



Il ruolo dell'industria ferroviaria europea per la sostenibilità e digitalizzazione

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Firenze - AICQ Settore Trasporto su Rotaia

9:30 – 9:50 – 12/10/2023

UNIFE in a few words

- ▶ UNIFE is the European Association of **train-builders and rail equipment suppliers**.
- ▶ A unique network of **118 member companies from all over Europe and of all sizes** (1/3 of SMEs) and **12 National Associations** (e.g. ASSIFER).
- ▶ Based in Brussels, UNIFE is **the European Rail Supply Industry's voice on several topics**, from standards and regulation to sustainability, financing and trade.
- ▶ 119 **IRIS** (International Railway Industry Standard) certifications in Italy



UNIFE Members

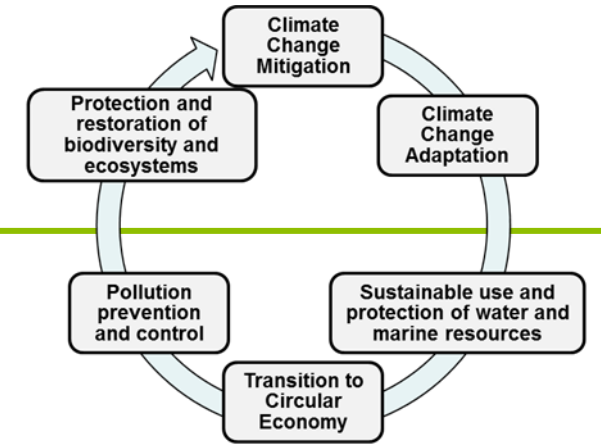
Associate Members

Make European transport more sustainable



- ▶ Since 2019, the EU has supported an ambitious *European Green Deal* programme to become the world's first “**carbon-neutral continent**” by 2050.
- ▶ All economic sectors and industries must massively reduce their **carbon footprint**.
- ▶ Yet, there is a political debate about whether to expand the scope of the European environmental agenda, e.g. the ban on some chemical substances, or to implement what is already voted.
- ▶ But stopping or delaying the European environmental plan can threaten the rail sector.
- ▶ Members of the **UNIFE Sustainable Transport Committee** and its technical subgroups have been closely following many legislative proposals.

What is the EU Taxonomy?



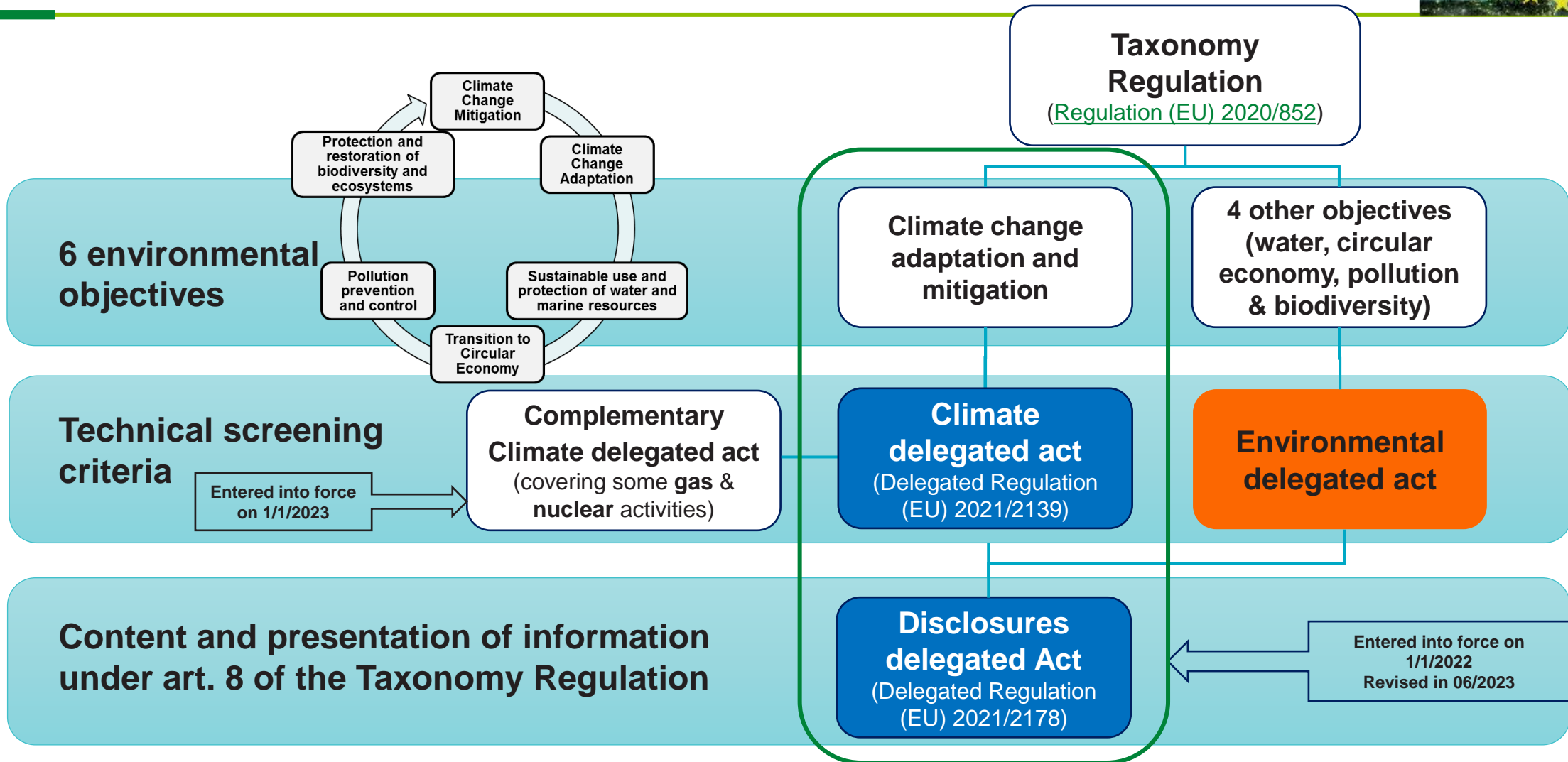
What is the EU Taxonomy?

