

Tachograph Obligation for Light Commercial Vehicles (2.5 - 3.5 tonnes)

Effective 1 July 2026 under Regulation (EC) No 561/2006

Following the publication of Regulation (EU) No 2020/1054, the legislator introduced several amendments to Regulation (EC) No 561/2006, which were adopted as part of the so-called "[Mobility Package I](#)"¹. This also included the announcement of the deadline from which Light Commercial Vehicles (hereinafter referred to as LCVs) are required to use a tachograph and the legal requirements they shall abide by accordingly.

The Mobility Package I also introduced Directive (EU) 2020/1057, establishing specific posting rules for drivers in road transport. This directive defines when drivers are considered "posted," outlines administrative requirements, and specifies applicable remuneration principles.

The subsequent chapters summarise the relevant articles from the consolidated version of the pertinent legal texts and help the affected market participants verify their obligations.

Our website offers a substantial collection of relevant materials, and should you require further clarification, our colleagues in your area KG Knutsson SIA would be keen to provide assistance.

Disclaimer: This document is intended for general guidance purposes only and makes no claim to exhaustiveness. Continental does not bear any responsibility or liability for any errors, omissions or inaccuracies in this document.

¹ <https://www.fleet.vdo.com/eu-mp1-retrofit/>

1. Affected Vehicles

Scope:

- Vehicles or vehicle combinations with a **maximum permissible mass (MPM) exceeding 2.5 tonnes** (including trailers) – regardless of whether they are existing vehicles or newly registered vehicles.
- Used for **international / cross-border transport** (EU/EEA/Switzerland (CH)/UK²) or **cabotage**³.
- Commercial operations for **hire or reward**.
- **Driving is main activity**⁴ of the driver.

Reason for inclusion:

EU legislators aim to **harmonise road safety** standards and **address competitive distortions** caused by increased use of LCVs in cross-border logistics that so far have been excluded from the stringent scope of the social legislation (drivers' hours rules and use of the tachograph).

2. Key Exemptions

Article 3

ARTICLE	VEHICLE CATEGORY	DESCRIPTION	CONDITIONS
3(a)	Regular passenger services	Vehicles used for passenger transport on regular services with routes not exceeding 50 km	Complete exemption
3(aa)	Craftsman vehicles	Vehicles or combinations not exceeding 7.5t used for carrying materials/equipment for the driver's work or delivering craft-based goods	Within 100 km radius ⁵ , driving not main activity, not for hire or reward
3(b)	Slow vehicles	Vehicles with a maximum speed not exceeding 40 km/h	Complete exemption

² Consult GOV.UK guidance "[Drivers' hours and tachographs: goods vehicles](#)"

³ Regulation (EC) No 1073/2009, [Chapter V](#).

⁴ Directive (EU) 2022/2561, [recital \(10\)](#).

⁵ The current interpretation is that the regulation makes no distinction between domestic and cross-border transport within this radius. The exemption is based on the nature of the activity, the distance from the operating centre, and the non-commercial purpose of the transport. **Still to be confirmed whether this also applies to cross-border transport operations.**

ARTICLE	VEHICLE CATEGORY	DESCRIPTION	CONDITIONS
3(c)	Military, emergency services	Vehicles owned or hired by armed services, civil defence, fire services, or public order forces	When carriage is a consequence of assigned tasks under their control
3(d)	Emergency vehicles	Vehicles used in emergencies or rescue operations	Including non-commercial ⁶ humanitarian aid
3(e)	Medical vehicles	Specialised vehicles used for medical purposes	Complete exemption
3(f)	Breakdown vehicles	Specialised breakdown vehicles	Operating within a 100 km radius ⁵ of base
3(g)	Test vehicles	Vehicles undergoing road tests for technical development, repair, or maintenance	Also new/rebuilt vehicles not yet in service
3(h)	Non-commercial ⁶ goods vehicles	Vehicles or combinations not exceeding 7.5t used for non-commercial ⁶ carriage of goods	Complete exemption
3(ha)	Light commercial vehicles	Vehicles between 2.5t and 3.5t used for transport of goods	Not for hire or reward, on own account, driving not main activity
3(i)	Historic vehicles	Commercial vehicles with historic status	Used for non-commercial ⁶ carriage of passengers or goods

Article 13

ARTICLE	VEHICLE CATEGORY	DESCRIPTION	CONDITIONS
13(1)(a)	Public authority vehicles	Vehicles owned or hired by public authorities for road transport	Must not compete with private transport undertakings
13(1)(b)	Agricultural vehicles	Vehicles used by agricultural, horticultural, forestry, farming, or fishery undertakings	For carrying goods as part of own entrepreneurial activity within a 100 km radius ⁵

