to the opinion of Joint Research Centre – is low, and that it can and must be properly managed by tachograph and card manufacturers under supervision of the Commission.

You raise the case of certain specialised vehicles with a long production lead-time. Please be informed that DG MOVE is in close contact with ACEA. Their plea is to have the smart tachograph available as soon as possible to be able to equip such vehicles early in the process, in time for their registration from mid-June 2019. It is in the interests of all stakeholders to have the smart tachograph available early next year, which obviously could not be achieved by imposing on tachograph manufacturer to put on hold their production for additional four months.

Finally, let me assure you that since the very beginning, DG MOVE and the Joint Research Centre have been in close contact with all relevant stakeholders, including IRU, CORTE and ACEA, which have been consulted and fully informed. My services have been attending and reporting about the smart tachograph in different working groups and workshops, some of them organised by IRU. DG MOVE has also organised events, such as the Workshop on seals for smart tachographs on 19 March 2018 and the 3rd session of the Tachograph Forum on 3 December 2018.

Considering the above, I do not consider that additional measures would be needed at this stage. We will continue to monitor and follow closely the deployment process.

I would be grateful if you could circulate this letter to IRU members to reassure them of the commitment of the industry and of the Commission to meet the objective of mid-June 2019 for the smart tachograph.

I remain at your disposal for any further exchange of views, and hope for the full and unconditional support of the IRU on this very important matter.

Yours sincerely,

(e-signed)
Henrik HOLOLEI