- ▶ The EU Taxonomy is a European initiative to establish a list of **environmentally sustainable economic activities**.
- ▶ All sectors and industries are considered.

What is the purpose of setting an EU Taxonomy?

- ▶ Direct public and private funding towards environmentally sustainable economic activities.
- ▶ Drive companies, institutions and businesses towards sustainable choices.
- ▶ Provide transparency to investors in order to mitigate greenwashing.

Taxonomy – where do we stand?



Two new delegated acts published in June 2023

Climate change
adaptation and
mitigation

A text amending

**Climate
delegated act**

(Delegated Regulation
(EU) 2021/2139)

**Disclosures
delegated Act**

(Delegated Regulation
(EU) 2021/2178)

UNIFE's feedback:

- ▶ **Single path principle** (avoid contradictions & duplication)
- ▶ **Eligibility** (rail components)
- ▶ **Alignment** (DNSH criteria)
- ▶ **Appendix C** (essential use concept)
- ▶ **Level playing field** (inclusion of the aviation sector)

Four other objectives
(water, circular economy,
pollution & biodiversity)

A text tackling the remaining four objectives

**Environmental
delegated act**

UNIFE's feedback?

NO

Joint statement on the revised *Taxonomy Delegated Acts*



European rail sector's joint statement on the revised *Taxonomy Delegated Acts*

This Statement has been jointly prepared by the following associations: Alliance of Passenger Rail New Entrants (ALLRAIL), Community of the European Railways and Infrastructure Companies (CER), European Rail Infrastructure Managers (EIM), European Rail Freight Association (ERFA), International Union of Wagon Keepers (UIP) and European Rail Supply Industry (UNIFE), hereinafter "the European rail sector".

Brussels, May 2023

With the present joint statement, the European rail sector aims to highlight its common priorities on the European Commission's proposal for amending the *Taxonomy Climate & Disclosures Delegated Acts*.

