The Group of Representative Bodies (GRB)

The Sector Forum Rail (SFR)

Sector Vision for the Future of Reference Standards

Brussels, 13th July 2018

Scope of position paper

This position paper sets out the railway sector's vision for how referenced standards within the Technical Specifications for Interoperability (TSIs) should be managed in the future. The vision has been established together by the Group of Representative Bodies (GRB) and the CEN/CENELEC/ETSI Sector Forum Rail (SFR).

The proposal described in this paper aims to solve challenges faced in the sector today when applying TSIs and European standards during the conformity assessment process. The aim of the proposal is to introduce a process which allows the sector to benefit from regulatory stability while at the same time being able to apply the state-of-the-art standards.

The GRB and SFR asks the European Commission (EC) and the European Union Agency for Railways (ERA) to consider this position paper and to reflect on how the future regulatory framework for the railways can be adapted to work better for the sector and for society.

1. Background

The TSIs include referenced standards to comply with certain requirements, often listed within an appendix, e.g Appendix J for the TSI LOC&PAS. Currently the appendices set out mandatory standards or their provisions by referencing a dated version of each standard. Once referenced in a TSI the application of these standards (or part of) becomes mandatory, regardless of whether an updated version of the standard has since been published.

Appendix J

Technical specifications referred to in this TSI

J.1 **Standards or normative documents**

	TSI		Normative document	
Index No	Characteristics to be assessed	Point	Document No	Mandatory points
1	Inner coupling for articulated units	4.2.2.2.2	EN 12663-1:2010	6.5.3, 6.7.5
2	End coupling — manual UIC type — pipes interface	4.2.2.2.3	EN 15807:2012	relevant cl. (1)
3	End coupling — manual UIC type — end cocks	4.2.2.2.3	EN 14601:2005 +A1:2010	relevant cl. (1)
4	End coupling — manual UIC type — lateral location of brake pipe and cocks	4.2.2.2.3	UIC 648 Sept 2001	relevant cl. (1)

January 2015 saw a synchronised entry into force of the majority of updated TSIs, with a few exceptions. Since then several of these have been subject to 'Limited Revisions' by ERA working parties to close open points. However, with the introduction of the Fourth Railway Package (4RP) the publication of these limited revisions have been delayed. ERA Working Parties are currently active on many of the TSIs for updates required by the 4RP, many of them will be published in 2019, according to the ERA's latest schedule.

In late 2017 the Group of Representative Bodies recommended the 'limited revisions' which are currently ready be further postponed to coincide with the 2019 publications, rather than published in 2018. The position being that frequent TSI amendments in 2018 and 2019 would result in significant challenges and costs for on-going project management. However, an acknowledged consequence of this was a further delay to any update to the referenced standards appendices.

This situation highlights the apparent conflict between requiring stability of the TSIs with a limited number of revisions to allow certainty for projects, versus requiring a timely update of the referenced standards appendices in order to benefit from new processes, state-of-the-art standards, error corrections etc.

Stability of TSIs and the applicable rules for vehicle projects on one side is crucial for a competitive industry. When changes occur to the applicable TSIs the manufacturers and the Notified Bodies (NoBos)

must review and compare the changes in detail and assess their applicability for on-going projects and the validity of assessments already performed. It must be demonstrated that the changed requirements are either already met or not applicable due to transitional rules or derogation. These tasks take considerable effort and cost, especially for projects which span several years and where the manufacturer must ensure the agreed project strategy, timelines and budget with a customer are met. Therefore, frequent changes in the TSIs and applicable rules introduces significant risk to existing projects and the costs of frequent changes may outweigh the benefits intended.

On the other side, the use of updated standards which introduce state-of-the-art processes can result in significant savings in terms of effort and cost for manufacturers when demonstrating compliance to the TSIs and applicable rules (for example, the use of simulation instead of physical testing). Especially for new projects there is a desire to use the latest available standards, however the application of the previous versions may be mandatory due to their reference in a TSI. In practice today, some projects do manage to apply the latest version rather than the version mandated in the TSI by demonstrating to the NoBo that the requirements of the previous version are met and that there are no implications on the safety level of the system. However, this is not consistently applied.

