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Analytical Report

Implementation of the EU Regulation on Drivers' Working Time in Ukraine

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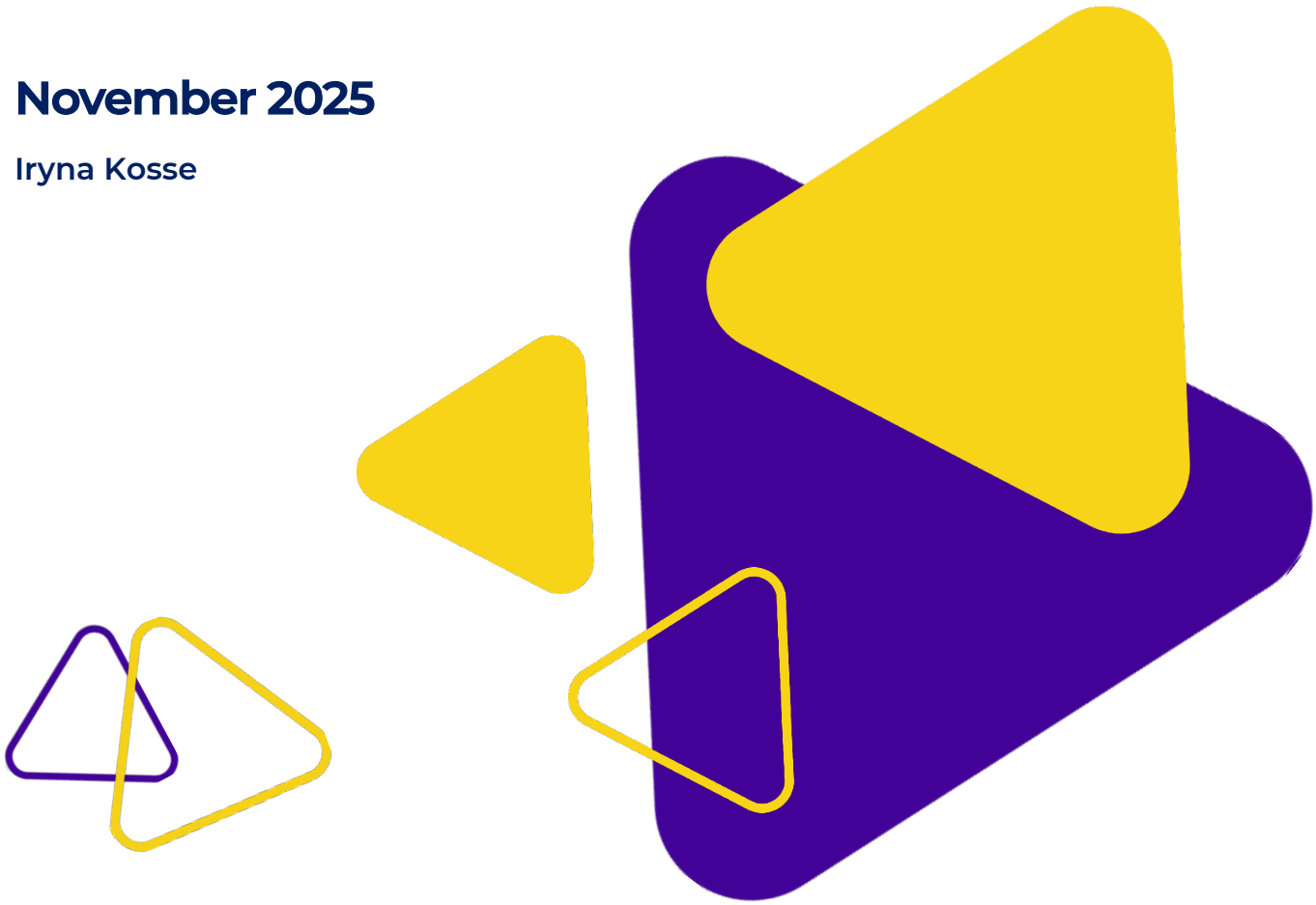

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Summary

The implementation of Regulation (EU) № 561/2006 regarding drivers' working time and rest periods is one of the fundamental elements of Ukraine's approximation to EU standards in the field of road transport. This represents a game-changer in the transport market: stricter driving limits are being introduced, along with mandatory breaks and rest periods, tachograph requirements, and control approaches. As a result, compliance costs increase, but at the same time, road safety, logistics predictability, and competition transparency improve.

The current situation in Ukraine is characterized by partial regulatory approximation (especially for international transport thanks to AETR), but weak and fragmented control practices: limited use and verification of tachographs, absence of systematic digital record-keeping and centralized analytics, irregular control of domestic transport, and insufficient coordination of authorities. This means the key challenge is creating an effective institutional and digital infrastructure to implement European standards.

The economic consequences of the reform will be uneven, with high upfront costs expected to yield benefits in the future. For the state, these are primarily initial investments in the supervision system: training and certification of inspectors, procurement of equipment, creation and modernization of databases, launch of risk-based controls, and provision of safe rest area infrastructure. For businesses, these are costs for digital record-keeping and the restructuring of operational processes (planning routes and schedules that account for rest periods, possible increases in staffing needs, revisions to remuneration models, and incentives). The most vulnerable are small carriers, for whom compliance costs and administrative complexity may become barriers, increasing the risk of market exit or a transition to subcontracting. At the same time, the reform creates incentives for technological modernization, greater predictability in transport operations, and reduced price competition driven by driver fatigue or regulatory circumvention, which, in the medium term, should improve service quality and sector productivity.