- Rail is the greenest mode of mass transportation and freight: achieving the climate-neutrality ambition by 2050 requires decarbonising the transport sector. Rail accounts for less than 0.5% of transport-related greenhouse gas emissions¹ and has been steadily reducing emissions while increasing energy efficiency. Rail is thus essential to contribute to a cleaner transport paradigm.
- Our sector's environmental assets and energy efficiency are vital to transitioning to a low-carbon economy and reducing the EU's dependency on imported fossil fuels. Therefore, we consider that rail-related economic activities for infrastructure and operations, as well as for the manufacture of products and technologies, should all be considered compliant with the minimum criteria to be considered environmentally sustainable.
- In order to channel investments towards greener projects and financing solutions, the EU Taxonomy's regulatory framework must enable fair, verifiable and reliable comparability between the different economic activities and modes of transport.

We, the European rail sector, reaffirm our readiness to work with EU Institutions to make the EU Taxonomy successful. Our main recommendations on the European Commission's proposal to amend the *Delegated Regulation (EU) 2021/2139* are in ANNEX I on the next page.

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Gilles Peterhans
UIP Secretary General

Philippe Citroën
UNIFE Director General

¹ Distribution of greenhouse gas emissions from transportation in the European Union (EU-27) in 2020 by mode - <https://www.statista.com/statistics/1237597/transport-greenhouse-gas-emissions-by-mode-eu/>



ABOUT US

MEMBERSHIP

ACTIVITIES

NEWS & RESOURCES

EVENTS

UNIFE IN THE PRESS

01 JUN 2023

European rail sector's joint statement on the revised *Taxonomy Delegated Acts*

On Thursday, 1 June 2023, the European rail sector co-signed a joint statement in response to the European Commission's proposal in amending the *Taxonomy Climate & Disclosures Delegated Acts*. The joint statement was sent to relevant Commissioners managing the EU Taxonomy.

The statement has been jointly prepared by the following associations: Alliance of Passenger Rail New Entrants (ALLRAIL), Community of the European Railways and Infrastructure Companies (CER), European Rail Infrastructure Managers (EIM), European Rail Freight Association (ERFA), International Union of Wagon Keepers (UIP) and European Rail Supply Industry (UNIFE).

In this joint statement, the European rail sector suggests major improvements to the European Commission's proposal, by focusing on the following crucial points:

► Eligibility of rail components: need for a broader definition

It is vital that the rail infrastructure supply industry can report their infrastructure components in one activity and to avoid splitting into two activities. All constituents listed in the TSIs (Technical Specifications for Interoperability) should be in the scope of the EU Taxonomy.



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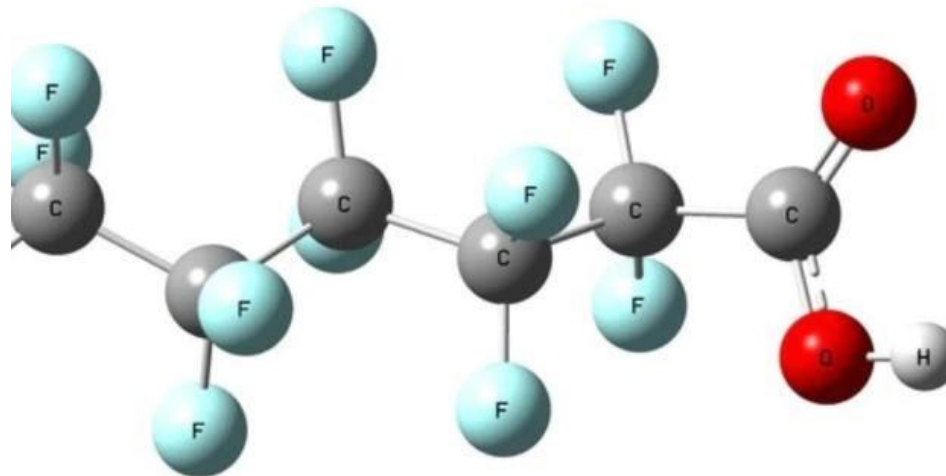
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We, the European rail sector, reaffirm our readiness to work with EU institutions to make the EU Taxonomy successful. Our main recommendations on the European Commission's proposal to amend the *Delegated Regulation (EU) 2021/2139* are in ANNEX I on the next page.


New PFAS restriction proposal (Per- and polyfluoroalkyl substances)

- ▶ PFAS are a family of artificial chemicals with 12 000 different substances.
- ▶ PFAS are used in many different sectors, including the rail supply industry (entire value chain).
- ▶ PFAS are crucial for the rail supply industry.
- ▶ Releases of PFAS are considered health and environmental risks.
- ▶ High-impact media coverage: “the forever chemicals”.



