Position Paper

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RINF use and evolution

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Summary

With this Position Paper CER and ERFA present their view on the use and evolution of RINF (Register of Infrastructure) as a mid-to-long-term goal to be achieved.

The primary objective of RINF is to support the process of assessing the route compatibility between the vehicle and the route. In order to support a sound assessment the register of infrastructure must be comprehensive. RINF has to be populated with the relevant information by each National Registry Entity (NRE). NREs from each Member State (MS) have already provided data but the set of data in RINF is not yet complete.

As a mid-to-long-term goal, it is important to avoid any redundancy with the TSIs and to optimise the infrastructure managers' efforts in providing information to railway undertakings. Therefore, we promote a harmonisation of the TSI requirements that provide use cases to RINF (e.g. Annex D of the OPE TSI) and amendments to avoid any repetition in this respect.

As IMs have to provide data to RUs to comply with different legal duties, the proposed approach will allow using specific and unique data exchange channels for each necessary item with the RUs: the RINF must be one of these channels.

1. The objectives of RINF

One of the main objectives of the Register of Infrastructure (RINF) is to be the common platform where IMs provide to RUs (and other actors like manufacturers, keepers, ECMs, etc., or the so-called RINF End Users) the infrastructure-related information and geographical information, useful for the RUs to fulfil their obligations to:

- perform procedures for using authorised vehicles;
- plan and prepare freight and passengers trains.

In particular, RINF should in future be the "stable reference infrastructure description" to locate the temporary infrastructure restrictions.

2. Background

The provision of infrastructure-related information is supported by legal texts, especially:

- Directive 2012/34 with article 27 (network statement) and its appendix IV stating its consistency with the RINF;
- Directive 2016/797 with article 23 where RINF is used to check if a vehicle is compatible with the route;
- OPE TSI (regulation 2015/995) with articles 4.2.1.2.2 (route book) and 4.2.2.5 (compliance train-route) referring both to appendix D.

3. The use of RINF

Impact on RUs

Considering the current role of the RINF, the RUs are, at present, in charge of checking route compatibility and IMs must provide full support to the process, by providing information for the RINF according to 880/2014/EU within certain times. With the current framework there is a need to clarify the responsibilities and boundaries of the RUs and IMs in this process, in terms of who-does-what and when.

RINF is an important tool to provide infrastructure-related information from IMs to RUs. To be really efficient, we need to move towards a RINF that serves as a unique database where RUs find the relevant information directly or through a service (for example, but not limited to, the braking performance related information - OPE TSI Annex D). The specification of the current RINF is not sufficient to reach this target and needs to be extended to provide the missing data. This extension is indeed in progress but in addition, some services should be developed.

Use of the RINF

Several MSs use the RINF in the procedure linked to the network access for commercial operation, to check route compatibility and complete the RU process for operation. Using RINF for this purpose allows the removal they need to manually deal with certain information, however it requires the RINF to be complete in terms of data. Some MSs even refer to the RINF in their Network Statement (with a clear relation between the Network Statement and RINF in many aspects), therefore even today it is possible to show the benefits and opportunities for the current and for the future RINF.

Last but not least, the use of the RINF by the RUs will be facilitated if the Agency interface is accessible to the RUs at the IT structure level, so that the RUs can study how to develop the interface on the IT level.

Article 21 (3) d of the Interoperability Directive describes that the application for a vehicle authorisation for placing on the market shall be accompanied by a file concerning the vehicle or vehicle type and including documentary evidence of the technical compatibility of the vehicle with the network in the area of use referred to in paragraph 2, established on the basis of the relevant TSIs and, where applicable, national rules and registers of infrastructure.

It is our understanding that the use of the register(s) of infrastructure is part of the arrangements for the use of a vehicle as outlined in Article 23 of the Interoperability Directive and not part of the practical arrangements for vehicle authorisation.

We request a clarification what is meant by "where applicable" in connection with "register of infrastructure".

RINF evolution

CER and ERFA object to using of RINF for the cleaning up of the national technical rules by transferring national rules to RINF, as introduced by the Agency in Annex I to the Program Plan Rules cleaning-up (ERA-PRG-006 V 1.0). Considering the legislative framework in force, RINF should be considered as an "IT Slave" in the paradigm for the relation between use-cases and Infrastructure-parameters[i]. Therefore, the RINF should contain only technical parameters while the various use-cases are to be drafted or revised within each TSI (INF, ENE, OPE, etc.). In addition, CER-ERFA believes that all rules for technical compatibility between vehicle and network should be exhaustively described by TSIs and, if necessary, in National Rules in the Reference Document Database (RDD), therefore no rule shall be transferred from RDD to RINF.

The group of TSIs therefore represent the "Functional-Operational Master" in the above-mentioned paradigm[ii], and it should be considered like this even for the future RINF 2.0, when, together with the RINF End Users, the IMs can start the project of creating an extended and more flexible register facilitating its potential operational use in the future.

At which level should RINF work?

The approach regarding the RINF information level seems to have changed, from macro level to micro level of the rail network topology. As an example: in RINF, the minimum wheel diameter is specified to ensure safe operation over switches. From our point of view the extend of parameters covered by RINF, also considering the link with the other TSIs (e.g. TSI OPE data requirements) needs to be clarified.

For this and more general questions, a wider involvement of RUs in the development of RINF is requested, to allow RUs to clarify whether the information in RINF is adequate or not. In this respect, we ask the Agency for a more stable participation of the RINF End Users to the Agency's related meetings, e.g. by recognising a formal role for them in the established working party.

At the 1st ERA RINF End Users meeting the Agency made a promising first step towards a formal involvement of the RINF End Users. However, considering the importance of the RINF in the context of the 4th Railway Package Technical Pillar for the checks to be performed by RUs after vehicle authorisation to verify train path (route) compatibility, we suggest to accelerate this process, also for the participation. In our view more resources are needed to foster this activity by the Agency.

4. Conclusion:

CER and ERFA acknowledge RINF as a tool to carry out the assessment of the route compatibility allowing the use of authorised vehicles. We urge the responsible entities to ensure that RINF is sufficiently complete in due time.

Until the moment RINF is comprehensive in terms of the needed parameters for the assessment of the route compatibility and a transparent process shall be defined between infrastructure managers and railway undertakings allowing the latter to carry out the aforesaid assessment in a non-constraining way.

We believe that the use of RINF not in the scope of the vehicle authorisation process and therefore we request to clarify what is meant by Article 21 (3) d IOD which refers to RINF.

We strongly object to use RINF for the cleaning up of the national technical rules.

We propose a wider involvement of RUs and RINF End Users in the development of the RINF, to clarify the macro-data and the micro-data approach, and to harmonise the RINF and TSI's in order to achieve full mutual support and avoid duplications; in this exercise, we believe that no rule shall be transferred from RDD to RINF.

About

CER, the Community of European Railway and Infrastructure Companies, brings together more than 70 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 73% of the rail network length, 80% of the rail freight business and about 96% 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 via Twitter at @CER_railways

ERFA - European Rail Freight Association - represents new entrants, i.e. all those operators who want open access and fair market conditions, and sustains their role of pushing forward the development of the railway market. The Association is very much a spin-off of the First Railway Package, adopted by the EU in 2001, and its vision of creating an open and competitive European rail market. The 36 members of ERFA represent the entire value chain of rail transportation: rail freight operators, wagon keepers, service providers, forwarders, passenger operators and national rail freight associations.

[i] It will contain only infrastructure-parameters and not use-cases.
[ii] TSIs include use-cases and not infrastructure-parameters.