The social effect is part of the economic balance. Ensuring genuine rest, reducing fatigue, improving worker protection, and distributing responsibility between driver and carrier can reduce accident rates and losses from road accidents, as well as support staff retention in the industry. For the broader economy, there may be partial increases in logistics costs, but also gains from greater supply reliability, fewer disruptions, and reduced safety losses.

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List of Abbreviations

SSTS State Service for Transport Safety

EBRD European Bank for Reconstruction and Development

EU European Union

AFU Armed Forces of Ukraine

CEE Central and Eastern Europe

AETR European Agreement concerning the Work of Crews of Vehicles engaged in International Road Transport

GITD General Inspectorate of Road Transport of Poland (Główna Inspekcja Transportu Drogowego)

ISCTR State Inspectorate for Road Traffic Control of Romania (Inspectoratul de Stat pentru Controlul în Transportul Rutier)

Introduction

On its path to EU membership, Ukraine must align the rules governing the organization of work in the transport sector with EU law. One important step is the implementation of Regulation (EU) No 561/2006, which establishes rules on driving time, breaks, and rest periods for drivers. Its implementation is essential not only as part of European integration commitments. Compliance with the relevant standards reduces accident rates and, consequently, costs associated with road incidents, increases transport productivity, improves drivers' working conditions, and makes competition between companies fairer. At the same time, these changes affect transport costs.

Currently, Ukraine partially applies similar standards for international transport in accordance with the European Agreement concerning the Work of Crews of Vehicles engaged in International Road Transport (AETR).[1] However, the EU Regulation imposes stricter requirements, particularly regarding weekly rest, driver return, the prohibition on rest in the cabin, digital monitoring, and so on. Their implementation requires changes in legislation, institutions, and business practices.

This paper analyzes the possible consequences of implementing Regulation No. 561/2006 for the state budget, businesses, and drivers. It provides recommendations taking into account the experience of Central and Eastern European countries.

Key Provisions of Regulation 561/2006

Regulation (EU) No 561/2006[2] establishes limits on driving time, breaks, and rest periods for drivers engaged in freight and passenger transport in the EU. Its purpose is to reduce fatigue, improve safety, enhance working conditions, and ensure fair competition.

According to the Regulation, the maximum daily driving time is nine hours. Twice per week, this limit may be extended to 10 hours. At the same time, the maximum driving time during a week must not exceed 56 hours, and over any two consecutive weeks – no more than 90 hours. This means drivers must plan their routes to avoid exceeding these limits, even in the event of delays or unforeseen circumstances.

Drivers are required to take a break of at least 45 minutes after every 4.5 hours of continuous driving. This break may be divided into two parts – 15 and 30 minutes respectively – provided that it is fully taken within the specified period.

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[1] European Agreement concerning the work of crews of vehicles engaged in international road transport (AETR). OJ L 95, 8.4.1978, pp. 1–18 https://eur-lex.europa.eu/eli/agree_internation/1977/2829/oj/eng

[2] Regulation (EC) No 561/2006 of the European Parliament and of the Council of 15 March 2006 on the harmonisation of certain social legislation relating to road transport and amending Council Regulations (EEC) No 3821/85 and (EC) No 2135/98 and repealing Council Regulation (EEC) No 3820/85 (Text with EEA relevance). OJ L 102, 11.4.2006 https://eur-lex.europa.eu/eli/reg/2006/561/oj/eng

The daily rest period must be at least 11 hours. However, this rule allows exceptions: up to three times per week, it may be reduced to 9 hours without the obligation to compensate for this reduced time. Weekly rest, in turn, must last at least 45 hours. Once every two weeks, it may be reduced to 24 hours, provided that the reduced time is compensated for the following week.

To monitor compliance with these standards, the use of digital tachographs is mandatory. These devices record driving time, breaks, and driver rest periods. According to the rules, EU member states must check at least 3% of drivers' working days annually – both during roadside inspections and at company premises. These checks are carried out by specially authorized control bodies – mostly road or transport inspectorates, in some cases, police or customs services. Severe sanctions are provided for violations – ranging from fines to vehicle immobilization - and both the driver and the carrier bear responsibility.

Special attention is given to safe stopping and rest areas. A delegated act from April 2022[3] establishes standards for certified parking areas, as well as rest conditions on ferries and trains, if special rest cabins are available on them. Such provisions are intended to ensure comfortable and safe conditions for drivers' extended rest during trips.

Regulation 561/2006 takes into account the requirements of the Mobility Package. The EU Mobility Package is a series of legislative changes adopted in 2020[4] that detail and supplement the rules governing drivers' work, particularly in the context of combating social dumping and unfair competition. The main requirements include: mandatory return of the truck to the country of registration every eight weeks; provision of weekly rest outside the cabin (in a hotel); prohibition of cabotage exceeding three trips in seven days with a subsequent 4-day "cooling-off" period; remuneration level not lower than the minimum in the country of work; mandatory use of smart tachographs 2.0 for accurate route tracking.