PFAS restriction proposal

- ▶ REACH regulation procedure: **total PFAS ban** 18 months after the entry into force
- ▶ Manufacturing and placing products on the EU market containing PFAS will no longer be allowed (\approx 2026-2027).
 - ▶ Possible derogations but time-limited (max.15 years \approx 2039), without extension or renewal.



Ban on manufacture, use and placing on the market

- As substances on their own
- As a constituent
- A mixture
- An article

≥ 25 ppb for any PFASs
≥ 250 ppb for sum of PFASs
≥ 50 ppm * for PFASs

* If total fluorine exceeds 50 mg F/kg the manufacturer, importer or downstream user shall upon request provide to the enforcement authorities a proof for the fluorine measured as content of either PFASs or non-PFASs.

PFAS restriction proposal – derogations

- ▶ The basis for derogation after the entry into force (EIF):

18 months after EiF	18 months + 5 years	18 months + 12 years
Alternatives exist	Sufficiently strong evidence that technically and economically feasible alternatives are in development	Sufficiently strong evidence that technically and economically feasible alternatives are not available in near future (R&D)
No or not sufficiently strong evidence that alternatives are not available	Sufficiently strong evidence that alternatives exist, but not available in sufficient quantities and/or cannot be implemented by company before transition period ends	Certification or regulatory approval of PFAS-free alternatives cannot be achieved within a 5-year derogation period

Your companies and suppliers should map all the PFAS you might use.

The fact sheet on PFAS to the UNIFE membership



PFAS restriction proposal: a key concern for the rail industry

PFAS, a large class of thousands of synthetic chemicals

Per- and poly-fluoroalkyl substances (PFAS)¹ are a family of artificial chemicals with 12 000 different substances. PTFE (Polytetrafluoroethylene) is one of the best-known and widely applied PFAS. The commonly known brand name of PTFE-based composition is *Teflon*®. Similarly, *Viton*® is the brand name of FKM (fluoro-rubber).

PFAS are used in many products and have various valuable properties: lubricant, water and dirt repellence, durability under extreme conditions (temperature, pressure, radiation, chemicals), electrical and thermal insulation, refrigerants etc.

However, **PFAS have a high persistence associated with potential environmental and human health concerns**, thus their prevalence in high-impact media coverage, which terms them as “*the forever chemicals*”.

ECHA and the PFAS restriction proposal

For this reason, the **European Chemicals Agency (ECHA)**, backed by the national authorities of Germany, Denmark, the Netherlands, Norway and Sweden, published [a PFAS restriction proposal](#)² on 7 February 2023.

The proposed restriction on PFAS is set to be one of the largest ever on chemical substances in the European Union. As a result, manufacturing and placing products on the EU market containing **PFAS will no longer be permitted by 2026 or 2027**. After this, **possible derogations might exist for a use-specific and a time-limited transition period (maximum until 2039) without extension or renewal**. This means work on alternatives by industry is necessary. In addition, particular uses have time-unlimited derogations.³

Some PFASs are already restricted in the EU (PFOS, PFOA, C9-C14 PFCAs). This proposal does not affect these existing restrictions and ongoing decision-making for PFHxS and PFHxA restrictions.

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¹ **The PFAS definition used by the OECD:** “Fluorinated substances that contain at least one fully fluorinated methyl or methylene carbon atom (without any H/Cl/Br/I atom attached to it), any chemical with at least a perfluorinated methyl group (-CF₃) or a perfluorinated methylene group (-CF₂-) is a PFAS.” The substances in the ECHA restriction scope are also defined by their chemical structure.

² <https://echa.europa.eu/restrictions-under-consideration/-/substance-rev/72301/term>

³ Where to find ECHA provisional derogations? **Annex XV reporting** – Draft entry text (pages 4 to 8; column 2, par. 4, 5 and 6) – Table 9 – Annex E – More detailed information peruse sector.

