



Position Paper

Brussels, 23 September 2024

Commission Pilot Projects

1. Introduction

The European Commission introduced the Action plan to boost long distance and cross-border passenger rail as part of the “Efficient and Green Mobility” Strategy on 14 December 2021 and announced they will publish a call for 10 Pilot services as part of their measures to boost rail traffic and the call was published half a year later in Connecting Europe days on 29 June 2022. CER has welcomed the initiative, as the sector appreciates any proactive engagement in order to strive towards a safe and fully interoperable railway system as Single European Railway Area. CER pointed out the need for financial support for certain aspects of pilots and would benefit the overall impact.

In early 2023, the Commission unveiled the chosen pilot projects, with 10 projects showcasing a mix of incumbents and new entrant companies applying. Given the active involvement of numerous CER members in pilot projects, the ambition of this document is to consolidate the experience of CER members, creating a platform for sharing experiences and facilitating discussions. We are convinced that this initiative has the potential to streamline the efforts and objectives of CER members, while also offering valuable insights to other stakeholders involved in the process.

2. Description of individual Pilot Projects and issues

2.1. SJ: Night train Stockholm-Copenhagen-Hamburg-Berlin (and vice versa)

- **Description:** Following a long authorisation process (see key challenges below), RIC¹ couchettes and sleepers were authorised in November 2022 (2 months after the traffic was supposed to start). Authorisation process of seat wagons is still ongoing after 2 years. Traffic was extended to Berlin in April 2023. Regarding contacts with DG MOVE etc., a first kick-off meeting was held in June 2023. The perceived problems related to authorisation and the Danish National Safety Authority (NSA) were raised with DG MOVE in November 2023, eventually leading to an online meeting SJ/DG MOVE/ERA/DK NSA in February 2024. SJ hopes that upcoming bilateral meetings between DG MOVE/ERA and the Danish NSA will lead to a more transparent and smoother process of vehicle authorisation (see key challenges below). SJ expects to have RIC seat coaches being handled in the One-Stop Shop (OSS) process to become authorised soon and to initiate the process of authorisation of restaurant wagons.
- **Main challenges:** The Pilot is up and running, but with a shortage of wagons, in particular seat coaches. A key challenge has been to get various RIC coaches authorised (individually) for traffic through Denmark (in particular the tunnels), following the new process established by means of the fourth Railway Package. The Danish NSA has interpreted the requirements (for example regarding fire safety) and has handled the related authorisation process in a way that has caused considerable delays and additional costs for SJ and partner companies. The work of third-party assessment bodies has been questioned, even leading to double assessment. Another challenge has been track infrastructure works in Denmark and Germany that have disrupted operations, sometimes on very short notice.

¹ The International Coach Regulations or RIC (Regolamento Internazionale delle Carrozze)

2.2. SJ: Daytime train (Oslo)-Gothenburg-Copenhagen-Hamburg (and vice versa)

- **Description:** A first kick-off meeting with DG MOVE was held in June 2023. After that, RNE has been particularly committed and helpful, for example in getting affected IMs involved and cooperating to find effective cross-border train paths. RNE has also encouraged SJ to submit a Capacity Needs Announcement for the Oslo-Hamburg route. Internal work regarding solutions for rolling stock that can function in all involved countries.
- **Main challenges:** A key challenge is finding a solution regarding rolling stock that creates a viable business case. The lack of progress in this regard has meant that SJ has not been able to push forward on some other issues. Another challenge is track infrastructure capacity constraints and finding effective cross-border train paths. Priority given to PSO traffic in Norway is a specific capacity-related problem.

2.3. Eurostar and NS: Enhancement of the existing Amsterdam – London service

- **Description:** NS-Eurostar worked with Dutch stakeholders on securing the future, high-capacity Amsterdam Channel terminal. Meeting with all IM partners to identify the most pressing operational and planning issues. Decision was made to set up a planning working group and a performance working group to improve coordination. In the future, there is a need to ensure the working groups meet, identify improvements, and try new ways of working together. Eurostar and NS need to focus on borders with relevant Dutch stakeholders with Commission support.
- **Main challenges:** Given the lack of governance and financial incentives, it is questionable whether the pilot will achieve better results than day-to-day cooperation between operators and IMs. The EU pilot 'label' is not sufficient.

