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Brussels, 12<sup>th</sup> September 2017

Call to reconsider the timetable for TSI LOC&PAS and TSI WAG revisions  
2018-2020

Dear Keir,  
Dear Josef,

CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail would like to raise to your attention the concern of the railway sector over the proposed timeline for revisions of the TSIs LOC&PAS and WAG in coming years.

Upon receiving the latest information by the European Commission in the 'RISC79 Rolling Plan' and the European Union Agency for Railways in the 'Call for interest for ERA's working party for the TSI LOC&PAS and TSI WAG limited revision', the frequency of revisions in the next three years raises an urgent concern for the railway sector.

As proposed, the ERA working party for the TSI revisions would work in a two-step approach resulting in two separate proposals being made to the European Commission in December 2018 and December 2019, for amendments to be voted and published in 2019 and 2020 respectively. In the meantime, the EC has already received recommendations for the 2015 "limited revision" of the two same TSIs, which are due for RISC vote in January 2018 (REC 111-2015, 120-2015, 120-1 for



LOC&PAS and 117-2015 for WAG). This means that the sector will face three revisions of the LOC&PAS and WAG TSIs over a three years period in 2018, 2019 and 2020.

We believe that this new three-step approach goes beyond the two-step approach of the 2015 “limited revision” (in 2018) and the 4RP revision (in 2019) and have already raised our concerns about it verbally to both the EC and ERA. As such CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail now call on the European Commission and European Union Agency for Railways to urgently reconsider this timeline in order to not harm the sector and reduce the risks and additional costs that such frequent TSIs revisions will bring.

We would like to remind as well that every time a new version of a TSI is released the industry must make an assessment of the changes and the impact of the new version on running contracts or ongoing projects. Each revision results in assessment over validity of certificates and approvals by the NoBos. This is a costly exercise that can jeopardize projects and bids. With the new proposal, ongoing projects would need to make this assessment three times, possibly also resulting in three deviation requests per project over this period.

When considering changes to existing rolling stock, these changes must be assessed against the latest TSI in force. With frequent revisions as proposed there will be inevitable difficulties for applicants to deal with all the versions on the same project and difficulties for the NoBo to assess the changes and to draw the certificates.

In addition, the proposed timetable for the TSI revisions overlaps with the transition period of the interoperability directives and authorisation regimes. This transition is already expected to be a challenge for the sector and also for the authorising entities without further complication and uncertainty by frequent TSI revisions.

CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail call for a reduction in the number of revisions to mitigate the problems mentioned above. CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail recommend that, as a minimum, the 2015 “limited revision” be delayed further by one year and combined with the 2019 revision. This is being requested with the knowledge that the 2015 “limited revision” would bring with it important updates to the referenced standards appendices of the TSIs. However, the benefit of these updates is not worth the risk of instability due to three TSI revisions. CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail ask the EC and ERA to consider if these appendices can be updated already prior to 2019 without the need of a TSI revision, and we welcome a dialogue on how these should be updated in the future.



CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail would also support the work of the ERA WP to be accelerated to result in a single recommendation and TSI revision in 2019. If this is not possible we ask for an assessment to be undertaken by ERA and the working party so at least the critical technical topics be included in the 2019 revision and not held until 2020.

CER, UNIFE, EIM, UIP, EPTTOLA, FEDECRAIL, ERFA and NB-Rail hope that a practical solution can be found for this sensitive topic and look forward to your response.

Yours Sincerely,

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CER Executive Director

Philippe Citroën  
UNIFE Director General

Gilles Peterhans  
UIP Secretary General

Monika Heimig  
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