An internal UNIFE webinar on
*“PFAS restriction proposal:
a key concern for the rail industry”*

PFAS restriction proposal (Per- and polyfluoroalkyl substances)

- ▶ UNIFE and partner organisations are asking for **derogations and exemptions (F-gases)**:
 - ▶ UNIFE prepared a sectorial contribution (68 pages) endorsed by 9 rail organisations and submitted on 22/09
- ▶ The UNIFE STC prepared a detailed mapping of the PFAS used by the railway sector, a list of alternatives (when possible), and a table listing derogations for essential PFAS applications
- ▶ **Actions planned:**
 - ▶ Monitor the next move of the European Chemicals Agency (ECHA)
 - ▶ Contact decision-makers and improve the Commission's upcoming proposal

The following table summarises the derogation requests Exemption*: as already covered by the revision of the F-gases regulation

Main application as defined in Annex XV report proposal	Sub-uses as described in Annex XV report proposal	Examples of use	Request for confirmation of the proposed derogation as in the Annex XV report proposal (plus a review clause)	Request for derogations for missing uses and/or no possibility of modifying the existing application (plus a review clause)
Applications of fluorinated gases (F-gas)	Air conditioning and heat pumps	New HVAC	Missing use	Exemption*
		Existing HVAC	5.i (13.5 years after EiT)	Exemption*
		Existing HVAC with mechanical and hydraulic compressors	5.p (6.5 years after EiT)	Exemption*
	Fire suppressants	Automatic fire system	5.m (13.5 years after EiT)	Exemption*
	Refrigeration	Catering Battery Monitoring Systems	Missing use	Exemption*
	Climatic chamber	5.g (13.5 years after EiT)	Exemption*	
Electronics & semiconductors	Coating, solvents, cleaning		Missing use	13.5 years after EiT
	Electronic components		Missing use	13.5 years after EiT
	Semiconductors		5.ee (13.5 years after EiT)	-
	Wires & cables	Motor Sheath - Heat shrinkable	Missing use	13.5 years after EiT
Energy sector	Batteries	Batteries	Missing use	13.5 years after EiT
	Proton exchange membrane (PEM) fuel cells	Fuel cells	6.e (6.5 years after EiT)	13.5 years after EiT as a minimum
Lubricants	Greases	Grease	5.s (13.5 years after EiT)	-
	Low viscosity lubricants	Oil	5.s (13.5 years after EiT)	-
Transport	Coating and finishings	Balljoint	6.o (13.5 years after EiT)	-
	Electrical engineering and information technology		6.o (13.5 years after EiT)	-
	Sliding and guiding elements	Sliding part - segment - guide - bearing	5.a (6.5 years after EiT)	13.5 years after EiT
			6.o (13.5 years after EiT)	
	Safety equipment (incl. fire prevention & protection)		6.o (13.5 years after EiT)	-
	Sealing applications	Transformer - bogie - motor - brake	6.o (13.5 years after EiT)	-
		Valves of tank wagons	Missing use	13.5 years after EiT as a minimum
TULAC (Textile, upholstery, leather, apparel and carpets)	Technical textiles	Valves, venting, membrane	5.e (6.5 years after EiT)	-

Digitalisation and the European rail sector

- ▶ EU Data Act (see next slide)
- ▶ European Mobility Dataspace strategy (EMDS)
- ▶ The upcoming *Multimodal Digital Mobility Services* (MDMS), a digital platforms providing information on traffic and travel data, including making of reservations, bookings payments or the issuing of tickets.
- ▶ EU artificial intelligence (AI) Act
- ▶ Cyber Resilience Act (CRA)

EU Data Act: Final approval by the end of 2023



- ▶ The EU Data Act will govern how firms use, own, and share data generated by connected devices, including rolling stock.
- ▶ On 23/06, the Council and the Parliament agreed to the final compromise text – final vote expected by the end of the year. Yet, some points are unclear and “guidelines” are expected.
- ▶ UNIFE listed several areas of concern for European rail suppliers with this initial proposal, followed by what UNIFE and its partners and allies obtained:

Key points of concern for UNIFE		Results
Misleading conception of data control	→	Corrected: Manufactures only need to share data they have access to
Exclusion of processed data	→	Corrected: Only raw data is in scope, but definitions continue to be blurry
Protection of trade secrets and IP	→	Corrected: Possibilities of exclusion if product safety or trade secrets are affected
Protections of current contracts	→	Not solved: Regulation also applies to existing contracts once its entry into force

Any questions?

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See you soon

THANK YOU



 @UNIFE

 UNIFE - The European Rail
Supply Industry Association

www.unife.org