

# Return of Experience on the Implementation of the 4<sup>th</sup> Railway Package

## UNIFE Feedback – Current issues in Vehicle Authorisation Process

Convegno Aicq 2021, 18/11/2021



# Overview

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- ▶ **About UNIFE**
- ▶ **4<sup>th</sup> Railway Package implementation: general feedback on vehicle authorisation**
- ▶ **Critical issues experienced**
  - ▶ **Conformity to type authorisations**
  - ▶ **'Line to take' and 'Clarification Notes'**
  - ▶ **ERA registers and NNTRs**
- ▶ **Conclusion**

# About UNIFE

The only Association representing all business segments of the European Rail Supply Industry at EU and global level.



**System  
Integrators**



**Rolling Stock  
and Subsystems**



**Infrastructure  
and Energy**



**Signalling &  
Telecommunications**



**Railway  
Engineering**

# Our Members and Associate Members



# UNIFE Feedback on 4RP Authorisation

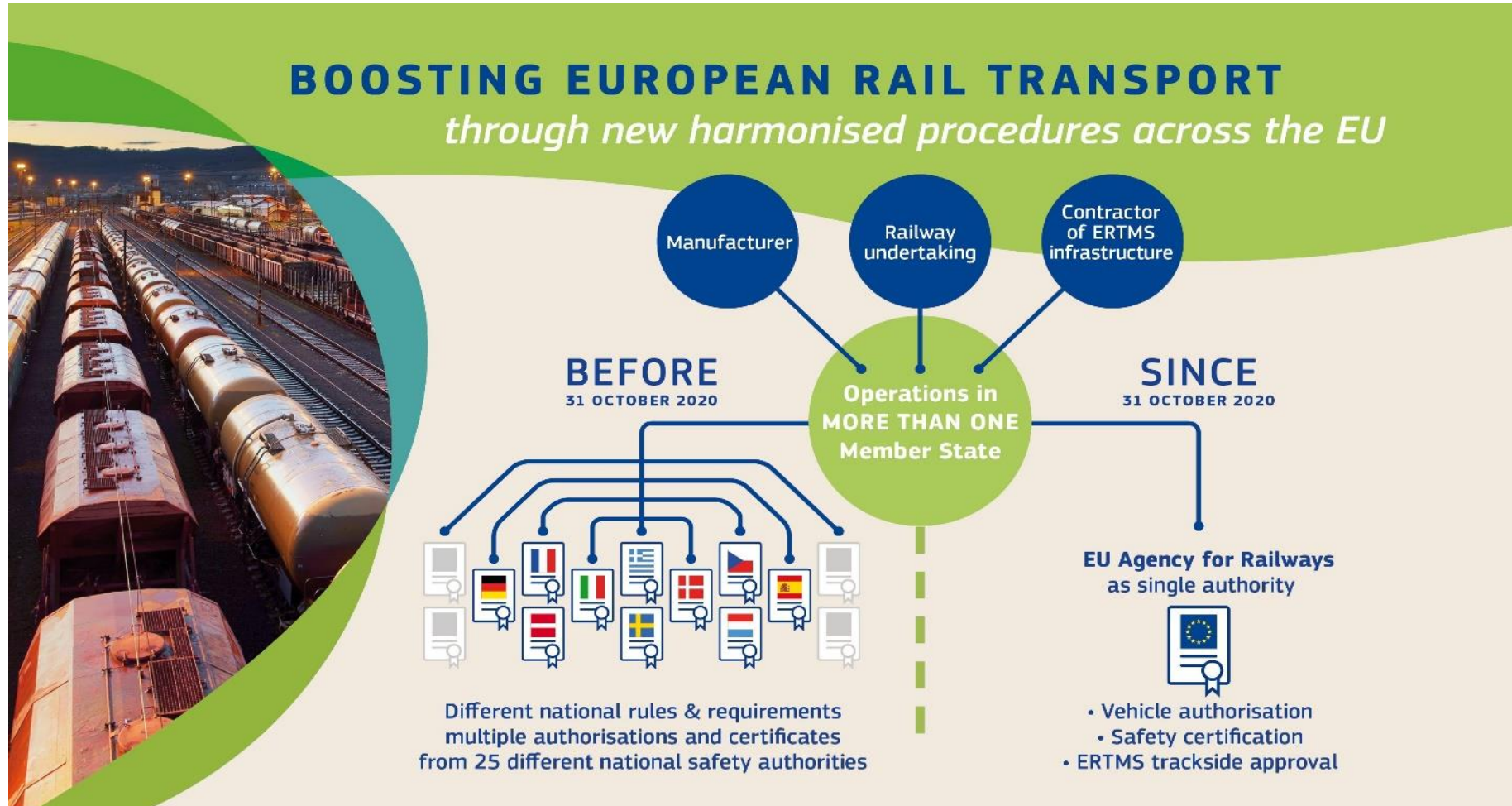


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# General Feedback

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- ▶ **UNIFE strongly supported the adoption of the Technical Pillar**