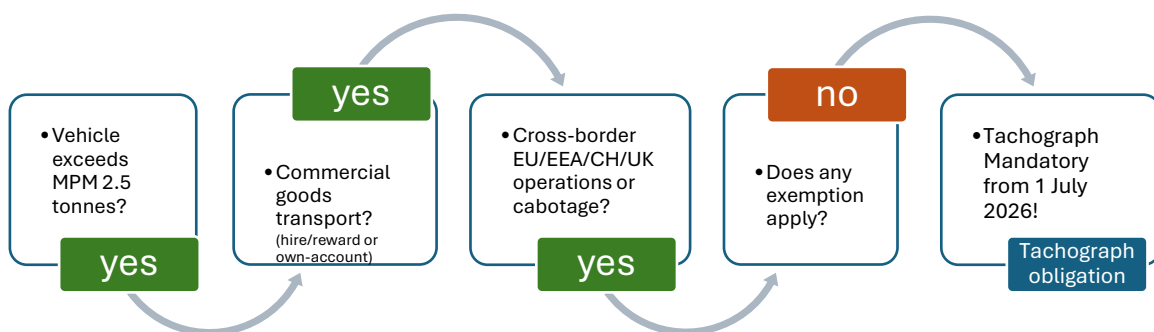
⁶ See [Art. 4 \(r\)](#), Regulation (EC) No 561/2006 – „... any carriage by road, other than carriage for hire or reward or on own account ...“.

ARTICLE	VEHICLE CATEGORY	DESCRIPTION	CONDITIONS
13(1)(c)	Agricultural tractors	Agricultural and forestry tractors	Used for agricultural or forestry activities within a 100 km radius ⁵
13(1)(d)	Universal service vehicles	Vehicles not exceeding 7.5t used by universal service providers	To deliver items as part of universal service within a 100 km radius ⁵
13(1)(e)	Island vehicles	Vehicles operating exclusively on islands or in isolated regions	Area not exceeding 2,300 square kilometres
13(1)(f)	Gas/electric vehicles	Vehicles for goods carriage propelled by natural or liquefied gas or electricity	Within a 100 km radius ⁵ , not exceeding 7.5t
13(1)(g)	Driving school vehicles	Vehicles used for driving instruction and examination	Not used for commercial carriage
13(1)(h)	Utility service vehicles	Vehicles used for sewerage, flood protection, water, gas, electricity, road maintenance, refuse collection, telegraph, telephone, broadcasting services	Complete exemption when granted by Member State
13(1)(i)	Minibuses	Vehicles with 10–17 seats	Used exclusively for non-commercial ⁶ passenger transport
13(1)(j)	Circus/funfair vehicles	Specialised vehicles transporting circus and funfair equipment	Complete exemption when granted by Member State
13(1)(k)	Mobile project vehicles	Specially fitted mobile project vehicles	Primary purpose as an educational facility when stationary
13(1)(l)	Milk collection vehicles	Vehicles used for milk collection from farms or return of milk containers	Also for milk products intended for animal feed
13(1)(m)	Money transport vehicles	Specialised vehicles transporting money and/or valuables	Complete exemption when granted by Member State
13(1)(n)	Animal waste vehicles	Vehicles carrying animal waste or carcasses	Not intended for human consumption
13(1)(o)	Hub facility vehicles	Vehicles used exclusively on roads inside hub facilities	Such as ports, inter-ports, and railway terminals

