

Position Paper

Brussels, 16 october 2026

Trackside Approval Process: Ensuring interoperability through a more efficient and optimized framework.

Call for a more efficient and predictable framework

Executive Summary

CER welcomes the European Union Agency for Railways' (ERA) commitment to supporting the harmonised implementation of the European Rail Traffic Management System (ERTMS) and strengthening railway interoperability across Europe through the ERTMS Trackside Approval (TA) process.

Since its introduction under the Fourth Railway Package, the Trackside Approval process has played an important role in ensuring the consistent deployment of ERTMS trackside solutions across the European railway network. However, experience gained by applicants over recent years has highlighted several operational challenges, including lengthy approval timelines, significant administrative and resource requirements, considerable effort in providing evidence, and constantly increasing ERA fees, which are often difficult to anticipate at the procurement stage.

In this context, CER welcomes any efforts by ERA to review and improve the current process. The sector supports the development of a more efficient, transparent and optimized framework that continues to fulfil the interoperability objectives underpinning the Trackside Approval while ensuring greater proportionality and scalability in its implementation. Such improvements will be particularly important in view of the forthcoming acceleration of ERTMS deployment and the future introduction of the Future Railway Mobile Communication System (FRMCS) across Europe.

Key takeaways:

- The current TA process can result in long running times affecting the planning and delivery of ERTMS deployment projects.
- Applicants may face substantial administrative, technical, and financial burdens in responding to evidence requests and application issues.
- A stable and structured set of technical requirements, applicable from the procurement phase onwards, could contribute to a more efficient and consistent approval process.

Further simplification of the process will be important to support future large-scale ERTMS deployment and the implementation of FRMCS across the European railway system.

1. Introduction

Since the technical pillar of the 4th Railway Package entered into force ten years ago, the European Union Agency for Railways (ERA) has made a significant contribution to the interoperability of the European railway system by issuing safety certificates, authorising vehicles and approving ERTMS trackside solutions. Established under Directive (EU) 2016/797, this regulatory framework aims to promote the harmonised implementation of ERTMS across the European Union and facilitate the development of the Single European Railway Area.

Within this framework, the ERTMS Trackside Approval (TA) process allows ERA to assess whether technical solutions for ETCS, RMR and ATO trackside equipment comply with the subsystem CCS, thereby supporting their interoperable deployment across the European railway network. The TA process currently comprises an initial engagement phase, a submission and completeness verification phase, and an assessment and decision phase.

CER fully supports the objective of interoperability and recognises the important role of ERA in achieving it. At the same time, experience gained from numerous applications in recent years has highlighted significant shortcomings in the implementation of the current TA process. Infrastructure managers and other applicants have repeatedly reported substantial delays, high administrative workloads, rising costs and requests for information regarding application issues that often conflict with the project implementation timeline. Sector representatives have raised these concerns on several occasions, notably in joint correspondence addressed to the ERA in 2024 and 2026, and during the ERTMS conference.

Against this background, the railway sector considers it timely to review the practical implementation of the TA process. The objective should not be to alter the fundamental role of the process in safeguarding interoperability, but to ensure that its implementation is proportionate, predictable, transparent and better aligned with the realities of ERTMS-projects. CER therefore welcomes ERA's willingness, demonstrated in 2026, to examine the concerns raised by the sector and to engage with stakeholders on possible improvements. This position paper aims to contribute constructively to this process by setting out the main challenges encountered by applicants and proposing principles for a more efficient, transparent and future-proof Trackside Approval framework.

2. Challenges of the current Trackside Approval (TA) process

2.1. Significant delays and growing resource burden

The principal concern expressed by applicants relates to the duration of the TA process. Evidence gathered from infrastructure managers indicates that some applications have remained open for many years, while others have experienced delays of several months compared with the timelines initially agreed with ERA. Feedback collected during workshops with applicants indicated that a number of ongoing applications had already been in progress for between 28 and 54 months.

Such prolonged timelines have direct implications for project planning, resource allocation and investment decisions. As TA is a prerequisite for subsequent authorisation activities, extended assessment periods create considerable uncertainty for infrastructure managers and increase the risks associated with ERTMS deployment programmes.

2.2. Excessive administrative burden and costs

Applicants consistently report that the administrative effort required to respond to questions and application issue requests throughout the TA process has increased significantly. According to experience gathered from several infrastructure managers, between 600 and 1,000 expert hours may be required solely to address ERA requests and successive clarification rounds for a single project. This represents a substantial additional workload beyond the resources initially foreseen for the approval process.

This burden falls primarily on highly specialised signalling experts whose expertise is equally required for the design, implementation and commissioning of ERTMS systems. In this respect, the administrative burden associated with TA has implications not only for individual applicants but also for the overall capacity of the sector to implement ERTMS projects.