- ▶ However, today the industry has **not witnessed the 4RP objective of a 20% reduction** in time and cost but **rather a significant increase** in efforts and costs for VA.
- ▶ **UNIFE has continually provided detailed return of experience** to ERA and EC in several forums including the ERA Management Board's 4RP Steering Group and the European Commissions EC Expert Group on the 4RP Implementation.
- ▶ Still experiencing the **'learning curve'** in many Member States
- ▶ With over two years experience and all MSs involved for 1 year, now is the time to **review the processes and ensure the expected benefits materialise**

# General Feedback: Positive Experience

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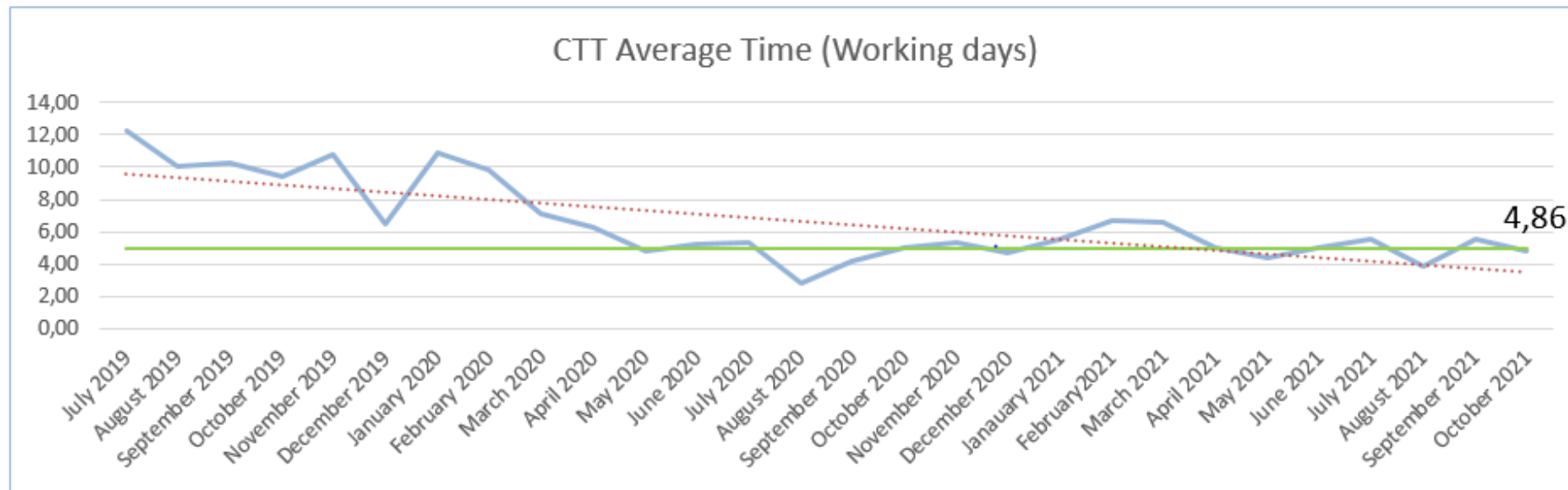
- ▶ Proactive and constructive engagement with ERA staff at VA project level and commitment to deadlines on ERA side.
- ▶ OSS as standardised single entry point
- ▶ Common structure for documentation and authorising entity checks (PA VA Annexes)
- ▶ Reduction of NNTRs pre-2020
- ▶ Efforts to reduce conformity to type authorisations timing since June 2019

# Issues faced and areas for improvement: Conformity to type authorisations

- ▶ **Conformity to Type authorisation** has become much longer and costlier under the 4RP than in many MSs under the 3RP



