



## European Commission - Mobility and Transport

Mr Keir Fitch

Ms Michaela Strohschneider

Copy to:

**Railway Interoperability and Safety Committee (RISC) Members**

**European Union Agency for Railways (ERA) - Mr Josef Doppelbauer**

Brussels, 16 May 2024

### Consultation on the EC request to ERA regarding the revision of TSIs (draft v1.0)

Dear Keir,  
Dear Michaela,

AERRL, ALLRAIL, CER, EAL, EIM, FEDECRAIL, NB-Rail, UIP, UIRR, UITP and UNIFE appreciate the continued consultation of the railway sector stakeholders by the European Commission in shaping the next EC request to the European Union Agency for Railways for the future revisions of the Technical Specifications for Interoperability.

We welcome the objective of the European Commission in providing long term visibility and predictability with the multiannual approach shown in the draft request. Nonetheless, we must take note of the scale of the draft request with even more actions than the previous Digital Rail and Green Freight TSI request from January 2020. With the majority of items intended for delivery by 2027, the sector stakeholders question whether the ambition presented in the draft is deliverable in the timescale proposed, notably given the return of experience of the last revision, resources available and required ERJU or standardisation inputs. The sector stakeholders also question the benefit and impact of such an extensive TSI update in quick succession of the 2023 TSI Revision Package.

The sector stakeholders have previously called to focus on a few but important work items, primarily those coming from the Europe's Rail Joint Undertaking System Pillar work streams. We believe prioritisation must be given to the on-going enhancements being driven by the ERJU, namely **ETCS, operational rules harmonisation, FRMCS and DAC**. These topics are expected to contribute greatly to the increased performance, capacity, safety and digitalisation of the European railway system thereby supporting the modal shift to rail. Nonetheless, the development and implementation of these key items will still require significant coordinated efforts across the sector and Member States and must be accompanied by sound impact assessments and migration strategy. In addition, priority should be given to the actions aimed at **simplifying the TSI text**, its application and authorisation/certification processes for vehicles and infrastructure, contributing to the **reductions of costs and complexity of the system**.

Beyond these priorities, all other actions in the draft request need careful consideration regarding their urgency, benefit, appropriate harmonisation channel and impact once placed in the TSI. The TSIs must become as lean as possible in order to facilitate the certification and authorisation of rail vehicles and infrastructure in meeting the essential requirements and ensure the interoperability of the railway system of the European Union.

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We believe another extensive TSI revision package containing all items shown in the draft request for 2026/2027 shall be given more time. We would recommend in many cases the deadlines shown be set to a 2029 ERA recommendation and 2030 TSI Revision Package. Only a limited amendment of the relevant top-priorities identified above should be delivered by 2027-28. The TSI amendment related to FRMCS should be made available as soon as the specifications are delivered, expected by the end of 2026 - beginning 2027. In this way the sector will benefit from further stability and return of experience from the 2023 TSIs, as well more time for consideration of the parallel developments in the ERJU and standardisation domains.

As requested by 13 May 2024, we have individually provided our respective detailed comments on the draft TSI request. Nonetheless, we believe there is a common position to focus short-term efforts on the top priorities identified and the smooth transfer of outputs from the ERJU SP to the TSIs.

AERRL, ALLRAIL, CER, EAL, EIM, FEDECRAIL, NB-Rail, UIP, UIRR, UITP and UNIFE remain committed in supporting the European Commission and ERA on the long-term evolution of the TSIs and their contribution to the development of an efficient and competitive European railway system. We welcome the opportunity for further dialogue on the input provided to this consultation together with DG MOVE and Member States within the EC Expert Group meetings prior to the June RISC.

Yours sincerely,



Association of European Rail Rolling Stock Lessors (AERRL)



The Alliance of Passenger Rail New Entrants (ALLRAIL)



Community of European Railways and Infrastructures Companies (CER)



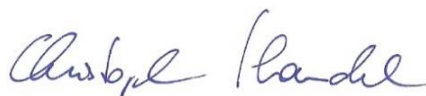
Association of ERTMS Accredited Laboratories (EAL)



European Infrastructure Managers (EIM)



European Federation of Museum & Tourist Railways (FEDECRAIL)



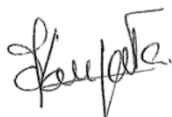
Notified Bodies Association (NB-Rail)



International Union of Private Wagons (UIP)



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The European Rail Supply Industry Association (UNIFE)