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## *GRB – the Group of Representative Bodies*

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Ms Elżbieta Bieńkowska

**Commissioner**, Internal Market, Industry, Entrepreneurship and SMEs  
European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels

Brussels, 19<sup>th</sup> February 2015

CC:

Ms Kerstin Jorna,

**Director**, Industrial Property, Innovation and Standards  
European Commission DG GROW  
Avenue d'Auderghem 45/Oudergemseleen 45  
1049 Brussels

Mr O Onidi, DG MOVE  
Mr J Doppelbauer, ERA  
Ms E Santiago Cid, CEN\_CENELEC  
Mr Luis Jorge Romero, ETSI

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### **Standardisation in the railway sector**

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Dear Ms Bieńkowska,

The Railway Sector is very active in supporting both the European Railway Agency and 'CEN-CENELEC-ETSI' for the development of the Interoperability and Safety regulations and the European technical standards.

When it comes to railway standardisation, it is the sector in its widest sense (railway undertakings, infrastructure managers, suppliers, users...) that invests a significant amount of time and effort (including its own experts) in standards development and the subsequent purchase of those standards and thereby covers about 95% of the total cost of standardisation works for rail in Europe.

Standardisation is a very important support for the internal market and also for business competitiveness. Rapid technological changes in our sector require a flexible, responsive and business-focussed standardisation system. This is essential to the competitiveness of rail not only in Europe but also on global markets and for that we want to promote initiatives that improve its efficiency.

New Approach Consultants employed by CEN\_CENELEC are identified by the sector as a key contributor for the quality and efficiency of the standardisation process in our sector whilst helping to reduce the delivery time of the standards. Their work is complementary to that of the sector and they guarantee consistency between the voluntary standardisation structure and the regulatory framework managed by the European Railway Agency.

The availability of these New Approach Consultants was however interrupted during the first 7 months of 2014, and currently, we understand, the work on standardisation is again interrupted for an undefined period due to negotiations between CEN\_CENELEC and your services on the budget for these New Approach Consultants.

As a result of this interruption we believe there to be a risk that a range of adopted standards could be blocked from citation in the Official Journal of the European Union (OJEU), with, as a consequence, absence of presumption of conformity vis-à-vis the essential requirements of the Railway Interoperability Directive 2008/57/EC and its Technical Specifications for Interoperability. On one side, the EC desk officers will not get the tangible elements helping them to validate the referencing in the OJEU and on the other side, the Annexes Z could be delayed from being correctly updated with consequential unnecessary time and cost wasted.

We would urge you to resolve this position together with CEN\_CENELEC and ETSI so that a definitive solution can be put in place and thus avoid the continued unavailability of the New Approach Consultants and the consequent perturbation of the standardisation process.

Yours sincerely

A handwritten signature in black ink, appearing to read 'andy', written in a cursive style.

**Professor Andy Doherty** FR ENG  
Chairman, Group of Representative Bodies (GRB)