## Conformity to Type (CTT)





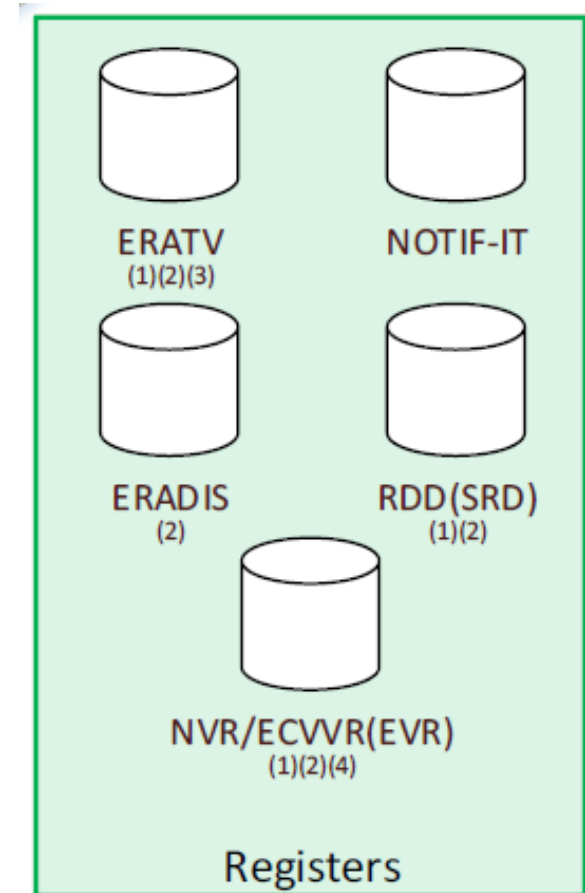
# Issues faced and areas for improvement: 'Line to take' and 'Clarification notes'

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- ▶ Extensive ERA guidelines and additional 'line to take' or 'clarification notes' leading to sudden **short-notice changes in practical projects** due to the interpretation of ERA of the PA VA or TSIs.
- ▶ UNIFE has proposed a forum be established to solve practical issues at a fast pace, **together with the sector** before further guidance or interpretations are published which impact on-going projects.
- ▶ A **pragmatic holistic view and practical approach** based on experience is needed.

# Issues faced and areas for improvement: Registers and IT tools

- ▶ Further **development and interconnection** is needed between the related **ERA IT tools** to **reduce the duplication** of documentation, certificates and efforts



(1) Directive (EU) 2016/797

(2) Regulation (EU) 2016/796

(3) Regulation (EU) 2019/776 ERATV

(4) Decision (EU) 2018/1614 EVR

# Issues faced and areas for improvement: NNTRs

- ▶ UNIFE calls for the finalisation of the long-overdue clean-up programme for the Notified National Technical Rules for vehicle authorisation.

MS	Opinion sent out	Publication in RDD by MS	Agency status updated in RDD
Austria (Draft NRs)	For draft national rules in RDD, OPI-2021-3 was sent to MS. The MS's reply to TO OPI-2021-3 received. Assessment ongoing for rules originating from Health and Safety legislation	Partly done. H and S rules not published	Done
Belgium	Sent to MS, discussion with EC ongoing :1 NR revised by BE, 1 NR ongoing	Done	Done
Bulgaria	NA	Done	Done
Croatia	NA	Ongoing	Ongoing
Czech Republic	Assessment postponed	Ongoing	Ongoing
Channel Tunnel	Sent to MS, CT agreed with 3NRs (removed from RDD): 1NR ongoing	Done	Done
Denmark	NA	Done	Done
Estonia	Sent to MS, EE agree with TO - Reply to EC ongoing	Done	Done
Finland	NA	Done	Done
France	Sent to MS. The MS's reply to TO received.	Done	Done
Germany	Assessment Ongoing	Done	Ongoing
Greece	NA	Done	Done
Hungary	Sent to MS, waiting feedback from MS	RDD updated, pending publication by MS	Ongoing
Ireland	NA	Done	Done
Italy	Assessment Ongoing	Done	Ongoing
Latvia	Sent to MS, LV agreed and corrected the concerned NRs	Done	Done
Lithuania	NA	Done	Done
Luxembourg	Sent to MS. LU agreed to repeal remaining 1NR	Done	Done
Netherlands	Assesment postponed	Done	Ongoing
Norway	Sent to MS, waiting feedback from MS	Done	Done
Poland	Sent to MS, PL agreed and corrected the concerned NRs	Done	Done
Portugal	Sent to MS, PT agreed and corrected the concerned NRs	Done	Done
Romania	NA	Done	Done
Slovakia	Sent to MS, reply received, waiting feedback from MS	Done	Done
Slovenia (Draft NRs)	Sent to MS, waiting feedback from MS	Ongoing	Ongoing
Spain	NA	Done	Done
Sweden (Draft NRs)	NA	Done	Done
Switzerland	Sent to MS. The MS's reply to TO received.	Done	Done
UK-Northern Ireland	No rules from MS	No rules from MS	No rules from MS

# Conclusion:

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The European Rail Supply Industry is fully supportive of the Fourth Railway Package Technical Pillar.

However, action is needed to address the current processes which have been established in order to **come back to the original intention and spirit of the Fourth Railway Package:**

- Achieving 20% reduction in time and costs
- Trust in the third-party assessments and certificates
- Trust in the responsibilities of the manufacturers and declarations



# Thank you!

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 UNIFE - The European Rail  
Supply Industry Association