2.4. ČD, DB and DSB: Prague – Hamburg – Copenhagen

- **Description:** Currently, the connection between Prague and Copenhagen is only possible with a transfer in Hamburg between trains Prague – Hamburg and Hamburg – Copenhagen and v.v. The goal of this Pilot Project is to bring 2 pairs of through connections between the Czech and Danish capitals. These trains will be part of the existing timetable scheme and will be integrated into the other connections operated between Prague and Hamburg and Hamburg and Copenhagen (based on interval timetable). This integration between 2 lines represents one of the most critical aspects, especially due to the many Temporary Capacity Restrictions (TCRs) announced. Several consultations were held with the Commission and RNE, Capacity Needs Announcements (CNA) was requested, test and authorisation of new trains for these services have been started. Clarification of responsibilities among individual stakeholders – CZ RU + CZ IM, DE RU + DE IM and DK RU and DK IM and cross-communication. Unfortunately, no clear rules and obligations were established (or even communicated) esp. when designing the capacity solutions for this Pilot Project. Continuation of train authorisation.
- **Main challenges:** The low predictability of infrastructure upgrades incl. the implementation of new technologies on infrastructure like ETCS, potentially affect the launch of service on the entire route, impacting its business case. The issue arises from the time discontinuity between the train authorisation (based on deadlines set in contract) and the finalisation of plans on infrastructure works along the entire route. This may cause technological discontinuities (between versions), making rolling stock

unsuitable, especially if the decision on infrastructure upgrade is taken after signing rolling-stock contract. Reliable long-term plans for infrastructure equipment are therefore essential. In addition, the unclear availability of alternative routes during the TCRs complicates planning for the introduction of the new service.

2.5. Trenitalia, Deutsche Bahn and ÖBB: Rome – Munich and Milan – Munich, with a possible extension to Berlin

- **Description:** The pilot is carried out by Trenitalia, ÖBB and DB. Key obstacles to the project realisation have been presented to DG MOVE (European Commission), which has indicated points of contact within itself, ERA and RNE to reach out for support. RNE has shown the most support, organising meetings to hear about capacity management issues and giving participants the opportunity to take part in the CNA process for the 2025 timetable. For now, no further action is planned. RNE has proposed to organise a roundtable with the IMs involved in the pilot, which took place in mid-June 2024.
- **Main challenges:** Key challenges to bringing the pilot project to life pertain mostly to the harmonisation of regulation, vehicle approval process and capacity management.

2.6. ILSA new services Lisbon – A Coruña and Lisbon – Madrid

- **Description:** In 2023, Iryo presented to the European Commission and other relevant stakeholders the key obstacles they face in the realisation of the cross-border service. RNE showed the most support and provided Iryo with points of contact within the EC to help them tackle infrastructure management issues. At this time, no further action is planned.
- **Main challenges:** Key challenges to bringing the pilot project to life pertain generally to the lack of infrastructure development on the Atlantic Corridor. This issue derives from the underdeveloped infrastructure. In particular, infrastructure development on the Madrid-Lisbon HSR line, which belongs to the TEN-T core network, is far behind schedule and will likely not be completed before 2030.

3. Shared recommendations of CER Pilot Projects

CER Members have identified the following recommendations for present and any future pilot projects:

- A more proactive approach on the Commission's side to support RUs in tackling the challenges identified and a clarification on the Commission's objectives in relation to these projects, which continue to be unclear. More comprehensive feedback from the Commission on the issues identified, as well as stronger support in tackling the infrastructure development issues would be appreciated.
- It would be beneficial to have more group sharing of experience with other Pilots, organised by the Commission.
- Staff in the Commission to steer the pilots and play a mediating role across all parties.
- A better-defined content of actions that could be taken and bring pilot projects to life. The very vague definition in a starting phase of the projects made it likely to bring unclear (unnecessary) steps and unrealistic expectations. Therefore, some actors do not respond to the project sufficiently. After closing these projects, it would be welcome to see establish a toolbox that could be used in the future for starting new projects in a shorter and more efficient time.

- The RUs involved would also like to know which next steps would be undertaken by the Commission in relation to the pilot projects.
- Financial support could be provided with EU fundings in order to create incentives to deliver quality actions and fulfil the objectives of the pilot.

4. Policy recommendations

All stakeholders should direct their efforts toward the five strategic pillars (Infrastructure, Capacity, Standardisation, Ticketing and Financing) to establish an international, customer-focused railway network and improve the traveller experience. For the purpose of brevity and as they were not directly connected to the Pilot Projects, we have omitted ticketing and financing. We address this issue in CER Manifesto 'On Track For Europe' 2024-2029².

4.1. Infrastructure

The Smart and Sustainable Mobility Strategy aims to double high-speed rail traffic by 2030 and triple it by 2050. Developing a high-speed network connecting all EU capitals and major cities is key to boosting international passenger services and meeting these targets.³ A frequent European high-speed rail network linking major urban centres is crucial for enhancing international rail passenger services. Further development of urban nodes is needed, as rail currently lacks substantial last-mile infrastructure for multimodal connections.