The financial impact is similarly significant. Examples reported by applicants indicate that direct ERA fees can range from approximately €9,000 to €45,000 per project, in addition to substantial costs associated with consultants and the mobilisation of internal resources. In some cases, applicants have reported additional expenditure exceeding €70,000 for a single project. It should also be noted that the ERA fees have increased by more than 100% since the start of the TA procedures.

The increasing number of issues requiring assessment also contributes to this burden. The evolution of the Functions and Issues (F+I) list has resulted in a growing number of interoperability issues to be addressed by applicants. According to feedback collected from infrastructure managers, a typical ETCS Level 2 project may now require responses to approximately 75 to 80 issues, compared with around 55 to 60 previously. This increase adds further complexity to the assessment process and reinforces the need to ensure that the scope and depth of the information requested remain proportionate to the objective pursued and the situation at the start of an ERTMS-project.

2.3. Difficulties in obtaining evidence

A recurring issue concerns requests for reference documentation that are not available during the phase in which TA is intended to be performed.

Directive (EU) 2016/797 places particular emphasis on the tendering phase. Nevertheless, applicants report that a substantial proportion of the reference documentation requested by ERA can only be obtained much later in the project evolution, often after contracts have been awarded and detailed design activities are underway. Applicants have repeatedly highlighted this gap between the legal framework and ERA's actual practices.

Examples include detailed supplier documentation around engineering directives and technical components, test results and technical compatibility evidence that are generally produced only towards the end of project implementation.

Consequently, infrastructure managers (IMs) are frequently required to request additional reference documentation from suppliers outside the original contractual scope, generating additional workload, further delays, contractual amendments and additional costs.

2.4. Misalignment with the legal framework

Applicants also question whether the current TA process comply with the fundamental considerations established by Article 19 of Directive (EU) 2016/797.

The sector observes that certain requirements incorporated into the assessment process extend beyond what applicants can reasonably demonstrate at the tender stage. More broadly, stakeholders have identified inconsistencies between the legal concept of TA and the reference documentation actually requested during assessments by ERA.

In addition, several questions included in the Functions list and Issues log (F+I) appear to address broader technical design matters rather than interoperability risks. Furthermore, the F+I shows that many issues are queried there that are also resolved in the hazard protocol according to subset 113 during project implementation between the contractor and the supplier. This reveals inconsistencies that are no longer relevant to the original goal of TA procedures. TA procedures are initiated in the early stages of the project, and they should also be completed in the early stages. If, beyond this, questions are posed to applicants that extend over the entire project implementation, this places an enormous burden on the applicants and is counterproductive for the European railway sector.

The sector believes that TA procedures cannot meet an excessive demand that does not improve the actual project implementation but only places an additional burden on it.

2.5. Towards a more optimized and scalable approach

Such an approach would enable applicants and suppliers to take interoperability requirements into account from the earliest stages of project development, while preserving ERA's function to check the compatibility with interoperability. By providing greater clarity on the reference documentation and technical information expected, it could reduce repetitive clarification rounds on application issues, improve transparency and facilitate a more consistent application of the TA process across European ERTMS-projects. It is also the basis for a lessons learned progress and support the reuse of established solutions that have already been addressed in comparable projects.

It is an adaptive approach to streamlining requirements in the TA process. It responds to concerns repeatedly raised by applicants, including the need to reduce the workload for all stakeholders. It provides more transparency and clearer guidance and enables decisions to be made earlier in the project implementation process.

3. Conclusion

CER remains fully committed to the objective of achieving a harmonised and interoperable European ERTMS network. ERA plays an essential role in this ambition, and applicants appreciate the Agency's efforts to support consistent implementation across the European railway sector.

At the same time, experience accumulated over recent years indicates that the current TA process places a significant administrative burden on applicants, generates substantial additional costs and can result in complex situations between applicant and authority. Experiences gathered from applicants shows that these challenges are not isolated cases but lead to structural issues in the practical implementation of the current TA process. CER therefore believes that a reform of the TA process should focus on three principles: proportionality, predictability and legal certainty.

CER welcomes to continue the constructive dialogue initiated by ERA and its willingness to explore improvements together with the European Railway sector. Europe can preserve the benefits of interoperability while accelerating ERTMS deployment, reducing unnecessary administrative burdens and ensuring that public and private resources remain focused on delivering the digital railway transformation that Europe needs.

About CER

The Community of European Railway and Infrastructure Companies (CER) brings together railway undertakings, their national associations as well as infrastructure managers and vehicle leasing companies. The diverse and comprehensive membership made up of long-established bodies, new entrants and both private and public enterprises, covers the large majority of the rail infrastructure network, rail freight business and rail passenger operations in EU, EFTA and EU accession countries. CER represents the interests of its members towards EU policy makers and transport stakeholders, advocating rail as the backbone of a resilient, competitive, and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on social media.

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