Overall, Regulation 561/2006 is a key element of European road safety policy and social protection for transport industry workers. Its implementation in Ukraine will mean not only technical adaptation to EU requirements, but also a significant improvement in work standards in the transport sector.

[3] Commission Delegated Regulation (EU) 2022/1012 of 7 April 2022 supplementing Regulation (EC) No 561/2006 of the European Parliament and of the Council with regard to the establishment of standards detailing the level of service and security of safe and secure parking areas and to the procedures for their certification https://eur-lex.europa.eu/eli/reg_del/2022/1012/oj/eng

[4] https://transport.ec.europa.eu/transport-modes/road/mobility-package-i_en

Current Situation in Ukraine

In Ukraine, the rules on drivers' working time are regulated separately for domestic and international transport. For domestic transport, the main document is the Regulation on Working Time and Rest Time for Drivers of Wheeled Vehicles, issued by the Ministry of Transport.[5] Its provisions largely correspond to the basic requirements of AETR: limits on time behind the wheel, breaks, and rest (see Table 1). This is important because AETR is the minimum common framework on which the "transport visa-free regime" relies for fair competition and safety. At the same time, for approximation to EU internal market practices, the key will be not only formal compliance with AETR, but also complete transition to the logic of Regulation No 561/2006 and digital control (tachographs, risk-based inspections).

Table 1. Comparison of the main provisions of AETR, Regulation No 561/2006, and the current Ukrainian Regulation on Working Time and Rest Time for Drivers for domestic transport

Parameter	AETR	Regulation No 561/2006	Regulation for domestic transport (Ukraine)
Maximum continuous driving time	4 hours 30 minutes	4 hours 30 minutes	4 hours
Break after continuous driving	Minimum 45 minutes (can be split into 15+30 minutes)	Minimum 45 minutes (can be split into 15+30 minutes)	Minimum 30 minutes (after 4 hours of driving)
Total daily driving time	Up to 9 hours, twice per week up to 10 hours	Up to 9 hours, twice per week up to 10 hours	Up to 9 hours, under certain conditions up to 10 hours
Weekly driving time limit	56 hours	56 hours	56 hours
Two-week driving time limit	90 hours	90 hours	90 hours
Daily rest	At least 11 hours (can be reduced to 9 hours 3 times per week)	At least 11 hours (can be reduced to 9 hours 3 times per week)	11 hours, reduction is permitted

[5] Order of the Ministry of Transport and Communications of Ukraine dated 07.06.2010 No 340 "On approval of the Regulation on Working Time and Rest Time for Drivers of Wheeled Vehicles" https://zakon.rada.gov.ua/laws/show/z0811-10#Text

Parameter	AETR	Regulation No 561/2006	Regulation for domestic transport (Ukraine)
Weekly rest	45 hours (can be reduced to 24 if compensated)	45 hours (can be reduced to 24 if compensated)	42 hours
Record keeping	Using tachographs	Using tachographs	Logbooks and other local forms
Scope of application	International transport (with AETR participants)	Predominantly transport within the EU or between participating countries, since 2010, AETR and the Regulation have been aligned	Domestic transport in Ukraine
Mobility Package	Does not account for some recent EU changes (Mobility Package)	Includes changes introduced by Regulation (EU) 2020/1054 (part of the Mobility Package)	

Sources: https://eur-lex.europa.eu, https://zakon.rada.gov.ua

However, control implementation in Ukraine is fragmented. As in many EU countries, in Ukraine inspection functions are distributed among several bodies, but there is no clear delineation of powers and no coordination between the responsible structures. Currently, compliance with drivers' working time regulations is partially enforced by the State Service for Transport Safety (SSTS, Ukrtransbezpeka), the National Police, and the State Labor Service. For example, the SSTS public report for 2022 mentions "state supervision measures in road transport."[6] However, there is no confirmed data that a target volume of inspections has been established (for example, as in the EU, a minimum of 3% of working days[7]). There is also no information that domestic transport is systematically covered by the control of drivers' working time.

Although Ukrainian legislation provides for the use of tachographs (in particular, by Order No. 340 of 07.06.2010 and relevant regulations) and the implementation of the Smart-

[6] Ukrtransbezpeka. Public report of the Head of SSTS Yevhen Zborovskyi. 2022. https://dsbt.gov.ua/images/public_reports/publichnyy_zvit_2022_na_sayt.pdf

[7] Report on the implementation in 2009-2010 of Regulation (EC) No 561/2006 on the harmonisation of certain social legislation relating to road transport and of Directive 2002/15/EC on the organisation of the working time of persons performing mobile road transport activities https://www.bmimi.gv.at/dam/jcr%3A1c342a48-0546-4f02-b0cb-6c7d416ca237/bericht_09_10.pdf

Tacho system, in practice, their potential is insufficiently utilized. For example, Ukrtransbezpeka reports the launch of remote control via Smart-Tacho only now.[8] Tachograph calibration is mandatory, but "in our country, there is still no clear control over compliance with all standards regarding the observance of work and rest time regulations for domestic transport."[9] Control is often carried out through documents or visual inspection, which limits the possibilities for objective monitoring.

