Important Customer Information - New Tachograph Obligation from 01.07.2026

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Dear Sir or Madam,

the market for time-critical direct and special transport is facing the most profound disruption in years.
As of 1 July 2026, the next stage of the EU Mobility Package comes into effect: the mandatory use of the intelligent tachograph (Smart Tacho 2) is being extended to commercially used vans over 2.5 tonnes in cross-border transport.
This change brings an end to the operational flexibility that has existed in this segment.
The seamless, second-by-second recording of driving and rest times is causing a fundamental structural break in the market:

- **Reduced vehicle output:** Stricter controls lead to shorter driving times.
- **Extended transit times:** require intermediate stops, driver changes, or transhipment.
- **Greater planning effort:** The need for complex and precise dispatching is increasing.

Implications for Capacity and Prices

The new restrictions will noticeably reduce the actual available transport capacity in the van market. We expect a shift in transport volumes toward larger vehicle classes or vehicles below the regulatory threshold.
Due to this loss of productivity and the significant additional costs, a substantial price increase of approximately +25% to +60% is to be expected in the 3.5t segment. For extremely time-critical long-distance routes, this effect may be even higher.

Our Approach for Your Supply Chain

We have adapted our operational structures at an early stage. To keep your transport chains stable and predictable, we rely on:

- The targeted securing of freight capacities under the new conditions.
- Flexible, legally compliant deployment concepts such as optimised double-crew operations.
- The strategic use of alternative vehicle classes.

The coming months will be characterised by high market dynamics. Let us set the course together at an early stage – we are happy to assist you with any questions.

Kind regards
Maintaler Group

Customer information / detailed report 06-2026

Structural change and cost analysis on the Digital Tachograph Obligation from 2.5t / 3.5t

1. Regulatory background and scope

Under the EU Mobility Package, from **01.07.2026** the obligation to use the *Smart Tacho 2* applies to all vehicles with a permissible gross weight of over 2.5 tonnes up to and including 3.5 tonnes.

- **Who is affected?** All vehicles with a fitted tachograph in this weight range that are used commercially for cross-border freight transports are affected.
- **The grey zone is eliminated:** Purely domestic operations within Germany are initially exempt. However, anyone operating in mixed mode (both domestic parcel/courier services and international trips) must retrofit their fleet, as the vehicle will otherwise no longer be permitted to cross the border.

2. Direct investment costs (Sample calculation for a 5-vehicle fleet)

The introduction brings significant immediate bureaucratic and financial burdens for transport operators:

- **Hardware & Installation:** Installation of the Smart Tacho 2 may only be carried out by certified workshops. Including calibration, costs per vehicle amount to **3.500 to 4.000 Euro**. For a small fleet of 5 vehicles, this immediately creates an investment requirement of up to **20.000 Euro**.
- **Driver cards:** Each driver requires a personal card (valid for 5 years) costing on average **40 Euro**. The application requires a personal appearance at the authority; processing time is approximately two weeks. For 5 drivers, this amounts to around **200 Euro** plus lost working time for the application process.
- **Company card:** A one-time fee of **50 to 80 Euro** (valid for 5 years) applies for data management within the company.

3. Ongoing operating costs and archiving obligations

The hardware alone is not sufficient. The legislator attaches strict compliance requirements to the tachograph:

- **Data download intervals:** Driver cards must be downloaded at least every **28 days**, and the internal vehicle memory at least every **90 days** and the data must be archived in a legally compliant manner within the company.

- Software & Service: Ongoing costs for archiving solutions amount of 30 Euro per vehicle and month (1,800 per year for 5 vehicles).
- Inspection obligation: Recalibration at an approved workshop is required every two years, costing more than 300 Euro per vehicle (1,500 for the entire fleet).
- Increased fine risk: The absence of a driver card immediately costs the driver 250 Euro. Violations of archiving obligations are penalised for the operator with 500 Euro.

4. The biggest impact: Loss of productivity due to the end of "driving flexibility"

The decisive economic impact lies in the loss of the previously unregulated flexibility. Where daily record sheets (informally known as "cheat sheets") formerly allowed certain interpretive leeway, the Smart Tacho 2 now records driving time in a continuous second-by-second grid.

From now on, the strict rules of the EU driving and rest time regulations apply:

- Daily driving time: Maximum 9 hours (extendable to 10 hours twice per week).
- Breaks: After no more than 4.5 hours of continuous driving, a break of 45 minutes is mandatory.
- Weekly limit: Maximum 56 hours of driving per week (or 90 hours in a two-week period).

The business consequence: Drivers who previously worked 11 to 12 hours per day in international express transport will lose approximately 2 hours of daily working time. On a monthly basis, this represents a real productivity and revenue loss of up to 35% per vehicle.

5. The "two-driver problem" for time-critical long-distance routes

While the use of a double crew (two drivers in one vehicle) increases theoretical driving time to up to 20 hours under ideal conditions, it conceals a serious legal and logistical trap:

- The partial-route trap: If the second driver exits after an international partial route, the journey for the remaining first driver is *no longer* recognised as multi-driver operation. This inevitably leads to violations of that driver's personal driving time regulations.
- Mandatory stops: Multi-driver operation is only legally permissible if both drivers take their rest periods simultaneously, or the journey is only resumed once both have completed a rest period of at least 9 hours. Once Driver 2 has finished their shift, Driver 1 may not move the vehicle alone, as the simultaneous rest period for both drivers has not yet been completed. The vehicle is therefore forced to stand still.

- **Direct additional costs:** In addition to the planning risk, the second driver immediately incurs **EUR 300 to 1200 in additional costs** (wages, expenses, possible return transport or hotel costs).

Summary of cost structure (5-vehicle fleet)

Cost Item	Financial Impact
Smart Tacho 2 installation (5 vehicles)	€17,500 – €23,500 (one-time)
Driver cards (5 drivers)	~€200 (every 5 years)
Company card	~€50 – €80 (every 5 years)
Calibration (every 2 years)	€750 – €1,500
Data download & archiving software	€600 – €1,800 / year
Additional costs second driver (long-distance)	€300 – €1200 per affected trip
Revenue loss due to driving time restrictions	**Up to 35 % revenue decline** per vehicle

Conclusion for the market

The visible investment costs for the hardware are calculable. The true economic impact lies in the massive loss of driving capacity and flexibility. Anyone wishing to operate stably and in compliance with the law in the international transport business over the long term must restructure their operational processes and urgently adjust their pricing structures to reflect the changed productivity.