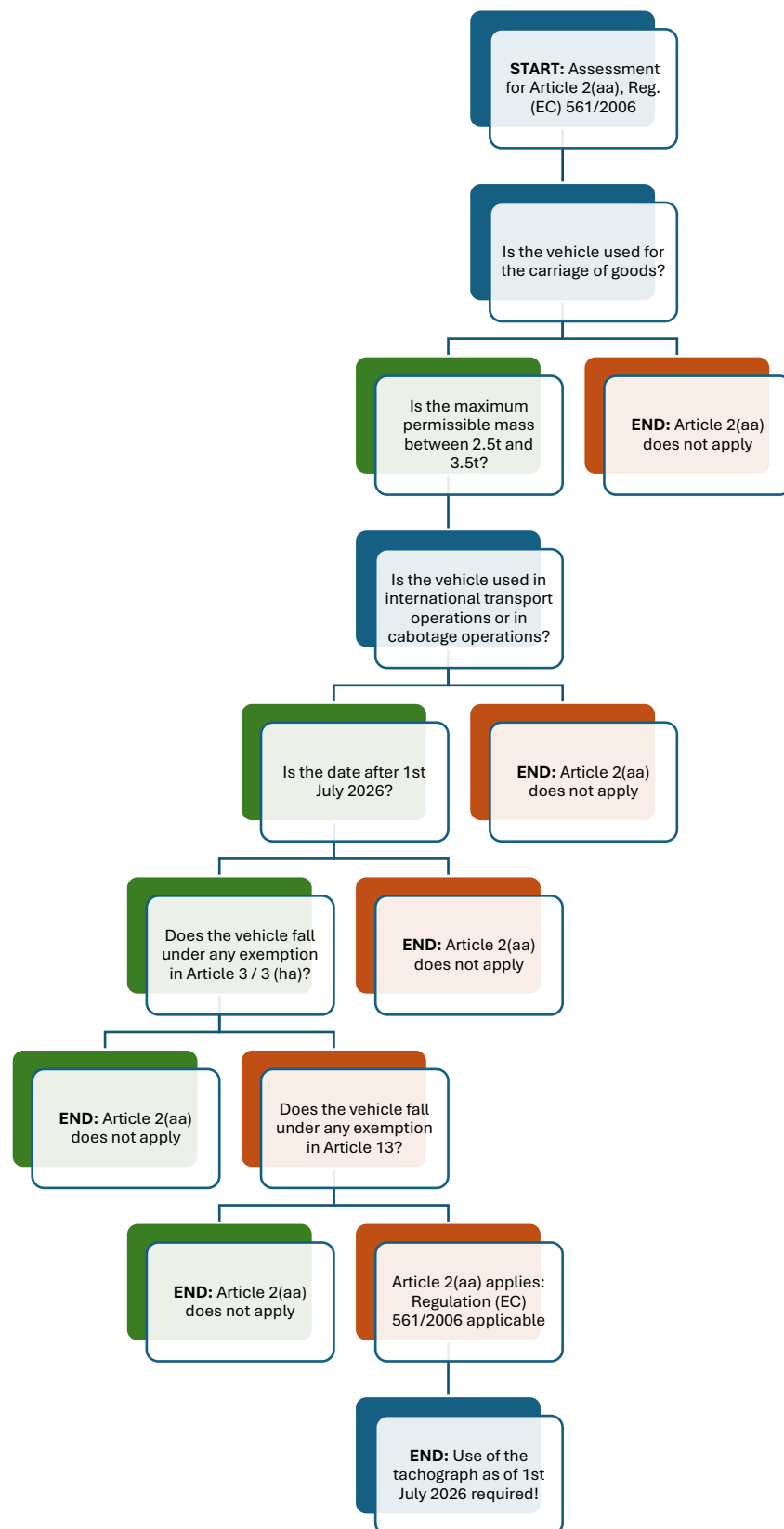
ARTICLE	VEHICLE CATEGORY	DESCRIPTION	CONDITIONS
13(1)(p)	Live animal transport	Vehicles used for live animal transport	From farms to markets and vice versa, or from markets to slaughterhouses within a 100 km radius ⁵
13(1)(q)	Construction machinery vehicles	Vehicles or combinations carrying construction machinery	For construction undertakings within a 100 km radius ⁵ , driving not main activity
13(1)(r)	Concrete mixer vehicles	Vehicles used for delivery of ready-mixed concrete	Complete exemption when granted by Member State
13(2)	Information obligation	Member States shall inform the Commission of exemptions granted	Commission informs other Member States
13(3)	Low population density areas	Minor exemptions for vehicles in areas with a population density < 5 persons/km ²	For domestic passenger services or domestic road haulage, after Commission approval

3. Decision Pathway for Compliance

Simplified:



Extensive:



Legend:



4. Implementation Steps

1. Audit fleet for 2.5 - 3.5t vehicles used internationally.
 2. Install EU-certified smart tachographs (compliant with Regulation (EU) No 165/2014). Authorised workshops can be found here: [VDO Partner Finder⁷](#).
 3. Train drivers on recording driving/rest times under EU rules.
 4. Train drivers on the correct use of the smart tachograph.
 5. Obtain a Driver Card for respective drivers.
 6. Register company in the IMI system (Internal Market Information System⁸) for posting declarations.
 7. Train drivers and administrative staff on the requirements of the Posting of Workers Directive.
 8. Develop and implement internal procedures for maintaining posting records and ensuring compliance with host Member State remuneration rules.
 9. Create Driver Information Packages containing guidance on both tachograph usage and posting requirements for international journeys. [Could be offered by VDO / Partners]
 10. Establish a monitoring system to ensure ongoing compliance with both tachograph regulations and posting requirements. [VDO Fleet as a proper solution]
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5. Training programme

This chapter presents a formal recommendation for the establishment and implementation of a comprehensive training protocol for the LCVs drivers. This initiative is a direct response to the impending mandate under the EU Mobility Package I, which requires the installation and operation of digital tachographs in all vehicles with a Gross Vehicle Weight between 2.5 and 3.5 tonnes engaged in international haulage, effective 01 July 2026.