In international transport, Ukrainian carriers are obliged to comply with AETR, which establishes time limits similar to the requirements of Regulation (EU) No 561/2006: maximum driving time, minimum breaks, and rest periods. The provisions of AETR and Regulation No 561/2006 are essentially identical in basic parameters (driving time, rest, weekly/two-week limits, see Table 1). At the same time, AETR does not include the new provisions of the EU Mobility Package – such as mandatory driver return or the prohibition of rest in the cabin.[10] For Ukraine, there is logic in adapting to the highest standard – that is, to the provisions of the Regulation and the Mobility Package, not only to AETR.

Control over compliance with AETR standards in Ukraine remains weak: there are no systematic inspection statistics, a centralized database, or regular analysis of tachograph data. This differs significantly from EU requirements, which provide for an annual control sample of at least 3% of drivers' working days.

> **Thus, although Ukraine's regulatory framework partially meets EU requirements, the absence of systematic control and digital monitoring is a key barrier to the adaptation and implementation of EU law, especially in the field of domestic transport.**

International Experience: Adaptation of Regulation (EU) No 561/2006 in CEE Countries

The countries of Central and Eastern Europe (CEE), which joined the EU in 2004–2007, underwent legislative adaptation in the field of road transport during the preparatory phase for membership. This required institutional changes, additional costs, and the restructuring of business processes, but in the medium term brought about the stabilization and professionalization of the sector.

[8] In Ukraine, starting May 27 new driver rules come into force. 26.05.25 https://tsn.ua/auto/news/v-ukrayini-z-27-travnia-pochnut-diiaty-onovleni-pravyla-dlia-vodiyiv-2836379.html
[9] https://dp-css.com.ua/service/tachograph-calibration/
[10] 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. PE/25/2020/INIT, OJ L 249, 31.7.2020, pp. 1–16 https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32020R1054

Poland created a separate body – the General Inspectorate of Road Transport (GITD) – back in 2002, before joining the EU.[11] This made it possible to prepare in an organized manner for the Regulation's requirements regarding a minimum of 3% checks of drivers' working days. The initial costs of forming the inspectorate, purchasing equipment, and training personnel were substantial but proved quite manageable in the medium term. No detailed breakdown of these costs was found in open sources. Still, within the framework of GITD's organizational reform, annual costs of up to PLN 40 m (EUR 9.4 m), salary increases, and infrastructure upgrade costs are mentioned as part of these changes.[12]

Regarding business, Polish transport companies reported an increase in operating costs of 1–2% for large firms and up to 3% for small ones.[13] After the implementation of new standards, driver wages in Poland increased by 15.3% just during the period 2017–2019.[14] In addition, the industry shifted from per-kilometer payments to fixed daily rates and stable salaries, reducing pressure on drivers to violate the rules.[15]

Overall, according to CNR estimates[16], the total activity of the Polish road freight transport sector after joining the EU increased approximately threefold; as early as 2007, Poland became the leader in international transport in the EU. According to Eurostat[17], the total work volume of Polish carriers in road freight transport (tonne-kilometers) grew from 120–130 bn t-km in 2004 to over 300 bn t-km in 2018, with a significant increase in the share of international transport.

Romania modernized its control system with EU technical and financial support, particularly through training for inspectors and the digitalization of tachograph monitoring. The Road Transport Inspectorate (ISCTR – Inspectoratul de Stat pentru Controlul în Transportul Rutier), established as a separate state body, is responsible for implementing control measures.

However, in the early stages, the country faced challenges in implementing the new rules. In the private sector, costs of complying with social legislation (particularly

[11] Summaries of EU Legislation. Poland https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=legissum:e13106
[12] https://logistyka.rp.pl/krajowe/art39747901-organizacja-gitd-bedzie-ustalana-na-nowo
[13] Ex-post evaluation of social legislation in road transport and its enforcement. Final report. Study contract no. MOVE/D3/2014-256. June – 2016 https://transport.ec.europa.eu/system/files/2016-09/2016-ex-post-eval-road-transport-social-legislation-final-report.pdf
[14] The Polish road freight transport sector in 2019. CNR. https://www.cnr.fr/download/file/publications/CNR%20-%20The%20Polish%20road%20freight%20transport%20sector%20-%202019.pdf
[15] Because usually when drivers receive payment per kilometer, they are financially incentivized to drive as much as possible in a day. This creates a direct incentive to violate the rules.
[16] EUROPEAN CNR STUDIES. Road Freight Transport (RFT) in Poland. 2012. https://www.cnr.fr/download/file/publications/Road%20Freight%20Transport%20in%20Poland%20-%20summary%202011.pdf
[17] Road freight transport in the EU https://www.etf-europe.org/wp-content/uploads/2025/04/Road-Freight-Transport-in-the-EU_TransFair-KU-Leuven-analysis.pdf

regarding drivers' working time, mandatory rest, and return home) increased by 2–3% of turnover.[18] At the same time, average driver wages increased by 34% in just three years (2017–2020). This growth is explained, in particular, by the doubling of the minimum wage in the country, the development of the transport sector, and changes in working conditions and control. After introducing the requirement for drivers to return home once every four weeks, average mileage per vehicle decreased, but drivers' quality of life increased. Romanian carriers also gradually transitioned to structured remuneration: instead of predominantly "per-kilometer" payments, base rates and fixed daily allowances were introduced, guaranteeing minimum payments regardless of mileage. This approach helped reduce pressure on drivers and increase transparency in calculations.