Before significant progress in HSR network development can be achieved, improvements to the conventional TEN-T network must occur. This includes investments in the TEN-T Core Network and its nodes, with greater coordination between member states. Emphasis should be placed on coordinating efforts between national entities and the EU in funding requests to improve infrastructure on international corridors and promote Pilot Projects.

4.2. Capacity

Building new railway lines and completing the TEN-T network is crucial to providing the necessary capacity for both international and domestic rail services. In addition to infrastructure, timetabling is an essential tool for reaching higher capacity. Optimal network usage and connections can be reached through Digital Capacity Management within the TTR Project framework and potential alignment with the EuroLink approach. If the capacity of infrastructure is not sufficient, synergies between domestic and international long-distance services should be considered.

The draft Capacity Regulation, as well as the TTR project, are essential for generating the capacity needed to shift more traffic onto railways. For a well-functioning rail passenger traffic system, it is particularly important to integrate rail passenger and freight transport optimally. Better systemic optimization of train path capacities is also necessary to shift more passengers from air traffic to high-speed long-distance rail connections.

Therefore, the ongoing discussion on the Capacity Regulation is a timely and necessary piece of legislation to optimize the use of existing rail infrastructure, enhance the efficiency

² <https://www.cer.be/cer-positions/cer-manifesto-on-track-for-europe-2024-2029>

³ As was shown in the study ("Metropolitan Network: A strong European railway for an ever closer union" accessible at the following link https://www.deutschebahn.com/en/presse/press_releases/DB-presents-study-on-expansion-of-high-speed-rail-in-Europe-10878406

of capacity and traffic management, and thereby improve the quality of rail services and contribute to achieving a Single European Rail Area.

4.3. Standardisation

Technical Specifications for Interoperability (TSIs) are setting ground rules for railway subsystems. TSI should ensure trains can operate safely across borders and thus eliminates the need for national rulebooks, streamlining operations, like recognising sector solutions. Standardization is a key tool to bridge the gap between rail and other transport sectors, creating a more efficient and sustainable multimodal transport system in Europe.

Last but not least, emphasis must be placed on the decommissioning of non-interoperable systems, as well as class B systems and eliminating various national rules for interoperable systems.

We see the following as key elements for improving operations:

- **ETCS** – An important element for ensuring interoperability of engines and units. However, there is a need to streamline the implementation of ETCS, for example by unifying the interfaces of the trackside part (EULYNX), or by maintaining backward compatibility while developing ETCS. ETCS needs to be seen as a key tool for the digitisation of the whole railway system and given due attention and adequate financial support.

However, backward compatibility must be taken into account as a serious issue, so that further new challenges in interoperability are not unnecessarily imposed and the competitiveness of the railway will not be reduced by new recurrent costs for fitting new ETCS on-board units to vehicles.

- **FRMCS** – Assuming that the rail system will not be burdened with inadequate costs, there is a need to accelerate the release of FRMCS specifications and subsequently accelerate the implementation of FRMCS to take advantage of its benefits (e.g. ATO).
- **Automatic Train Operation (ATO)** – The ATO is one of the main elements for facilitating operations within a single European railway area and at the same time can bring significant energy savings. However, it is closely linked to the ETCS system, for which backward compatibility must be maintained for a certain period of time.
- **Train detection systems** – One of the biggest barriers to interoperability that prevents fully TSI compliant trains from operating freely. The variety and the need for demanding operational tests impose (RUs) costs significantly prior to entry into service and e.g. make deploying a replacement vehicle or unit on an operational basis impossible.
- **Operational rules** – Large differences persist in the operating rules of individual infrastructure managers, which complicate operations within the single European railway area. The main obstacles, arising in particular from different control-command and signalling systems, need to be eliminated urgently.
- **Go everywhere vehicle** – The idea of authorisation of railway vehicles under one umbrella at ERA is great; however, the authorisation has become a very challenging process in terms of time and costs. This is the case esp. when the authorisation covers more than 3 countries. One of the steps to be done is making the authorisation process as easy as possible and starting in segments with limited risks – i.e. in single carriages/non traction fix train compositions.

However, bringing the rail network fully into line with TSIs is a long-term and costly process that cannot be achieved across the board without sufficient financial support.

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 membership is made up of long-established bodies, new entrants and both private and public enterprises, representing 78% of the rail network length, 81% of the rail freight business and about 94% of 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 competitive and sustainable transport system in Europe. For more information, visit www.cer.be or follow us on Twitter [@CER_railways](https://twitter.com/CER_railways) or [LinkedIn](https://www.linkedin.com/company/cer).

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