



European Rail  
Infrastructure  
Managers



European Commission  
Directorate-General  
Mobility and Transport  
Director-General  
Henrik Hololei  
De Motstraat 24-28  
B-1000 Brussel

Brussels, 27.04.2017

## **Implementation of the 4<sup>th</sup> Railway Package's Technical Pillar – Vehicle Authorisation**

Dear Mr. Hololei,

The European railway sector, the European Union Agency for Railways and the Member States have been intensively working on the practical arrangements for vehicle authorisation for a long time. The draft working document was handed over by the Agency to the European Commission and discussed among the aforesaid actors at the last EC Expert Group in Brussels on 12.04.2017.

The sector associations would like to draw your attention to a very critical point regarding the transitional provision. The current proposal of the EC foresees a potential gap of several months, where an applicant cannot yet apply to the Agency (option only available starting from 16 June 2019), but at the same time the National Safety Authorities (NSAs) would not start new application processes as they can no longer issue authorisation under the old 2008/57 Directive after 16 June 2019. Authorization processes last several months from the official request by the applicant to the NSAs. Such an option will generate uncertainties, costs and delays for projects planned in 2019-2020.

Therefore, in order to be constructive and ensure a timely implementation of the 4<sup>th</sup> Railway Package's Technical Pillar, CER, EIM, UNIFE, EPTTOLA and UIP submitted a position paper on the transitional provision and a proposal for text amendments on the implementing act for vehicle authorisation covering other sector concerns. Whilst these 13 amendments do not change the spirit of the existing Agency's draft, they are essential for implementing a sound approach to shape sound practical arrangements.

The sector focusses on the four crucial points: requirements capture, the pre-engagement baseline, the update of an issued vehicle type authorization as well as on the transitional regime for vehicles, vehicle types and the implications of running cross border traffic when different MS apply under different legislations.

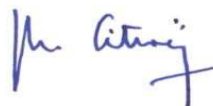
The sector associations believe that the text as proposed by the Agency needs to be amended. UNIFE and CER ask the European Commission to take these amendments into account in order to avoid that the future vehicle authorisation process becomes a burden for the sector.

The set-up of lean and transparent vehicle authorisation and safety certification processes are key for the success of the implementation of the 4<sup>th</sup> Railway Package's Technical Pillar. Amending the aforesaid description of the vehicle authorisation processes in the form of the implementing act would allow us achieving this commonly agreed goal.

Kind regards,



Libor Lochman  
CER Executive Director



Philippe Citroën  
UNIFE Director General



Gilles Peterhans  
UIP Secretary General



Monika Heiming  
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