Overall, in 2009–2019, the volume of transport in Romania grew from 34.3 to 61.0 bn t-km, with international transport growing on average by 12.7% per year from 13.4 to 44.4 bn t-km. Cabotage under Romanian registration increased 44-fold (from 93 m to 4,083 m t-km). The number of transport companies also increased from 20,000 in the early 2010s to nearly 30,000 by the end of the decade. But in 2007–2010, Romanian carriers complained about difficulties: meeting the new requirements was hard, costs increased, there was a crisis, poor roads, a lack of parking, and queues at the border; there were even carrier protests. In the short term (2007–2010), the combination of new social rules (561/2006), the general economic crisis, and weak infrastructure created significant pressure on business. But in the medium and long term, we see that the sector adapted to the rules of 561/2006, took advantage of low labor costs and the opening of the EU market after joining the EU, significantly increased international and cabotage transport, and became one of the leaders in Western Europe.

Bulgaria chose a different approach – it did not create a new control body, but strengthened the already existing Road Administration Agency. With a limited budget, the focus was on implementing risk-based inspections and gradually implementing European social rules in transport (Regulation 561/2006, AETR), and, from the second half of the 2010s, on adapting to the future Mobility Package.

Against this background, the Bulgarian road transport market grew very rapidly: in 2008–2020, the total volume of work doubled (average growth of 6.5% per year), with international transport increasing by almost 10% annually, and the share of international operations reaching about 77% of all sector activity, with cross-trade at 44% and notable growth in cabotage. At the same time, the market faced a chronic driver shortage, combined with new regulatory restrictions and the entry of Bulgarian carriers into international markets, leading to increased demand for qualified labor. The result was

[18] The Romanian road freight transport in 2020. CNR. https://www.cnr.fr/download/file/publications/CNR%20-%20The%20Romanian%20road%20freight%20transport%20in%202020.pdf

gradual wage growth: the cost of one hour of driver work increased by 27% from 2015 to 2021 (from EUR 8.02 to 10.16), including base pay and compensation, and total annual costs per driver in international transport – from EUR 15,859 to 20,061.[19]

Companies, especially small ones, initially faced difficulties during adaptation: this included costs for training, implementing tachographs, legal support, and the need to revise the business model to comply with new requirements. However, many of them gradually came to terms with the latest regulatory reality. In particular, they successfully entered Western European markets thanks to low costs and high flexibility, which ensured the competitiveness of Bulgarian drivers even under the new restrictions.

Hungary already had a national control system before joining the EU, particularly through the activities of the National Transport Authority and the road police, which conduct inspections to ensure compliance with drivers' working time and rest regulations. After adopting the Regulation, the country faced a need to increase inspection intensity and digitalize monitoring. Against this background, the road transport sector remained heavily oriented toward international routes: in 2019, the total work volume of Hungarian carriers was about 37 bn t-km, of which almost 64% was accounted for by international transport, including approximately 19% cross-trade and 2–2.5% cabotage under the Hungarian flag.[20]

Business operating costs increased by 1–3%. Even with rising labor costs (the total cost of a driver between 2013 and 2019 increased by approximately 15% in EUR, and the cost per hour of work – to 11 EUR/hour), Hungarian companies maintained competitiveness thanks to their transit location, flexible tax and social policy, and the ability to optimize payment structures (low base salary and high daily allowances and bonuses). Over several years, most violations were reduced, though control in the early years remained insufficient, creating an imbalance between conscientious companies and those who continued to disregard the rules.

Slovakia and Slovenia – smaller economies – also implemented the necessary institutional changes. In Slovenia, the staff of inspectors at the State Labour Inspectorate (Inšpektorat RS za delo) was significantly expanded after 2004, while the control budget remained relatively small. In Slovakia, control is carried out by the National Labour Inspectorate (Národný inšpektorát práce). After joining the EU, many drivers began working on international routes: as of 2018, the total work volume of Slovak carriers was about 35.6 bn tkm, of which 81.8% was accounted for by international routes; about 33% of all work was formed by cross-trade between third countries, and another 3.5% –

[19] The Bulgarian road freight transport. 2021 study. CNR. https://www.cnr.fr/download/file/publications/CNR%20-%20Bulgaria-%20The%20Bulgarian%20road%20freight%20transport%20sector%20.pdf

[20] EUROPEAN STUDIES. The Hungarian road freight transport sector in 2019. https://www.cnr.fr/download/file/publications/CNR%20-%20The%20Hungarian%20road%20freight%20transport%20sector%20-%202019.pdf

cabotage under the Slovak flag.[21] In Slovenia in 2019, road carriers performed about 24.0 bn tkm, of which 90.4% was international transport, of which 44% was cross-trade and 5.3% cabotage; overall, the volume of tonne-kilometers after joining the EU in 2004–2011 increased by approximately 83%.[22]

Against the background of strengthened control and implementation of European rules, labor costs also grew: in Slovakia, the cost of a driver in international transport rose from approximately EUR 23.5 to over 28 thousand per year between 2012 and 2019; in Slovenia, the total annual cost of a driver in 2020 reached about EUR 26.5 thousand with the cost per hour of driving around EUR 14–15. Despite this, companies from both countries maintained competitiveness through focus on international markets, tariff increases, and productivity improvements.