2. Problem Statement

As a result of the practice of referencing a dated version of the standards, and the recent TSIs not being updated within 4 years since publication (even if beneficial for project stability), there are growing examples of where new or updated standards have been published and made available, but the benefits cannot be utilised due to the mandatory application of the older versions of the standards.

In the future the GRB and SFR would like to see even more stability of the TSIs than previously experienced. Therefore, this conflict of TSI stability versus use of updated referenced standards will become even more apparent if a solution is not found.

3. Recognised Problem

The Commission Delegated Decision (EU) 2017/1474 'of 8 June 2017 supplementing Directive (EU) 2016/797 of the European Parliament and of the Council with regard to specific objectives for the drafting, adoption and review of technical specifications for interoperability' recognises the need for a solution to the problem described in this paper.

Recital 11: "In order to allow TSIs to keep up with developments in standards and other technical documents, TSIs should integrate references to those documents in a way which makes it possible to update them in a timely manner while providing for the necessary transitions between standards or between versions of standards."

Article 3 Common specific objectives: "5. The TSIs shall, where appropriate, include provisions which: (f) integrate references to standards and to other technical documents evolving regularly in a way which allows their updating in a timely manner"

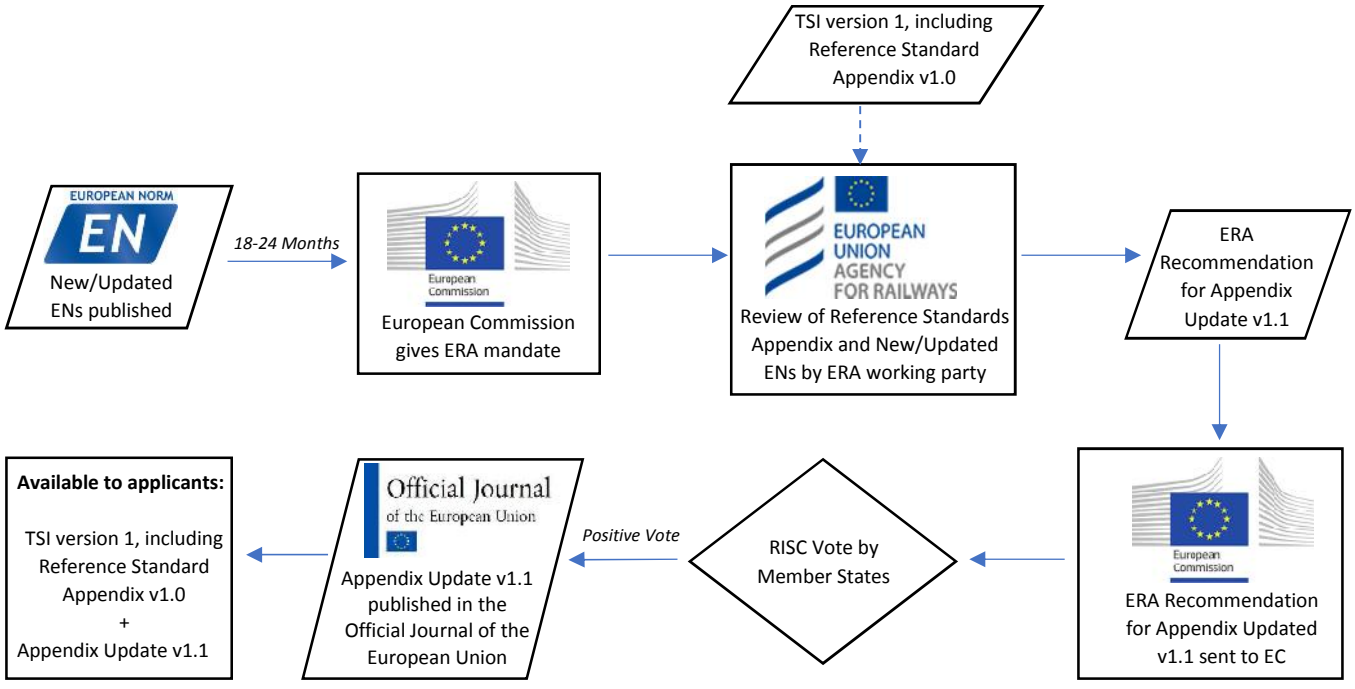
This position paper aims to support the EC and ERA by proposing how the railway sector sees this issue being solved appropriately.

