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Mr. Josef Doppelbauer
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European Union Agency for Railways
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Brussels, 12th September 2017

Vehicle Authorisation

Dear Keir,
Dear Josef,

CER, UNIFE, UIP, EPTTOLA, FEDECRAIL and ERFA acknowledge the huge efforts made for drafting and continuously amending the draft Implementing Act (IA) on vehicle authorisation.

We see progress being made after intensive discussions among the European Commission, the Agency, the national safety authorities and the sector stakeholders. Nevertheless, for our associations some crucial and important issues remain to be solved. The sector has submitted detailed change requests in the light of the forthcoming EC Expert Group on the implementation of the 4th Railway Package's Technical Pillar. In particular, we would like to draw your special attention to the following four major issues:

- Changes to an already authorised vehicle (Article 15)
A pragmatic approach to “changes to an already authorised vehicle type” is needed in order to avoid administrative burden.
- Pre-engagement (Articles 21 and 23)
The need for stability of the applicable legal requirements is inevitable.

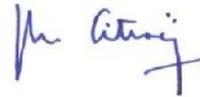
- Timeframe for the assessment of the application (Articles 34 and 54)
A timeframe for subsequent authorisation needs to be added and the timeframe for an updated authorisation improved. Both timeframes should be appropriate and reflect the level of assessment undertaken.
- Transitional provisions (Article 58)
The administrative burden of resubmitting the application needs to be prevented.

The sector would highly appreciate that the European Commission thoroughly reflects upon these points and amends the draft Implementing Act (IA) on vehicle authorisation accordingly. We are concerned that without the suggested amendments the sector will face extra administrative burden and considerable costs – the effects sharply contradicting the targets of the EU rail acquis.

Yours Sincerely,



Libor Lochman
CER Executive Director



Philippe Citroën
UNIFE Director General



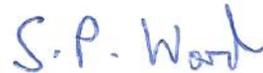
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