> **In all the mentioned countries, the main business costs were adapting logistics, training personnel, transitioning to new accounting and payroll models (particularly implementing hourly accounting instead of the "per-kilometer" system), and increasing driver wages. However, after 2–3 years, the industry adapted, safety improved, accident rates decreased, and working conditions improved.**

Economic Consequences for Ukraine

1. Impact on the State Budget

The implementation of Regulation (EU) No 561/2006 in Ukraine will require the establishment of an effective system to monitor compliance with standards on working time, breaks, and driver rest periods. This involves financing the following elements:

- training of inspectors and certification of personnel of the State Service of Ukraine for Transport Safety (Ukrtransbezpeka), which will likely perform control functions;
- procurement of mobile equipment for reading digital tachographs;
- creation or modernization of a centralized database with analytical tools;
- launch of a risk-based control system and regular inspections – at least 3% of drivers' working days annually, as provided for in the EU regulation;
- preparation of reports by the control body (for example, Ukrtransbezpeka) for state statistics bodies and international partners.

[21] The Slovak road freight transport sector in 2019 https://www.cnr.fr/download/file/publications/CNR%20-%20The%20Slovak%20road%20freight%20transport%20sector%20-%202019.pdf
[22] Slovenian road freight transport in 2020 https://www.cnr.fr/download/file/publications/CNR%20-%20The%20Slovenian%20road%20freight%20transport%20in%202020.pdf

According to European Commission estimates, at the EU scale, total costs for control administration amount to EUR 7–8 m per year (based on 2011–2012 data).[23] For Ukraine, given the smaller market size, population, and significantly lower wage levels, these costs may be considerably lower. Based on a conditional ratio to population, adjusted for lower labor costs, an approximate estimate is **EUR 300–350 thousand per year**, to ensure annual monitoring, data processing, and reporting. At the same time, this **does not account for one-time costs associated with launching the institutional infrastructure**, which may be significantly higher during the startup period. In this regard, it would be advisable to plan for attracting technical and financial assistance from the EU.

The introduction of mandatory conditions for drivers' weekly rest outside the truck cabin will require not only institutional but also infrastructural support. In the EU, a system of certified parking areas for freight transport (Safe & Secure Truck Parking Areas, SSTPA) serves this purpose, including sanitary facilities, food services, security, internet access, and the possibility of safe driver rest.[24] Ukraine currently lacks a comparable network of such zones along the main international corridors.

These costs may be mixed. The state will likely bear the costs for integral elements – planning the placement of facilities, allocating land plots, meeting minimum security requirements, and connecting to transport and digital infrastructure. At the same time, the construction and operation of such parking areas can be carried out by private operators, particularly through public-private partnership agreements, concessions, or investment incentive mechanisms.

A preliminary estimate can be based on EU approaches: the average investment cost to equip a certified parking area is EUR 0.8–1.2 m for 50–80 parking spaces (according to European Commission research on SSTPA). Even partial scaling of this infrastructure to the main corridors (Yahodyn–Dorohusk, Krakovets–Korczowa, Chop–Čierna nad Tisou, Porubne–Siret, Reni–Galați) will require additional capital expenditures from the state or partnership instruments. At the same time, the development of such parking areas can generate associated revenues for local budgets and create additional jobs.

> **It is crucial that, in EU countries, digital tools have enabled increased inspection efficiency without a proportional increase in budgetary burden.**

Technical solutions – such as data exchange between inspection bodies and automatic risk analysis algorithms – have enabled reducing the number of unjustified inspections

[23] Ex-post evaluation of social legislation in road transport and its enforcement. Final report. Study contract no. MOVE/D3/2014-256. June – 2016 https://transport.ec.europa.eu/system/files/2016-09/2016-ex-post-eval-road-transport-social-legislation-final-report.pdf

[24] Study on the availability of suitable rest facilities for professional drivers and of secured parking facilities, as well as on the development of safe and secure parking facilities in the EU. https://op.europa.eu/en/publication-detail/-/publication/71d155f0-167e-11f0-b1a3-01aa75ed71a1

and focusing attention on companies with an elevated risk of violations. The development and implementation of such digital systems were typically financed from national budgets in combination with EU instruments, such as the European Social Fund or technical assistance programs (for example, TAIEX), thereby reducing the burden on state finances. A similar approach can be applied in Ukraine to avoid excessive roadside raids and reduce the administrative burden on businesses.

> **In the long term, costs for ensuring control will stabilize and become part of routine budget planning in transport and law enforcement.**

Special attention should be paid to fines for violations, which can serve as a partial compensation mechanism to cover control costs. At the same time, it is essential to emphasize that the goal of the reform is not fiscal, but preventive: the system should be oriented toward preventing violations, not collecting fines.

2. Impact on the Private Sector (Transport Companies)

For Ukrainian road carriers, the implementation of Regulation (EU) No 561/2006 will mean a transition to a clearly regulated regime for organizing drivers' work. In the short term, this will require a review of logistics schemes, the adaptation of internal procedures, investments in digital accounting tools, and the training of personnel – both drivers and dispatchers. This concerns not so much one-time equipment purchases (such as tachographs and driver cards) as ongoing costs for maintaining compliance with the new rules.