4. Proposal

In the future the GRB and SFR would like to see even more stability of the TSIs than previously experienced. There should be a more consistent period between subsequent TSI revisions (for example at least 7 years for LOC&PAS TSI), when deemed necessary by the EC and/or ERA, in consultation with the respective ERA working parties which are kept active for this purpose.

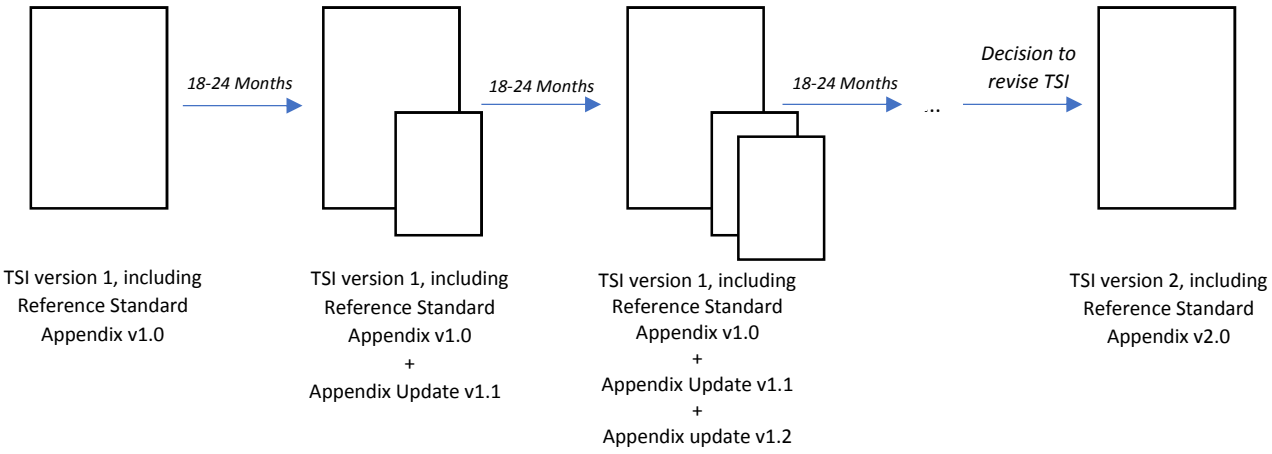
In order to benefit from on-going developments in standardisation, the GRB and SFR propose a method where updates to the referenced standards appendices are made available by the EC every 18-24 Months. As a result, it becomes the applicant's choice whether to apply the older or new version of the standard as both would be referenced. This is beneficial compared to the situation today where only the old version is referenced and therefore must be used.

These appendix updates need to be developed and checked in detail by the respective ERA working parties to ensure an approved new or updated standard does not negatively impact the performance, safety and / or interoperability of the railway system. The working party would also check that the use of the new or updated standard will have no negative impacts on interfaces with other applicable standards. The updated appendix would then become an accompanying document to the applicable TSI after receiving a positive vote by the Railway Interoperability and Safety Committee (RISC).



Between TSI revisions, while one or more appendix update exists, the applicant will have a choice of which version of the referenced standards to use, considering any conditions of use set out by the ERA working party. This will eliminate the need for detailed discussions with the NoBo on the selection and a potential of different answers.

Once the TSI itself is updated, the reference standard appendix published in this revision of the TSI again becomes the single list applicable (with the standard transitional provisions).



The option to either choose a more up to date version of the referenced standard, or apply the version originally referenced in the TSI appendix is essential to ensure the competitiveness of the railway sector. This will give the necessary stability to existing vehicle types and projects to benefit from simpler and quicker authorisations and ensure economies of scale can be achieved by continuing to apply the standards originally applicable. It will also allow new projects and new vehicle types the chance to benefit from the latest and most up to date versions of the standards, thereby facilitating the associated benefits in terms of safety and cost to be realised sooner.