The institution of a proactive and exhaustive training regimen is considered indispensable for ensuring regulatory compliance, safeguarding driver welfare, and mitigating the substantial pecuniary and legal liabilities associated with non-compliance.

Identified Competency Deficits:

- A deficit of working knowledge regarding EU Drivers' Hours Regulations (EC) No 561/2006.
- An absence of proficiency in the application of the complex regulatory framework governing driving times, breaks, and rest periods.
- A lack of practical experience in the operation of digital tachograph systems, including critical functions such as manual data entry and mode selection.
- An undeveloped capacity for strategic journey planning that integrates strict regulatory time constraints.

⁷ <https://www.fleet.vdo.com/partnerfinder/>

⁸ <https://www.postingdeclaration.eu/landing>

- An opportunity to enhance understanding of the Posting of Workers Directive requirements for international transport operations.
- A need for greater familiarity with posting declaration procedures and associated documentation requirements.
- An area for professional development regarding host Member State remuneration rules applicable during posting periods.

Proposed Curriculum for the Training Protocol:

To rectify the identified deficiencies, a multi-module training protocol is proposed.

Module I: Legal and Regulatory Foundations

Objective: To establish a comprehensive understanding of the statutory framework.

Content: In-depth analysis and understanding of Regulation (EC) No 561/2006 and of Regulation (EU) No 165/2014; delineation of driver and company liabilities; systematic review of the enforcement mechanisms and penalty structures within EU member states.

Module II: EU Drivers' Hours Regulations

Objective: To ensure mastery of all applicable time-based regulations for compliant journey execution.

Content: Detailed instruction on daily, weekly, and fortnightly driving times; regulations for breaks and rest periods, including reduction and compensation rules; and protocols for special circumstances (e.g. ferry/train transits).

Module III: Practical Operation of Digital Tachograph Systems

Objective: To develop full operational competence and confidence in the use of the mandated equipment.

Content: Applied training on driver card management; correct procedures for manual entry of activities; accurate selection of operational modes; generation and interpretation of data printouts; and protocols for managing system errors.

Module IV: Posting of Workers Directive

Objective: To ensure comprehensive understanding of the Posting of Workers Directive as it applies to international transport operations.

Content: Detailed explanation of Directive (EU) No 2020/1057 specific to the road transport sector; requirements for documentation and declaration of posting; remuneration rules in host Member States; record-keeping obligations; and use of the [IMI system](#) for posting declarations.

Module V: Protocol for Enforcement Interactions and Compliance Audits

Objective: To prepare drivers for official roadside inspections and internal audits.

Content: Instruction on statutory documentation requirements (56-day activity record); standardised procedures for interacting with enforcement authorities; and methods for articulating journey data during an inspection.

6. Obtaining a Driver Card

The following points are based on the applicable regulations in Germany and may differ from the requirements in other EU member states. However, they provide a comprehensive guideline and practical framework.

How to Obtain a Driver Card

LCVs drivers in the EU need to apply for a driver card if they do not already have one and operate vehicles that require the use of a digital tachograph. The application process typically involves:

1. Completing an application form from the relevant national issuing authority
2. Providing required documentation
3. Paying the applicable fee
4. Collecting or receiving the card by post

Eligibility Requirements

To be eligible for a driver card in the EU, the following requirements are typically applied:

- Have your normal residence in an EU Member State
- Hold a valid driving licence for the relevant vehicle category
- Not be subject to any restrictions preventing you from driving
- Not already hold a valid driver card

Required Documentation

The following documents are typically required when applying for a driver card:

- Completed application form
- Valid passport or national ID card
- Recent passport-sized photograph
- Valid driving licence
- Proof of address/residency
- Payment for the application fee (varies by country)

Where to Obtain a Driver Card

Driver cards are issued by designated authorities in each EU member state. In most countries, these include:

- National transport authorities
- Driver and Vehicle Licensing agencies
- Designated card issuing offices

Renewal and Replacement

Renewal

Driver cards are valid for 5 years and must be renewed before expiration. It is advisable to apply for renewal at least 15 working days before the expiry date.

Replacement for Lost, Stolen or Damaged Cards

If your driver card is lost, stolen or damaged:

1. Report the loss or theft to the respective authorities
2. Apply for a replacement card immediately through the relevant national authority
3. Follow the official guidance provided by the competent authorities until the replacement card arrives

7. Legal References

- Regulation (EC) No 561/2006 (as amended by Regulation (EU) No 2020/1054)
 - Regulation (EU) No 165/2014 (as amended by Regulation (EU) No 2024/1230)
 - Regulation (EC) No 1072/2009 (as amended by Regulation (EU) No 2020/1055)
 - Regulation (EC) No 1073/2009 (as amended by Regulation (EU) No 517/2013)
 - Directive (EU) No 2020/1057
 - Directive (EU) No 2022/2561
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