Structurally, the reform works as a "compliance filter": medium- and large-sized companies with dispatching, telematics, HR, and legal support, and access to working capital, gain an advantage. Small carriers with 1–5 vehicles risk finding themselves in a zone of market exit or forced cooperation (subcontracting, consolidation, working through freight forwarders) if their competitiveness was based on excessive driver working hours.

In the medium term, there is a paradoxical potential benefit for the sector: a levelled playing field and control reduce "grey" competition, and investments in planning and digitalization increase productivity (fewer fines, fewer accidents, fewer chaotic downtimes). This may mean fewer companies, but higher average quality and formalization of employment, as well as greater ability to work in international markets.

The change in working time regime will require route planning taking into account new restrictions on daily and weekly driving duration, mandatory breaks, rest periods, and driver returns home. For many companies, this will mean recruiting additional drivers, adjusting transport schedules, and, in some cases, revising the business model, especially on long-distance international routes. The most vulnerable to these changes are small- and medium-sized carriers, which lack an extensive administrative structure and are constrained by limited financial and human resources.

A separate block of costs concerns the introduction of digital accounting. Companies will need to establish procedures for reading data from tachographs, analyzing it, storing it, and preparing for possible inspections. This will require both special software and personnel training. In European countries, the cost of compliance with social legislation on drivers' working time is estimated at **1–3% of companies' annual turnover**. For large companies, this figure is about 1.3%, for small ones, closer to 3%. Ukrainian carriers can expect similar costs during the transition period, including time costs, reduced route efficiency, and possible fines.

Changes in drivers' working regime (driving time limits, breaks, weekly rest outside the cabin, vehicle return) will affect not only transport companies but also the broader economy. Routes may become longer, and the number of stops may increase, which, in turn, will raise transport costs and extend delivery times. EU studies show that even minor changes in the structure of transport costs (fuel, logistics, personnel) have a noticeable impact on final goods prices in supply chains. For Ukraine, where the logistics component of price is traditionally high, an increase in costs of 1–3% of carriers' turnover may be partially passed on to customers, which will have a multiplier effect: increased cost of imports and exports, higher prices for goods on the domestic market, and reduced competitiveness of Ukrainian producers in foreign markets.

The impact on the economy beyond the sector occurs through several channels:

1. Price channel. Part of the increase in carriers' costs is transferred to prices for agriculture, metallurgy, retail, and imports; the most sensitive are goods with a high logistics share in costs and long delivery distances.
2. Export competitiveness and reliability. More expensive transport reduces margins, but more predictable schedules and control can improve delivery reliability (fewer disruptions due to fatigue, violations, or fines), which partially offsets the price disadvantage in demanding markets.
3. Redistribution between modes of transport. For some cargo, more expensive road transport accelerates the transition to rail or multimodality (where technically feasible).
4. External safety effects. Reducing road accidents and associated losses is an economic benefit beyond the sector (healthcare, insurance, loss of working time, and damage to cargo and infrastructure).

As a rough estimate, if Ukrainian road carriers face additional mileage or downtime due to new rules at the level of an extra 2% of today's routed kilometers or time costs,[25] then assuming that the logistics component constitutes, say, 30% of delivery cost, this could

[25] The impact of EU Mobility Package on capacity and costs https://ti-insight.com/briefs/the-impact-of-eu-mobility-package-on-capacity-and-costs/

mean an increase in transport cost of 0.6–1.0%. If additional stops, wage increases, downtime, and other related expenses are factored in, the actual range could reach 1–3% of current logistics costs.

A significant impact factor will be the increase in personnel costs. In the event of reduced driving time requirements, companies will be forced to either reduce the number of trips per driver or recruit additional workers. In conditions of an already existing shortage of qualified drivers, related to the mobilization of men into the Armed Forces of Ukraine and labor migration to the EU, this will intensify competition for personnel and contribute to wage growth. The experience of CEE countries (particularly Romania and Poland) shows that **personnel costs can increase by 15–30% over several years**. Important steps will include attracting women to work as drivers, which will require allocating funds for training.

At the same time, the new rules create incentives for technological modernization and efficiency improvements. Telematics systems, route planning that takes rest time into account, and automatic reminders for drivers and dispatchers about the need to stop – all this helps reduce control costs and improve safety. Companies that are first to adopt these solutions will have a competitive advantage in both domestic and international markets.

Another important consequence will be the need to revise remuneration schemes. The Regulation directly prohibits incentive models that encourage violation of the regime – for example, payment only per kilometer. Companies will have to transition to fixed rates: hourly or daily pay, which does not make the driver dependent on the volume of work performed. This will reduce pressure on drivers and improve safety. Companies that adapt first will gain a competitive advantage. In EU countries that were the first to implement the new rules, companies that switched to transparent hourly or daily pay stabilized their personnel situation faster, reduced penalties, and increased driver satisfaction. For example, in Germany, the introduction of fixed rates was accompanied by an average wage increase of 5–10% but enabled reductions in staff turnover and hiring costs. For Ukraine, this may be important given the shortage of drivers and competitive pressure from companies in EU countries.

Social Guarantees for Drivers

Regulation (EU) No 561/2006 aims to improve social protection for drivers by establishing mandatory time limits on driving, breaks, and rest. It creates a legally guaranteed threshold for workload, the violation of which entails administrative liability.

