



# GRB Position Paper Route Compatibility Check

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## Scope of Position Paper

The position paper sets out the Group of Representative Bodies' (GRB) view on the general principles for the route compatibility check (RCC) before the use of authorised vehicles as outlined in Article 23 of the Interoperability Directive (EU) 2016/797. The GRB calls on the European Union Agency for Railways to adopt these principles and ensure these are reflected in the regulations and guidelines outlining this process.

## Background

The recast Interoperability Directive makes a clear distinction between the vehicle authorisation for placing on the market (Art.21) and the checks before the use of authorised vehicles (Art.23). Within vehicle authorisation the applicant demonstrates the technical compatibility of the vehicle with the network in the area of use. After vehicle authorisation, the Railway Undertaking is responsible for the route compatibility check between the vehicle and the intended routes of operation within the area of use. These two concepts of compatibility and their content must be clearly defined and separated.

## Basic Concepts and Principles

### Network:

- A network is a set of infrastructure lines in a country that share the same technical characteristics. In the vehicle authorisation process, those network infrastructure characteristics are the ones that are taken into account for the technical compatibility check between the vehicle and the network as defined in the TSIs.
- Within a Member State you may have for historical reasons different standardised values for one or more relevant characteristics/parameters. This is the reason why vehicle authorisation refers to the technical compatibility with one or more networks.
- A network shares by principle the same parameter values. A network may also be structured with categories referring to one parameter with different values, e.g. the catenary voltage. Network parameters which are not defined in the TSIs are subject to national definition (NNTRs).

### Area of Use (AoU):

- In the vehicle authorisation process the applicant specifies the intended area of use that may consist of one or more networks or parts of them within a Member State or group of Member States.
- The authorising entity may restrict the authorised AoU when granting the authorisation for placing on the market via the so-called "conditions for use".
- The AoU is mandatorily linked to network(s) and not to route.

### Technical Compatibility with the Network(s):

- The applicant for vehicle authorisation is responsible for the technical compatibility of the vehicle with the network(s) in the area of use, based on the TSIs and NNTRs.
- The application for vehicle authorisation shall include evidence that this has been checked.



### Route Compatibility Check:

- The route compatibility check is to be performed by the Railway Undertaking after the vehicle authorisation for placing on the market and before starting operations.
- The parameters to be checked by the Railway Undertaking for the purpose of route compatibility check shall be clearly described in the TSIs. A limited and clearly identified set of parameters which are relevant for ensuring the operational compatibility of vehicles and trains on a specific route shall be identified for the RCC.
- Route compatibility is checked by evaluating vehicle data against the information from the Register of Infrastructure and the Infrastructure Manager if incomplete.
- If a route presents additional requirements or deviates from a network for some characteristics the RCC will have to cover the parameters whose value differs from the network standards.

*Note: Railway Undertaking may request support from the supply industry to fulfil their tasks of checking route compatibility. Support from the supply industry, if requested, shall be defined on a contractual basis at early stage.*

*Railway Undertaking may request support from the infrastructure manager to fulfil their tasks of checking route compatibility.*

- In case of structural changes of the network (upgrading, renewal, new line or new station, etc.), usually planned on long term, the RCC may need to be performed again depending on the changes and their consequences.
- The infrastructure manager must inform the railway undertaking of the changes on characteristics of the allocated path change, as soon as these changes occur.

### **Areas of Concern and Clarifications**

#### Lean Process:

- The RCC must be an easy, lean and straightforward process, allowing all and in particular small traffic organisers (e.g. RUs) to perform it.
- There should be no duplication of the checks/demonstrations already carried out by the applicant for vehicle authorisation as part of the technical compatibility with the vehicle and network by the railway undertaking during the route compatibility check.
- For TSI compliant rolling stock and infrastructure, and networks with single or homogeneous values concerning parameters, the RCC should be seen as a simple cross-check of vehicle and infrastructure parameters (excluding GE wagons).

#### Route Specific Items:

- Some particularities of a network may require tests, but this is not intended and should be seen as an exception. This may be the case when parts of a desired route present additional requirements or deviates from a network for some characteristics.
- To reduce this need, the sector should promote convergence of the country networks related to the technical vehicle-network compatibility towards harmonised parameters as set in the TSIs.



### RU and IM Cooperation:

- Incorrect interpretation of the information on the RU's side or the transmission of erroneous information on the IM's side for the process of assessing the compatibility of the vehicle/train with the route should be minimised. This is possible through monitoring the process in accordance with the Safety Management System (SMS).
- It would be useful to have the RU inform the IM of the conclusions of their RCC. If there are conditions of use to be applied because of the RCC the IM should be made aware of this and receive any appropriate information.

### Freight Wagons:

- In the case of freight wagons, as there are no open points in the TSI, Railway Undertakings integrate the vehicle in the composition of the train where they are intended to operate based on the systematic way of risk control in its safety management system set out in Article 9 of Directive (EU) 2016/798.
- For GE marked freight wagons (compliant with today's appendix C of the TSI WAG), RUs shall add them to their trains (train composition) without further checks additional to the authorization phase. Nevertheless, the RUs remain responsible for establishing the compatibility between the wagons, the train and the route the wagons are intended to travel on.

### Historic vehicles:

- If an RU using existing vehicles authorised under previous procedures, or those that have "Grandfather Rights", wishes to change the area of use of those specific vehicles they will be able to do so. This will apply for the named vehicles only and for that RU only.
- If another RU using the ostensibly same type of vehicle also wishes to run that type of vehicle on the same routes as the first RU, they will be required to undertake their own RCC as the vehicles can be modified over time and therefore could have considerable differences to the first RU's vehicles. This may involve routing restrictions.

### **Conclusions**

The Group of Representative Bodies asks the European Union Agency for Railways to adopt the RCC principles set out in this paper. The GRB asks for clear guidance documentation to be developed by the Agency for how the route compatibility process should be implemented in the day to day business where appropriate, either in a dedicated RCC application guide or in a section of existing guide documents.

The two concepts of technical compatibility with the network on one hand (article 21) and route compatibility on the other hand (article 23) as laid out in the interoperability directive shall be respected and kept separately. However, clear guidance is necessary to understand the content and responsibilities included and to ensure the route compatibility check performed by the railway undertaking is as easy, lean and straightforward as possible.