In practice, this means creating a system of protection against excessive exploitation, which is especially relevant for domestic transport in Ukraine, where drivers often work overtime. After the Regulation is implemented, drivers will have the legal right to demand compliance with the regime without fear of losing their jobs. EU experience shows that

compliance with standards has a positive impact on health, psycho-emotional state, and productivity.[26]

Particularly important are two norms absent in AETR and Ukrainian legislation: the prohibition on taking a weekly 45-hour rest in the truck cabin and the mandatory return of the driver to base at least once every four weeks. The first norm means that a driver cannot sleep in the cabin during their weekly rest – the company must provide them with accommodation (for example, a hotel or dormitory). In EU countries, non-compliance with this norm carries significant fines, as complete rest is recognized under labor law.

The driver's return to base or place of residence at least once every four weeks helps maintain work-life balance and reduce burnout. According to an IRU review (2022), in Eastern European countries there is a trend toward more frequent driver returns: in Lithuania and Poland – approximately once every 2–3 weeks, in Romania – on average once a month with about a week spent at home; at the same time, before the changes, drivers could spend up to three months on trips without returning. IRU emphasizes that these observations require further confirmation by data.[27]

In addition, responsibility for violations is distributed between the driver and the employer. The company is obliged to organize work so that compliance with standards is possible. This creates space for drivers to refuse illegal demands without risk of sanctions.

> **Overall, the implementation of Regulation No 561/2006 will not only improve working conditions but also raise the prestige of the profession, stabilize employment, and reduce labor migration. The apparent social benefits are one of the strongest arguments in favor of implementing the Regulation.**

[26] Ex-post evaluation of social legislation in road transport and its enforcement. Final report. Study contract no. MOVE/D3/2014-256. June – 2016 https://transport.ec.europa.eu/system/files/2016-09/2016-ex-post-eval-road-transport-social-legislation-final-report.pdf

[27] IRU intelligence briefing: Ease access and attract drivers to the profession https://www.youtube.com/watch?v=W7zjw2MRUag

Conclusions

The implementation of Regulation (EU) No 561/2006 is not only a formal requirement for EU membership, but also an opportunity to improve the efficiency and safety of Ukrainian road transport. The introduction of digital control and clear working time standards will reduce costs associated with violations and accidents, making logistics more predictable and competitive.

The social effect is no less critical: mandatory breaks and rest, fair payment schemes, and prohibition of practices that encourage violation of the regime improve drivers' working conditions, reduce the risk of burnout, and increase road safety. This will also help retain qualified personnel in the industry.

The economic balance for the sector will be uneven: in the short term, some businesses (primarily small ones) will feel pressure on margins and the risk of market exit, while companies with better processes and access to financing will adapt faster and may increase their market share. In the medium term, the expected result is a more formalized and productive sector, where competitive advantage is more often determined by the quality of trip planning, compliance with working time regimes, and safety, rather than the ability to "win on price" through excessive driver working hours or circumventing accounting requirements. This does not happen automatically and requires a properly designed transition.

For the state, investments in creating a modern control system are justified: the reduction of social and economic losses from road accidents and stabilization of the labor market will, over time, outweigh the initial costs of the reform.

> **The implementation of Regulation No. 561/2006 combines fulfillment of European integration commitments with practical economic and social benefits for the industry and the country as a whole.**

Recommendations

The implementation of Regulation (EU) No 561/2006 in Ukraine requires a systemic approach not only at the level of the regulatory framework, but also in practical implementation. To minimize the costs of the transition period and ensure a long-term positive impact, it is advisable to act in advance and draw on the experience of Central and Eastern European countries. Below are the key steps that should be included in the adaptation policy.

1. The Ministry of Development should develop a step-by-step roadmap for implementing the Regulation with clear stages, priorities, and deadlines.
2. The Ministry of Development, together with the Ministry of Economy, should initiate negotiations with the EU (DG MOVE, TAIEX) and international donors (for example, EBRD, GIZ, World Bank) to obtain technical and financial assistance for training inspectors, procuring equipment, and developing IT systems.
3. Introduce transition periods for small road carriers, and create grant programs for adaptation – particularly for the purchase and calibration of tachographs, basic accounting software, and driver and dispatcher training. Direct SME support toward increasing the capacity to comply with the rules (standardized compliance procedures, training modules, digital tools) to reduce administrative burden and compliance costs. This lowers the entry barrier for small companies without distorting competition.
4. The Ministry of Development, together with Ukrtransbezpeka, should strengthen the personnel and technical capacity of bodies responsible for inspections – particularly by creating or modernizing a specialized inspectorate for monitoring compliance with drivers' working time and rest regimes.
5. Ukrtransbezpeka, in cooperation with the Ministry of Development, needs to create a system for collecting and analyzing data on violations, the level of company adaptation, and the impact on road safety, integrated into a unified digital platform.
6. The Ministry of Development, together with industry associations, should organize an information campaign for drivers and carriers regarding new rules, workers' rights, and expected changes.
7. The Ministry of Development should coordinate with other initiatives in the transport sector, particularly the digitalization of control systems, permit reform, and infrastructure projects, to avoid duplication of efforts and leverage the synergies of implemented changes.

These measures will make the transition to European standards on drivers' working time manageable, fair, and effective. They will also increase trust in the regulatory system, provide social support for change, and lay a foundation for the sustainable development of Ukraine's road transport sector in the context of European integration.

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